THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

Rampion Two Offshore Wind Farm

Appendix B6 to the Natural England Deadline 6 Submission

Natural England's Advice on the Rampion 2 Guillemot and Razorbill Evidence and Roadmap and Guillemot and Razorbill Implementation Monitoring Plan. Kittiwake Implementation Monitoring Plan and Response to Examining Authority's Second Written Questions

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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01 August 2024

Appendix B6 - Natural England's Advice on the Rampion 2 Guillemot and Razorbill Evidence and Roadmap and Guillemot and Razorbill Implementation Monitoring Plan. Kittiwake Implementation Monitoring Plan and Response to Examining Authority's Second Written Questions

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

- [REP5-118] 8.65 Guillemot and Razorbill Evidence and Roadmap Rev B (tracked changes)
- [REP5-127] 8.89 Guillemot and Razorbill Implementation and Monitoring Plan
- [REP5-116] 8.64 Kittiwake Implementation and Monitoring Plan Rev B (tracked)
- [REP5-119] 8.81 Applicant's Responses to Examining Authority's Second Written Questions (ExQ2)

1. Summary

[REP5-118] 8.65 Guillemot and Razorbill Evidence and Roadmap Rev B (tracked changes) and [REP5-127] 8.89 Guillemot and Razorbill Implementation and Monitoring Plan

Natural England welcomes the Applicant's efforts to survey potential compensation sites and notes the benefit of this exercise in refining the Applicant's shortlist. We note that these surveys were relatively limited in scope, and we therefore agree with the Applicant's conclusion that further surveys and subsequent baseline monitoring should be completed in the next breeding season to characterise the baseline levels of disturbance and any influence on colony productivity. As the compensation measures proposed would take several years to have a material benefit to the guillemot and razorbill population (if they prove to be effective), it is imperative that work is carried out as early as possible to effectively characterise baseline conditions at the proposed colonies and identify the most effective measures for improving colony breeding success.

[REP5-119] 8.81 Applicant's Responses to Examining Authority's Second Written Questions (ExQ2)

We advise that post-consent monitoring should be carried out. The Applicant has argued that:

1) the number of birds in the Rampion 2 array area is currently inflated due to the attractive effect of the Rampion 1 turbines, which they use for roosting.
2) the number of collisions predicted through collision risk modelling using the SNCB-recommended parameters is overly precautionary.

It would be appropriate to carry out monitoring to test both of these arguments. This would allow the Applicant to confirm whether their impact is minor, as they maintain, and would provide important information to inform our understanding of the behaviour of gulls within an array and would improve our ability to accurately predict collision risk. In addition, Natural England considers there would be merit in undertaking monitoring to test whether deterrents can reduce roosting behaviour and the level of activity (and collision risk) within the Rampion 1 array. This monitoring should then be expanded to Rampion 2 to explore how gull behaviour changes once Rampion 2 is constructed and whether there is a need to mitigate for collision risk at Rampion 2.

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).

2. Detailed Comments

Table 1 Summary of Key Issues Document Reviewed - [REP5-118] 8.65 Guillemot and Razorbill Evidence and Roadmap Rev B (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
	8	51	8.2.2	As requested, the Applicant has provided an explanation of the compensation calculation method used. It is unclear, however, how the fledgling survival rates that have been used were calculated from the demographic rates in Horswill and Robinson (2015). These should be calculated by multiplying the survival rate for each age class up to the age at which an individual reaches maturity. We have not been able to replicate the Applicant's values using this method.	We advise that the Applicant checks the method and calculations used to derive fledgling survival rates, and corrects any errors or clarifies the calculation method used if no errors are found. If compensatory measures are sought by the Secretary of State, the submitted GRIMP would need to be based on any updated values.

