



**The RSPB's Responses to the Examining Authority's Fifth  
Round of Written Questions**

**for the  
Royal Society for the Protection of Birds**

**Submitted for Deadline 14  
25<sup>th</sup> August 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**

Ref	Respondent	ExA question	RSPB comments
<b>4. Cumulative effects of other proposals</b>			
<b>4.0 General cumulative effects, including phasing</b>			
Q5.4.0.1	Interested Parties	<p><b>Projects included in cumulative impact assessment</b></p> <p>Provide any comments that you wish to make further to the Applicant’s response to the ExA question at ISH5 [REP13-016, ref 8c] and follow up from OFH2 [REP13-014, ref 4] in which the Applicant confirms that its response to WQ1 [REP2-021, response to Q4.0.1] stands regarding not including the Dudgeon and Sheringham Shoal extension project(s) in the cumulative impact assessment for the Proposed Development.</p>	<p>The RSPB accepts that the Dudgeon and Sheringham Shoal extension projects are at an early stage and no information from these projects is available currently for the Norfolk Boreas assessments. Therefore, our comment at Deadline 3 (REP3-028) still stands.</p>
<b>8.4 Offshore ornithology</b>			
Q5.8.4.1	Natural England	<p>For in-combination effects, does NE have a view on the following scenario? Each OFW considered could be said to have a de minimis effect on bird mortality. However, at what point does a number of de minimis effects accumulate into a significant effect?</p>	<p>Whilst this question is directed to Natural England, the RSPB considers this to be a fundamental issue that we have raised concerns about on previous Offshore Wind Farm cases. We consider it essential that this be addressed for the Norfolk Boreas project.</p> <p>We note Natural England’s response to question R17.1.8 regarding conclusions on AEOI for kittiwake from the Flamborough and Filey Coast SPA:</p> <p><i>“Additionally, we note that FFC SPA kittiwakes have a relatively large foraging range and this makes it particularly prone to in-combination effects ‘stacking up’, as birds will be fairly widely distributed in the breeding season. This means birds from the FFC SPA colony will be interacting with a substantial proportion of the southern North Sea offshore wind farms in the breeding season, and with the majority of North Sea projects in the non-breeding periods. Hence there is an associated risk that in ruling out AEOI on the basis that individual projects have a minor contribution to the in-combination collision total, that total, which has already reached a level</i></p>

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			<p data-bbox="994 233 2166 446"><i>where adverse effects could arise, will only increase. Furthermore, as that in- combination total continues to increase with additional offshore wind farm projects consented in the North Sea, the percentage contribution of individual projects to that increasing total will tend to decrease, which could lead to further decisions being made on the basis of individual projects having minor contributions. This risks the impacts on the SPA becoming an example of ‘death by a thousand cuts’.”</i></p> <p data-bbox="994 486 2166 518">The RSPB supports fully this position set out by Natural England.</p> <p data-bbox="994 558 2166 769">The RSPB is developing our detailed comments on the Secretary of State’s recent decisions on the Hornsea THREE and Norfolk Vanguard schemes, and specifically our thoughts on the issue of ‘de minimis’ and its appropriateness when considering incremental increases in collision risk and displacement from multiple developments. We had hoped to have this completed for Deadline 14 (25<sup>th</sup> August), but unfortunately this will not be possible. However, we can commit to providing our detailed comments by Deadline 15 (1<sup>st</sup> September).</p>