



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

Outer Dowsing Offshore Wind Farm

**Appendix L1 to the Natural England Deadline 6 Submission**

**Natural England's comments on the Offshore In-Principle Monitoring Plan [REP4a-074]**

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

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4<sup>th</sup> April 2025

## Appendix L1 - Natural England's Comments on the Offshore In-Principle Monitoring Plan

In formulating these comments, the following document has been considered:

- [REP4a-074] 8.03 Offshore In-Principle Monitoring Plan (Tracked)

### Summary

For the avoidance of doubt and audit trail purposes, Natural England has set out below our final advice in relation to monitoring requirements. In providing this advice we have highlighted where there is now agreement based on the updated IPMP [REP4a-074] and where there remain unresolved matters both from our review of the Applicant's Deadline 4a updates to the plan and our Deadline 3 response [REP3-075] on the Applicant's original IPMP [APP-276].

Unfortunately, much of our advice on the IPMP at Deadline 3 [REP3-075] remains unresolved. In particular, we advise that monitoring requirements in the form of hypotheses to be tested/met should be secured in the IPMP at the time of consent. Otherwise, our experience on other projects is that the need/requirement to undertake monitoring is open to challenge and that it is the lack of clear and robust hypotheses that introduces ambiguity around the purpose of the monitoring, thereby nourishing the challenge.

### A. Natural England's Detailed Advice on 8.3 Offshore In-Principle Monitoring Plan (Version 2) (Tracked) [REP4a-074]

#### 1) Marine Processes

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Table 3.1	Natural England welcomes the updated IPMP and Applicant's commitments to monitor seabed and bedform recovery. However, the IPMP should include consideration of the need for adaptive monitoring if unforeseen impacts are detected, and triggers for the development of countermeasures, where needed.	We advise that the IPMP consider the need for adaptive monitoring if unforeseen impacts are detected. Similarly, triggers for the development of countermeasures should be clearly stated.

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
2	Table 3.1	Natural England welcomes the Applicant's commitment to monitor scour in the updated IPMP and testing of a hypothesis regarding seabed level changes due to scour. However, we advise that this needs to go further to consider options for addressing the impacts, should scour observations prove greater than predicted.	We advise that the Applicant should manage the risk of potential impacts as far as possible and that if the proposed scour monitoring detect changes greater than expected, triggers should be established, and any necessary counter measures is secured. This should be adequately captured in the OOOMP so that the proposed post-construction geophysical surveys are used to validate ES predictions.

## 2) Marine Mammals

Please note that 8.13 Schedule of Mitigation V5 [REP4a-087] should also be updated accordingly.

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Section 3.5.2, Para 38	Natural England acknowledges the Applicant has stated that ' <i>the purpose of this monitoring will be to validate the predictions made within the ES, but also to validate the impacts ranges used to inform the MMMP and the specific mitigation measures set out therein</i> '.	Natural England accepts the Applicant's suggestion, however, continues to request further detail on how this will be monitored/implemented. Natural England would welcome the opportunity to engage with the Applicant on this matter post-consent.

### 3) Benthic Ecology

NE Ref	Section Para/ Table/ Figure	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	3.3.2	Natural England notes that the in-principle monitoring proposed for benthic receptors is limited to considering only effects on Annex I reef.	Natural England advises that the in-principle monitoring should be extended to include considerations of changes in the quality, extent and recovery of <i>S. spinulosa</i> supporting habitat, as well as that of Annex I sandbank communities.

### 4) **Offshore Ornithology**

Upon review of 8.3 Offshore In-Principle Monitoring Plan Revision 2 [REP4a-074] it is evident that proposed ornithological monitoring remains focused solely on the compensatory measures that are implemented for the project and that no further monitoring is proposed. The IPMP states “...*monitoring must have a clear purpose in order to provide answers to specific questions. Monitoring should be targeted to address significant evidence gaps or uncertainty, where there is a potential for significant impact. In this instance no monitoring or independent surveys are required*”. Natural England considers there to be significant evidence gaps and areas of uncertainty associated with the offshore ornithology assessment process, including but not limited to the effects of displacement, the various parameters used within collision risk modelling, and the connectivity of the array area to the colonies to which impacts are apportioned at different times of the year (and therefore the appropriate approach to apportioning impacts from the Project).