	Appendix A			We welcome that the Applicant has carried out initial site surveys to gather information on which sites are the most likely to benefit from measures to reduce disturbance, as well as the fact that the Applicant has collaborated with Five Estuaries to achieve this. The surveys appear to have achieved the main objective of refining the list of proposed sites for compensation. They have been effective at identifying sites where disturbance is unlikely to be having a large impact on the auk colonies found there, and where therefore compensatory measures are unlikely to be effective. While the surveys have identified some sites where there is greater potential for disturbance impacts, the limited nature of the surveys in terms of number of visits (one per site) duration and access (with several sites not being fully visible from the coast) means that they did not have the scope to produce accurate colony counts, nor identify with any certainty sites where disturbance is confirmed to be having a negative impact on breeding success. It is unfortunate that conditions were not ideal for observing potential disturbance events – this is a limitation of snapshot surveys and highlights the need for repeat visits.	We agree with the Applicant's conclusion that further surveys and subsequent baseline monitoring should be completed in the next breeding season to characterise the baseline levels of disturbance and any influence on colony productivity. This additional information should be used to select the colonies and implementation measures that will be included in the GRIMP.

Table 2 Summary of Key Issues Document Reviewed [REP5-127] 8.89 Guillemot and Razorbill Implementation and Monitoring Plan

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
	3	8	3.1.1	See Appendix B4 to the Natural England Deadline 4 [REP4-091] submission for Natural England's comments on the Guillemot and Razorbill Evidence and Roadmap, and see the comment on Appendix A of that report within this submission.	n/a
	6	17	6.4.2	The levels of disturbance recorded in the initial site visits are likely to have a minimal impact on adult survival. The primary way for these compensatory measures to have a positive impact would be through improved productivity, as eggs and chicks are much more vulnerable to disturbance impacts, directly and indirectly, than adult birds. It should therefore be assumed that the measures will take several years to have a material benefit.	We advise that it is imperative that work is carried out as early as possible to effectively characterise baseline conditions at the proposed colonies and identify the most effective measures for improving colony breeding success – and for these to inform the GRIMP in due course.
	6	18	Table 6-1	It is unlikely that the declines recorded in this table can be attributed entirely to recreational disturbance. This table likely represents an optimistic view of the potential of measures at short-listed sites.	To note.

Table 3 Summary of Key Issues Document Reviewed [REP5-116] 8.64 Kittiwake Implementation and Monitoring Plan Rev B (tracked)

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	p14	Table 4:1	We welcome the presentation of a range of values for the compensation quantum for consideration by the Secretary of State. Natural England advises the following aspects should be used: • Input value of 95% upper confidence interval – to reflect the uncertainty regarding the potential impacts of the development • Hornsea 3 step 2 approach – as this takes into account the need for the artificial nesting structure (ANS) to produce recruits to service the structure itself when birds need replacing, rather than draw on the wider biogeographic population to do so; • Ratio of 3:1 – to reflect various uncertainties e.g. the timing and speed of colonisation of the ANS, whether the ANS will grow the population rather than simply relocating breeding birds to it; and the extent to which its recruits will end up breeding in the National Site Network	To note.

				If this approach was accepted, this would mean provision of 33 nest spaces on the Gateshead 'kittiwakery' to account for Rampion 2's requirements.	
2	6	p21	6.2.2	It is stated that *'If the Secretary of State were to accept Natural England's calculation method for the required compensation considering the 95% UCI and a ratio of 3:1 the existing DBS ANS tower at Gateshead would be able to accommodate the 16 nesting spaces required to adequately compensate for the impacts of the Proposed Development assuming the 95% UCI and a 3:1 ratio.'* Natural England points out that 16 nesting spaces is the value derived from the Hornsea 3 Step 1 approach, whereas Natural England considers the Step 2 approach should be used instead.	Compensatory requirements should be determined based on the approach set out in our above comment.

