THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

NORTH FALLS OFFSHORE WIND FARM

Appendix G4.2 to the Natural England Deadline 4 Submission

Natural England's Guillemot and Razorbill Compensation Advice on the Applicant's Deadline 1 and 3 Documents

For:

The construction and operation of North Falls Offshore Wind Farm, located approximately 40 km from the East Anglia Coast in the Southern North Sea.

Planning Inspectorate Reference EN010119

25 April 2025

Appendix G4.2 Natural England's Guillemot and Razorbill Compensation Advice on the Applicant's Deadline 1 and 3 Documents

In formulating these comments, the following documents have been considered:

- [REP1-028] 7.2.5 HRA Appendix 5 Guillemot and Razorbill Compensation Document (Rev 1) (Tracked)
- [REP1-030] 7.2.5.1 HRA Annex 5A Outline Guillemot and Razorbill Implementation and Monitoring Plan (Rev 1) (Tracked)
- [REP3-010] 7.2.1.4 HRA Annex 1D Letter of Comfort from Cornwall Wildlife Trust

1. **Detailed comments – Natural England's Advice on Offshore Ornithology**

Table 1: Natural England's Advice On: [REP1-028] 7.2.5 HRA Appendix 5 Guillemot and Razorbill Compensation Document (Rev 1) (Tracked)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Section 3.3 Para 19, 20	Natural England note that work is on-going to identify collaboration opportunities with other projects. We note the progress made in this area, specifically REP3-010 (7.2.1.4 HRA Annex 1D Letter of Comfort from Cornwall Wildlife Trust) which relates to the option of *"A broader, regional, compensation package led by a delivery partner and funded in collaboration with other developers."*	Natural England continue to advise that a collaborative approach to this measure is preferable, and we are supportive of the high-level principles described so far. Natural England would welcome further engagement on the development of the measure as it progresses.
2	Section 5 Para 31	The Applicant notes Natural England's advice in our Relevant Representation to use an alternative method for calculating compensation quantum but detail an alternative approach.	Natural England confirm that the Applicant's general methodological approach (further detailed in para 38-43) is acceptable (see also our detailed advice in Appendix G4.1 to this Deadline 4 submission)
3	5 Table 5.1	We note that as local rates are not available, the Applicant has calculated the compensation quantum using both the 'West region' productivity rate of 0.823 and the national average of 0.672.	Natural England considers that due to considerable uncertainty in likely productivity rates, the more precautionary 'national average' productivity rate is most appropriate for the calculation of compensation quantum. Nonetheless, the presentation of data under different scenarios provides useful context.
4	5.3 58 Table 5.6	The Applicant has calculated the potential number of breeding pairs of guillemot and razorbill that could be achieved at compensation sites by subtracting a recent colony count from the historic mean count, and then applying a correction factor of 0.67, to converts individuals to pairs citing JNCC (2021). Natural England notes the following issues:	<u>Colony Counts</u> Baseline monitoring could also consider contemporary baseline data collection in the early phases at non-shortlisted sites without recent count data, but with historic breeding records of auks. This could be useful to identify additional intervention sites should adaptive management be required. Natural England suggest that this work would be best approached strategically under a collaborative delivery model.

		<u>Colony Counts</u> Natural England highlight that many of the sites in Devon and Cornwall may not have 'recent' colony counts, and their status may be unknown. While many of the sites in Table 5.6 do benefit from recent counts, North Cornwall 2 has not been counted since 2017. Natural England highlight that the short listing of sites is likely to have been biased toward those sites with recent count data. This is understandable but does risk the early elimination of data poor sites where interventions could be successful. <u>Correction Factors</u> Natural England suggest caution in applying a correction factor to calculate a potential increase in breeding pairs. Walsh et al (1995) state the recommended census unit for guillemots is the individual on land and advise against the routine use of a correction factor due to problems of interpretation and some evidence that at some colonies the relationship between the number of breeding pairs and the number of adults is different (e.g. del Nevo, 1990). Indeed, Harris (1989) makes a plea for the presentation of original counts rather than 'corrected' figures in published work. Furthermore, Harris et al (2015) subsequently point out that the correction factor to convert individuals into breeding pairs changed substantially over the course of their long-term study due to decreases in survival and colony attendance, a situation that may well be replicated in the declining southwest colonies under discussion.	No details have been provided for either the historic or recent counts presented in Table 5.6 in terms of count methodology when calculating indicative compensation potential. Thus, it is difficult to assess how indicative they are likely to be. We also advise that counts should be undertaken prior to implementation of the compensation measure (replicating methodologies of historic peak counts if possible) to establish a baseline. More generally, Natural England advises that the sporadic nature of historic and recent monitoring of mainland auk colonies in the south-west introduces significant uncertainty as regards population trends. Further, there is limited information regarding pressures on these colonies, despite the recent, welcome efforts of developers to gather initial data. In that light, it is important for the proposed collaborative approach to integrate an appropriate level of ongoing monitoring of both the candidate colonies and the pressures on them. <u>Correction Factors</u> The correct reference for the potential use of the correction factor is Walsh et al., (1995) based on studies by Birkhead (1978) and Harris (1989). Where more accurate studies of guillemot populations are considered necessary, the most suitable method is counting individuals at truly randomised study plots, not chosen for convenience (Harris et al, 1983). Photographs showing mapped nests in these plots can then be replicated and compared year on year where productivity monitoring is undertaken. Natural England advise that consideration be given to establishing site specific correction factors at colonies/regions where compensatory measures are implemented. In-lieu of

