



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

Response to Secretary of State's Consultation dated 5 February 2026

Submitted 5 March 2026

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 the RSPB's comments on the additional information submitted post-examination in respect of the following topics:

- Offshore ornithology matters;
- Guillemot and Razorbill Compensation – project-led measures; and
- Guillemot and Razorbill Compensation – strategic measures.

2. Offshore ornithology

2.1. This section sets out our comments in respect of matters relating to offshore ornithology:

- Summary of the RSPB's position on adverse effect on integrity for Guillemot and Razorbill at the end of the examination;
- Comments on the additional information submitted by the Applicant and Interested Parties.

Summary of the RSPB's position on adverse effect on integrity for Guillemot and Razorbill at the end of the examination

2.2. At the end of the examination, the RSPB's position on project-alone and in-combination adverse effect conclusions was set out in paragraphs 2.3-2.13 of examination document AS-183 submitted at Deadline 8 (dated 7 July 2025). Due to the length of those comments, we have not repeated them here.

2.3. In respect of Guillemot and Razorbill, the RSPB's conclusions on adverse effect in for the Flamborough and Filey Coast SPA and Farne Islands SPA can be summarised below.

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

2.4. We consider there is an adverse effect on integrity 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.

2.5. We were unable to reach a conclusion on adverse effect on integrity due to the impact of displacement mortality on the **Guillemot population of the Farne Islands SPA**.

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

2.6. We consider there is an adverse effect on integrity 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 AEOI in this respect.

2.7. We consider there is an adverse effect on integrity 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.

2.8. We consider there is an adverse effect on integrity due to the impact of displacement mortality on the **Guillemot population of the Farne Islands SPA**.

Comments on the additional information submitted by the Applicant and Interested Parties

2.9. The RSPB has reviewed the additional information submitted by the Applicant and Interested Parties as part of the various post-examination consultations. In addition, we highlight the recent seabird wrecks that have occurred through the winter of 2025-2026. We

do so as this information provides important context for the level of precaution required in the interpretation of population model outputs and subsequent decisions as to the significance of impacts.

- 2.10. A seabird wreck is a recognised natural phenomenon where large numbers of seabirds wash up dead or dying on beaches. Typically, this occurs after severe winter storms exhaust and starve birds that spend their winter far out to sea.
- 2.11. Since late January 2026, thousands of dead Puffins, Guillemots and Razorbills have washed up along coastlines from Cornwall to northern Scotland. This is part of a much larger event along the northwest Atlantic coast with tens of thousands of birds wrecked along the coastlines of France, Spain and Portugal. The last comparable event was the 2013-14 wreck when over 54,000 seabirds were recorded dead across European Atlantic coastlines, with Puffins again the most affected species. That event was shown to double adult Guillemot mortality rates at monitored colonies. The true death toll this winter is likely far higher than reported figures suggest, since most birds die at sea and never wash ashore.
- 2.12. These mass mortality events contribute to a reduction in resilience of seabird populations to absorb additional mortality such as that predicted to occur through the impacts of offshore wind farm developments. As such, there is an increased need for precaution in the interpretation of the key output metrics of Population Viability Analysis, the Counterfactuals of Population Growth Rate and Population Size. To reiterate the scale of these impacts the counterfactuals outputs of PVA for Flamborough and Filey Coast SPA and Farne Islands SPA are summarised below.
- 2.13. 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.
- 2.14. 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 AEOI 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 AEOI in this respect.

