

From: [James Dawkins](#)
To: [Hornsea Project Three](#)
Subject: RSPB submissions for Deadline 5
Date: 23 January 2019 20:22:34
Attachments: [image001.png](#)
[image002.png](#)
[RSPB Appendix 1 Individual Kittiwake Tracks by Year.pdf](#)
[RSPB Appendix 2 Kittiwake Tracks by Year.pdf](#)
[RSPB response to Deadline 5.pdf](#)

I attach the RSPB's submissions for Deadline 5. This consists of 3 documents – our main submission, along with 2 appendices – Appendix 1 – Individual Kittiwake Tracks by Year, and Appendix 2 – Kittiwake Tracks by Year.

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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**RSPB Submissions for Deadline 5
for
The Royal Society for the Protection of Birds**

23 January 2019

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**



RSPB submission for Deadline 5

The RSPB has reviewed and commented upon the planning-related documents submitted at Deadline 4.

Regrettably our scientific adviser has been unable to consider the various ornithological documents that were submitted in advance of this deadline and will review them in time for submission at Deadline 6. We apologise for any inconvenience this may cause.

The RSPB notes the Applicant's submissions on alternative solutions, imperative reasons of overriding public interest, and compensation in its Appendix 63. Due to the complexity of the issues raised and the limited time available between Deadlines 4 and 5 the RSPB will provide detailed submissions on this document for Deadline 6.

Changes to the Draft Development Consent Order

The RSPB welcomes the change to Requirement 10, Ecological Management Plan, in Schedule 1 of the Development Consent Order that clarifies the requirement for a written ecological management plan to be approved by the relevant planning authority before onshore site preparation works can commence.

The RSPB welcomes the change to Requirement 17, Code of Construction Practice, in Schedule 1 of the Development Consent Order that requires all construction work to be undertaken in accordance with the relevant approved Code of Construction Practice.

Changes to the Outline Ecological Management Plan

The RSPB notes the changes that have been made in section 4.3.4, Wintering and migratory pink-footed goose, and 5.4.3, Wintering and migratory birds. Our comments on the Outline Pink-Footed Goose Management Plan are included in our comments on the Outline Code of Construction Practice.

Changes to the Outline Code of Construction Practice

The RSPB has reviewed the Outline Pink-Footed Goose Management Plan attached as Appendix F to the latest version of the Outline Code of Construction Practice.

In paragraph 6.5.140 the final bullet point suggests that some works could take place during the winter as they are low key and will be limited in impact. However, we note that no detail has been provided to justify why they have been determined to be low key. People outside of vehicles can be perceived as a threat, and if they are out in the open they could disturb geese nearby. We consider that training of all staff to identify pink-footed geese and make the right decisions via the toolbox talks would help ensure that potential impacts are managed effectively. We would welcome clarity in the draft Management Plan that notes the disturbance risks and makes identification training for the geese a key element of the toolbox talks for staff working in that area at the key times.

The RSPB welcome the detail that has been provided as well as the decision tree which we consider will be a useful aid, particularly when coupled with the suggestion for identification training as part of the toolbox talks. The RSPB has concerns about the stage after Decision 5 as we consider that the proportion of the area should be reduced from the half of the available area of post-harvest sugar beet within the zone of influence that is currently proposed: we consider that a quarter would be a more appropriate amount.

The In-Principle Monitoring Plan

The RSPB has reviewed the In-Principle Monitoring Plan and notes that there is still no monitoring proposed for the construction period. We highlighted this in our response to Q1.2.94 at Deadline 1 and are disappointed that no provisions have been proposed since.

Results of Kittiwake tracking data from 2010 to 2015

In our response to Q2.2.19 submitted at Deadline 4 the RSPB undertook to provide a breakdown of more recent tagging and overlap with the array area for Deadline 5.

We attach maps showing the tracking work for 2010 to 2015 and for 2017 as Appendix 1 (each kittiwake identified by individual colour in each year) and Appendix 2 (all kittiwake flights presented in the same colour for each year).

No tracking work was undertaken in 2016. Changes to the way in which the tags operated in 2018 (non-continuous recording of locations) mean that the 2018 data do not accurately represent the proportion of time birds spend in different areas, and in particular the 2018 tracking will have under-recorded time spent in areas furthest from the colony, including the Hornsea Three footprint.

