

**From:** [James Dawkins](#)  
**To:** [Hornsea Project Three](#)  
**Subject:** Deadline 9 response for the RSPB  
**Date:** 26 March 2019 12:15:51  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[Hornsea Three - RSPB submission for Deadline 9.pdf](#)

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I attach the RSPB's submission for Deadline 9.

Please could you confirm safe receipt?

Kind regards,  
James

**James Dawkins**  
Casework Officer

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[rspb.org.uk](http://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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**Written Submission for Deadline 9  
for  
The Royal Society for the Protection of Birds**

**26 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**



## Outline Ecological Management Plan

The RSPB welcomes the amendment of Table 10.1 so that the Timetable of suitable work period now includes “March surveys to be carried out should February surveys indicate PFG may remain in March”.

## In-Principle Monitoring Plan

The RSPB notes that no changes to section 4.7 offshore ornithology have been made. Consequently our concern that there are no proposals to monitor construction impacts stands.

## Natural England – Annex E of the Written Submission for Deadline 7

The RSPB welcome this Annex. It provides clarity on the mortalities predicted to arise as a consequence of the proposed development both for the project alone and in combination, using the parameters preferred as the most robust by both the RSPB and Natural England. However, like Natural England, the RSPB continue to emphasise that there are incomplete baseline data to support the application, both due to inadequate survey effort, with only 20 months survey carried out, and through the surveys being concentrated at midday, when the least bird activity will be recorded. As such, we agree with Natural England position and we consider that it is **not possible to rule out an adverse effect on integrity for multiple features across multiple sites**. Regrettably due to the limitations of the surveying it is not possible for us to state with certainty what those sites are.

Whilst we do not wish to engage in further point-by-point discussion with the Applicant on the Answers to Written Questions, we think it is important to answer the point raised by the Applicant in its [Applicant’s comments on Written Representations and Responses submitted by Interested Parties at Deadline 6](#) response to Q2.2.19. The Applicant has continually cast doubt on the RSPB tracking data, claiming it has largely been of failed breeding birds. The RSPB have presented evidence for the number of failed birds tracked (0.7% of all tracked birds) at Deadline 7 and we have responded continually to the Applicant’s query as to the breeding status of the bird that recorded the longest foraging trip, both through the examination process and through email correspondence. For the avoidance of doubt, the bird in question was a successful breeder, which successfully fledged young.