- 2.15. 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 AEOI 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.
- 2.16. 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.
- 2.17. These should be read in conjunction with our previous submissions to the examination.
RSPB response to Offshore Ornithology Density Hotspot Modelling
- 2.18. In formulating these comments, the following documents have been considered:
- 20.4 Spatial modelling of baseline seabird data for Dogger Bank South (October 2025);
 - 17.10 Appendix A – Offshore Ornithology Year 1 and 2 Combined Spatial Plots (Revision 2) [REP8-041];
 - 10.41 Heat mapping report Atlantic: Herring and Sandeel [AS-105];
 - Natural England letter responding to November 2026 consultation (dated 5 December 2026).
- 2.19. The RSPB welcomes the Offshore Ornithology Density Hotspot Modelling submitted by the Applicant after the close of the Examination, and agree with Natural England that this provides important contextual information. We also agree with Natural England that there is evidence indicating a density hotspot for all of the seabird species considered in the southeast edge of the DBS West array. We therefore disagree with the Applicant that there are no areas of consistently high activity that can be identified for seabird species.
- 2.20. We further agree with Natural England that this hotspot offers a potential opportunity to mitigate the high predicted impacts of the Projects on key seabird features, through changes to the design, size, or layout of the arrays.
- 2.21. In addition to the above, the RSPB considers that the Hotspot Modelling carried out could be improved via the inclusion of environmental covariates. The analysis was carried out with a single term in the spatial models, the spatial smoother. Other one-dimensional covariates, such as distance to coast and bathymetry were not included. The Applicant has argued that

these were not considered necessary, as the analysis was only for the area confined by the survey boundaries, and no extrapolation of distribution was needed. However, while the analysis was only within the survey area, the surveys were only of a sub-sample of the area, and so interpolation of the distributions would be beneficial to the model's ability to predict distributions within the development footprint.

- 2.22. The RSPB also welcome the consideration of seabird tracking data in the response from Natural England, alongside consideration of work presented by the Applicant on sandeel habitat potential and the sandeel distribution mapping carried out by Langton *et al.*, (2021¹). These further sources of information support the conclusion that there is a density hotspot in the southeast edge of the DBS West array.

¹ Langton, R., Boulcott, P. and Wright, P. 2021. A verified distribution model for the lesser sandeel *Ammodytes marinus*. Marine Ecology Progress Series 667, 145–159.

3. Guillemot and Razorbill compensation – project-led measures

3.1. The RSPB has considered the following documents:

- Draft Guillemot [and Razorbill] Compensation Plan (versions 8 and 9);
- Natural England letter responding to November 2026 consultation (dated 5 December 2026);
- NatureScot letter responding to November 2026 consultation (dated 2 December 2025).

RSPB position at the end of the Examination

3.2. At the end of the Examination, the RSPB's position on the Applicant's project-led compensation measures for Guillemots and Razorbills was set out in various documents including:

- REP1-087: Written Representation;
- REP3-066: response to Examining Authority's First Written Questions;
- REP4-113: response to Rule 17 Questions;
- REP5-066: response to documents submitted at Deadline 4;
- REP7-159: comments on the Examining Authority's recommended amendments to the draft Development Consent Order;
- REP9-016: Dogger Bank South/RSPB Statement of Common Ground (Final).

3.3. In Section 6 of REP1-087 we referred to the need to assess any potential project-led measure against the 7 feasibility criteria set out in the Manual of the UK Rodent Eradication Best Practice Toolkit. We welcome the Applicant's reference to this toolkit although we remain concerned that the Applicant has failed to carry out much of this work in a timely way that can inform the Secretary of State's decision on the suitability of the Applicant's project-led measures in achieving the compensation requirements.

3.4. By the end of the examination, we remained critical of the two project-led measures in Wales that had been pursued by the Applicant due to the lack of, or uncertain, evidence of:

- Rat presence (for one location);
- Lack of evidence of rat predation of Guillemots or Razorbills;
- Lack of evidence that rat predation was having a significant ecological effect on breeding Guillemots or Razorbills; and therefore
- Lack of evidence of potential benefit of rat eradication to breeding Guillemots or Razorbills.

3.5. In addition, we requested the addition of safeguards to ensure biosecurity measures are maintained beyond the lifetime of the development. We proposed that the DCO be amended to require biosecurity measures to be maintained for the time it will take the

affected seabird populations to recover from the adverse effects of the Dogger Bank South project to ensure long-term success of any predator eradication measures (REP7-159, paras 2.10-2.11).