The RSPB have updated the table provided with Q2.2.19 to include the 2017 data.

Numbers of breeding individual kittiwake entering the array area:

Site	Year	No. birds tracked	No. birds entering Hornsea3	Proportion
Bempton	2010	25	0	0
	2011	17	0	0
	2012	9	2	0.22
	2013	21	0	0
	2014	17	1	0.06
	2015	15	3	0.20
	2017	13	5	0.38
Filey	2013	20	0	0
	2014	16	0	0
	2015	14	0	0
	2017	5	0	0

**Appendix 1: Individual Kittiwake Tracks by Year
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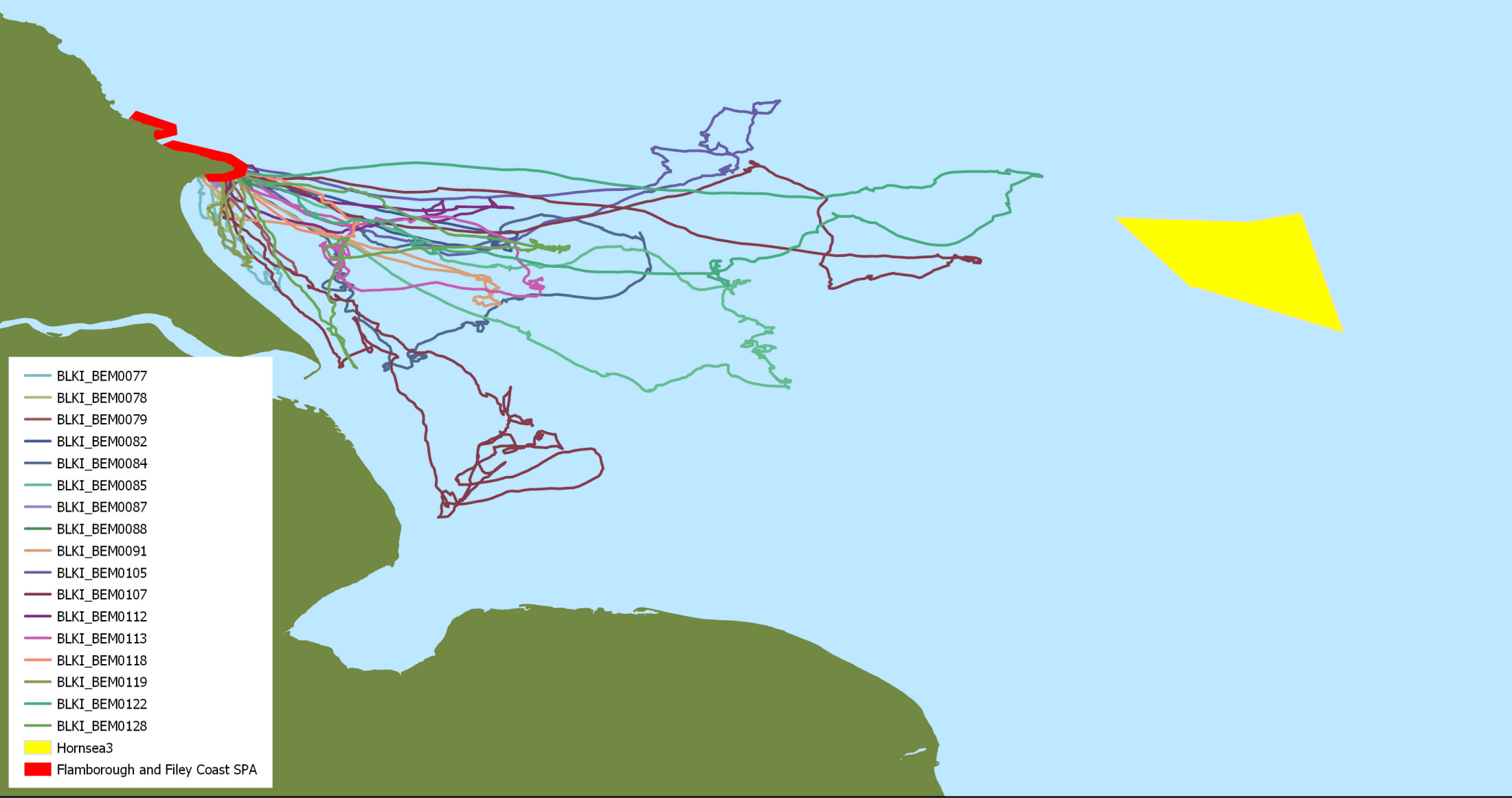


