



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

Outer Dowsing Offshore Wind Farm

Appendix I2 to the Natural England Deadline 3 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

13th December 2024

Appendix I2 – 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 and the proposed mitigation:

- [PD1-059] 8.13 Updated Schedule of mitigations V2 (Tracked)
- [REP2-040] 8.13 Schedule of Mitigation (Tracked)
- [PD1-056] 8.10 Outline Landscape and Ecological Management Strategy V3 (Tracked)
- [AS1-096] 7.1 Report to Inform Appropriate Assessment Redacted (Tracked)
- [PD1-096] 15.14 Addendum to RIAA Onshore Ornithology

Introduction

Further to Natural England’s advice provided at Deadline 1 in Appendix I1 [REP1-066], Natural England has reviewed the mitigation measures in relation to onshore ornithology stipulated in the updated Schedule of mitigations [PD1-059 and REP2-040], the Outline Landscape and Ecological Management Strategy (OLEMS) [PD1-056], Report to Inform Appropriate Assessment (RIAA) [AS1-096] and addendum to onshore ornithology [PD1-096].

Detailed Comments

1. [PD1-059] 8.13 Updated Schedule of mitigations V2 Tracked

Natural England has reviewed the updated Schedule of mitigations [PD1-059 and REP2-040] in relation to impacts on Annex I birds from The Wash Special Protection Area (SPA) utilising functionally linked land during the passage and overwintering period. Natural England notes that the focus of the updated mitigation measures is on reducing noise disturbance, but not visual disturbance. Whilst we welcome the commitment to not undertake installation works within 400m of The Wash, The Haven or areas designed to enhance bird numbers e.g. compensation areas, during the sensitive periods for Dark Bellied Geese; other activities which could cause visual disturbance to birds could still occur. Therefore, Natural

England queries if further mitigation measures can be adopted to minimise the visual disturbance impacts?

In addition, there remains limited mitigation of disturbance to Annex I birds such as Pink Footed Goose (PFG), golden plover, lapwing and curlew beyond this area, particularly in the Export Cable Corridor (ECC) running parallel to the A52. Therefore, Natural England queries if the seasonal restriction could be extended to other parts of the ECC?

Where seasonal restrictions are not possible, we advise that the Applicant should consider adopting further mitigation measures in the form of a management plan (as included in our Relevant Representations [RR-045] for PFG and as advised for Dudgeon and Sheringham Extension projects [RR-063, [REP1-135](#), [REP1-037](#)]. We would also welcome commitments implemented by the Applicant to limit the spatial extent of any disturbance at any one time. This is because we do not believe mitigation commitments to only work in 'small teams' sufficiently reduces the visual disturbance to acceptable levels on their own and potentially reduces availability of large areas of functionally linked land at the same time.

Lastly, Natural England notes from the Schedule of Mitigation update [PD1-058/059] that construction of the landfall noise bund will be limited to the months of August and September between the crop breeding and non-breeding seasons. For this issue to be resolved, this commitment must also be reflected in the OLEMS [PD1-056], as it currently states creation of the bund may also take place in March.

2. [\[AS1-096\] 7.1 Report to Inform Appropriate Assessment Redacted Tracked and \[PD1-056\] 8.10 Outline Landscape and Ecological Management Strategy V3 Tracked](#)

In addition, we note that the Report to Inform Appropriate Assessment (RIAA) [AS1-096] does not consider the second year of onshore bird data, but does include the suggested mitigation from the Schedule of Mitigation [PD1-059]. As highlighted above Natural England advises that the RIAA is updated to include the further data set and takes in consideration our advice provided at Deadline 1 [REP1-066] and Deadline 3 in relation to potential impacts and the need for further mitigation measures to remove the risk of an Adverse Effect on Integrity of The Wash SPA.

Furthermore, Natural England notes that the mitigation measures within the Schedule of Mitigation [PD1-059], RIAA [AS1-096], and Outline Landscape and Ecological Management

Strategy [PD1-056] do not align. Natural England advises that all three documents are updated accordingly, and the advice provided on the Schedule of Mitigation [PD1-059] in relation to mitigation measures to the functionally linked land are fully considered.