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By Email

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06 July 2020

Our ref. HOW03_CON_20200706

Hornsea Project Three Offshore Wind Farm

Dear Mr Leigh

We write to you further to your Minded to Approve letter dated 1 July 2020 and accompanying information, including the Habitats Regulations Assessment ("HRA"). Orsted Hornsea Project Three (UK) Limited ("the Applicant") thanks you for the opportunity to provide further detailed information on the kittiwake compensation plan and notes the deadline for a response of 30 September 2020.

To allow the Applicant to evaluate its position we would be grateful if you could please provide clarification on the following points as soon as possible.

Kittiwake Displacement

Paragraph 5.3 of the Minded to Approve letter refers to adverse effects as a result of "kittiwake displacement mortality". In light of the conclusions of the HRA this appears to be an erroneous reference and paragraph 5.3 should instead refer to "kittiwake collision mortality".

We would be grateful if you could please confirm reference to "kittiwake displacement mortality" was included in the Minded to Approve letter in error.

Parameters for Kittiwake CRM

The Applicant wishes to clarify what parameters have been used in the Secretary of State's precautionary methodology to arrive at an estimated number of kittiwake collisions per year of between 65 and 73 individuals for Hornsea Three alone (section 5.3.5 of the HRA).

We note that at section 4.3.1.5 of the HRA the Secretary of State confirms that he is "satisfied that his conclusions in the Appropriate Assessment can be based on outputs from CRM based on the NE preferred approach and the revised project design."

We assume that the Secretary of State has taken the Applicant's interpretation of NE's preferred parameters (as NE did not provide that information during examination or subsequently) and has relied upon the information provided by the Applicant in Appendix 13 of the Applicant's submission at Deadline 7¹ however we would be grateful if you could please confirm.

We also note however that the Secretary of State agreed with the Applicant, and the Examining Authority, that the use of a longer breeding season to apportion impacts to

¹[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010080/EN010080-001840-%C3%98rsted%20Hornsea%20Project%20Three%20\(UK\)%20Ltd%20-%20Appendix%2013%20-%20Collision%20Risk%20Estimates%20for%20Mitigation%20Scenarios.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010080/EN010080-001840-%C3%98rsted%20Hornsea%20Project%20Three%20(UK)%20Ltd%20-%20Appendix%2013%20-%20Collision%20Risk%20Estimates%20for%20Mitigation%20Scenarios.pdf)

kittiwake (and gannet) at the Flamborough and Filey Coast SPA as advocated by NE was not justified (section 5.3.1 of the HRA).

The Applicant would therefore be grateful for clarification from the Secretary of State on the parameters and assumptions used for his collision risk modelling for the kittiwake feature at the Flamborough and Filey Coast SPA for the Hornsea Three HRA.

If you have any questions about the content of this letter please do not hesitate to contact Karma Leyland at the number or email provided below, otherwise we would be grateful for a response to these clarification questions as soon as possible.

Yours Sincerely,



Hornsea Project Three Consents Manager
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Cc: Craig Harwood, Project Development Manager, Hornsea Three