



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Dogger Bank South Offshore Wind Farm

Appendix H4 to the Natural England Deadline 4 Submission
Natural England's comments and updated advice on Offshore Ornithology
Compensation

For:

The construction and operation of the Dogger Bank South (East and West) Offshore Wind Farm located approximately 100-122km off the Northeast Coast in the Southern North Sea.

Planning Inspectorate Reference EN010125

25th April 2025

Appendix H4 – Natural England’s Advice on Offshore Ornithology Compensation at Deadline 4

In formulating these comments, the following documents submitted by the Applicant have been considered in relation to the impacts of Dogger Bank South (East and West) Offshore Wind Farm (DBS) on Offshore Ornithology Compensation:

- [REP3-020] 10.20. Guillemot and Razorbill Compensation Site Refinement Report (Revision 2) (Tracked) – Please note that Natural England also had sight of the unredacted version of this document which is not currently in the Examination library.
- [REP3-032] 13.5 Precaution in the Ornithology Assessment and Implications for Compensation Quantum

1. Guillemot and Razorbill Compensation Site Refinement Report

1.1. Summary

Natural England welcome the survey work undertaken by the Projects to verify rat presence and assess the amount of suitable nesting habitat for guillemot and razorbill at shortlisted locations. However, we have some concerns about the methods used to estimate the number of breeding pairs that can be accommodated, particularly for Razorbill. We note that the identification of suitable habitat was based on guillemot nesting habitat requirements, and that these are significantly different to those of Razorbill. We also have queries about the method used to estimate the total area of suitable habitat and consider that the potential nesting densities used for guillemot may be unrealistically high. The final figures presented for estimated compensation potential may require unfeasible colony growth rates and have not considered factors such as likely recruitment and productivity rates, the quantity and quality of available prey, and the current levels of suppression by rats.

We note that only one option, the Isles of Scilly, has currently been assessed as potentially meeting all of the necessary criteria for a compensation eradication site. Whilst we welcome the inclusion of the Isles of Scilly in the Applicant's proposed approach, it is likely that further progress on this measure will be limited within the Examination timeframe, given that the focus should be on developing the strategic delivery mechanism.

The Applicant’s recent surveys have confirmed predator presence on Worm’s Head and further surveys are planned in May/June 2025. We consider that the current survey scope should be extended to address remaining uncertainties that will be essential in determining the feasibility of this location, noting its connection to the mainland at low tide and Worm’s

Head being a tourist destination Natural England would be happy to engage with the Applicant on the survey methodology outside of the Examination as needed. Given the site lies in Wales, it would be appropriate for discussions regarding the feasibility of this site for predator management to include Natural Resources Wales as well.

1.2. Methodology

1.2.1 Applicability to razorbill

The methodology presented for the seabird counts and correction factors (Section 2.1.3.1) are described as being applied to guillemot only, however the count results include data for razorbill. Natural England advise the Applicant provides further clarification on the methods used for counting and estimating the numbers of breeding razorbill.

Natural England also disagree with guillemot nesting densities being used in the habitat assessment to estimate the number of breeding pairs that could be accommodated for both species. Razorbill have significantly different nesting habitat requirements to guillemot, preferring enclosed spaces to open-topped ledges, and usually nest at much lower densities than guillemot (Birkhead (1978)¹, Harris & Wanless (1989)², Hipfner & Dussureault (2001)³). We highlight that the highest nesting densities for razorbill recorded by Elisseou (2020)⁴ and Legard and Davoren (2025)⁵ were 0.65 birds/m² and 0.86 birds/m², respectively. This is far lower than even the lower nesting density of 20 pairs/m² used by the Applicant, which is a guillemot nesting density from Harris & Birkhead (1985)⁶. Natural England advise that estimation of compensation potential for razorbills should be based on an assessment of the availability of suitable razorbill nesting habitat and realistic razorbill nesting densities.

1.2.2 Nesting densities

Natural England consider that the nesting densities used to estimate the potential number of breeding pairs that could be accommodated are very high, even for guillemots. The lower

¹ Birkhead, T.R., 1978. Behavioural adaptations to high density nesting in the common guillemot *Uria aalge*. *Animal Behaviour*, 26, pp.321-331.

² Harris, M.P. and Wanless, S., 1989. The breeding biology of Razorbills *Alca torda* on the Isle of May. *Bird Study*, 36(2), pp.105-114.

³ Hipfner, J.M. and Dussureault, J., 2001. The occurrence, size, and composition of Razorbill nest structures. *The Wilson Bulletin*, 113(4), pp.445-448.

⁴ Elisseou, M., 2020. Change in occupancy and density of nesting Atlantic puffins and razorbills on Machias Seal Island between 2011 and 2019. Thesis submitted to University of New Brunswick

⁵ Legard, M.J. and Davoren, G.K., 2025. A non-invasive method during routine handling indicates docility in a wild, crevice-nesting seabird. *Behaviour*, 1(aop), pp.1-22

⁶ Harris, M.P. and Birkhead, T.R. 1985. Breeding ecology of the Atlantic Alcidae. In D.N. Nettleship and T.R. Birkhead (eds.), *The Atlantic Alcidae* (London: Academic Press).

nesting density of 20 pairs/m² used by the Applicant is presented in Harris & Birkhead (1985)⁶ as “the average density on broad, flat rocky areas” and may not therefore be suitable to apply for every habitat type included in this assessment. Further, Birkhead (1976)⁷ describes nesting densities of guillemot on Skomer as ‘dense’ when above 10 pairs/m² and also describes nesting areas of ‘medium’ (5.5 pairs/m²) and ‘sparse’ (2.5 pairs/m²) density. The Applicant themselves state (Section 2.1.3.2.1) that guillemots may nest at lower densities in boulders and cavities, which is the most prevalent habitat type on the Isles of Scilly.