2010



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| BLKI_BEM0027 | BLKI_BEM0063 |
| BLKI_BEM0028 | BLKI_BEM0064 |
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| BLKI_BEM0038 | Flamborough and Filey Coast SPA |
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2011



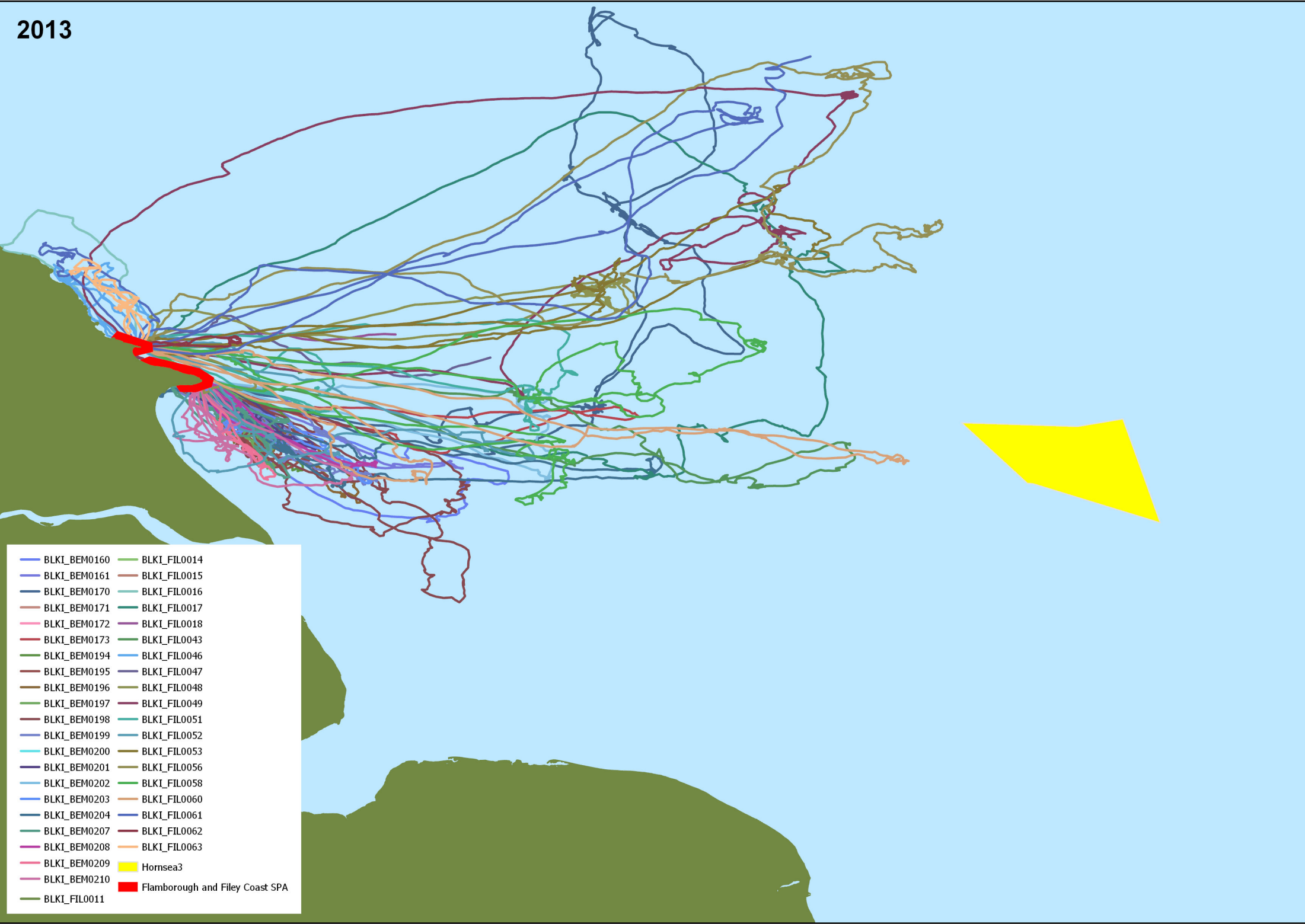
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- Flamborough and Filey Coast SPA

