

Please accept herewith the RSPB's representation to be an interested party to RWE Innogy's (*the Applicant*) Development Consent Order application (*the application*) for the Atlantic Array Offshore Windfarm (*the Project*).

The RSPB supports renewable energy, providing that adverse impacts on wildlife are avoided, e.g. through siting and design. We welcome the Applicant's constructive pre-application dialogue on ornithological survey, analysis and interpretation. However, we retain some serious concerns with the application. We hope to work with the Applicant throughout the Pre-Examination stage to resolve these, and to ensure that further robust evidence providing an appropriately high level of reassurance on the Project's ecological risks is submitted in advance of the Examination.

The Project lies close to several national and international protected areas for wildlife, including the SACs of the Severn Estuary, River Usk and River Wye, as well as the major seabird colonies of Skokholm and Skomer SPA and Lundy SSSI. It lies within the foraging range of many seabird species associated with the latter sites. The survey work undertaken by the Applicant and its analysis to determine densities and population estimates confirms the use of the Atlantic Array zone by large numbers of seabirds throughout the year.

Whilst we acknowledge the extensive work to predict risks to these bird populations, we are concerned about the robustness of the assessment of the Project's impacts on seabird populations and how these are addressed. In particular:

- The characterisation of the site including data collection and methods used to estimate populations.
- Assessment of risks including collision risk and displacement. In particular, risks to the still rapidly growing Lundy population of Manx Shearwater, now approaching the threshold for international importance.
- Estimation of effects e.g. apportionment of risk and Potential Biological Removal.

We hope that these uncertainties will be resolved prior to the Examination, to provide greater confidence on ecological risks to the Examining Authority.

Given the importance of the nearby seabird colonies, the large number of seabirds using the Project zone and the uncertainty over the Project's impacts, should the application be granted consent a robust package of post-construction monitoring (PCM) is, in our view, essential. We hope to work with the Applicant in the Pre-Examination stage to determine PCM needs

proportionate to the Project and its risks. Outside the Examination, we will pursue a wider programme of PCM to inform future assessments.

The RSPB is concerned at the risks to harbour porpoise and migratory fish, particularly allis and twaite shad. We will defer to the expertise of other bodies on these matters.

We will articulate these concerns in our written representations. We anticipate only being involved in the process through written representations. We will not seek to participate in the Examination hearing, but will answer any questions from the Examining Authority.

The RSPB reserves the right to add to/amend its position in the light of any new information submitted by the Applicant.