

From: [James Dawkins](#)
To: [Hornsea Project Three](#)
Subject: RSPB submissions for Deadline 3
Date: 14 December 2018 15:07:39
Attachments: [image001.png](#)
[image002.png](#)
[RSPB - Guillemot, Razorbill and Kittiwake Phenology 2016-17.pdf](#)
[RSPB Submission for Deadline 3.pdf](#)

I attach the RSPB's submissions for Deadline 3.

Please could you confirm safe receipt?

Kind regards,
James

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rspb.org.uk

Let's give nature a home



The RSPB is the UK's largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

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**Submission for Deadline 3
for
The Royal Society for the Protection of Birds**

14 December 2018

Planning Act 2008 (as amended)

In the matter of:

**Application by Ørsted Hornsea Project Three (UK) Ltd for an Order Granting Development
Consent for the**

Hornsea Project Three Offshore Wind Farm

**Planning Inspectorate Ref: EN010080
Registration Identification Ref: 20010702**



Designation of the Flamborough and Filey Coast Special Protection Area (SPA)

The Flamborough and Filey Coast SPA was formally designated on 23 November. The existing Flamborough Head and Bempton Cliffs SPA has been incorporated into the Flamborough and Filey Coast SPA. For the avoidance of doubt all references to the pSPA should be read as references to the SPA from the date of designation. References to the Flamborough Head and Bempton Cliffs SPA should now be read as references to the Flamborough and Filey Coast SPA. Due to the Government's policy of treating pSPAs in the same manner as designated sites the changes do not affect the RSPB's comments.

Avoidance and mitigation measures for pink-footed geese

The RSPB continues to discuss the mechanisms by which the pink-footed geese population of the North Norfolk Coast SPA will be protected from construction of the onshore cable corridor. We will reserve comment until we have had the opportunity to review the revised Outline Code of Construction Practice that the Applicant intends to publish at Deadline 3.

In essence the disagreement between the RSPB and the Applicant is around how best to ensure that the cable works do not impact on the pink-footed geese. The RSPB proposed controlling the location of sugar beet crops because that offered the Applicant the confidence that it was highly unlikely that significant pink-footed geese populations would be in the cable corridor in any winter that they wished to work and consequently that it would be unlikely that there would be any risk of disruption to the construction works. We are willing to accept commitments from the Applicant that it is willing to delay work instead.

Guillemot, Razorbill and Kittiwake Phenology at Bempton/Flamborough 2016-17

The RSPB encloses a phenology note in support of our and Natural England's position on the use of site-specific phenology data to inform the definition of seasons.