



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

Rampion Two Offshore Wind Farm

**Appendix B5 to the Natural England Deadline 5 Submission**

**Natural England's Advice on the further Information for Action Point 34 - Guillemot  
and Razorbill and the Habitats Regulations Assessment (Without Prejudice)  
Derogation Case Rev B**

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

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09 July 2024

**Natural England’s Advice on the further Information for Action Point 34 - Guillemot and Razorbill and the Habitats Regulations Assessment (Without Prejudice) Derogation Case Rev B**

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

- [REP4-066] 8.25.8 - Applicant’s Post Hearing Submission – Issue Specific Hearing 1 Appendix 8 Further Information for Action Point 34 - Guillemot and Razorbill Rev B (Tracked)
- [REP4-015] 5.10 Habitats Regulations Assessment (Without Prejudice) Derogation Case Rev B (tracked)
- [REP4-058] 7.22 Commitments Register Rev D (tracked)

**1. Summary**

**[REP4-066] Guillemot and Razorbill in-combination assessment (tracked changes)**

The tracked changes in document [REP4-066] 8.25.8 - Further Information for Action Point 34 - Guillemot and Razorbill Rev B comprise corrections to some of the errors in one table of guillemot abundance figures which Natural England highlighted in our previous comments ([REP3-080] Appendix B3 to the Natural England Deadline 3 Submission). We note that some errors persist in other tables of abundance figures in this document and recommend that all tables are reviewed, however we do not expect any corrections to materially affect the conclusions. All other comments made in Appendix B3 to the Natural England Deadline 3 Submission regarding this document still stand. We note that the Applicant has concluded that adverse effect on integrity (AEOI) can be ruled out for all of the features considered. **Natural England advise that we do not agree with this conclusion and consider that Rampion 2 will make a contribution to in-combination adverse effects to the three sites under consideration, albeit a modest one.** As a range of scenarios were presented, we present this summary of our conclusions:

Species & SPA	Projects included in in-combination assessment	Natural England’s advice on the conclusion
Guillemot, Flamborough and Filey Coast (FFC SPA)	Rampion 2 plus all consented projects	AEOI cannot be ruled out
	Rampion 2 plus all consented projects (excluding Hornsea Four)	AEOI can be ruled out
	Rampion 2 plus all other projects	AEOI cannot be ruled out
	Rampion 2 plus all other projects (excluding Hornsea Four)	AEOI cannot be ruled out
Razorbill, FFC SPA	Rampion 2 plus all consented projects	AEOI cannot be ruled out
	Rampion 2 plus all other projects	AEOI cannot be ruled out
Guillemot, Farne Islands SPA	Rampion 2 plus all consented projects	AEOI can be ruled out
	Rampion 2 plus all other projects	AEOI cannot be ruled out

**HRA (without-prejudice) Derogations case (tracked changes)**

Throughout this document, the Applicant has referred to their predicted impacts on the guillemot and razorbill features of FFC SPA and the guillemot feature of the Farne Islands SPA using a single impact value calculated using the Applicant’s preferred displacement rate and displacement mortality rate of 50% and 1%, respectively. We do not agree with this and advise that the full range of possible impacts based on possible displacement rates of 30-70% and displacement mortality rates of 1-10% are presented, rather than the Applicant’s preferred values alone.

We refer to [REP4-091] Appendix B4 to the Natural England Deadline 4 Submission for our detailed comments on the Applicant’s proposed compensatory measures for kittiwake, guillemot and razorbill. We broadly consider the proposed approaches to be appropriate and proportionate, although we note that significant monitoring efforts will be required at each colony considered for guillemot and razorbill compensation to establish whether recreational disturbance is currently having a significant impact on the success of those colonies, and what methods may be effective in addressing it

2. Detailed Comments

**Table 1 Summary of Key Issues Document Reviewed - [REP4-066] 8.25.8 Appendix 8 – Further Information for Action Point 34 – In Combination Assessment Update for Guillemot and Razorbill (tracked changes); [REP4-015] 5.10 Habitat Regulations Assessment (Without Prejudice) Derogation case (tracked changes); [REP4-058]7.22 Commitments Register Rev D (tracked)**