2012



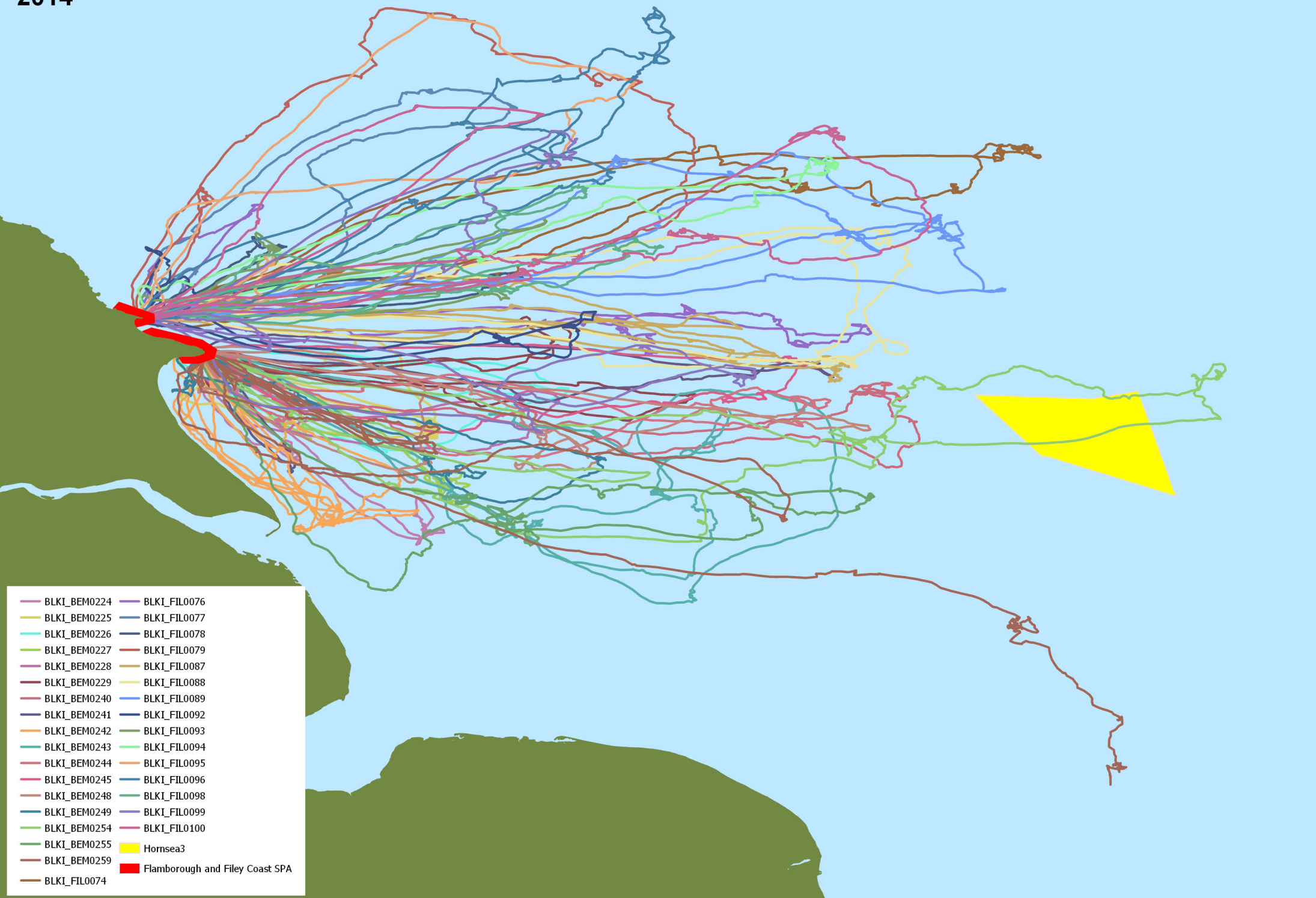
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- BLKI_BEM0155
- Hornsea3
- Flamborough and Filey Coast SPA

