THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

Rampion Two Offshore Wind Farm

Appendix B4 to the Natural England Deadline 4 Submission

Natural England's Advice on the Kittiwake Implementation and Monitoring Plan, and the Guillemot and Razorbill Evidence and Roadmap

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

---

3 June 2024

Natural England's Advice on the Kittiwake Implementation and Monitoring Plan, and the Guillemot and Razorbill Evidence and Roadmap

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

- [REP3-059] 8.64 Kittiwake Implementation and Monitoring Plan (tracked changes)
- [REP3-060] 8.65 Guillemot and Razorbill Evidence and Roadmap

1. Summary

[REP3-059] 8.64 Kittiwake Implementation and Monitoring Plan (tracked changes)

Following Natural England's comments on the previous iteration of the Kittiwake Implementation and Monitoring Plan (KIMP), the Applicant has now included consideration of the 95% upper confidence interval (UCI) impact value in the document, which is welcomed. We advise that it is important to consider this value as part of an appropriately precautionary approach given the multiple layers of uncertainty that exist within the assessment process and confidence in compensatory measures. We note that the Applicant has also now stated that the Offshore Ornithology Engagement Group is likely to comprise multiple developers as well as key stakeholders. We emphasise that this group will be essential for effective coordination of agreed protocols and strategic monitoring.

[REP3-060] 8.65 Guillemot and Razorbill Evidence and Roadmap

Natural England are broadly supportive of the measures proposed in this document to provide compensation for impacts on guillemot and razorbill through reduction of disturbance at small colonies in the South-west. Although disturbance certainly represents a general threat to guillemot and razorbill breeding success, the nature and severity of any impact is likely to vary significantly between individual colonies. We advise that it will require significant amounts of on-site monitoring and engagement with local experts to establish a baseline for the current level of disturbance and its impact on colony productivity at any given site, and to establish what measures might effectively mitigate any disturbance occurring.

2. Detailed Comments

Table 1 Summary of Key Issues Document Reviewed - *[*REP3-059*] 8.64 Kittiwake Implementation and Monitoring Plan (tracked changes)*

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the Issue
1	**4**	**8**	**4.1.2**	Natural England highlights that assessment of collision risk currently relies on limited empirical evidence and contains multiple sources of uncertainty and variability. We advise that Natural England's current recommended parameters represent a reasonable level of precaution in the absence of more reliable data. The request to consider the 95% upper Confidence Interval (UCI) is reflective of the importance of taking into account the multiple sources of variation and uncertainty, and presenting results in a way that does not assign false levels of confidence to predicted impacts. This applies to an even greater extent when considering compensation, which itself introduces new sources of uncertainty around the true effectiveness of measures. Consideration of the 95% Upper Confidence Interval seems particularly reasonable in the case of Rampion 2's impacts on kittiwake at Flamborough and Filey Coast Special Protection Area (SPA), as this would only involve compensating for a single additional potential kittiwake mortality.	We continue to advise that the 95% confidence level is considered.
2	**7**	**18**	**7.1.2**	We note that the Applicant has now stated that the Offshore Ornithology Engagement Group (OOEG) is likely to comprise multiple developers as well as key stakeholders. We note that this is in line with our suggestion that a single OOEG covering all projects dependent on the tower be set up to avoid duplication of effort. We emphasise that this group will be essential for coordination of agreed protocols, implementation of strategic monitoring, and effective data sharing.	We are content that this has been updated in line with our advice.
3	**7**	**18**	**7.2.2**	We note that the Applicant has provided more detail on the other sites that will be monitored as part of the monitoring plan, as requested.	We advise that the sites listed are appropriate, but the list is not exhaustive. Coordination with other developers and key stakeholders will be important for the implementation of a comprehensive monitoring programme.