- 3.6. We concluded, in our Statement of Common Ground with the Applicant (SoCG ID 40) that there were no credible project-led compensation measures in front of the examination in respect of Guillemot and Razorbill.
- 3.7. In addition to our position set out during the examination and summarised above, we would also draw the Secretary of State's attention to the importance of setting appropriate success criteria for predator eradication measures: one relating to successful eradication and one relating to the successful colonisation and/or recovery of the Guillemot and/or Razorbill populations to meet the compensation requirement.
- 3.8. Therefore, we recommend that the Secretary of State follows the approach he approved in the Hornsea Project Four Guillemot Compensation and Implementation Plan (GCIMP) in setting two success criteria. For ease of reference, we have provided the Hornsea Four success criteria below (taken from paragraph 9.2.1.2 of the June 2025 version of the Hornsea Project Four GCIMP) which can readily be adapted to Dogger Bank South's proposals:
 1. *Deliver and maintain at least 4,760 additional rat-free guillemot nesting spaces across the Herm Island complex and L'Etac; and*
 2. *Achieve increases in the number and distribution of breeding guillemot across the eradication areas that shows sustained progress towards the occupancy of 4,760 rat-free guillemot nesting spaces by guillemot across the Bailiwick of Guernsey.*

[RSPB comments on the additional information submitted after the Examination](#)

- 3.9. We have reviewed the additional information in the context of the concerns we set out during the examination and summarised above.
- 3.10. We note that the Applicant is considering three locations for potential rat eradication:
 - Bearasaigh, Outer Hebrides;
 - Pabaigh Mor and Pabaigh Beag, Outer Hebrides;
 - Out Skerries, Shetland.
- 3.11. We note that the Applicant has secured letters of comfort from landowners in relation to all locations except Bearasigh.
- 3.12. We also note and welcome that the Applicant intends to engage with the local community in each location to secure its support. As we noted in our Written Representation, the full and long-term support of the local community is essential to any eradication project, both for the initial eradication phase and, more critically, to ensure the sustained effectiveness of the long-term biosecurity measures required. The Applicant should be asked to provide robust evidence on its work to secure the support of the local communities over the long-term on these matters.

- 3.13. While we note that the Applicant has sought to obtain relevant information on each location, we remain concerned that significant evidence gaps remain.

Lack of evidence relating to predation of seabirds by rats at potential locations

- 3.14. In general, the concerns expressed by the RSPB in relation to the Applicant's Welsh sites apply to the three Scottish locations set out in the draft Guillemot [and Razorbill] Compensation Plan (version 9) i.e. a lack of, or uncertain, evidence at various locations in respect of:

- Rat presence (Bearsaigh);
- Lack of evidence of rat predation of Guillemots or Razorbills (all locations);
- Lack of evidence that rat predation is having a significant ecological effect on breeding Guillemots or Razorbills (all locations) and is a limiting factor; and therefore
- Lack of evidence of a potential benefit of rat eradication to breeding Guillemots or Razorbills (all locations).

- 3.15. The lack of evidence of any impact of rats on Guillemots and Razorbills continues to be of particular concern as it creates significant uncertainty as to:

- Whether any benefit will accrue to breeding Guillemot or Razorbill from rat eradication in any of the locations; or, if there is some benefit
- The scale of any benefit that might accrue.

- 3.16. We note the various calculations that the Applicant has made which seek to estimate the potential benefit of a rat eradication to Guillemots and/or Razorbills. We also note Natural England's comment (emphasis added):

"Based on the values presented in 22.8, and notwithstanding the caveats outlined in sections 3.1 and 3.2 (including the need to take into account any advice provided by NatureScot), we note that the number of breeding pairs that could theoretically be supported for razorbill and guillemot across the Outer Hebrides sites and the Out Skerries could, if this level of benefit turns out to be achievable, make a meaningful contribution to DBS's package of compensatory measures." (Section 3.3, Annex 2, Natural England letter dated 5 December 2025).

- 3.17. Given our concerns over the lack of detailed survey work and evidence set out above, we would urge the Secretary of State to treat any estimates of the number of breeding pairs that could theoretically be supported with utmost caution.