2013



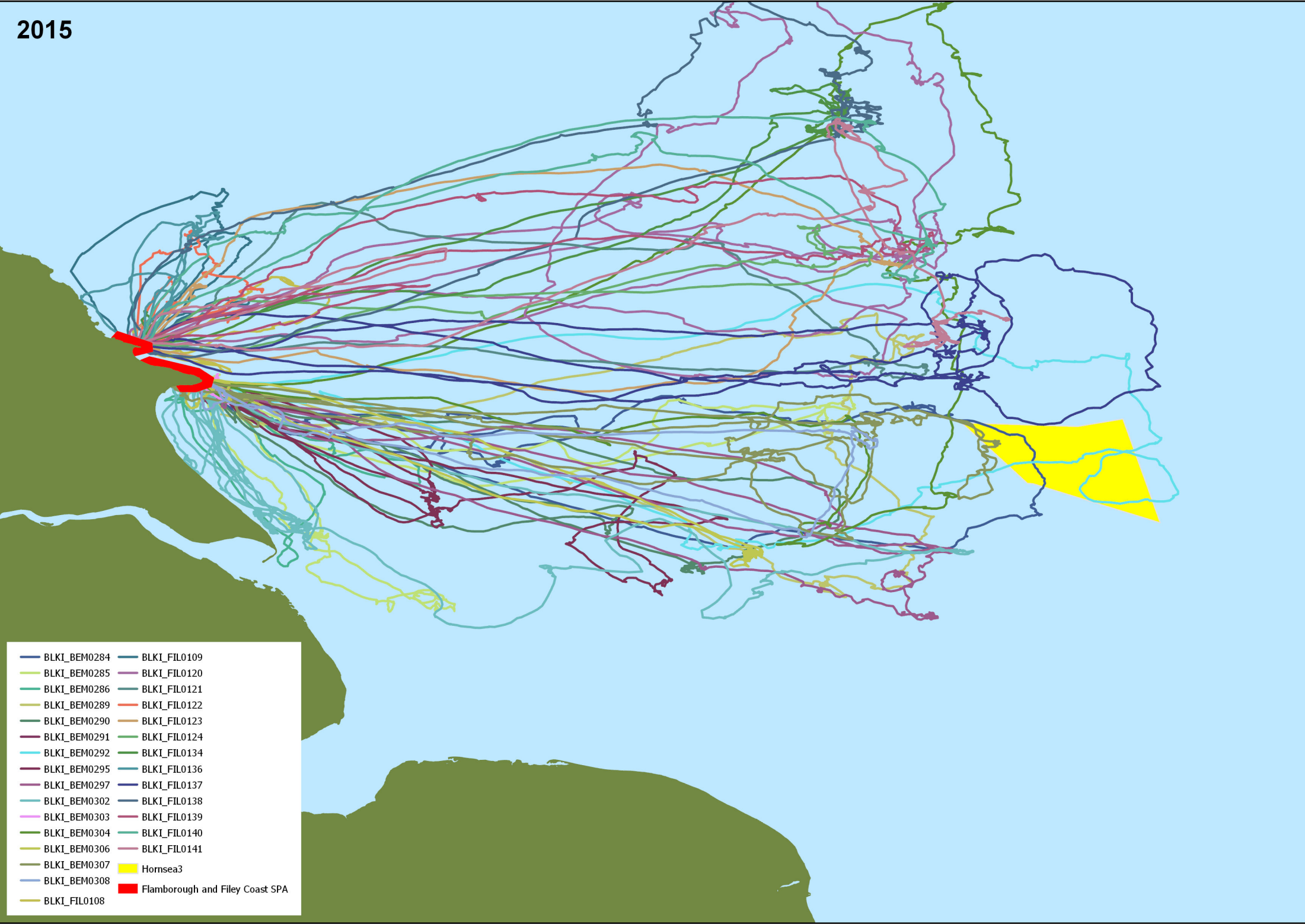
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2014



