

From: [James Dawkins](#)
To: [Hornsea Project Three](#)
Subject: RSPB submission for Deadline 7
Date: 14 March 2019 21:44:55
Attachments: [image001.png](#)
[image002.png](#)
[RSPB response for Deadline 7.pdf](#)

I attach the RSPB's submission for Deadline 7. 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 7
for
The Royal Society for the Protection of Birds**

Thursday 14 March 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**



1. Comments on the Report on the Implications for European Sites

The RSPB has restricted its review of this document to the extent that it covers European sites for which we have raised issues.

Onshore impacts

In relation to onshore impacts, subject to the comments below, the RSPB considers that the RIES has captured our concerns and that the information presented gives an accurate picture of the discussions to date.

Stage 1 Matrix 5: North Norfolk Coast SPA, revised screening matrix (page 82)

The RSPB consider that clarity is needed about the column headed “Temporary habitat disturbance/displacement”. This could be read as a temporary change to supporting habitat or it could be a “catch all” for other disturbance factors that could cause displacement. We consider that it needs to be clear that there are habitat impacts but also other mechanisms that could cause disturbance (e.g. noise, lighting) that need to be considered to understand the entire impact pathway that could affect pink-footed geese.

Stage 2 Matrix 8: North Norfolk Coast SPA, matrix on adverse effect on integrity (page 120)

There is no column for displacement, which will be the key issue for pink-footed geese.

Consequently, we recommend that this table is expanded to capture the uncertainty between the applicant, Natural England and the RSPB that has been highlighted in points a to g.

2. Applicant’s comments on Written Representations and Responses submitted by Interested Parties at Deadline 5 (REP6-009)

Response to RSPB Written Representation (REP5-027)

Changes to the Outline Code of Construction Practice (page 15)

The RSPB welcomes the acknowledgment that fencing works were included in error and that it will be removed from the Outline Code of Construction Practice.

The RSPB welcomes the definition of “low key” construction works.

The RSPB is satisfied with the explanation of the reason for selecting the available area of post-harvest sugar beet influence.

3. Applicant’s Comments on Interested Parties’ Responses to the ExA’s Second Written Questions submitted at Deadline 4 (REP 5-008)

The Applicant’s comments on the RSPB’s answers to Questions 2.2.19 and 2.2.32

The RSPB has recovered a total of 1457 tags from guillemots, razorbills, kittiwakes, guillemots, shags and fulmars as part of FAME/STAR. From these experiences we conclude that the likelihood of catching a bird on its nest in order to retrieve a tag is very low if the nest has failed because the bird has less compulsion to stay on the nest whilst we attempt to catch it.

Of the 1457 tags recovered only 10 (0.7%) were from nests which no longer contained either an egg or a chick: 9 of these were from kittiwake nests and 1 was from a shag nest.

Of the 9 kittiwakes:

3 were from Orkney,
2 from Bempton,
2 from Filey,
2 from Fowlsheugh and
1 from Colonsay.

It is important to note that the tagging period (i.e. the period for which data will be gathered) with the tags used is short (the battery usually lasts less than 4 days) so of the 10 birds that ultimately failed most will have been successful breeders (i.e. they were initially captured and tagged on a nest) for part or most of the time that they were subsequently tracked.

4. The Outline Code of Construction Practice (Appendix 2) (REP6-014)

The RSPB welcome the clarification of the status of the Outline CoCP that is now provided in paragraph 1.2.1.5.

We welcome the statement in paragraph 1.3.1.1 that under requirement 17 of the DCO that a detailed CoCP will need to be approved by the relevant planning authority prior to the commencement of any onshore and intertidal construction works.

The RSPB welcomes the deletion of the deletion of the reference to fencing as a pre-construction work which could go ahead in paragraph 6.5.1.40.

Appendix F – Outline Pink-Footed Goose Management Plan

The RSPB note that our recommendation to reduce the available area of post-harvest sugar beet within the zone of influence from “more than half” to a lower level in Table 3.8.1 has not been adopted. However, we understand the explanation advanced for this level and do not seek to pursue this issue further.

The RSPB welcomes the inclusion of training to identify geese species which has been added to paragraph F.5.3.1.

5. The Outline Ecological Management Plan (Appendix 26) (REP6-040)

The RSPB has not identified any changes within this document that affect our position.