



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

Additional submission

7 July 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

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1. Introduction

1.1. This Written Submission contains an update to the following:

- Offshore ornithology matters following review of the Applicant's Deadline 6 submissions; and
- RSPB's REP5-066 comments on the Applicant's REP4-097 (Dogger Bank South Isles of Scilly Guillemot and Razorbill Survey and Habitat Assessment report).

2. Offshore ornithology – update on RSPB position following review of the Applicant's Deadline 6 submissions

2.1. The RSPB has reviewed the Applicant's Deadline 6 submissions, in particular REP6-008 (RIAA HRA Part 4 of 4: Marine Ornithological Features). As a consequence, we are providing additional comments by way of an update on the following issues:

- Conclusions on project alone Adverse Effects on Site Integrity (AEOI) (including where we are unable to reach conclusions);
- Conclusions on project in-combination AEOI (including where we are unable to reach conclusions);
- Application of macro-avoidance to Gannet collision risk modelling;
- Displacement Rates;
- Population Viability Analysis (output metrics);
- Highly Pathogenic Avian Influenza (HPAI).

2.2. These should be read in conjunction with our previous submissions to the examination.

Conclusions on project alone Adverse Effects on Site Integrity (AEOI) (including where we are unable to reach conclusions)

2.3. Following review of this topic, in particular the revised predictions in REP6-008 and REP6-018 the RSPB has updated their position as follows.

2.4. Within the range of likely mortalities derived using the methods advocated by Natural England and the RSPB, the impacts arising through collisions associated with Dogger Bank South East and West 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 0.9975. This means that after a period of 30 years, the population size of the SPA is expected to be **92.4%** 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. We disagree with the Applicant's conclusion in this respect.

2.5. Within the range of likely mortalities derived using the methods advocated by Natural England and the RSPB, the impacts arising through displacement and barrier effects associated with Dogger Bank South East and West are predicted to result in the annual population growth rate of **Guillemot at the Flamborough and Filey Coast SPA** declining, with a ratio of impacted to unimpacted population growth rate of between 0.9830 and 0.9988. This means that after a period of 30 years, the population size of the SPA is expected to be between **58.8 and 96.3%** of what it would have been in the absence of the development. Therefore, we consider there is an AEOI due to the impact of displacement and barrier effects mortality on the Guillemot population of the Flamborough and Filey Coast SPA. We disagree with the Applicant's conclusion in this respect.

2.6. We cannot rule out an adverse effect on site integrity arising through the following project alone impacts:

- The impact of combined collision and displacement mortality Gannet populations of the Flamborough and Filey Coast SPA

2.7. We are unable to reach a conclusion on AEOL through the following project alone impacts:

- The impact of displacement mortality on the Guillemot population of the Farne Islands SPA;
- The impact of combined collision and displacement mortality on the Gannet population of the Forth Islands SPA.

Conclusions on project in-combination AEOL (including where we are unable to reach conclusions)

2.8. Within the range of likely mortalities derived using the methods advocated by Natural England and the RSPB, the impacts arising through collisions associated with Dogger Bank South East and West in-combination with other projects 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 0.9921. This means that after a period of 30 years, the population size of the SPA is expected to be **78.31%** of what it would have been in the absence of the development. Therefore, we consider there is an AEOL due to the impact of collision mortality on the Kittiwake population of the Flamborough and Filey Coast SPA. We agree with the Applicant's concession of AEOL in this respect.

2.9. The revised assessment shows the impacts arising through displacement and barrier effects 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 **Guillemot at the Flamborough and Filey Coast SPA** declining, with a ratio of impacted to unimpacted population growth rate of between 0.9426 and 0.9959. This means that after a period of 30 years, the population size of the SPA is expected to be between **15.98 and 88.03%** of what it would have been in the absence of the development. Therefore, we consider there is an AEOL due to the impact of displacement mortality on the Guillemot population of the Flamborough and Filey Coast SPA. We agree with the Applicant's concession of AEOL in this respect.