- 3.18. In this context, we are particularly concerned that the reference to gathering evidence of rat predation on Guillemots or Razorbills appears to have been struck out in paragraph 199 of the tracked edition of version 8 of the draft Guillemot [and Razorbill] Compensation Plan. Therefore, it appears the Applicant will not be seeking to establish a link between rat presence and a damaging ecological impact on breeding Guillemot and/or Razorbill. This is a significant concern in terms of the evidence-based approach required by the Manual of the UK Rodent Eradication Best Practice Toolkit. It acts to undermine any attempt to predict the

ability of any of the proposed locations to meet the compensation requirements set out by the Secretary of State for Guillemot and/or Razorbill.

[Additional comments relating to the Outer Hebrides locations](#)

- 3.19. The Applicant acknowledges in Table 6-5 of the draft Guillemot [and Razorbill] Compensation Plan (version 9) that various locations, including parts of mainland Lewis are within 1km of selected islands. This is acknowledged as a factor when considering the critical issue of biosecurity and the risk of reinvasion.
- 3.20. However, we consider the approach taken by the Applicant is significantly flawed as it is based on a swimming distance of 1km for brown rat. Brown rats have been recorded on many occasions swimming distances of 2km. Therefore, the Applicant appears to have underestimated the potential risk of reinvasion and the implications for long-term biosecurity of any eradication, including the geographic area they will need to be applied to.
- 3.21. In addition, in respect of Bearasaigh, the Applicant has completely omitted reference to the large islands of Great Bernera and Little Bernera, both of which would act as potential stepping stones from mainland Lewis. Great Bernera is connected by road to mainland Lewis. Little Bernera is approximately 100m swimming distance from Great Bernera. This additional risk factor in respect of reinvasion needs to be properly assessed and addressed.
- 3.22. Based on the RSPB's significant experience, the practical impact of this is that it would require ongoing and intense control of rats at these locations to reduce reinvasion risk. This goes far beyond what the RSPB would consider to be biosecurity.
- 3.23. In respect of the availability of suitable habitat for breeding Guillemots and Razorbills and limiting factors, we make the following overarching points that are relevant when assessing the Applicant's predictions for the benefits to Guillemot and Razorbill:
 - Of the key SPAs for the two species in the Outer Hebrides, the Shiant Isles SPA was the last to have rats present (they were successfully eradicated 10 years ago);
 - The other SPAs have seen declines in their populations of Guillemot and Razorbill without the presence of mammalian predators;
 - Potential source populations are not near capacity for either species, thereby reducing the likelihood that newly recruited breeding birds would need to find other locations to breed (such as the suggested locations for the Applicant's compensation measures);
 - Given our concerns over proximity of the Applicant's suggested locations to sources of rodent reinvasion, the proposed locations would be a higher risk option for breeding birds.
- 3.24. Therefore, based on the currently available information, we have serious doubts as to the suitability of the selected locations for predator eradication to benefit breeding Guillemot and Razorbill to meet the compensation requirements for Dogger Bank South.

Impacts on other ecological receptors

- 3.25. The RSPB notes that otters are present on the Out Skerries. Therefore, any eradication planning must factor in their ecological requirements and sensitivities to any eradication and subsequent biosecurity responses.

Comments on NatureScot's letter of 2 December 2025

- 3.26. The RSPB notes and supports NatureScot's comments in relation to the need for monitoring success, with particular reference to monitoring of efficacy and success (which links to our comments on appropriate success criteria) and monitoring of potential impacts on nearby Special Protection Areas as well as non-SPA areas. It may be appropriate to give some consideration of the latter as part of the Secretary of State's assessment of the Applicant's proposals, given the absence of detailed consideration of these issues by the Applicant in the information provided to date.

