



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Dogger Bank South Offshore Wind Farm

Appendix G9 to the Natural England Deadline 9 Submission
Natural England's comments and updated advice on Offshore Ornithology

For:

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

Planning Inspectorate Reference EN010125

10th July 2025

Appendix G9 – Natural England’s Advice on Offshore Ornithology at Deadline 9

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

- [REP8-041] 17.10 Appendix A - Offshore Ornithology Year 1 and 2 Combined Spatial Plots

1. Offshore Ornithology Year 1 and 2 Combined Spatial Plots

Natural England welcomes the Applicant’s Deadline 8 update of spatial mapping in 17.10 Appendix A - Offshore Ornithology Year 1 and 2 Combined Spatial Plots [REP8-041]. Whilst the breakdown by survey year provides some additional insight, we maintain our Deadline 8 advice [REP8-051] that modelling of species-specific breeding seasons and by month is required to show area usage. We note that the Applicant has not stated that the modelling methods would prevent this from being presented.

We also welcome the provision of the raw data for kittiwake, guillemot and razorbill; however, the small size of the maps prevents critical analysis. We highlight that one of the benefits of hotspot modelling is that it addresses the issue of overlapping data points in raw data which cannot be separated. Natural England also considers the colour scale presented in the spatial mapping could potentially result in misleading conclusions and creates a barrier to effectively comparing the data. As the y-axis values (number/density of birds) have not been standardised across maps within or between species, the same colour can represent 2 or 200 birds depending on the map.

From the data that has been presented, apparent areas of consistent/regular high densities (particularly for kittiwake and guillemot) are shown both between the arrays and within the array areas in the areas closest to gap between the arrays (e.g. the southeast corner of the DBS West array). That these areas appear to be consistently used at higher densities by all species (even those with lower numbers such as puffin and gannet) suggests that these areas are of elevated importance and indicate significant scope for exploring options to further reduce ornithology impacts.

As the focus of this exercise is to determine whether there are any areas of consistent high usage that would be affected by the development as currently bounded, we advise that should future iterations be provided, maps are produced showing the refined array boundaries plus buffer zones to look specifically at distributions within those areas. We also consider that there would be merit in investigating how depth and sandeel habitat correspond to the high-density

areas, to determine whether there are any drivers of the large abundance of birds in particular areas at particular times of year.

Whilst we welcome the Applicant's explanation of the modelling used in the further information provided, it is not sufficient to assess what has been done. Should further work be conducted it would be appropriate for full details of the modelling methodology and diagnostics to be provided in an appendix, or as a minimum, further information on how the data has been binned.

We acknowledge that the Applicant has not been able to address the remainder of our concerns detailed in [REP8-041] due to the limited time between Deadlines 7 and 8; however we highlight that Natural England first requested the provision of this information when the revised array areas were first presented post-PEIR, and again in our Relevant Representations [RR-039]. There has therefore been ample time for the Applicant to address this either before or within the Examination timeframe, and it is disappointing that they have chosen not to do so.

To summarise, we maintain that in its current form, this document is still insufficient to address our concerns with respect to density hotspot modelling. It does however indicate that there is merit in further exploration of the potential to reduce the high predicted impacts of the development, albeit this would now fall out of the formal Examination period. [R&I, G18].