2.10. The revised assessment shows the impacts arising through displacement and barrier effects 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 **Razorbill at the Flamborough and Filey Coast SPA** declining, with a ratio of impacted to unimpacted population growth rate of between 0.9681 and 0.9977. This means that after a period of 30 years, the population size of the SPA is expected to be between **36.55 and 93.15%** of what it would have been in the absence of the development. Therefore, we consider there is an AEOL due to the impact of displacement mortality on the Razorbill population of the Flamborough and Filey Coast SPA. We disagree with the Applicant in this respect.

- 2.11. The revised assessment shows the impacts arising through displacement and barrier effects 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 **Guillemot at the Farne Islands SPA** declining, with a ratio of impacted to unimpacted population growth rate of between 0.9320 and 0.9973. This means that after a period of 30 years, the population size of the SPA is expected to be between **30.14 and 91.94 %** of what it would have been in the absence of the development. Therefore, the RSPB considers there is an AEOI due to the impact of displacement mortality on the Guillemot population of the Farne Islands SPA.
- 2.12. We cannot rule out in-combination impacts on the following features of the Flamborough and Filey Coast SPA:
- The impact of combined collision and displacement mortality on the Gannet population; and
 - The impact of combined collision and displacement mortality on the seabird assemblage.
- 2.13. Due to the methodological concerns, in particular with the Applicant's approach to a *de minimis*, background mortality threshold, but also the application of a macro-avoidance correction factor to Gannet densities, as detailed below, we are unable to reach conclusions as to the significance of in-combination impacts on the following SPAs and listed features:
- Coquet Island SPA: Puffin (displacement mortality);
 - Farne Islands SPA: Kittiwake (collision mortality);
 - St. Abbs to Fast Castle SPA: Kittiwake (collision mortality), Guillemot (displacement mortality), Razorbill (displacement mortality);
 - Forth Islands SPA: Gannet (combined collision and displacement mortality), Kittiwake (collision mortality), Guillemot (displacement mortality), Razorbill (displacement mortality), Puffin (displacement mortality);
 - Fowlsheugh SPA: Kittiwake (collision mortality), Guillemot (displacement mortality), Razorbill (displacement mortality);
 - Buchan Ness to Collieston Coast SPA: Kittiwake (collision mortality), Guillemot (displacement mortality);
 - Troup, Pennan and Lion's Head SPA: Gannet (combined collision and displacement mortality), Kittiwake (collision mortality), Guillemot (displacement mortality), Razorbill (displacement mortality);
 - East Caithness Cliffs SPA: Kittiwake (collision mortality), Guillemot (displacement mortality), Razorbill (displacement mortality);
 - North Caithness Cliffs SPA: Kittiwake (collision mortality), Guillemot (displacement mortality), Razorbill (displacement mortality);
 - Copinsay SPA: Kittiwake (collision mortality), Guillemot (displacement mortality);
 - Hoy SPA: Kittiwake (collision mortality), Guillemot (displacement mortality), Puffin (displacement mortality);
 - Rousay SPA: Kittiwake (collision mortality), Guillemot (displacement mortality);
 - Calf of Eday SPA: Kittiwake (collision mortality), Guillemot (displacement mortality);
 - Marwick Head SPA: Kittiwake (collision mortality), Guillemot (displacement mortality);

- West Westray SPA: Kittiwake (collision mortality), Guillemot (displacement mortality), Razorbill (displacement mortality);
- Fair Isle SPA: Gannet (combined collision and displacement mortality), Kittiwake (collision mortality), Guillemot (displacement mortality), Razorbill (displacement mortality), Puffin (displacement mortality);
- Sumburgh Head SPA: Kittiwake (collision mortality), Guillemot (displacement mortality);
- Noss SPA: Gannet (combined collision and displacement mortality), Kittiwake (collision mortality), Guillemot (displacement mortality);
- Foula SPA: Kittiwake (collision mortality); Guillemot (displacement mortality), Razorbill (displacement mortality), Puffin (displacement mortality);
- Hermaness, Saxa Vord and Valla Field SPA: Gannet (combined collision and displacement mortality), Kittiwake (collision mortality), Guillemot (displacement mortality), Puffin (displacement mortality).