		It is also worth noting that Birkhead and Nettleship (1980) define the correction factor as the number of pairs that bred in an area determined by daily checks throughout the laying period divided by the number of individuals counted in the same area at the time that the colony census is made. This suggests that a substantial amount of work is required before any site-specific correction can be established.	this, breeding pairs derived from counts of individuals should be treated as indicative estimates.
5	9.1 95	Natural England notes that the site selection procedure will be informed by surveys and consultation, taking into account existing pressures and existing management.	Natural England welcomes the Applicant's intention to use surveys and consultations to inform final site selection. However, we reiterate the need for a baseline dataset of site-specific disturbance events, against which the success of the disturbance reduction measures can be assessed. We also suggest that disturbance monitoring commences as in advance as possible before implementation of the measures.
6	9.3 101-102	Timing of compensation delivery is stated as three breeding seasons prior to operation of North Falls OWF, with an acknowledgement that this will result in a potential mortality debt due to age at first breeding of guillemot (6 years) and razorbill (5 years). However, it is argued that because the measure will be in place over the lifetime of the project (30+ years), the delay will have a negligible effect on the success of the measure.	We reiterate our comments made in our Relevant Representations [RR-243]and question the validity of the assumption that every colony exhibiting population declines is doing so due to the impacts of recreational disturbance. Establishing this as a causal factor should be achieved firstly by undertaking sufficient investigations of current population declines at shortlisted sites and secondly, by considering other potential factors (such as food availability or predation pressure), notwithstanding the considerable uncertainty surrounding future population dynamics in light of the effects of climate change and disease risk (e.g. HPAI). Natural England remain concerned that if disturbance impacts are not a major factor at short-listed sites, then the ability of the measure to recover a mortality debt will be diminished, as the debt will compound while

			alternative solutions to as yet unknown pressures are sought. We also highlight the potential need for adaptive management at some sites once they have been adopted and welcome the Applicant's recognition of this.

Table 2: Natural England's Advice On: [REP1-030] 7.2.5.1 Annex 5A Outline Guillemot and Razorbill CIMP (Rev 1) Tracked)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	3.3 20-23	Natural England consider the short-listed sites to represent viable locations for further investigation into disturbance impacts on breeding auks. We note that other sites may still be considered and support this flexible approach to the measure. Natural England are aware of the ongoing work by other projects & strategic initiatives investigating the potential to reduce recreational disturbance at southwest auk colonies. We welcome potential collaboration between the Applicant and other OWF projects provided sufficient benefits can be secured for all collaborating projects.	We advise the Applicant should continue to investigate options to deliver the measure as part of a collaborative effort. Natural England recommend strategic approaches at all levels, from site identification and baseline monitoring to interventions/measure implementation and ongoing (efficacy) monitoring.
2	3.5 30	The Applicant states that monitoring would commence at least one breeding season prior to commencement of the compensatory measure and that monitoring will be required for the first three years or until the measure is deemed to be operating successfully.	Natural England maintain that the success of the measure relies on the Applicant's ability to quantify the reduction in recreational disturbance, with resulting increases in the size of the colony. This can only be achieved if baseline data exist detailing frequency and intensity of disturbance events from site-specific disturbance studies conducted over several seasons prior to the measure being deployed. Alternatively, the efficacy of the disturbance-reduction element of the measure could be quantified. If attending vessels or wardening staff at compensation sites

			intervene and preclude potential disturbance events, the logging and reporting of such interventions could evidence the successful operation of the measures. With respect to monitoring for the first three years, or until the measure is operating successfully, we suggest that regardless of prior success, some level of long-term monitoring will be required to evidence ongoing efficacy, and this should be clearly acknowledged by the Applicant. Natural England continue to advise that strategic, collaborative approaches to all levels of monitoring are preferable.
4	3.8.140	The Applicant suggests that due to the nature and scale of the proposed measure(s), it may be difficult to derive cause and effect relationships, so indirect monitoring methods, such as visitor statistics or colony counts, and comparing trends with control colonies in the region, may be appropriate.	Natural England agree that it may be difficult to determine cause and effect. However, we maintain that determining the success of the measure relies on being able to demonstrate a reduction in disturbance to the birds, which should then hopefully be reflected in an increase in colony count(s). Thus, we consider that monitoring of these elements is key to establishing the success of the measure and all the suggested indirect monitoring methods are employed to this end. Disturbance data collected prior to or during measure implementation, is of key importance, as we have previously highlighted.

2. References

Birkhead, T.R., (1978). Attendance patterns of guillemots Uria aalge at breeding colonies on Skomer Island. *Ibis*, **120**(2); 219-229.

Del Nevo, A.J., (1990). *Reproductive biology and feeding ecology of common guillemots Uria aalge on Fair Isle, Shetland* (Doctoral dissertation, University of Sheffield).

Harris, M.P., (1989). Variation in the correction factor used for converting counts of individual Guillemots Uria aalge into breeding pairs. *Ibis*, **131**(1); 85-93.

Harris, M.P., Heubeck, M., Newell, M.A. and Wanless, S., (2015). The need for year-specific correction factors (k values) when converting counts of individual Common Guillemots Uria aalge to breeding pairs. *Bird Study*, **62**(2); 276-279.

Harris, M.P., Wanless, S. and Rothery, P., (1983). Assessing changes in the numbers of guillemots Uria aalge at breeding colonies. *Bird Study*, **30**(1); 57-66.

Walsh, P.M., Halley, D.J., Harris, M.P., Del Nevo, A., Sim, I.M.W. and Tasker, M.L., (1995). *Seabird monitoring handbook for Britain and Ireland: a compilation of methods for survey and monitoring of breeding seabirds*. JNCC/RSPB/ITE/Seabird Group.