



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Rampion Two Offshore Wind Farm

Appendix B2 to the Natural England Deadline 2 Submission

**Natural England's Comments on 8.25.7 - Appendix 7 – Further information
for Action Point 33 – Kittiwake Implementation and Monitoring Plan –
[REP1-026]**

For:

The construction and operation of the Rampion 2 Offshore Windfarm located
approximately 13km off the Sussex coast in the English Channel.

Planning Inspectorate Reference EN010117

20 March 2024

Natural England's Advice on the Kittiwake Implementation and Monitoring Plan

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

- [REP1-026] 8.25.7 - Appendix 7 – Further information for Action Point 33 – Kittiwake Implementation and Monitoring Plan

1. Summary

The Applicant has provided further details of the proposed Kittiwake Implementation and Monitoring Plan (KIMP). The plan involves entering into an agreement with RWE Dogger Bank South (DBS) to allocate nesting sites on the pre-existing artificial nesting structure (ANS) at Gateshead to Rampion 2. We consider this to be an appropriate and proportionate measure to compensate for the small contribution of Rampion 2 to the in-combination adverse effect on the kittiwake feature of Flamborough and Filey Coast (FFC) SPA. Our main comment is that the Applicant has used the central estimate of their kittiwake impacts as the basis for calculating how many nesting spaces will be required to compensate for their impact, whereas it is our advice to all offshore wind (OWF) developers that the 95% upper confidence limit estimate should be used to calculate this.

2. Detailed Comments

Table 1 Summary of Key Issues: Document Reviewed – [REP1-026] - 8.25.7 - Appendix 7 – Further Information for Action Point 33 – Kittiwake Implementation and Monitoring Plan

Point Ref	Location within Submitted Document			Natural England Response	
	Section	Page	Para Number	Key Concern	Natural England's Advice to Resolve the Issue
1	4	8	4.1.3	The Applicant has calculated the requirements for compensation on the basis of the central impact estimate (0.72) rather than the 95% upper confidence limit (UCL) value, as NE has consistently advised OWF developers since the Hornsea 3 project.	Calculate how many of the 95% UCL of 66 predicted annual kittiwake mortalities (ES Chapter 12, Offshore and intertidal ornithology) should be apportioned to FFC SPA and use this figure as the basis for the estimated compensation quantum.
2	7	16	7.1.1	The Applicant is proposing to set up an Offshore Ornithology Engagement Group (OOEG) to oversee the compensatory measure.	Given the collaborative nature of the proposal, it would be preferable if the KIMP stated that a single OOEG covering all projects dependent on the tower be set up, to avoid duplication of effort.
3	7	16	7.2.1	It would be useful to have details of which existing colonies with connectivity to the DBS ANS will be monitored as part of the creation of a baseline.	Provide details on which other colonies will be monitored as part of the baseline and how these were selected.