Application of macro-avoidance to Gannet collision risk modelling

- 2.14. The RSPB position on the use of a macro-avoidance correction factor to the gannet mortalities predicted by Collision Risk Modelling has been detailed in our Relevant and Written Representations (and responses to the Examining Authority's written questions). While this position is different from the guidance issued by Natural England, it is the same as that advised by NatureScot and has formed the basis for recent consent decisions by the Scottish Government (e.g. West of Orkney Offshore Wind Farm¹).

Displacement rates

- 2.15. For the assessment of the impacts arising from distributional responses to the presence of the development, namely displacement and barrier effects, the Applicant has frequently highlighted the conclusions of a recent study, Trinder *et al.*, (2024)² which reported no displacement of auk species within a single site, Beatrice wind farm in the Moray Firth. In contrast, a recent study across 15 sites with auks present, reported that 65% of these studies detected an effect³. There are a number of methodological issues with the Trinder *et al.*, study, most notably that the study only looked at birds within 400m of turbines, so does not consider any wider scale redistribution. Any displacement effects are likely to act on a much wider scale, for example, Peschko et al, 2024⁴ demonstrated via tracking studies in the German North Sea that Guillemot density in autumn was significantly reduced within a

¹ [Appropriate Assessment - West of Orkney Windfarm - Offshore Generating Station and Offshore Transmission Infrastructure - West of Hoy, Orkney - 00010559, 00010561 & Section 36 Consent | marine.gov.scot](#)

² Trinder, M., O'Brien, S. H., & Deimel, J. (2024). A new method for quantifying redistribution of seabirds within operational offshore wind farms finds no evidence of within-wind farm displacement. *Frontiers in Marine Science*, 11, 1235061.

³ Lamb, J., Gulka, J., Adams, E., Cook, A., & Williams, K. A. (2024). A synthetic analysis of post-construction displacement and attraction of marine birds at offshore wind energy installations. *Environmental Impact Assessment Review*, 108, 107611.

⁴ Peschko, V., Schwemmer, H., Mercker, M., Markones, N., Borkenhagen, K., & Garthe, S. (2024). Cumulative effects of offshore wind farms on common guillemots (*Uria aalge*) in the southern North Sea-climate versus biodiversity?. *Biodiversity and Conservation*, 33(3), 949-970.

radius of 19.5km around operating offshore wind farms. This reduction was of up to 75% when the turbines were rotating.

- 2.16. The RSPB would also like to highlight the recent Appropriate Assessment carried out by the Marine Directorate for the Scottish Government for the West of Orkney Offshore Wind Farm, where the Trinder et al study is also discussed as follows (paragraph 9.5.2): *“The Scottish Ministers advise that the Trinder et al. (2024) study only considers within wind farm displacement (meso-avoidance), and does not consider macro-avoidance, i.e. displacement from the wind farm footprint, and only within 400 m of each turbine. Therefore, this study does not provide good evidence for the overall displacement impact on auks, instead focusing only on birds that are present in the wind farm and therefore not impacted. In the meta-analysis of displacement studies, Lamb et al. (2024) found that the probability of detecting a displacement effect was positively influenced by the survey area covered and the distance of the counterfactual area from the study area. Notwithstanding the fact that the study design of Trinder et al. (2024) cannot address displacement from the wind farm footprint by only making comparisons within 400 m of turbines, the small scale and the use of within wind farm counterfactual areas for Trinder et al. (2024) weaken its ability to detect distributional change based on the findings of Lamb et al. (2024). Therefore, the Scottish Ministers advise that the NatureScot rates apply appropriate precaution in the case of guillemot displacement, and therefore the AA relies on the Scoping Approach for estimating displacement effects for its conclusions”.*

