



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Dogger Bank South Offshore Wind Farm

**Appendix H6 to the Natural England Deadline 6 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

13th June 2025

Appendix H6 – Natural England’s Advice on Offshore Ornithology Compensation at Deadline 6

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:

- [REP5-012] 6.2.2 Appendix 2 Guillemot and Razorbill Compensation Plan (Revision 5) (Tracked)
- [REP5-037] 15.3 The Applicants’ Response to Deadline 4 Documents
- [REP4-085] 12.6 Case for Reduction in Kittiwake Breeding Seasons for ANS Installation (Revision 2) (Tracked)(1)

Our detailed comments on documents submitted by the Applicant in relation to Offshore Ornithology Compensation as listed above are provided below.

1. Guillemot and Razorbill Compensation Plan

Predator eradication locations

As set out in the Interim Guidance published by DESNZ in January 2025 ([Strategic compensation measures for offshore wind activities: Marine Recovery Fund interim guidance - GOV.UK](#)), Applicants wishing to use predator reduction as a compensation measure ahead of the Marine Recovery Fund (MRF) being operational will need to deliver the measure themselves or in collaboration with other projects. We note the update from the Applicant that proposals at Worm’s Head will no longer be progressed due to visual impact concerns. Whilst Middle Mouse remains in scope, Natural England retains its concerns regarding the lack of evidence for rat presence on the island. The capacity available at this location is also unlikely to be sufficient to meet the Project’s requirements. Therefore, the Isles of Scilly is the only location that remains fully in scope; however as previously noted it is the preference of The Wildlife Trusts that this is progressed as a strategic measure via the MRF, rather than as a project-led measure.

The Applicant has stated that they will revisit their longlist of original sites and are also considering locations in Scotland and have engaged with landowners. Whilst this is welcome, it is unlikely that it will be possible for a new location to be meaningfully progressed at a project level within the time remaining in Examination. To facilitate any progress that can be made, we recommend the Applicant discuss any Scottish candidate locations with Nature Scot, as the relevant SNCB.

2. Case for Reduction in Kittiwake Breeding Seasons for ANS Installation

Further to our advice provided at Deadline 4 [REP4-125] regarding the Applicant's Case for Reduction in Kittiwake Breeding Seasons for artificial nest structure (ANS) Installation [REP4-085], we note that the Applicant's arguments primarily centre around logistical constraints related to consenting and supply chain risks. Whilst we acknowledge these arguments and recognise the significant difficulties of construction at sea, they are not within Natural England's field of expertise to comment on. Ultimately, we consider arguments of this nature to be for the consideration of the decision-maker as part of the decision-making process, rather than ourselves. In that light, we note that guidance on compensatory measure provision emphasises the importance of compensation being in place and functioning at the point of impact, and that where this is not possible, delayed implementation should be addressed through the design of the measure, for example by providing a greater amount of compensation.

Notwithstanding requests made in our Deadline 4 advice [REP4-125] for further clarity on certain aspects of the modelling methodology, Natural England are in agreement with the Applicant that there would be little merit in further discussion between our parties on this topic within the remainder of Examination, and that we maintain our respective positions.

3. The Applicants' Response to Deadline 4 Documents

Compensation scale

Natural England note the following statement made by the Applicant in [REP5-037] with respect to the scale versus target of compensation measures:

"it is not clear to the Applicants why Natural England considers that the magnitude of compensation needs to be scaled to accommodate the upper 95% confidence interval impact when they also state that success of the compensation should be assessed against the mean value. This will require considerable extra effort and cost to be made for no apparent purpose."

We refer the Applicant and Examiner's to the advice provided in Section 1.2.1 of Appendix G4 of our Deadline 4 submission [REP4-124], which details our reasoning in full.

Methodology – Applicability to Razorbill

We welcome the Applicant's clarification to point REP4-125:1.2.1 in the Applicant's Response to the Deadline 4 documents [REP5-037]. However, we maintain the advice provided in

[REP4-125] regarding the suitability of the method used to assess the compensation potential of sites for razorbill. The Applicant has justified their approach of applying guillemot nesting habitat and densities to razorbill by stating that guillemot and razorbill habitually nest in mixed colonies. Natural England note that while this is the case, nesting habitat preferences and nesting densities within mixed colonies differ between the two species, as is evident from the scientific literature (see REP4-125). We therefore maintain our position 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.

Estimation of Potential Nesting Habitat

We welcome the Applicant's clarification to point REP4-125:1.2.3 in [REP5-037]. However, as detailed in Table 1 of Appendix H5 to our Deadline 5 submission [REP5-059], we note that in the majority of cases the Applicant's assessment of available habitat includes areas of boulder habitat for which the slope is likely to preclude nesting. We therefore consider it inappropriate for the entire three-dimensional area to be treated as suitable nesting habitat and consider that the potential numbers of breeding pairs estimated based on these calculations may be unrealistically high. It is unclear from the Applicant's response to point REP4-125:1.2.3 how and under what circumstances 'flat surface area' was reduced.

Natural England advise the Applicant to fully consider the three-dimensional nature of the areas being assessed, and to appropriately account for areas where the slope is likely to preclude nesting.

Compensation Potential

Natural England welcomes the Applicant's provision of colony growth projections for the Isles of Scilly based on compensation requirements and realistic colony growth rates, as well as the maximum capacity of the location (REP4-125:1.2.4; [REP5-037]). The Applicant's projections indicate that it could take ~37 years for the Upper Confidence Interval level of compensation to be delivered for guillemot (7,762 (mean 4,029); 70% displacement, 2% mortality, 2:1 ratio). We consider that it would be beneficial for the Applicant to also consider growth projections for the number of years it would take to achieve compensation at a 3:1 ratio (70% displacement, 2% mortality, 95% upper confidence interval). This would give the decision-maker a wider view of what the measure might be able to achieve and by when, given that Natural England cannot advise on an appropriate ratio at this time, given the remaining uncertainties associated with the measure.

The projections have also only been provided for guillemot, and not for razorbill. We consider that it would be beneficial for the values for both guillemot and razorbill to be included in a future iteration of the Site Refinement Report or the GRCP.