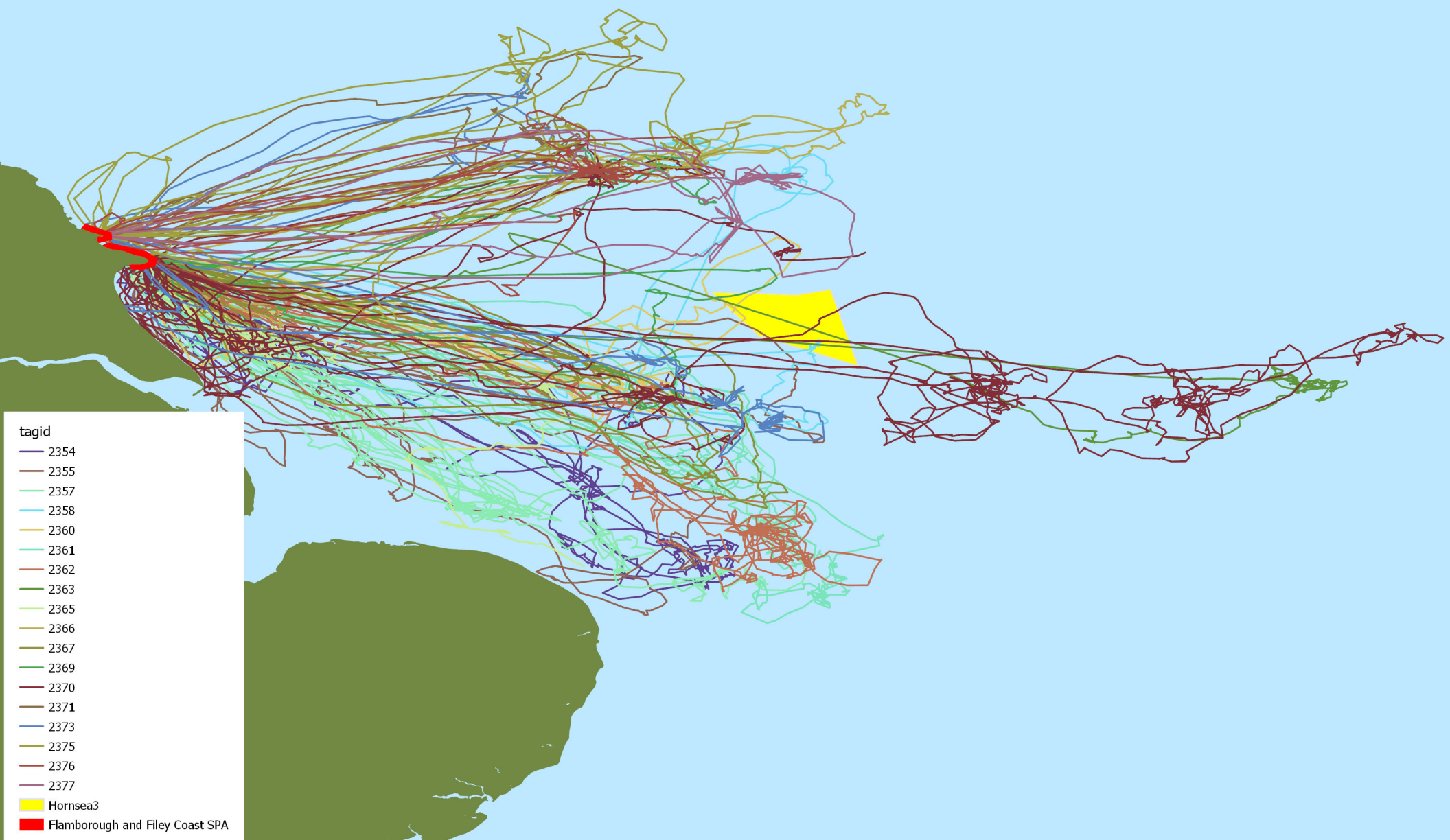
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| BLKI_BEM0240 | BLKI_FIL0089 |
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| BLKI_BEM0242 | BLKI_FIL0093 |
| BLKI_BEM0243 | BLKI_FIL0094 |
| BLKI_BEM0244 | BLKI_FIL0095 |
| BLKI_BEM0245 | BLKI_FIL0096 |
| BLKI_BEM0248 | BLKI_FIL0098 |
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| BLKI_BEM0254 | BLKI_FIL0100 |
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2015



- | | |
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2017



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 - 2355
 - 2357
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 - 2360
 - 2361
 - 2362
 - 2363
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 - 2367
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 - 2373
 - 2375
 - 2376
 - 2377
 - Hornsea3
 - Flamborough and Filey Coast SPA

**Appendix 2: Kittiwake Tracks by Year
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