The higher nesting density of 46 pairs/m² used by the Applicant is taken from Harris and Wanless (1988)⁸, who are clear that this was the highest nesting density for guillemots recorded on the Isle of May, while the majority of nesting areas had nesting densities of less than half this. Natural England therefore consider that the potential numbers of breeding pairs estimated by the Applicant are likely to be unrealistically high, and we advise the Applicant also includes results using lower nesting densities when assessing the habitat potential for the preferred sites presented in Tables 3-2 and 4-1.

1.2.3 Habitat area

A key aim of the surveys was to quantify the amount of suitable available nesting habitat, with the size of this estimated using laser measuring tools and scaling of photographs. Natural England would welcome further detail being provided on how the three-dimensional nature of the environments, including rocky ledges, platforms, and boulder fields, was accounted for in the estimates i.e. whether it was all treated as flat surface for scaling.

1.2.4 Colony growth rates

The Applicant has presented the estimated compensation potential (i.e. potential number of breeding pairs) for each location based on the available habitat area. However, it is important to note that the calculated space available is not a guarantee that it will be fully utilised. We highlight that based on the 2023 starting colony size for the Isles of Scilly, the colony would need to achieve annual growth rates of up to 17% over 30 years to meet the numbers proposed. Likewise, for Worm’s Head, based on the 2024 population size of 38 pairs recorded by the Applicant, to achieve the population sizes presented in Table 4-1, the guillemot population would have to achieve annual growth rates of up to 21% over 30 years. We

⁷ Birkhead, T., 1976. *Breeding biology and survival of guillemots (Uria aalge)* (Doctoral dissertation, University of Oxford).

⁸ Harris, M.P. and Wanless, S., 1988. The breeding biology of guillemots *Uria aalge* on the Isle of May over a six-year period. *Ibis*, 130(2), pp.172-192.

consider that these growth rates may be unachievable in practice, noting that following the eradication of rats on Lundy annual growth rates have been ~9%.

We do acknowledge, however, that the estimates currently presented are based on the maximum space available and not the compensation target, which could be a lower value, and therefore a more achievable target. Natural England advise that the estimation of compensation potential should consider the likely growth rates achievable, factoring in likely recruitment and productivity rates, and what would be required to meet the compensation requirement (according to both the Applicant's and SNCB's preferred values) rather than just the maximum site capacity.

1.3 Survey results

1.3.1 Worm's Head

Natural England welcome the further surveys undertaken by the Applicant which have confirmed rat presence on the headland. However, we note that there remain questions around whether rats can access the identified areas of suitable guillemot and razorbill nesting habitat and are therefore having a negative impact on auk populations. There are also concerns regarding the feasibility of an eradication and prevention of re-incursions at this site, given its connectivity with the mainland and high visitor use (which introduces additional food sources for rats). We acknowledge and welcome the Applicant's stated commitment to conduct further surveys at this site in May/June 2025 to obtain accurate seabird counts, and advise that the surveys should also consider the aspects listed above as the results will be essential to determine whether predator eradication at this location is suitable and feasible. We advise that the results should be submitted into Examination at the earliest possible opportunity.

Worm's Head falls within two Welsh designated sites – Gower Coast: Rhossili to Port Eynon SSSI and Limestone Coast of Southwest Wales / Arfordir Calchfaen De Orllewin Cymru Special Area of Conservation (SAC). Accordingly, the site-specific understanding and advice of the relevant Statutory Nature Conservation Body (SNCB) is key to achieving a consensus regarding the practicality and sustainability of predator management measures on the site, including any unintended consequences to other interest features. It would therefore be appropriate for discussions regarding the feasibility of this site for predator management to include Natural Resources Wales.

1.3.2 Middle Mouse

The report states that the most recent surveys undertaken by the Applicant found no evidence of predators on Middle Mouse, and that previous research by the University of Bangor also

did not observe any predators. We further note that a report by Hornsea Project 4 (Orsted 2021) found no evidence of rats or impacts of predators on auk populations on the island. The Applicant has stated that they will continue to consult with the landowner and that “*further surveys will be required during the breeding season to confirm the presence or absence of rats*”. However, given the above results, Natural England query whether further surveys are required to confirm the absence of rats on Middle Mouse.

1.3.3 The Isles of Scilly

Natural England note that the Applicant has suggested that one option to support a rat eradication on the Isles of Scilly would be through: “*identification of geographically distinct islands where a predator eradication scheme could be undertaken, including maintenance of a biosecurity zone, until such time as an entire predator eradication scheme for the remaining islands would be undertaken*”. However, a successful rat eradication on the archipelago is likely to require concurrent action on all of the islands in the northern Scillies group to ensure reinvasion does not occur, as noted by the Applicant.

We note that there are the Isles of Scilly Seabird Recovery Partnership and the Defra Task and Finish group undertaking ongoing work to attempt to quantify the benefits of a rat eradication on the Isles of Scillies to seabirds. The results of this work will need to be taken into consideration if this measure is taken forward, and we welcome the Applicant’s ongoing engagement with initiatives regarding the measure. However, the outputs are not expected until Spring 2027 so it is unlikely that significant further progress can be made with this measure within the Examination timeframe.