Table 4 Summary of Key Issues Document Reviewed - [REP5-119] 8.81 Applicant's Responses to Examining Authority's Second Written Questions (ExQ2)

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	2	8	Table 2-1 HRA 2.1	We advise that it is not correct to characterise the parameters used for collision risk modelling as being overly conservative. They are considered the most appropriate values to use in the context of significant uncertainty. Natural England has addressed this in [REP3-080] Appendix B3 to the Natural England Deadline 3 Submission. With reference to using the species group avoidance rate as opposed to the species-specific rate for kittiwake, the species group rate is recommended because in the most recent avoidance rates review (Ozsanlav-Harris and others 2023) there was data with which to estimate avoidance rates for this species from only two sites. Whilst kittiwake are a small gull, behaviourally they may be considered as not very similar to the other small gull species for which we have data to estimate avoidance rates, insofar as kittiwake are considered more marine in nature and forage much further offshore than other small species for which we have data (Woodward and others 2019).	We advise that this information is taken into account when considering the appropriate impact values to use for compensation.

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
	2	82	Table 2-19 OR2.1	Natural England have already addressed the Applicant's arguments regarding the parameters used for collision risk modelling in REP3-080. The Applicant argues that the number of great black backed gulls found in the Rampion 2 array area may be inflated due to the birds using the adjacent Rampion 1 turbine platforms as roosting areas, and that this effect will be lessened once the Rampion 2 array is built, as they assert the birds generally avoided flying through the array. Natural England advised that it is possible that the turbines have an attractive effect on the gulls but that the Applicant had not provided any clear evidence that the birds would avoid using the inner array area once it is built. Natural England continue to advise that there is clear potential for the Project to have adverse effects on the UK South-west and Channel great black-backed gull population. The Applicant states that there is no feasible method for the Project to provide compensation for great black-backed gull.	We advise that the Applicant carry out post-consent monitoring to facilitate better understanding of how GBBG are using the existing Rampion 1 array, in particular how that usage relates to birds roosting on the outer array turbines, and whether deterrents can reduce roosting behaviour and as a result the level of activity within the array. This should be followed by post-consent monitoring of the two array areas to establish the distribution and behaviour of GBBG once Rampion 2 is constructed, and to test the assertion that the numbers of great black-backed gulls may be currently inflated due to the attractive effect of the Rampion 1 array and that these numbers will be reduced post construction. We also advise that, to test the Applicant's assertion that the SNCB recommended avoidance rate for this species is overly precautionary, the Applicant should consider monitoring of collisions within the Rampion 2 array area. This will help confirm the true impact of the OWF and establish more effectively whether there is a significant effect. This should be secured in the IPMP.

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
					The findings of these investigations should in turn inform whether there is a need for Rampion 2 to mitigate the impacts on GBBG through the use of roost deterrents, should that be established as a significant driver of collision risk. We note the ExA's reference to compensation. To date, compensation for seabird impacts from offshore wind has solely been in the context of the Habitats Regulations, but it is recognised that compensation is an integral part of the mitigation hierarchy for biodiversity impacts in general. Measures that would benefit GBBG and thereby offset the impacts would likely to involve interventions at breeding colonies and focus on increasing the number of breeding pairs and/or their productivity. Relevant measures would be vegetation management to increase the area of suitable breeding habitat or installation of predator fencing to exclude mammalian predators (e.g. fox, brown rat). However, identifying suitable colonies for such interventions would take some time and therefore their development would fall beyond the Examination timetable.

References

- Horswill, C. & Robinson, R.A. 2015. Review of Seabird Demographic Rates and Density Dependence. JNCC Report No. 552. JNCC, Peterborough.
- Ozsanlav-Harris, L., Inger, R. and Sherley, R. 2023. Review of data used to calculate avoidance rates for collision risk modelling of seabirds. JNCC Report 732, JNCC, Peterborough, ISSN 0963-8091.
- Woodward, I., Thaxter, C.B., Owen, E., Cook, A.S.C.P. 2019. Desk-based revision of seabird foraging ranges used for HRA screening. BTO Research Report No. 724, The British Trust for Ornithology, The Nunnery, Thetford, Norfolk IP24 2PU