Table 2 Summary of Key Issues Document Reviewed - *[REP3-060] 8.65 Guillemot and Razorbill Evidence and Roadmap*

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
4	**4**	14	4.1.2	We advise that although recreational disturbance represents a general threat to guillemot and razorbill, it is not certain that it is the key threat affecting any given one of the shortlisted colonies. To confirm this requires a programme of monitoring at each site in which the number and scale of disturbance events is recorded and an effort is made to quantify its impact on the breeding success of the colonies (although we recognise that some effects such as low-level stress responses are difficult to quantify).	We advise that the next key step for the Applicant is to carry out a significant programme of monitoring at the shortlisted sites, along with engagement with local experts, to establish the current level of disturbance each colony is subject to and what the impacts are on breeding success of the guillemot and razorbill populations there. This should then be used to inform what compensation measures are likely to be effective at each particular site and to set a baseline against which the effectiveness of the proposed measures can be compared.

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
5	**4**	15-17	4.2.5-4.2.12	We advise that it is difficult to say how vulnerable a site is to incursions without examining the site directly. The Watson *et al.* (2014) study cited examined effects of disturbance on a burrow-nesting species (storm petrel), where the walkers were likely coming into close proximity with the burrows. We advise that it is reasonable to assume that the disturbance effects of walkers are much less for a cliff-nesting species. This is due to the fact that it is unlikely in most cases that colonies will be accessible to walkers, and in the majority of locations walkers will be out of sight and likely to be some distance away. We acknowledge that there is a potential pathway for disturbance or direct mortality to occur if walkers throw or dislodge material from the clifftop into a colony below. We advise that most of the examples of disturbance caused by dogs cited would also be far less applicable to cliff-nesting species, with the possible exception of noise disturbance. Furthermore, we advise that the examples given here of disturbance and mortality due to incursion by birdwatchers are unlikely to be as applicable to cliff-nesting species in most locations, as they are to species that nest on more accessible ground.	We advise this is considered when identifying the most appropriate sites for interventions.
6	**4**	18-19	4.2.16-4.2.17	We note that it is certainly possible that watercraft/aircraft pose a significant disturbance risk to auk colonies in the southwest. We advise that for the purposes of compensation, it is essential that the amount of disturbance each particular colony is subject to is monitored for a significant period of time in order to assess the likelihood that this is a major factor affecting the success of that particular colony.	See recommendation for point 4.
7	**5**	24	5.1.9	We advise that the distance at which disturbance effects can be observed is likely to vary significantly both between species and between colonies within a single species. Therefore, establishing appropriate set back distances for the colonies listed may require a dedicated study effort. It may be the case that different watercraft warrant different set back distances depending on the effect they are observed to have.	See recommendation for point 4.
8	**5**	25	5.1.14	We broadly agree with this monitoring approach and would add that it is important that as much time as possible is spent observing the colonies to record the number of disturbance events the colonies are subject to and their consequences, and also to gather as much data as possible on the direct causes of nest failure.	We advise this is considered in the survey design.
9	**6**	46	6.13.6	We agree that hiring a warden or ranger is likely to be beneficial to sites where this is not already in place.	N/A
10	**6**	46	6.13.7	We agree that stakeholder engagement could be an effective avenue for raising awareness and reducing disturbance at these sites.	N/A
11	**7**	50	7.1.1	We emphasise that site-specific surveys conducted during the breeding season to monitor productivity are essential for establishing a baseline against which the effect of any measures implemented can be assessed.	We advise that it should be ensured that site-specific surveys include effective monitoring of current productivity at each colony.
12	**8**	52	Table 8.1	We note that the Applicant states they have used the Hornsea Four method for calculating compensation quanta but has not provided details of the parameters used, so the calculations cannot be checked for accuracy.	We advise that a clear explanation of the method and parameters used to calculate the compensation quanta is submitted in an updated document.

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
13	**8**	52	Table 8.1	We note that the Applicant has only considered a 1:1 compensation ratio. We advise that 2:1 and 3:1 compensation ratios are also presented.	We advise that the document is updated to also include 2:1 and 3:1 compensation ratios.