Written Representation

for the

Royal Society for the Protection of Birds

Comments on Deadline 8 submissions

Submitted 19 August 2022

Planning Act 2008 (as amended)

In the matter of:

Application by Hornsea Project Four Limited for an Order

Granting Development Consent for the Hornsea Project Four Offshore Wind Farm

Planning Inspectorate Ref: EN010098

Contents

1. Response to Deadline 8 submissions

Scope of submission

1.1. The RSPB has reviewed the Applicant's submissions at Deadline 8. With the exception of the two, interrelated, issues listed below, nothing merited additional submission to those the RSPB has already made to the examination.

1.2. The issues we wish to cover in this short submission arise from REP8-012 (G8.3 Applicant's Response to Deadline 6 Ornithology submissions - Revision: 01) and REP8-013 (G8.4 Applicant's response to Rule 17 letter dated 11 August 2022 - Revision: 01), in relation to:

- Counterfactual of Population Growth Rate and Counterfactual of Population Size; and
- Highly Pathogenic Avian Influenza.

1.3. Below, we provide a brief response on each topic.

Counterfactual of Population Growth Rate and Counterfactual of Population Size

1.4. In REP8-012 (G8.3 Applicant's Response to Deadline 6 Ornithology submissions - Revision: 01) the Applicant comments on the RSPB's REP6-068 (Comments on any other submissions received at Deadline 5 and Deadline 5a - Annex A Offshore Ornithology). The Applicant claims that the Counterfactual of Population Size is not meaningful because both the impacted and unimpacted population could still have a positive growth trend. This entirely misses the point of Counterfactual metrics. Population Viability Analysis, (PVA) which the counterfactuals are output metrics of, have great utility, but they do not allow us to see into the future. It is impossible to know what a population, or its growth trend, will be in the future, in particular for the long lifetime of a wind farm. This is because of so many factors potentially acting on the populations, such as climate change, political upheaval and changes in fishery policy. The perfect example of this has unfortunately been provided by the spread of Highly Pathogenic Avian Influenza (HPAI). While we know it is acting in these seabird populations, we will not know what the population scale effects are until at least next year, but likely several years into the future. As such, with the current state of knowledge we do not know what the population size or growth trend of seabirds at the Flamborough and Filey Coast and other colonies will be in 5 years let alone in 35 years.

1.5. This is one of the key reasons that the most useful outputs of PVA are counterfactual metrics, since both the impacted and unimpacted population scenarios are subject to the same uncertainty surrounding the extrinsic factors that may act upon them in the future. This means that while we do not know what the future absolute population or its trend will be, we can predict, with some degree of certainty, what the proportional difference between impacted and unimpacted populations and growth rates will be. For these reasons, the RSPB and Natural England rely on Counterfactual metrics, alongside a range of contextual information, to reach conclusions with regard to adverse effects on site integrity of affected Special Protection Areas, in this case the Flamborough and Filey Coast SPA.

Highly Pathogenic Avian Influenza

1.6. In the Applicant's response to the Examining Authority's Rule 17 letter dated 11 August 2022, the Applicant acknowledges that HPAI is likely to act on the affected seabird populations (see section 2, Reference 1 in REP8-013). However, they assume that any population decline will be reflected in a proportional decline in impact. This is to completely oversimplify the situation. There is currently no way of knowing how the disease will influence "at sea" behaviour and distribution. Furthermore, the disease is known to affect behaviour, including spatial awareness, and we have no understanding of how this may influence risks arising from the presence of turbines. For clarity, HPAI has been confirmed at the FFC SPA, and carcasses of gannet, kittiwake, herring gull, guillemot and razorbill (amongst other species) have been recorded.

1.7. This is why we stated, at paragraph 4.3 in our Deadline 7 submission (REP7-098):

"*It is currently unclear what the population scale impacts of the [HPAI] outbreak will be, but it is likely that they will be severe. This year's outbreak at the Bass Rock gannetry has coincided with, and is the likely cause of, an estimated 95% nest failure. This scale of impact means that seabird populations will be considerably less robust to any additional mortality arising from offshore wind farm developments. It also means that there will need to be a reassessment of whether the relevant FFC seabird SPA populations remain in Favourable Conservation Status. With such uncertainty as to the future of these populations, there is the need for an extremely high level of precaution to be included in examination of impacts arising from the proposed development of Hornsea Project Four*."