

**From:** [Brown, Emma \(NE\)](#)  
**To:** [Hornsea Project Three](#)  
**Cc:** ["Felicity Browner"](#)  
**Subject:** Hornsea Project 3: Deadline 5  
**Date:** 23 January 2019 18:18:24  
**Attachments:** [EN\\_10080\\_Hornsea\\_Project\\_Three\\_Updated\\_Appendix\\_3\\_to\\_NE's\\_written\\_summary\\_of\\_ISH\\_2\\_Ornithology\\_-\\_Pers\\_comm\\_with\\_RSPB\\_on\\_FFC\\_SPA\\_Breeding\\_Seasons.pdf](#)  
[EN\\_10080\\_Hornsea\\_Project\\_Three\\_Updated\\_Appendix\\_3\\_to\\_NE's\\_written\\_summary\\_of\\_ISH\\_2\\_Ornithology\\_-\\_Pers\\_comm\\_with\\_RSPB\\_on\\_FFC\\_SPA\\_Breeding\\_Seasons.pdf](#)

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Good Evening,

Please note that given the large volume of documentation submitted at Deadline 4, it has not been possible for Natural England to fully review all of the relevant documents and provide comments in time for this deadline. However, we would like to reserve the right to provide any pertinent feedback in a later submission.

Our initial review of the submission from the Applicant has drawn our attention to the fact that an embedded attachment in one of the appendices of deadline 3 submission [REP3-075] did not work. (See Ørsted's response to 2.2.25 of the ExA Questions).

Please accept my apologies for this oversight.

I have provided an updated version of this annex to REP3-075 with associated attachment appended to the end of the email. Please note that this table includes the same information as that presented in Table 7.1 of Annex C of Natural England Written Representation [REP1-211].

Kind regards,

Emma

**Emma Brown**  
Marine Senior Adviser  
Yorkshire & Northern Lincolnshire  
Natural England  
Lateral, 8 City Walk, Leeds, LS11 9AT  
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Please note I currently work Monday - Thursday

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THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE)  
RULES 2010

HORNSEA PROJECT THREE OFFSHORE WIND FARM

Planning Inspectorate Reference: EN010080

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**NATURAL ENGLAND**

**Updated Appendix 3 to NE's written summary on ISH 2 Ornithology:**

**Pers Comm from RSPB colony managers regarding Flamborough  
and Filey Coast SPA breeding seasons. \***

Dated 23<sup>rd</sup> January 2019

**\*Please note that this was initially included in Natural England's Deadline 3 response dated 14th December 2019, but the accompanying attachment was omitted in error.**

**From:** Allen, Sophy (NE)  
**Sent:** 07 November 2018 21:32  
**To:** 'Alison Barratt' <[Alison.Barratt@rspb.org.uk](mailto:Alison.Barratt@rspb.org.uk)>; Michael Babcock <[Michael.Babcock@rspb.org.uk](mailto:Michael.Babcock@rspb.org.uk)>; Keith Clarkson  
**Cc:** Kerby, Martin G (NE) <[Martin.Kerby@naturalengland.org.uk](mailto:Martin.Kerby@naturalengland.org.uk)>; 'Aly McCluskie' <[Aly.McCluskie@rspb.org.uk](mailto:Aly.McCluskie@rspb.org.uk)>  
**Subject:** RE: Hornsea 3 NE submission - your 'pers comm'

Hi Ali,

Thanks for talking to Keith about this. I've amended your joint pers comm to try and reflect this (see below) which I hope captures what you observe to be the situation.

At this stage, NE are continuing to advise the breeding season for gannet at FFC SPA is March – Sept, however this pers comm will assist in both supporting this, and illustrating that March to Sept is not overly precautionary (which is the criticism normally levelled at us by developers).

Thanks again for all your help to date on this

Sophy

'RSPB reserve managers advise that numbers of gannet inshore start to increase from mid-January, with birds prospecting on the cliffs from February onwards, with the majority returning by late March. A high proportion of birds have departed the colony by the end of September, though some presence on the cliffs is expected throughout October and into November. The last juveniles on the cliffs are usually in early November.'

