



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

NORTH FALLS OFFSHORE WIND FARM

Appendix F5 to the Natural England Deadline 5 Submission

Natural England's Offshore Ornithology Advice on the Applicant's Deadline 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

30 May 2025

Appendix F5 Natural England's Offshore Ornithology Advice on the Applicant's Deadline 3 Documents

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

- REP3-039 Applicant's Comments on Other Deadline Submissions (Rev 0)
- REP3-040 North Falls 9.29 Updated Information for Offshore Ornithology Cumulative Effects Assessment (Rev 0)
- REP3-042 North Falls 9.31 Cumulative Effects Assessment Summary

1. Summary

We welcome the Applicant's response [REP3-039] to provide clarity on the differences in the Population Viability Analysis (PVA) results for guillemot and razorbill at the Flamborough Filey Coast Special Protection Area (FFC SPA) presented in their submission [APP-178] in comparison with the Sheringham and Dudgeon Extension Project (SADEP) consent decision, as requested in our Relevant Representation (RR).

In our RR, Natural England also requested that the Applicant consider information made available after March 2024 (e.g. impact estimates from the Five Estuaries, Dogger Bank South & Outer Dowsing OWF projects) in their cumulative effects assessment (CEA). We also suggested collaboration between these projects to agree how updated impact values (based on SNCB advice) could be efficiently incorporated into each project's assessments as their Examinations progress.

Whilst we welcome the revised document 'Updated Information for Offshore Ornithology Cumulative Effects Assessment' [REP3-040], received at Deadline 3, the Applicant has not re-submitted updated in-combination assessments nor re-run PVAs for guillemot and razorbill apportioned to FFC SPA using these figures, which are now significantly different in some circumstances from those considered by the original assessment.

For example, the Dogger Bank South contribution to the in-combination guillemot abundance in North Sea and English Channel wind farms apportioned to the FFC SPA adult population is stated as 32,563 (RWE Renewables, 2024; Table 9-28) in comparison with that considered in the North Falls RIAA of 15,742 (North Falls, 2024; Table 4.44). Similarly, the Outer Dowsing RIAA (Version 4.0) annual abundance of 17,763 adults apportioned to FFC SPA (Outer Dowsing, 2025; Table 9-37) is significantly higher than the total of 5,181 considered in the North Falls RIAA (taken from ODOW's RIAA submitted before the introduction of the Offshore Restricted Build Area). Both project impact values are calculated based on 70% mortality and 2% displacement. We expect differences in impact values for razorbill are also likely. The in-combination totals require updating accordingly to reflect the latest impact values available, though given the limited time available in the Examination, we recognise that updating the PVAs is not necessarily a priority.

We highlighted previously that the Applicant's PVAs had not used some Natural England-recommended input parameters (e.g. years for burn-in, impacts applied separately for immatures, random seeds), acknowledging that we considered these differences would probably make little difference to the conclusions of the PVAs. We note that the Applicant has subsequently used these parameters for the guillemot shadow Appropriate Assessment for the Farne Islands SPA and welcome their commitment to integrate them into any updated PVA (North Falls, 2025¹; NE-252/F27).

2. Applicant's Comments on Other Deadline Submissions (Rev 0) [REP3-039 Table 2.1, RR-243 F31, F32 and F41]

Natural England can confirm that the Applicant's interpretation of the PVA outputs from SADEP is correct. As set out in our End of Examination Statement [REP8-102], Natural England did not agree with the updated PVA outputs as presented by SADEP within REP5-044 due to a reduction in the number of simulations from 5000 to 1000 and therefore referred to the original PVA outputs presented within the SADEP RIAA [APP-059] when forming our final conclusions. For guillemot, Natural England selected the PVA outputs from the closest impact value (1,539) as a proxy for the impact value of 1,498 at 70% displacement and 2% mortality for all projects, except for Hornsea Project 4 for which 5% mortality was applied in line with previous cases. A similar approach was taken for razorbill, with the PVA run for the impact value of 215, selected as a proxy for the impact value of 206.

We acknowledge that the reference population of individuals for the FFC SPA used by the Applicant in their PVA is significantly higher than that used by SADEP, and that this will influence the predicted levels of effect. However, we also highlight that some of the in-combination impact values from other projects have also changed, with some significant increases as outlined above. For this reason, Natural England are unable to draw firm conclusions on the in-combination impact total nor the PVA outputs as presented by the Applicant within APP-180. Nevertheless, we continue to advise that an in-combination Adverse Effect on Integrity (AEOI) for the guillemot and razorbill features of the FFC SPA cannot be ruled out.

We note that it has already been determined by the Secretary of State (SoS) in the Hornsea Four decision that in-combination impacts on the guillemot feature have reached a level where AEOI cannot be ruled out. More recently, at Rampion 2, the SoS again determined that the in-combination impact was over the threshold for AEOI on the guillemot feature of FFC SPA even with the removal of Hornsea 4 impacts (which were subject to derogations).

Furthermore, SoS concluded that AEOI in-combination could not be ruled out at Rampion 2, despite the project's '*modest*' contribution of 3.5 adult mortalities per annum in the non-breeding season ([Rampion 2 - DESNZ HRA](#)). With respect to the razorbill feature of FFC SPA, we highlight our advice to Hornsea 4, and all subsequent projects predicted to contribute to the in-combination total. In brief, we consider that there is significant uncertainty as to whether the current net growth of the population is sustainable in the face of numerous pressures and, therefore, AEOI cannot be ruled out.

We welcome the provision of without prejudice derogations cases for guillemot and razorbill and consider that our input through the remainder of the Examination period would be best spent assisting the Applicant in ensuring that ecologically effective compensatory measures can be delivered, should they be required.

References

Natural England (2023). Sheringham Shoal Extension and Dudgeon Extension Offshore Wind Farms Appendix B3 to the Natural England Deadline 8 Submission Natural England's Offshore Ornithology Position (Revision 2).

North Falls (2024). Report to Inform Appropriate Assessment Part 4 Offshore Ornithology (Birds Directive Annex 1 and Migratory Species) (Revision 0).

[EN010119-000345-7.1.4 RIAA Part 4 Offshore Ornithology Birds Directive Annex 1 and Migratory Species.pdf](#)

North Falls (2025¹). 9.1 Applicant's Responses to Relevant Representations Received from Natural England (Revision 0).

North Falls (2025²). 9.1 Applicant's Responses to Relevant Representations Received from Natural England. February 2025 (Revision 0)

Outer Dowsing (2025). Habitats Regulations Assessment Report to Inform Appropriate Assessment. Document 7.1. (Revision 4.0).

RWE (2024). Dogger Bank South Offshore Wind Farms Report to Inform Appropriate Assessment Habitats Regulations Assessment Volume 6 Part 4 of 4 – Marine Ornithological Features (Revision 3)

[EN010125-000881-6.1 RIAA HRA Part 4 of 4 – Marine Ornithological Features \(Revision 3\) Clean.pdf](#)

[EN010125-001496-6.1 RIAA HRA Part 4 of 4 – Marine Ornithological Features \(Revision 4\) \(Tracked\).pdf](#)