



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Outer Dowsing Offshore Wind Farm

Appendix G4 to the Natural England's Deadline 6 Submission

**Natural England's position regarding the proposed reduction in lead-in time for
kittiwake Artificial Nesting Structure(s)**

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

4th April 2025

Appendix G4 – Natural England’s position regarding the proposed reduction in lead-in time for kittiwake Artificial Nesting Structure(s)

The Applicant submitted a Change Consultation Request for a lead-in time reduction for the proposed offshore Artificial Nesting Structure(s) (oANS) from three full kittiwake breeding seasons to two full kittiwake breeding seasons [REP4-124]. Natural England’s general advice is that compensatory measures for kittiwake be in place four full breeding seasons in advance of impacts arising.

ODOW’s position is that delivery of Project scale compensation is best met through designing the measures to over-compensate for predicted impacts over the lifetime of the Project and thus account for any compensation debt accrued rather than through implementation of a lead-in period. The Applicant has demonstrated within Revision 2 of 19.11 Lead-in Periods for Kittiwake Breeding on ANS [REP4-105] how this will be achieved.

Natural England accept that that the Applicant has demonstrated that at an impact of 15.5 kittiwake per annum, the provision of an ANS with at least 300 nest spaces two full breeding seasons prior to the operation of any turbine will, under various scenarios of potential growth rates and colony starting sizes, meet the compensation requirement within the lifetime of the Project (35 years). The modelling also shows that, depending on the scenario, this may not occur until well into the operational lifespan of the project. For example, for an ANS with 300 nest spaces and when assuming a colony starting size of one and a precautionary but not unrealistic growth rate of 10%, the cumulative compensation requirement is not surpassed by the cumulative output until year 30. Assuming a larger colony starting size of three, and a higher growth rate of 15%, the equivalent ‘break-even’ point is year 9.

Natural England acknowledge that regardless of the lead-in time being four, three or two years, a significant amount of time is required to achieve the required level of compensation, and a delay in installation is likely to lead to an equivalent delay in full compensation delivery. Nonetheless, Natural England do not agree that this is sufficient reason to reduce the lead-in time from three full breeding seasons to two full breeding seasons, noting that to date Natural England have generally advised a lead-in time for kittiwake of four full breeding seasons due to the average age of recruitment for kittiwake as per Coulson, 2011.

We reiterate our position that every effort should be made to ensure that measures are in place and delivering compensation before damage to a site occurs, that the advised lead-in time of four full breeding seasons is based on the breeding ecology of kittiwake, and that any

action to reduce this should be considered as a last resort, in the face of difficulties relating to timely installation, which has undeniably been a challenge for other developers of ANS. We do not underestimate the complexities of installing structures offshore and the potential for unavoidable delays, and recognise the Applicant's readiness to progress project-led off ANS rather than pursue onshore options.

Nevertheless, the prospect of non-colonisation or slow colonisation needs to be considered, given that some ANS have not been colonised in years one and two (and some older, non-OWF ANS have not been colonised at all). We also highlight that as the Applicant is also proposing ANS as part of the package of compensatory measures for guillemot and razorbill, the lead-in time should also be considered in relation to razorbill and guillemot breeding ecology; these species have a typical age of recruitment of five and six years respectively, meaning that a longer lead-in time has the potential to impact the ability of this measure to deliver compensation for these species even more so than for kittiwake.

Lastly, we consider the current lack of material in the public domain regarding the number of ANS, the specific design of these structures (and their suitability for all three species), the final location of the structure(s) and the lack of detail provided with regards to proposed monitoring and options for adaptive management, all contribute to reduced confidence in the likelihood of the measure being successful at fully delivering the required compensation.

In light of the above, Natural England consider there to be a real risk that a significant compensation debt could accrue for a number of years after impacts begin. Therefore, at this time, without any evidence from the Applicant that specific logistical constraints are prevailing, Natural England cannot support the proposed change to reduce the lead-in time to two full breeding seasons. However, we do recognise that the Secretary of State (SoS) may wish to take an alternative view given the project's contribution to climate change targets, in which case we highlight that the use of a higher ratio than proposed by the Applicant may provide additional confidence that the off ANS can fully address the predicted impacts in a sufficiently timely way.

A note on the Hornsea 3 and 4 non-material changes regarding lead-in times for kittiwake

The Applicant has included within their justification for a reduced lead-in time the 'precedent' for a reduced lead-in time set by the decisions for Hornsea 3 and Hornsea 4 offshore windfarms. However, for the reasons set out below, Natural England do not consider these

Non-Material Changes (NMC) automatically set a precedent that other projects proposing ANS for compensation can follow.

Natural England acknowledge that both Hornsea 3 and 4 Offshore Wind Farms (OWF) were granted NMC to reduce the number of breeding seasons for ANS installation prior to operation. At the point when the NMCs were granted for Hornsea 3 and 4, considerable work had been undertaken post-consent with respect to both site securement and ANS design, providing greater certainty and confidence in the measure that would be delivered. It had also been demonstrated that best endeavours had been made to deliver the compensation within the four breeding seasons secured in the Development Consent Order (DCO), but that this had become unfeasible largely due to reasons outside of the projects' control.

Specifically for Hornsea 3, Natural England were reassured as the project were progressing four structures, in at least two English regions, each of which were estimated to address their predicted impacts. The provision of multiple ANS provided some reassurance that any build up in mortality debt resulting from the reduction in the number of breeding seasons had the potential to be mitigated against by the high degree of nest space provision. Furthermore, the installation of ANS in two different regions was likely to provide resilience against any negative environmental influences that could arise in one location, again mitigating against the accumulation of mortality debt. Natural England therefore concluded that the NMC would not significantly impair the effectiveness of the DCO in securing the compensatory measures. It should also be noted that three of Hornsea Three's structures were subsequently installed three breeding seasons prior to operation.

For Hornsea 4, Natural England had been consulted through the Offshore Ornithology Engagement Group (OOEG) and the associated Marine License Application on the location and design plans for the ANS, and agreed that should the Applicant's proposals be progressed, they had a good prospect of delivering ecologically suitable nesting habitat for kittiwake. It was noted, however, that provision of a single rather than multiple structures would increase the risk around non-colonisation. We also highlight that the current iteration of the Hornsea 4 Kittiwake Compensation Implementation and Monitoring Plan recently approved by the Secretary of State, includes provision of compensation four breeding seasons prior to operation, albeit the proposals now relate to onshore rather than offshore ANS.