(K Clarkson, A Barratt, M Babcock pers comm)

**From:** Alison Barratt [<mailto:Alison.Barratt@rspb.org.uk>]  
**Sent:** 26 October 2018 09:58  
**To:** Michael Babcock <[Michael.Babcock@rspb.org.uk](mailto:Michael.Babcock@rspb.org.uk)>; Allen, Sophy (NE) <[Sophy.Allen@naturalengland.org.uk](mailto:Sophy.Allen@naturalengland.org.uk)>; Keith Clarkson  
**Cc:** Kerby, Martin G (NE) <[Martin.Kerby@naturalengland.org.uk](mailto:Martin.Kerby@naturalengland.org.uk)>  
**Subject:** RE: Hornsea 3 NE submission - your 'pers comm'

I chatted with Keith and he agrees that attendance should be March to October, but there is a high presence of gannets in the SPA in February, as noted previously.

Keith also asked why razorbill and guillemot attendance is not included, but puffins are?

**From:** Michael Babcock  
**Sent:** 24 October 2018 08:49  
**To:** Alison Barratt <[Alison.Barratt@rspb.org.uk](mailto:Alison.Barratt@rspb.org.uk)>; Allen, Sophy (NE) <[Sophy.Allen@naturalengland.org.uk](mailto:Sophy.Allen@naturalengland.org.uk)>; Keith Clarkson  
**Cc:** Kerby, Martin G (NE) <[Martin.Kerby@naturalengland.org.uk](mailto:Martin.Kerby@naturalengland.org.uk)>  
**Subject:** RE: Hornsea 3 NE submission - your 'pers comm'

As of yesterday there is one Gannet chick left on the cliffs we can see on the Reserve – and from the plumage it looks likely to be there for another week at least - but of course we can't see the core of the colony on the high cliffs at Speeton where there may be a few more. So attendance into early November is probably correct – but for a very small proportion of the colony.

Best wishes

Mike

**From:** Alison Barratt  
**Sent:** 23 October 2018 16:34  
**To:** Allen, Sophy (NE) <[Sophy.Allen@naturalengland.org.uk](mailto:Sophy.Allen@naturalengland.org.uk)>; Michael Babcock <[Michael.Babcock@rspb.org.uk](mailto:Michael.Babcock@rspb.org.uk)>; Keith Clarkson  
**Cc:** Kerby, Martin G (NE) <[Martin.Kerby@naturalengland.org.uk](mailto:Martin.Kerby@naturalengland.org.uk)>  
**Subject:** Re: Hornsea 3 NE submission - your 'pers comm'

That seems fair to me, but would like to hear Dr. Clarkson's opinion!

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**From:** Allen, Sophy (NE) <[Sophy.Allen@naturalengland.org.uk](mailto:Sophy.Allen@naturalengland.org.uk)>  
**Sent:** 23 October 2018 16:28  
**To:** Alison Barratt; Michael Babcock; Keith Clarkson  
**Cc:** Kerby, Martin G (NE)  
**Subject:** RE: Hornsea 3 NE submission - your 'pers comm'

Thanks Ali, that's great.

Are you saying you think we should be advising a breeding colony attendance season of March – October for gannets?

Cheers

Sophy

**From:** Alison Barratt [<mailto:Alison.Barratt@rspb.org.uk>]

**Sent:** 23 October 2018 15:47

**To:** Allen, Sophy (NE) <[Sophy.Allen@naturalengland.org.uk](mailto:Sophy.Allen@naturalengland.org.uk)>; Michael Babcock <[Michael.Babcock@rspb.org.uk](mailto:Michael.Babcock@rspb.org.uk)>; Keith Clarkson

**Cc:** Kerby, Martin G (NE) <[Martin.Kerby@naturalengland.org.uk](mailto:Martin.Kerby@naturalengland.org.uk)>

**Subject:** Re: Hornsea 3 NE submission - your 'pers comm'

Hi Sophie,

I'm ok with this and think we are right to note that gannets are present throughout October.

Until Saturday morning, there were still many adult gannets on the lower levels of Staple Newk (the most visible section of the gannet colony from the cliff tops). By afternoon they were all gone from the ledges and have not returned to the cliffs since. But, we are still seeing them rafting at sea, and in flight along the cliff tops. So while they're no longer on the cliffs, they are still present in the FFC SPA.

Ali

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**From:** Allen, Sophy (NE) <[Sophy.Allen@naturalengland.org.uk](mailto:Sophy.Allen@naturalengland.org.uk)>

**Sent:** 23 October 2018 15:23

**To:** Michael Babcock; Keith Clarkson; Alison Barratt

**Cc:** Kerby, Martin G (NE)

**Subject:** Hornsea 3 NE submission - your 'pers comm'

Hi Mike, Keith and Ali,

I am currently in the process of finalising our ornithological representation on the Hornsea 3 OWF planning application. One of the points we are keen to represent is the selection of appropriate breeding seasons for the species that we have yet to reach agreement with the applicant on. I had a chat with Mike earlier about how best to use/reference the information you provided on the July 8<sup>th</sup> telecall (and the subsequent analysis that Mike conducted).

