



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Outer Dowsing Offshore Wind Farm

Appendix G2 to the Natural England Deadline 4 Submission

**Natural England's comments on Offshore Ornithology Compensation [REP2-026,
REP2-060, REP3-049]**

For:

The construction and operation of Outer Dowsing Offshore Wind Farm located approximately 54 km from the Lincolnshire Coast in the Southern North Sea.

Planning Inspectorate Reference EN010130

3rd February 2025

Appendix G2 - Natural England's Advice on documentation submitted and updated related to Offshore Ornithology Compensation.

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

- [REP2-026] 7.7.5 Predator Control Evidence Base and Roadmap V2 (Tracked)
- [REP2-060] 19.11 Lead in periods for kittiwake breeding on Artificial Nesting Structures
- [REP3-049] 20.17 Guillemot and Razorbill Compensation Quanta

Summary of Advice

1. [REP2-026] 7.7.5 Predator Control Evidence Base and Roadmap Version 2 (Tracked)

The Applicant's Deadline 2 submission included an updated tracked version of their Predator Control Evidence Base and Roadmap document [REP2-026] in response to Natural England's concerns as set out in our Relevant Representations [RR-045]. The concerns were in regard to our confidence that the measure could successfully compensate for predicted impacts to guillemot and razorbill at Flamborough & Filey Coast (FFC) Special Protection Area (SPA), which centred around the potential scale of benefit for each species and the technical feasibility of removing and permanently excluding predators from within the Plémont Seabird Reserve.

A summary is provided below of whether the additional information has addressed these concerns. However, we wish to highlight that REP2-026 has provided **updated information** regarding the location of the proposed fencing and the area that it will enclose in section 4.4.1.2, although clear mapping of these would be beneficial. It has now been clarified that the Applicant proposes to fence a length of 907m, which will protect a 3.34 hectare area. We highlight that the feasibility study refers to a maximum approximate length of 2,938 metres protecting 32.3 hectares of land: in other words, only a proportion of the coastline assessed for potential benefits by the feasibility study will actually be subject to predator exclusion.

The amount of cliff/boulder field habitat that is suitable for nesting guillemot/razorbill within the 3.34 hectares - and therefore the population that could be supported within in – does not appear to have been calculated, and the level of historic and present usage of the exclusion area by these species is unclear. We note that the maximum historic populations of guillemot and razorbill cited by the Applicant (300 pairs each) presumably relate to the entire reserve,

or indeed to the island of Jersey as a whole, not to a portion of it. It is therefore increasingly unclear whether the proposal can provide the stated benefits. This matter needs prompt clarification.

The assumption that predation is the primary pressure acting to prevent or limit nesting, with limited consideration of other potential pressures:

At Relevant Representations, Natural England stated that there was a high level of uncertainty that the removal or control of rats and other mammalian predators will lead to colonisation of guillemot and/or an increase in the number of successfully breeding razorbill (Table 1, [RR-045]). This uncertainty has two main elements – whether or not predators are the primary pressure acting to prevent/limit nesting, and whether the removal of these predators will result in there being nesting spaces available that otherwise wouldn't have been. Therefore, Natural England recommended that the Applicant i) investigated the potential reasons for the loss/decline of guillemot and razorbill on Jersey, and ii) conducted a more detailed analysis of the potential nesting habitat for these species that is currently accessible to rats/other predators.

Version 2 of the document includes a statement stating that data informing which predator(s) is/are limiting seabirds breeding at the Plémont Seabird Reserve are not currently available, but that an increase in ferrets broadly coincides with the decreases in breeding seabirds (para 37). However, the statement that “*there is suitable habitat within the proposed reserve to hold many more breeding auks and other cliff-nesting seabirds than the current numbers*” (para 45) remains unevidenced. Natural England acknowledge that increases in breeding auks have followed successful predator eradication programmes at other locations like Lundy and the Isles of Scilly SPA.

