



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

Outer Dowsing Offshore Wind Farm

**Appendix I1 to the Natural England Deadline 1 Submission
Natural England's comments on Onshore Ornithology**

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

24th October 2024

Appendix I1 – Natural England’s Advice on documentation related to Onshore Ornithology

In formulating these comments, the following documents have been considered in relation to the impacts of Outer Dowsing Offshore Wind Farm (ODOW) on onshore ornithology:

- [AS1-108] 13.2 Addendum Winter Bird Survey 2023-2024
- [AS1-001] The Applicant's Response to Section 51 Advice Covering Letter
- [PD1-093] 15.11 Additional clarifications relating to Natural England's Relevant Representations (Appendix I Onshore Ornithology)

Given advice provided in this Appendix, Natural England will undertake further consideration of the following documents and advise accordingly at the next appropriate deadline

- [AS1-096] 15.14 Addendum to RIAA Onshore Ornithology
- [PD1-058/059] 8.13 Schedule of Mitigation Clean/tracked

Summary of Advice

Natural England welcomes the provision of the second year of onshore bird survey data [AS1-108]. Having reviewed this data in light of the first year of bird data, we do not agree with the Applicant’s assessment of significance of impacts on SPA interest features namely Pink Footed Goose, Dark Bellied Goose, Golden Plover, Lapwing and Curlew whilst located within Functionally Linked Land (FLL) to The Wash SPA/Ramsar. We also believe that further mitigation measures could be adopted to minimise the impacts.

We will review all the mitigation measures included within various documentation in order to provide further advice on mitigation requirements to avoid an Adverse Effect on Integrity.

Currently, there is minimal resolution on the risks and issues presented on our Joint Relevant/Written Representation [RR-045]. Please see Appendix J of written representation to track issue resolution

Detailed Comments

- 1) [AS1-108] 13.2 Addendum Winter Bird Survey 2023-2024

Natural England welcomes the provision of the second year of onshore bird survey data [AS1-108]. And confirms that a sufficient level of data has now been provided by the Applicant to characterise passage and over-wintering bird usage of FLL at the landfall and along the ECC.

2) Comparison between first and second year of wintering bird data

Natural England notes that there is a significant increase in SPA Pink Footed Goose (PFG), golden plover, lapwing and curlew flock sizes between 2022/23 and 2023/24. These increases range from 2,205% increase for PFG and 83% increase for Curlew. Within AS1-108 the Applicant contests that these differences are not significant because there is no significant change in the distribution and number of flocks, concluding that mitigation measures remain fit for purpose due to birds only utilising fields for a short duration, with no specific preference.

However, Natural England advises that with more birds being reliant on FLL there is heightened sensitivity to disturbance. This is particularly true along the ECC running parallel to A52 and then around the RSPBs Freiston and Frampton nature reserves, the Rivers Witham (the Haven) and Wellend.

3) Mitigation measures

Natural England advises that the principal mitigation measure for overwintering birds is a seasonal restriction to avoid disturbance during sensitive periods. However, where that is not possible management plans will be required to ensure Adverse Effects on Integrity can be avoided. Natural England aims to provide further advice on the feasibility and effectiveness of the Applicants proposed mitigation measures at the next suitable deadline.

4) Preferences within Functionally Linked Land

Natural England advises that there is likely to be inter-annual variation in FLL preference locations due to crop rotation, environmental factors and disturbance. Generally, there is a trend for an increased number of species and abundance the closer to The Wash, in the vicinity of freshwater courses and RSPB Nature reserves, something which the Applicant has identified may require more intensive mitigation measures. However, for some species such as PFG it has been observed by the Applicant that there is a preference to forage

within fields of winter wheat. This information is critical to determining management measures to minimise impacts from loss/reduction in available FLL particularly where seasonal restrictions have not been presented as a mitigation option. Natural England will advise further on this at the next suitable deadline.

5) Dark-bellied brent goose

Natural England welcomes the additional mitigation measures for dark-bellied brent geese. The mitigation measures include, avoiding work around the Haven, between October and March, to avoid disturbance to dark-bellied brent geese in this hotspot area. In addition, works within 400m of the Haven during April, will be limited to soft start works, and no drilling will take place in April. But, the Applicant states that vegetation clearance and maintenance works, could occur between October to March seasonal restricted area. Natural England will consider if further real time mitigation measures could be adopted if DBBG are located outside of the seasonal restriction area.