I have summarised the relevant breeding season information in a table (attached), in which there are a number of statements that I have referenced as 'K Clarkson, A Barratt, M Babcock, pers comm'. Would you be able to check that you are happy that this is a faithful representation of the information you provided us on the telecall? (I've **bolded** the relevant text).



Evidence base for  
breeding season de

Ideally I would like to get a response from you this week, but at the latest by the 5<sup>th</sup> November would be great.

Many thanks  
Sophy

## Sophy Allen

### Senior Ornithologist

Specialist Services and Programmes Team, Chief Scientist Directorate  
Natural England



Please note I normally work Monday - Wednesday.

<http://www.naturalengland.org.uk/>

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Evidence base for breeding season definitions at FFC SPA for gannet, kittiwake and puffin.

Species	FFC SPA specific evidence sources	NE proposed breeding season for FFC SPA	The applicants proposed breeding season
Gannet	<p><b>RSPB reserve managers advise that numbers of gannet inshore start to increase from mid-January, with birds prospecting on the cliffs from February onwards, with the majority returning by late March. The majority of birds have departed the colony by the end of September, though some presence on the cliffs is expected in October. The last juveniles on the cliffs are usually in early November</b></p> <p><b>(K Clarkson, A Barratt, M Babcock pers comm)</b></p> <p>Langston et al (2013) conducted tracking studies at FFC SPA between 2010 and 2012. They noted that in 2012 gannets started to return in mid-January, with most birds back at their nest during March. In 2010 peak fledging occurred late August/early Sept, in 2011 it was the first 3 weeks of August (with most fledged by the end of Sept) and in 2012 it was late August (with the last few fledging by the end of Sept).</p> <p>They further noted that:</p> <p>'Many adults remain at Bempton Cliffs for a while after their chicks have</p>	March – Sept	April - August

	<p>fledged. Tracking studies indicated that most adults departed Bempton Cliffs during the second half of September in 2011 and all adults had left by early October.</p> <p>Productivity monitoring at Bempton Cliffs takes place between late April and October (Aitken et al, 2017)</p>		
	<p><b>RSPB reserve managers advise that:</b></p> <p><b>Birds usually start to return to the colony from mid-February, but irregularly, with significant numbers not expected until late March and egg-laying not generally occurring until May. Early August finds the colony still well occupied, but numbers decline during the month and the colony is usually deserted come September. (K Clarkson, A Barratt, M Babcock pers comm)</b></p> <p><b>RSPB analysed data from twenty-two kittiwake plots across the colony in 2016 and 2017, comprising of 713 apparently occupied nests (AON) in 2016, and 749 AON in 2017 to calculate estimated laying and hatching dates. The plots were visited at 7 day intervals, and so the resulting dates could be up to 7 days earlier (but not later). The modal lay dates were 5<sup>th</sup> May &amp; 7<sup>th</sup> May and hatch dates were 6<sup>th</sup> June and 8<sup>th</sup> June (2016 and 2017 respectively). In regards defining the end of the breeding season, the latest hatch</b></p>	<p>March - August</p>	<p>April - July</p>

	<p><b>dates were at the end of July in both years. (RSPB, unpublished data)</b></p> <p>RSPB productivity monitoring takes place between May and August (Aitken et al, 2017).</p>		
	<p>RSPB managers advise that:</p> <p><b>Productivity monitoring at Bempton Cliffs is not possible, due to puffin nesting in inaccessible clefts in the cliffs. (K Clarkson, A Barratt, M Babcock pers comm).</b></p> <p><b>From 2016 onwards a snapshot of colony numbers was estimated by recording numbers of birds aggregating on the sea below the colony prior to breeding. The first reports of large numbers of puffin on the sea were in the morning of 22nd March in 2016 (Babcock et al, 2016). In 2017, the equivalent date was 24th March (Aitken et al, 2017). In 2018, this assembly did not occur until early April, reflecting the lateness of the breeding season (Mike Babcock pers comm). The breeding season ends later than the other auks, although the majority have departed by mid-August. (K Clarkson, A Barratt, M Babcock pers comm).</b></p> <p>Mather (1985) notes that puffin arrives on the breeding cliffs of the Yorkshire coast in April, though no specific information is given to support this.</p>	<p>April – July (NB wider evidence presented in Furness (2015) suggests early August however in the colony specific case of FFC NE consider inclusion of July to be sufficient.</p>	<p>May-July</p>