We maintain that a more detailed analysis into the potential for the proposed site to support nesting auks is required in order to make an informed judgement regarding the potential scale of benefits from predator management within the area proposed for the reserve, particularly because the success of the measure for guillemot relies on re-establishment of a breeding colony after almost 50 years of no confirmed breeding of this species in Jersey.

This analysis is particularly important given the updated proposal has now clarified that the proposed compensation will only enclose a portion of the area that was covered by the feasibility study:

Lack of detailed fence operational plan, eradication plan, and biosecurity plan, as recommended in the Feasibility Study, and the need for full consideration of the risk of reinvasion/incursions:

At Relevant Representations [RR-045], Natural England highlighted the lack of detailed plans associated with the fence design and installation, predator eradication and biosecurity elements of the proposed measure. The additional information provided within Annex 2 (Design Statement) and Annex 3 (Management Plan) provides greater confidence that the fence design has and will continue to be informed via consultation with predator-proof fence experts, and that consideration has been given to the non-native predator eradication methodology and the necessary biosecurity protocols including how incursions via the intertidal will be dealt with. However, the recommendations in the Feasibility study were that these were “fully-costed”, and it is unclear whether this has been done.

Please also see our comments above regarding the scale of the proposed fence area.

Lead-in time:

At Relevant Representations [RR-045], Natural England raised concern regarding the short lead-in time of less than two years. This remains a significant concern, with the indicative timescales for establishment of the Reserve remaining unchanged except for a slight delay in the anticipated grant of planning permission for the predator exclusion fence. Furthermore, the Applicant’s indicative timescale appears overly optimistic when viewed alongside the Schedule of Works outlined within section 2 of the Annex 3 Management Plan which recognises that predator eradication will be ongoing over many years until 2029, and the Project Targets in Section 3 which aims for predator-exclusion status after five years and an increase in the population of auks after 15 years.

Conclusion:

Natural England remain concerned that there is still significant progress to be made before the Secretary of State can have sufficient confidence that the predicted compensatory benefits will occur, particular in light of the clarity given regarding the fenced area, and strongly encourage the Applicant to submit further information regarding the above points into the Examination as soon as is practicable.

2. 19.11 Lead in periods for kittiwake breeding on Artificial Nesting Structures [REP2-060]

Natural England has been consulted by the Applicant regarding their proposed changes to the lead-in time for kittiwake ANS, and has provided discretionary advice on their Deadline 2 submission 19.11 Lead in periods for kittiwake breeding on Artificial Nesting Structures [REP2-060], including but not limited to a request for clarification on the parameters used within the model, and a request that the Applicant presents additional modelling scenarios as per the approach taken by Hornsea 4, using a range of demographic rates (productivity rates, growth rates and colony starting sizes). Natural England await the submission of this updated assessment by the Applicant. Please refer to Natural England's response to Q2 HRA 2.3, in the second set of examiners questions (Appendix K2) and Natural England's advice submitted to the Applicant on 23 January 2025 in response to their Change Consultation request.

3. 20.17 Guillemot and Razorbill: Compensation Quanta [REP3-049]

Natural England has provided some initial high-level feedback through our Discretionary Advice Service (DAS), on the Applicant's Deadline 3 submission 20.17 Guillemot and Razorbill: Compensation Quanta [REP3-049]. Natural England primarily requested that the Applicant clearly outlines the methods taken to calculating these values using both the Hornsea 4 and the Hornsea 3 methods, including showing full workings and clearly stating and referencing the demographic rates (survival rates, age at first recruitment, philopatry/dispersal rates, etc) used to parameterise the calculations. This will assist Natural England in determining whether the high values outlined in REP3-049 are as a result of the demographic parameters used to calculate the requirement, or the calculation/formula used. Please also refer to Natural England's response to Examiners Questions Q2 HRA 1.2 for further information and a broader discussion of the issues and complexities associated with these calculations. We will respond in more detail in due course.

In Section 4 the Applicant has presented predicted outputs for the compensatory measures on a colony-by-colony basis. These will be fully detailed in an updated Evidence Base and Roadmap at Deadline 4, and so Natural England will provide our advice once this is submitted.