Some of these evidence gaps and areas of uncertainty have been discussed in depth by Natural England and the Applicant throughout the examination, and the Applicant has outlined some of the sources of this uncertainty (and the implications for the need to apply precaution to the assessment) within their document ‘Levels of precaution in the assessment and compensation calculations for offshore ornithology’ [REP4a-049] stating “*The use of precaution occurs where there is uncertainty, e.g. spatial apportioning, demographic structures of offshore populations, variation in published biometric information (the flight heights, speeds, nocturnal activity and avoidance rates used for Collision Risk Modelling (CRM)), uncertainty regarding the impact of a pressure (the displacement and mortality rates*

used), *uncertainty on sabbatical rates.*” Therefore, it is Natural England’s view that the IPMP should seek to address some of these uncertainties, particularly as some of them are associated with significant impacts to species including kittiwake, guillemot and razorbill.

At Deadline 3, Natural England responded to the first revision of the Offshore In-Principle Monitoring Plan [REP3-075] [advising that post-consent monitoring of the offshore wind farm could help clarify the key risks for offshore ornithology, such as those posed from collision and/or displacement. The Applicant responded to this stating: *“The Applicant’s proposals focus on the monitoring of species which are the subject of compensatory measures as these are the species with the greatest potential for sensitivity to the Project. By definition, monitoring the success of the compensation measures, or the benefits from them, will provide monitoring of the effects of the Project.”* Given that the Applicant’s proposed compensation measures (predator control measures on Jersey and additional measures at auk colonies in the South-West of England and, to a slightly lesser degree, offshore Artificial Nesting Structures (offANS)) are to be carried out remote from both the Project’s array area and the colony for which these measures are proposing to address impacts to i.e. Flamborough & Filey Coast (FFC) SPA, it is unclear how monitoring the success of these measures will provide information on the impacts to these colonies.

Further, the Applicant has not provided further detail on how monitoring of the predator control measure on Jersey and the additional measures at colonies in the South-West will be designed to provide data on the effects of the Project on key species for which impacts have been identified i.e. auks, or whether the monitoring undertaken for either of these measures includes monitoring of the array area or monitoring at FFC SPA. For the monitoring of offANS, the Applicant has referred to the mechanism set out within the Kittiwake Strategic Implementation and Monitoring Plan (KSIMP) which references monitoring of nearby colonies, but this is lacking in any further detail and is restricted to kittiwake.

Natural England therefore again refers the Applicant to the guidance set out in Phase IV of Natural England’s Best Practice Advice document [Environmental considerations for offshore wind and cable projects - Home](#), which provides advice for monitoring programmes for seabirds in the post-consent phase, including specific advice on monitoring to target key areas of uncertainty in ornithological assessments, including displacement, collision and apportioning of impacts to colonies, as well as monitoring at colonies. Further detail is provided below on additional monitoring options that could be undertaken to target the specific uncertainties associated with this Project:

### Connectivity of the array area to Flamborough and Filey Coast (FFC) SPA

Connectivity is a key area of uncertainty in affecting how both collision and displacement impacts of the Projects are apportioned to colonies, and there is often a disagreement around the appropriate rates to use within the apportioning process. There is limited tracking data from FFC SPA for auks in particular, and Natural England advise that the Project considers monitoring to determine the level of connectivity between the array area and FFC SPA, including considering how tagging/tracking studies of key affected species could be incorporated into the monitoring plans. Other approaches to determining connectivity could also be explored including photography, catching birds at sea, analysis of stable isotopes, colour ringing and dietary studies.