Implications of planned offshore wind development for Out Skerries

- 3.27. We wish to draw the Secretary of State's attention to the potential long-term risk that could be posed to a rat eradication compensation measure should it be carried out in the Out Skerries.
- 3.28. Arven (2.3 GW) and Stoura (0.5 GW) are both proposed floating offshore wind schemes lying to the east of Shetland and almost due east of the Out Skerries. If consented, they have the potential to cause displacement to any breeding Guillemots and Razorbills which rely on the marine area in and adjacent to them for feeding and transit to feeding areas.
- 3.29. As part of reviewing the Applicant's claimed long-term benefits to Guillemot and Razorbill of any rat eradication compensation measure in the Out Skerries, serious account needs to be taken of the potential long-term negative impacts on those species from the proposed offshore wind farms. Otherwise there remains a risk that the measure may be seriously compromised in its ability to achieve the required compensation objectives.

4. Guillemot and Razorbill Compensation – strategic measures

4.1. The RSPB has considered the following documents:

- Draft Guillemot [and Razorbill] Compensation Plan (versions 8 and 9);
- Natural England letter responding to November 2026 consultation (dated 5 December 2026);
- Defra letters responding to November 2026 consultation (dated 20 November 2026) and January 2026 consultation (dated 26 January 2026);
- Duchy of Cornwall letter responding to November 2026 consultation (dated 31 December 2026);
- Natural England paper “Isles of Scilly – Estimated Rates of Seabird Recovery Following Brown Rat Removal” (supplied to the Secretary of State by Defra on 18 December 2025).

RSPB position at the end of the Examination

4.2. At the end of the examination, the RSPB’s position on the strategic compensation measure put forward by the Applicant was set out in paragraphs 3.5-3.7 of examination document AS-183 submitted at Deadline 8 (dated 7 July 2025).

4.3. As context for our comments on the additional post-examination information, we have repeated paragraphs 3.5-3.7 below which relate to the Isles of Scilly Seabird Recovery Project as a potential strategic compensation measure for the Dogger Bank South offshore wind farm.

“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 [the Applicant’s] 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.”

4.4. As noted by Defra (see RSPB REP3-066, answer to question OR.1.29), the RSPB has been a member of a Task and Finish Group in respect of the Isles of Scilly Seabird Recovery Project. As per that statement, the RSPB is supportive of this strategic measure as “...*predator eradication on the Isles of Scilly has great potential to provide compensation for the impacts of offshore wind projects...*”.

RSPB comments on the additional information submitted after the Examination

- 4.5. As set out in Natural England's paper which seeks to estimate the rates of seabird recovery following brown rat removal on the Isles of Scilly, a successful eradication has the potential to benefit a wide range of seabird species.
- 4.6. In the context of the Dogger Bank South scheme, as noted above, it was the RSPB's position at the end of the examination that:
- the Applicant's estimations of potential nesting habitat (and the resultant population estimates) set out in REP4-097 [the Applicant's] are unrealistically high and so should not be relied upon; and
 - 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.
- 4.7. Therefore, we have reviewed the Applicant's updated Guillemot [and Razorbill] Compensation Plan documents in light of Natural England's paper estimating the rates of seabird recovery following brown rat removal on the Isles of Scilly.
- 4.8. Section 6.3.1.4.1 of version 9 of the Applicant's Guillemot [and Razorbill] Compensation Plan attempts to summarise Natural England's paper with regard to the potential benefit for Guillemot and Razorbill from a fully implemented Isles of Scilly Seabird Recovery Project:
- High confidence that the Isles of Scilly would provide an uplift of 2,500 pairs of Guillemot and 4,230 pairs of Razorbill over a 30-year timeframe. They state this would meet Natural England's advised success criteria of 2027 pairs of Guillemot (Flamborough and Filey Coast SPA and Farne Islands SPA combined) and 545 pairs of Razorbill (paragraph 163);
 - That there is other suitable Guillemot habitat available with the potential to allow growth into the 10,000s of pairs (paragraph 164).
- 4.9. We further note that at paragraphs 83 and 100 of version 9 of the Guillemot [and Razorbill] Compensation Plan, the Applicant describes Natural England's November 2025 advice in more detail:
- it would be acceptable to base compensation requirements upon the mean impact value at a ratio of 1:1; but
 - the proposed compensation measures should have the capacity to accommodate the requirements based upon the 95% upper confidence interval (UCI) of the impact value at a ratio of 2:1.
- 4.10. At paragraphs 84 and 101, this means that the compensation requirements for the impacts on Guillemot and Razorbill at the Flamborough and Filey Coast SPA are:
- Guillemot: 2015 pairs (1:1 ratio) and 7,762 pairs (2:1 ratio based on the 95% UCI);

