Comments on the Responses to the Examining Authority's Further Written Questions

for the

Royal Society for the Protection of Birds

Submitted for Deadline 6

5th March 2020

Planning Act 2008 (as amended)

In the matter of:

Application by Norfolk Boreas Limited for an Order Granting Development Consent for the Norfolk Boreas Offshore Wind Farm

Planning Inspectorate Ref: EN010087

Registration Identification Ref: 20022916

Question number	Question addressed to	ExA question	Applicant's comments	NE comments	RSPB comments on responses
2.8.4.1	The Applicant	Collision Risk Modelling: The Applicant intend to provide more CRM data at D6 [REP4- 014]. Given the tight timescales for Natural England to review the assessment before D7 and the issuing of the RIES it is imperative the Applicant conforms to this deadline. Can the Applicant provide assurance that it will meet this deadline?	The Applicant confirms that the offshore ornithology updates discussed at the ISH on the 22nd January (project alone updated collision impacts at Deadline 5 and cumulative and in-combination updated collision impacts at Deadline 6) will be submitted as agreed.	Following discussion with the Applicant since the ISH on 22nd January 2020, Natural England understands that the Applicant will be submitting updated CRM for Norfolk Boreas alone at Deadline 5 and updated cumulative/in-combination CRM and assessment at Deadline 6. In discussions with the Applicant since the ISH on 22nd January 2020, the Applicant has indicated that the updated cumulative/in-combination collision assessments will include new figures for Norfolk Vanguard (available 28th Feb) and potentially for Hornsea 3 (available 14th Feb). Natural England has recommended to the Applicant (in email dated 20.02.2020) that with regard to the figures for Hornsea 3, at the time of writing Natural England has not as yet seen the final submission from Hornsea 3 made the 14th February 2020, but we note that whilst any amendments to the Hornsea 3 project design envelope (i.e. lower tip height and reduction in turbine numbers) would result in a proportional reduction in the collision estimates, Natural England will most likely be unable to agree on what the absolute level of reduction for Hornsea 3 will be as we believe the issues with the underlying baseline data have not been resolved. Therefore, we have advised Boreas continue with using the numbers used to date for Hornsea 3 in their assessments, but to also present cumulative/in-combination collision totals for including and excluding Hornsea 3.	The RSPB welcomes the updated assessments that have been undertaken by the Applicant. Given the link between the alone assessments and the cumulative and in-combination assessments, the RSPB will review both reports together and will endeavour to provide our comments at Deadline 7.
2.8.4.3	The Applicant	Turbine draught height: To provide an update on the consideration of	The Applicant has undertaken detailed investigations into options for raising draught heights in tandem with consideration of other mitigation measures which could reduce	Following discussion with the Applicant since the ISH on 22nd January 2020, Natural England understands that the Applicant will be submitting updated CRM for Norfolk Boreas alone at Deadline 5 based on 11.55MW turbines with a draught height of 35m and on 14.7MW turbines	The RSPB welcomes the commitment to the higher draught heights now being committed to by the Applicant. We will review the implications of the proposed changes and will endeavour to provide

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		raising the draught height of turbines.	potential collision impacts. This investigation has identified that a key constraint for the Norfolk Boreas project is the maximum height to which available construction vessels can install turbines, which, when combined with the length of rotor blade for associated turbine models, determines the draught height. The Applicant can confirm that the minimum draught height for the project has been increased from 22m to 30m (from Mean High Water Springs, MHWS) for turbines rated at 14.7MW and higher and increased to 35m from MHWS for turbines rated at up to 14.6MW. In addition, the smaller capacity turbines (10MW and 11MW) have been removed from the design envelope, with the 11.55MW now the smallest wind turbine model which could be installed. Thus, the maximum number of turbines to be installed has been reduced from 180 to 158 (11.55MW) or 124 (14.7MW). The turbine revision on its own achieves a reduction in collision impacts equivalent to an increase in draught height of 5m for the original 10MW scenario. Together these design revisions (increase in draught height and turbine model) substantially reduce collisions risks, with reductions,	with a draught height of 30m. We understand from these discussions that the larger turbines (i.e. 14.7MW with 30m draught height) represent the worst case as these give higher collision predictions than the 11.55MW turbines with 35m draught height, largely due to the lower draught height for the larger turbines. We understand that the lower draught height for the larger turbines is due to construction vessel constraints. Natural England will provide comments/advice on the updated CRM for Norfolk Boreas once it is submitted into the examination.	comments at Deadline 7 once we have considered the updated cumulative and in-combination assessments.

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			of 74% for gannet, 73% for little gull, 72% for kittiwake, 64% for lesser black backed gull, 63% for herring gull and great black backed gull(these are for the 14.7MW turbine at 30m which is the new project worst case option for collision risk). Details of the project alone CRM have been submitted at Deadline 5 (ExA.AS-8.D5.V2).		