



**Written Submission  
for the  
Royal Society for the Protection of Birds**

**Submitted for Deadline 5  
23 May 2025**

**Planning Act 2008 (as amended)**

**In the matter of:**

**Application by Dogger Bank South (West) Limited and Dogger Bank South  
(East) Limited for an Order**

**Granting Development Consent for the Dogger Bank South Offshore Wind  
Farms**

**Planning Inspectorate Ref: EN010125**

**RSPB Registration Identification Ref: 20050122**

# Contents

1. Introduction .....	3
2. RSPB comments on issues raised by the Applicant's Deadline 4 submissions.....	4

## 1. Introduction

1.1. This Written Submission contains the RSPB's comments on specific issues raised by the Applicant's Deadline 4 submissions. It covers the following:

- Follow-up response to Examiners' Question OR.1.9 on the Kittiwake PVA following review of the Applicant's Deadline 4 submissions REP4-016 (RIAA HRA Part 4 of 4: Marine Ornithological Features) and REP4-087 (Applicant's comments on responses to ExQ1);
- Brief comment on REP4-097 (Dogger Bank South Isles of Scilly Guillemot and Razorbill Survey and Habitat Assessment report);
- Comments on the Guillemot and Razorbill Compensation Plan (REP4-025) updates.

## 2. RSPB comments on issues raised by the Applicant's Deadline 4 submissions

- 2.1. Below we set out the RSPB's comments on issues raised by the Applicant's Deadline 4 submissions.

### *Further response to Examining Authority question OR.1.9 on Kittiwake PVA*

- 2.2. Question OR.1.9 asked the RSPB and Natural England the following question:

*"Are NE and the RSPB satisfied with the PVAs undertaken for kittiwake from the FFC SPA and presented by the Applicants in the RIAA [AS-085]? Can you explain your response?"*

- 2.3. In the RSPB response to this question (REP4-104), the RSPB acknowledged that the Applicant had provided an updated PVA in Annex A of RIAA HRA Part 4 of 4 – Marine Ornithological Features (Revision 3) [AS-085], that to some extent supersedes the version that NE's advice is related to. We noted that the Applicant had stated it was carrying out further review of their results and would report on this review at Deadline 4. We committed to respond fully to this question upon review of the relevant Deadline 4 documents.

- 2.4. We have now reviewed the relevant parts of REP4-016 (RIAA HRA Part 4 of 4: Marine Ornithological Features) and REP4-087 (Applicant's comments on responses to ExQ1). Our comments are set out below.

- 2.5. The RSPB welcome the revised PVA undertaken for Kittiwake from the FFC SPA and note that the changes to the values of the output metrics (CPGR and CPS) are small and so do not alter our conclusion of in-combination AEoI on this feature of the SPA and agree with the Applicant's conclusion in this respect.

- 2.6. Within the range of likely mortalities derived using the methods advocated by Natural England and the RSPB, the revised impacts arising through collisions associated with Dogger Bank South East and West in combination with other offshore wind farms are predicted to result in the annual population growth rate of Kittiwake at the **Flamborough and Filey Coast SPA** declining, with a ratio of impacted to unimpacted population growth rate of between 0.9956 and 0.9962. This means that after a period of 30 years, the population size of the SPA is expected to be between **87.16 and 88.93%** of what it would have been in the absence of the development. Therefore, we consider there is an AEoI due to the impact of collision mortality on the Kittiwake population of the Flamborough and Filey Coast SPA.

### *Comment on REP4-097: Dogger Bank South Isles of Scilly Guillemot and Razorbill Survey and Habitat Assessment report*

- 2.7. The RSPB welcomes the submission into the examination of REP4-097 (Dogger Bank South Isles of Scilly Guillemot and Razorbill Survey and Habitat Assessment report). This includes the Applicant's estimates of the area of potentially suitable habitat available for a series of islands, and projections of possible additional auk populations (based on different breeding densities) following a predator eradication scheme. The estimates are summarised in Table 16 of the report and range from 24,296 pairs (conservative projection) to 55,880 pairs (healthy projection).

- 2.8. As part of the Isles of Scilly Seabird Recovery Project, OWIC has funded a seabird habitat assessment survey for summer 2025, including Guillemots and Razorbills. The survey is being carried out by staff from the RSPB and the Isles of Scilly Wildlife Trust on behalf of OWIC and the Seabird Recovery Project. To inform the Recovery Project work, the survey will assess the area of suitable habitat potentially available to different seabird species. This survey is being carried out in June and is scheduled to report in full in autumn 2025, following detailed analysis of the survey findings. Further work would be required after that in respect of possible population projections and falls outside the scope of this survey work.
- 2.9. Therefore, the RSPB will not be in a position to provide detailed commentary on Dogger Bank South's population projections during the examination. We may be able to provide qualitative feedback by either Deadline 8 (3 July) or Deadline 9 (10 July) in respect of whether there is likely to be broad alignment in respect of the availability of suitable habitat for Guillemot and Razorbill, and will endeavour to do so.

*[Comments on the Guillemot and Razorbill Compensation Plan \(REP4-025\) updates](#)*

- 2.10. The RSPB has the following brief comments on updates to the Guillemot and Razorbill Compensation Plan.

[Compensation requirements](#)

- 2.11. The RSPB welcomes the presentation of updated calculations for potential compensation requirements in Table 4-4, based on the Applicant's and Natural England's preferred displacement and mortality rates.
- 2.12. The RSPB notes that in its summary of the compensation requirements for each auk species (paragraph 81 for Guillemot and paragraph 98 for Razorbill), the Applicant only cites its preferred values.
- 2.13. These and any related text would need to be updated in the final Compensation Plan should the Secretary of State decide not to adopt the Applicant's preferred values. To date, the Secretary of State has been consistent in adopting Natural England's displacement and mortality rates in recent decisions.

[Status of Worms Head and Middle Mouse project-led sites](#)

- 2.14. The RSPB has the following comments in respect of the Applicant's updates regarding its survey work for Worms Head and Middle Mouse:

- **Worms Head:**

- The Applicant states in paragraph 126 the results of their survey indicate that Worms Head could provide sufficient nesting space to meet the compensation requirements of the projects. However, they do not reveal how they have reached that conclusion and on what compensation requirements it is based. Given the wide range in potential compensation requirements set out in Table 4-4 e.g. Guillemot could range from 543 pairs to 11,643 pairs, and Razorbill from 174 pairs to 25,029, it is critical for the basis of this claim to be set out clearly to the examination.

- **Middle Mouse**

- The Applicant's update states that no rats were recorded during their survey in February 2025. However, they then go on to state that this might be because the seabirds were absent at the time of the survey (i.e. the potential food resource was absent) and that rat presence on the island is potentially seasonally restricted. However, no evidence is presented to support these statements. Before Middle Mouse can be given serious consideration as a potential compensation location, it is essential that robust evidence is presented demonstrating rat presence during the breeding season and that it is having damaging impact on the breeding Guillemot and/or Razorbill populations.