

National Infrastructure Planning
Temple Quay
House 2
The Square
Bristol,
BS1 6PN

8th April 2020

By email only

Dear Sir/Madam,

RSPB comments at Deadline 8 – commitment for future submissions

The RSPB is aware that there are several documents submitted to the Norfolk Boreas examination since Deadline 6 that we have not been able to provide comments on. Whilst we have deferred comments, we recognise that it would be helpful to outline in more detail how we intend to respond during the remainder of the examination period.

At Deadline 9 (29th April 2020), the RSPB considers we can provide comments on the updated alone and in-combination assessments. We therefore commit to provide comments on the following questions and documents related to these issues:

- Q2.8.4.3 Turbine draught height: Applicant's response submitted at Deadline 5
- Q3.8.6.2 CRM for gannet and lesser black backed gull (LBBG): Question to the RSPB
- Responses to the Further Written Questions
- Responses to the Third Round of Written Questions
- Offshore Ornithology Assessment Update: Project Alone Collision Risk Modelling
- Offshore Ornithology Assessment Update: Cumulative and In-combination Collision Risk Modelling

At Deadline 10 (6th May 2020), the RSPB will provide our final thoughts on the Report on Implications for European Sites (RIES) and the derogation case that the Applicant has submitted. We will also respond to any final questions and responses submitted at Deadline 9 as appropriate.

Whilst we appreciate that earlier comments may be helpful, we have reviewed the capacity of our teams responding to examination submissions and have confirmed that meeting an earlier deadline is not possible due to the following reasons:

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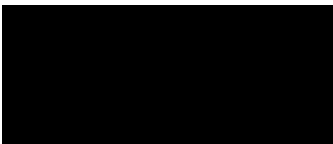
The RSPB is part of BirdLife International,
a partnership of conservation organisations
working to give nature a home around the world.

- We are still assessing the impact of Covid-19 guidance on staff and volunteers daily and, as many of the team have leadership roles, we must continue to prioritise our time to manage this situation.
- The impact of the past few weeks has meant significant amounts of work have been paused as we worked to keep staff and volunteers safe. This has meant that all plans to review key documents were changed and we are only now beginning to catch up on the backlog of tasks. This has been further exacerbated where key colleagues have had to take additional leave to look after family.
- The Hornsea 3 and Norfolk Vanguard consultations have been granted extensions until 22nd April. Dividing staff time across all three projects means we are having to prioritise our focus. Given the Norfolk Boreas examination is not due to conclude until 12th May 2020 and we can provide all necessary comments by this time, we considered that a delay in our comments as outlined above would cause least disruption and would not materially affect the examination.
- By waiting to provide comments until after the Hornsea 3 and Norfolk Vanguard consultations have ended, we will ensure a consistent approach is applied to Norfolk Boreas.
- The original date for Deadline 8 has been brought forward due to the Issue Specific Hearings not taking place. Our proposed timeline for submissions is therefore broadly in line with the original examination timetable.
- We note that Natural England have also deferred further comments on key elements until Deadline 9.

We hope this note is helpful and will provide confidence that the RSPB is endeavouring to provide our comments in a timely manner.

If you have any queries regarding the above comments, please get in touch.

Yours faithfully,



Philip Pearson (Dr)

Senior Conservation Officer

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