

Ms Ava Wood
The Planning Inspectorate
3/18 Eagle Wing
Temple Quay House
2 The Square
Bristol
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11 December 2014

By email only: navitusbay@infrastructure.gsi.gov.uk

Dear Ms Wood

Application by Navitus Bay Development Limited for an Order Granting Development Consent for the Navitus Bay Wind Park, PINS reference EN 010024

RSPB reference number 10029429

Introduction

Further to our various representations, the RSPB has followed the Issue-Specific Hearings, especially those relating to ornithological matters. We have additional comments to make at this Deadline IV stage and will also be reviewing submissions made by the Applicant and other interested parties for this deadline.

Ornithological issues

Population Viability Analysis

Our further representations of 5 November 2014 identified that we considered that the Applicant's conclusions with regard to the potential impacts on gannet were not robust. It remains the RSPB's opinion that the only robust approach to determining the potential effects of the project alone and in combination with other proposals (including Rampion Offshore Wind Park) on the Alderney

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working to give nature a home around the world.

gannet colony is to carry out a site-specific Population Viability Analysis (PVA) calculating the “Counterfactual of Population Size” as detailed in our Written Representation (paragraphs 4.3 to 4.17).

We were unable to attend the Issue-Specific Hearing on 20 November 2014, but have subsequently considered the relevant audio recording of the session.

We considered the discussion between the Panel and Dr Roger Buisson of APEM, where Dr Buisson characterised the RSPB position on PVA as one merely requiring a different ‘presentation’ of results. We refute this characterisation, the approach to PVA advocated by RSPB in its representations is predicated on a different approach to the calculation of possible impacts. Without such an approach, the RSPB considers that the likely impacts of the project alone and in combination on the Alderney gannet colony cannot be confidently determined. We would welcome the opportunity to discuss this matter directly with the Applicant’s ornithological advisers before Deadline V.

Monitoring

We understand that the Applicant is to discuss with the Hampshire and Isle of Wight Wildlife Trust (acting as agent for the Alderney Wildlife Trust), ornithological monitoring of the Alderney gannet colony. We would be grateful to be included in these important discussions.

Appendix 43 Turbine Area Mitigation Option

We noted the various discussions regarding the status of the Mitigation Option put forward by the Applicant within documents submitted at Deadline III. We understand that the admissibility of the Mitigation Option to the Examination process remains to be determined, but a procedural decision will be made by PINS on 14 January 2015.

Finally, we have considered PINS’s letter to interested parties dated 21 November 2014 which included a direction to the Applicant to provide further information on the Mitigation Option, including implications for environmental assessment and Habitats Regulations assessment for Deadline IV. We will in due course consider this information and will make representations at Deadline V as necessary.

Yours sincerely

A handwritten signature in black ink, appearing to read "R Henderson", with a long horizontal flourish extending to the right.

Renny Henderson

Conservation Officer