- Razorbill: 545 pairs (1:1 ratio) and 3,337 pairs (2:1 ratio based on the 95% UCI).
- 4.11. The equivalent compensation requirement figures for the impacts on Guillemots from the Farne Islands SPA are 57 pairs and 162 pairs (paragraph 116).
- 4.12. In total, this results in compensation requirements as follows:
- Guillemot: between 2,067 pairs (1:1 ratio) and 7,924 pairs (2:1 ratio based on the 95% UCI)
 - Razorbill: between 545 pairs (1:1 ratio) and 3,337 pairs (2:1 ratio based on the 95% UCI).
- 4.13. We note the Applicant's reference to 2,027 pairs of Guillemots in paragraph 163. This appears to be a typographical error and should be 2,067 pairs based on its own figures.
- 4.14. The RSPB agree with Natural England that proposed compensation measures should have the capacity to accommodate the requirements based upon the 95% upper confidence interval (UCI) of the impact value at a ratio of 2:1. We also highlight that while both the confidence intervals and the ratio are recommended in order to account for uncertainty, they account for two separate sources of uncertainty; uncertainty in the quantification of impact mortality and uncertainty around the success of the compensation measures.
- 4.15. The precaution implicit in the use of these intervals and ratios directly follows from this uncertainty. Furthermore, as highlighted above, precaution is needed in consideration of impacts on these populations due to the high mortality experienced in the recent seabird wreck and the consequent reduction in population resilience to additional mortality.

Implications of Natural England's paper estimating the rates of seabird recovery following brown rat removal on the Isles of Scilly

- 4.16. Natural England's paper states it has high confidence that the following uplift could be achieved in the Isles of Scilly for the two auk species 30 years after a successful eradication project:
- Guillemot: 2,500 pairs;
 - Razorbill: 4,230 pairs.
- 4.17. The RSPB agrees with Natural England that these estimates should be used.
- 4.18. The Applicant's reference to the text in Natural England's paper that other suitable Guillemot habitat is available in the Isles of Scilly with the potential to allow growth into the 10,000s of pairs is misleading and should not be relied upon. This is because it completely fails to set it in the context of Natural England's detailed caveats as to why it would be unsafe to rely on it.
- 4.19. The RSPB will not repeat the detailed caveats set out in Natural England's paper, but instead refer the Secretary of State to the Guillemot and Razorbill sections of that paper. We recommend that the Secretary of State ignore the Applicant's reference to the possibility of 10,000s of pairs of Guillemot and base his assessment of the suitability of the Isles of Scilly on the high confidence estimates provided by Natural England.

4.20. Using Natural England's high confidence figures for the potential uplift for Guillemots and Razorbills 30 years after a successful rat eradication on the Isles of Scilly, the RSPB concludes the following:

- **Guillemot:**

- the Isles of Scilly alone has the potential to meet the 1:1 ratio calculation of 2,067 pairs required to address the predicted impacts on the Flamborough and Filey Coast SPA and Farne Islands SPA;
- The Isles of Scilly alone would not be able to meet the 2:1 ratio calculation of 7,924 pairs required to address the predicted impacts on the Flamborough and Filey Coast SPA and Farne Islands SPA. It would be several thousands of pairs short and additional compensation measures would be required;

- **Razorbill:**

- the Isles of Scilly alone has the potential to meet both the 1:1 ratio and 2:1 ratio calculations of 545 pairs and 3,337 pairs respectively required to address the predicted impacts on the Flamborough and Filey Coast SPA.