Population Viability Analysis – output metrics

- 2.17. Natural England, the Applicant and the RSPB have made clear their position on the use of the counterfactual output metrics of Population Viability Analysis, the Counterfactual of Population Size (CPS) and the Counterfactual of Population Growth Rate (CPGR), in previous submissions.
- 2.18. The RSPB would also like to highlight the recent Appropriate Assessment carried out by the Marine Directorate for the Scottish Government for the West of Orkney Offshore Wind Farm, where these metrics are also discussed as follows (paragraph 9.10.11): *“The Company bases their conclusions solely on the CGR [the Counterfactual of Population Growth Rate]. NatureScot acknowledges that the Company considered the CGR to be the more robust and reliable metric for determining AEOSI but takes the view that both the CPS and CGR should be considered together to provide a robust measure of population level impacts. In contrast therefore, NatureScot’s assessments are primarily based on the CPS outputs from PVAs for the species where a PVA was required, across the 35 years scenario, reflecting the Application consent period. In addition, NatureScot has taken the following contextual information into account; CGR outputs, colony trend, condition of qualifying features, species life history, proportional importance of species in Scotland and the UK, recent HPAI impacts and climate change sensitivity, when reaching its conclusions. An analysis by Cook & Robinson (2016) highlighted that both counterfactual measures had strengths and weaknesses relating to detectability of impacts and variation in sensitivity to impact effects, and therefore this AA follows the NatureScot assessment approach, taking into account both CPS and CGR, along with other contextual information to maximise the robustness of the*

conclusion. RSPB Scotland in its response dated 8 January 2025, stated that both CPS and CGR metrics should be considered in reaching conclusions.”

Highly Pathogenic Avian Influenza (HPAI)

- 2.19. Both Natural England and the RSPB have highlighted in previous submissions the additional need for precaution in the assessment due to the recent outbreak of Highly Pathogenic Avian Influenza (HPAI). The RSPB would also like to highlight the recent Appropriate Assessment carried out by the Marine Directorate for the Scottish Government for the West of Orkney Offshore Wind Farm, where the influence of is also discussed as follows (paragraph 9.11.4): *“The Scottish Ministers conclude that HPAI outbreaks necessitate greater precaution for the above sites and species. This is because, whilst population numbers may be reduced, the life history of seabirds (slow maturing, low reproduction) means that colonies impacted by pressures such as HPAI may be more sensitive to additional mortality from offshore wind development, exacerbating declines or preventing recovery”*.

3. Updated comment on REP4-097: Dogger Bank South Isles of Scilly Guillemot and Razorbill Survey and Habitat Assessment report

- 3.1. In REP5-066 (paragraphs 2.7-2.9) the RSPB set out its comments on REP4-097: Dogger Bank South Isles of Scilly Guillemot and Razorbill Survey and Habitat Assessment report.
- 3.2. We noted that 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 in June 2025 and is scheduled to report in full in autumn 2025, following detailed analysis of the survey findings; and
 - Further work would be required after that in respect of possible population projections and this falls outside the scope of the survey work.
- 3.3. Given this timetable, we stated that we would only be able to provide qualitative feedback before the end of the examination in respect of whether there is likely to be broad alignment between the REP4-097 conclusions and the Isles of Scilly Seabird Recovery Project in respect of the availability of suitable habitat for Guillemot and Razorbill. The RSPB can confirm that the survey work has been completed and will report in full in the autumn.
- 3.4. The following comprises the RSPB's additional feedback.
- 3.5. The RSPB agrees with Natural England's comment in REP6-076 (Estimation of Potential Nesting Habitat) and that, consequently, the estimations of potential nesting habitat (and the resultant population estimates) set out in REP4-097 are unrealistically high. Therefore, we advise that reliance should not be placed on the Applicant's predictions.
- 3.6. We can state that the initial findings of the June 2025 habitat assessment survey indicate that there is more opportunity for Razorbill than there is for Guillemot.
- 3.7. We conclude that it would be appropriate for any future decision regarding use of the Isles of Scilly as strategic compensation for Guillemot and Razorbill impacts for Dogger Bank South to be informed by the full report of the Isles of Scilly Seabird Recovery Project habitat assessment survey (due in autumn 2025), and any subsequent work on population projections based on that report.