### The importance of the array area for auks at the beginning of the breeding season and post-breeding chick-rearing/moult period

The high numbers of auks recorded within the array area and buffers during the baseline characterisation surveys in both the early breeding season and post-breeding season suggest a high degree of importance of the array for these species at these times of year. These would therefore be highly relevant topics for monitoring. The Applicant has suggested that the large numbers of auks present in the array area in the post-breeding months are in the process of dispersing to other areas beyond it, however this is based on very limited data on post-breeding dispersal from breeding areas. Focusing digital aerial surveys on the area of sea between FFC SPA and the Project array area in the pre-breeding, breeding and post-breeding months has the potential to contribute to addressing this area of uncertainty and to address key questions about the importance of the Project's array area to auks at these times of year.

### Colony-based studies

Colony-based studies play an important role within post-consent monitoring in establishing evidence of the changes that occur in species' ecology, key demographic rates and abundance and how those compare with the predictions of, or assumptions made within, ornithological assessments. In order to have sufficient monitoring data to detect impacts at colonies, including from indirect effects such as reduced prey availability, long-term integrated monitoring that incorporates not just the standard abundance and productivity monitoring but also monitoring of survival, phenology and diet, is needed. All offshore wind projects with significant impacts to SPAs should consider contributing (in a strategic and collaborative way) to monitoring those colonies.

**B. Appendix L - Natural England's Comments on the Offshore In-Principle Monitoring Plan [APP-276]**

Natural England has focused in this section on providing an updated on the unresolved advice from our Deadline 3 response [REP-075]. This section should be read alongside the advice provided above on the Applicant's updated IPMP at Deadline 4a.

**5) Engineering and design related monitoring**

It remains unclear to Natural England how engineering and design related monitoring encompasses monitoring surveys to inform final project design, including those required to inform mitigation measures such as avoidance of certain sensitive receptors particularly environmental ones. We continue to highlight that geotechnical investigations will be critical to inform the cable burial risk assessment and in relation to reducing the direct or indirect impacts to environmental receptors particularly within IDRBNR SAC and the nearshore.

**6) Natural England's further updates to our [REP3-075] Advice to the IPMP**

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue	NE D6 response
1	[APP-276] Section 3.1	<u>Marine Processes</u> Evidence is needed to validate predictions of impacts to, and recovery of, sandbanks, sandwaves and designated areas of seabed following seabed preparation and sandwave clearance.	Natural England advises that sandwave/sandbank pre- and post- construction monitoring should be carried out to ensure no unexpected changes occur to seabed morphology, as predicted in the EIA. And that hypothesis on sandbank recovery have been met.	This is resolved in , but outstanding issues remain in relation to adaptive measures. Please see Section 1 above
2	[APP-276] Section 3.6	<u>Offshore Ornithology</u> The IPMP proposes that ornithological monitoring is focused solely on the compensatory measures that are implemented for the project. No further monitoring is proposed.	We advise that post-consent monitoring of the offshore wind farm could help clarify the key risks, such as those posed from collision and/or displacement, and as such be included within the IPMP. IPMP should also like with	Please see our advice in Section 4 above.

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue	NE D6 response
		<p>Natural England highlights that compensation monitoring is undertaken to observe the success of the compensation measures and not to test the predictions of the ES. Therefore, we advise that further monitoring is required of residual concerns and to test agreed hypothesis.</p>	<p>conditions within the DCO/dML.</p>	
3	[APP 276] Section 3.5	<p><u>Benthic Ecology</u> It remains unclear if all surface laid infrastructure within IDRBNR SAC will be monitored post construction and for how long. Or will any monitoring only be along a subsection. Again, as with Ornithology, we highlight that compensation monitoring is undertaken to observe the success of the compensation measures and not to test the predictions of the ES. Therefore, we advise that further monitoring is required of residual concerns and to test agreed hypothesis.</p>	<p>Natural England advises that all infrastructure within IDRBNR SAC should be monitored post installation to test particular hypotheses relating to significance and duration of impacts</p>	<p>The issue of Hypotheses to be tested remains. Natural England advises the IPMP needs to be updated to ensure the benthic hypothesis are updated to ensure necessary mitigation as identified though the R&amp;I log is appropriately monitored and adaptive management appropriately secured.</p>