Document Reviewed - [REP4-066] Appendix 8 – Further Information for Action Point 34 – In Combination Assessment Update for Guillemot and Razorbill (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	3	11-54	Tables 3.1, 3.2, 3.7, 3.8, 3.13	In our previous comments we noted some addition errors in table 3.1 and advised that the Applicant should review their figures. The Applicant has amended the figures in table 3.1, which is welcomed. However, we note that the other tables of abundance figures have not been updated and still contain multiple addition errors.	Ensure that all tables of abundance figures have been robustly reviewed so that future cumulative/in-combination assessments are based on accurate totals.
2	3	11-58	Tables 3.1 – 3.15	Note that Sheringham and Dudgeon Offshore Wind Extension Projects have now been consented. We note that the impacts on the guillemot feature of FFC SPA are required to be compensated for as part of those projects’ Development Consent Order (DCO).	We advise that Sheringham and Dudgeon Extension Projects Offshore Wind Farm are considered as part of the consented projects.
3			Remainder of document	The only changes made to the document compared to the previous version are some corrections to the guillemot abundance figures in table 3.1, which do not affect our conclusions. Therefore, all the comments made at deadline 3 still stand for this document.	See [REP3-080] Appendix B3 to the Natural England Deadline 3 Submission for our full advice on this document, which remains unchanged.
Document Reviewed - [REP4-015] 5.10 Habitat Regulations Assessment (Without Prejudice) Derogation case (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
4	1,3,4,6	5, 26, 26, 29, 64	1.1.3, 3.4.2, 3.5.2, 4.2.6, 6.2.6	Throughout this document, the Applicant has only listed mortality values for guillemot and razorbill based on their preferred displacement and displacement mortality rates of 50% and 1%, respectively, which Natural England does not agree with. Instead, a range of possible mortality values should be presented, based on consideration of a range of possible displacement and displacement mortality rates, to reflect the inherent uncertainty of this assessment.	We advise that when referring to the impacts of the Project on the guillemot and razorbill features of FFC SPA and the guillemot feature of the Farne Islands SPA, the full range of possible impacts based on possible displacement rates of 30-70% and displacement mortality rates of 1-10% are presented, rather than the Applicant’s preferred values alone.
5	1	11	1.3.4	Minor typo - this paragraph should read: “... Natural England disagreed with the Applicant’s conclusion for impacts on kittiwake, guillemot and razorbill features of the FFC SPA, and the guillemot feature of the <b>Farne Islands</b> SPA, in-combination”	N/A
6	6	75	6.2.43	Natural England provided comments on the Guillemot and Razorbill Evidence and Roadmap to the effect that, while it is possible that recreational disturbance is having a negative impact on the colonies the Applicant identified, any compensation would first require demonstrating this though monitoring, in advance of any measure to reduce disturbance being deployed.	We advise that Natural England’s comments on 8.65 Guillemot and Razorbill Evidence Roadmap are taken into consideration (Appendix B4 to the Natural England Deadline 4 Submission).
7	6	76	6.2.51	Note that as of July 2024, the Marine Recovery Fund remains in development.	N/A
8	6	79 - 84	6.2.63 – 6.2.102	As these measures are no longer being considered, these paragraphs are not necessary.	N/A
9	6	85	6.2.103	We wish to clarify that the ranking of the measure within the hierarchy does not on its own indicate that the proposed measure has a high certainty of success. Our comments on the Guillemot and Razorbill Evidence Roadmap provide caveats and measures to be taken into account when considering the likelihood of success of the proposed compensation measure.	We advise that Natural England’s comments on the 8.65 Guillemot and Razorbill Evidence Roadmap are taken into consideration [REP4-091] Appendix B4 to the Natural England Deadline 4 Submission).

10	6	88	6.2.113	See Natural England's previous comments on the Kittiwake Implementation and Monitoring Plan (KIMP).	We advise that Natural England's comments on 8.64 Kittiwake Implementation and Monitoring Plan are taken into consideration [REP4-091] Appendix B4 to the Natural England Deadline 4 Submission).
<b>Document Reviewed - [REP4-058] 7.22 Commitments Register Rev D (tracked)</b>					
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
11		167	C-298	We note that C-298 commits to undertaking post consent offshore ornithology monitoring that will be secured in the In Principle Monitoring Plan (IPMP). This commitment is also echoed in the Statement of Common Ground (SoCG). This has however, not been transferred into the IPMP. We acknowledge that there is a separate Kittiwake Implementation and Monitoring Plan.	In line with the detail provided in the SoCG and as discussed in our meeting with the Applicant on 17 April 2024, Natural England considers there would be merit in undertaking monitoring to better understand the uncertainties regarding how great black backed gulls (GBBG) use the existing Rampion 1 array site, in particular how they roost on the outer array turbines and whether deterrents can reduce roosting behaviour and the level of activity (e.g. foraging) within the array. This monitoring should then be expanded to Rampion 2 to explore how gull behaviour changes once Rampion 2 is constructed and the effectiveness of any deterrents used at Rampion 2.