

DOGGER BANK D WIND FARM

Preliminary Environmental Information Report

Volume 2

Appendix 13.1 Consultation Responses for Offshore
and Intertidal Ornithology

Document Reference No: 2.13.1

Date: June 2025

Revision: V1



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APPENDIX 13.1 CONSULTATION REPONSES FOR OFFSHORE AND INTERTIDAL
ORNITHOLOGY

Document Title:	Volume 2, Appendix 13.1 Consultation Responses for Offshore and Intertidal Ornithology
Document BIM No.	PC6250-APM-XX-OF-RP-EV-0123
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Prepared For:	Dogger Bank D Offshore Wind Farm

Revision No.	Date	Status / Reason for Issue	Author	Checked By	Approved By
V1	23/05/2025	Final	AW/ MB	RR	GA

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Glossary

Term	Definition
Array	All wind turbines, offshore platform(s), inter-array cables, and supporting sub-sea infrastructure within the DBD Array Area, as defined, when considered collectively, excluding the offshore export cables.
Array Area	The area within which the wind turbines, inter-array cables and offshore platform(s) will be located.
Baseline	The existing conditions as represented by the latest available survey and other data which is used as a benchmark for making comparisons to assess the impact of the Project.
Commitment	<p>Refers to any embedded mitigation and additional mitigation, enhancement or monitoring measures identified through the EIA process and those identified outside the EIA process such as through stakeholder engagement and design evolution.</p> <p>All commitments adopted by the Project are provided in the Commitments Register.</p>
Design	All of the decisions that shape a development throughout its design and pre-construction, construction / commissioning, operation and, where relevant, decommissioning phases.
Development Consent Order (DCO)	A consent required under Section 37 of the Planning Act 2008 to authorise the development of a Nationally Significant Infrastructure Project, which is granted by the relevant Secretary of State following an application to the Planning Inspectorate.
Effect	An effect is the consequence of an impact when considered in combination with the receptor's sensitivity / value / importance, defined in terms of significance.
Embedded Mitigation	<p>Embedded mitigation includes:</p> <ul style="list-style-type: none"> Measures that form an inherent part of the project design evolution such as modifications to the location or design of the development made during the pre-application phase (also known as primary (inherent) mitigation); and Measures that will occur regardless of the EIA process as they are imposed by other existing legislative requirements or are considered as standard or best practice to manage commonly occurring environmental impacts (also known as tertiary (inexorable) mitigation). <p>All embedded mitigation measures adopted by the Project are provided in the Commitments Register.</p>
Enhancement	Measures committed to by the Project to create or enhance positive benefits to the environment or communities, as a result of the Project.

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Term	Definition
	All enhancement measures adopted by the Project are provided in the Commitments Register.
Environmental Impact Assessment (EIA)	A process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information and includes the publication of an Environmental Statement.
Environmental Statement (ES)	A document reporting the findings of the EIA which describes the measures proposed to mitigate any likely significant effects.
Evidence Plan Process (EPP)	A voluntary consultation process with technical stakeholders which includes a Steering Group and Expert Topic Group (ETG) meetings to encourage upfront agreement on the nature, volume and range of supporting evidence required to inform the EIA and HRA process.
Expert Topic Group (ETG)	A forum for targeted technical engagement with relevant stakeholders through the EPP.
Impact	A change resulting from an activity associated with the Project, defined in terms of magnitude.
Inter-Array Cables	Cables which link the wind turbines to the offshore platform(s).
Mitigation	Any action or process designed to avoid, prevent, reduce or, if possible, offset potentially significant adverse effects of a development. All mitigation measures adopted by the Project are provided in the Commitments Register.
Monitoring	Measures to ensure the systematic and ongoing collection, analysis and evaluation of data related to the implementation and performance of a development. Monitoring can be undertaken to monitor conditions in the future to verify any environmental effects identified by the EIA, the effectiveness of mitigation or enhancement measures or ensure remedial action are taken should adverse effects above a set threshold occur. All monitoring measures adopted by the Project are provided in the Commitments Register.
Offshore	Area seaward of nearshore in which the transport of sediment is not caused by wave activity.
Offshore Development Area	The area in which all offshore infrastructure associated with the Project will be located, including any temporary works area during construction, which extends seaward of Mean High Water Springs. There is an overlap with the Onshore Development Area in the intertidal zone.
Offshore Export Cable Corridor (ECC)	The area within which the offshore export cables will be located, extending from the DBD Array Area to Mean High Water Springs at the landfall.

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Term	Definition
Offshore Export Cables	Cables which bring electricity from the offshore platform(s) to the transition joint bay at landfall.
Offshore Platform(s)	Fixed structures located within the DBD Array Area that contain electrical equipment to aggregate and, where required, convert the power from the wind turbines, into a more suitable voltage for transmission through the export cables to the Onshore Converter Station. Such structures could include (but are not limited to): Offshore Converter Station(s) and an Offshore Switching Station.
Preliminary Environmental Information Report (PEIR)	The PEIR provides a draft environmental assessment and information to support and inform the statutory consultation process in the pre-application phase. The PEIR will be updated to produce the Project's ES that will accompany the DCO application.
Scoping Opinion	<p>A written opinion issued by the Planning Inspectorate on behalf of the Secretary of State regarding the scope and level of detail of the information to be provided in the Applicant's Environmental Statement.</p> <p>The Scoping Opinion for the Project was adopted by the Secretary of State on 02 August 2024.</p>
Scoping Report	<p>A request by the Applicant made to the Planning Inspectorate for a Scoping Opinion on behalf of the Secretary of State.</p> <p>The Scoping Report for the Project was submitted to the Secretary of State on 24 June 2024.</p>
The Applicant	SSE Renewables and Equinor acting through 'Doggerbank Offshore Wind Farm Project 4 Projco Limited'.
The Project	Dogger Bank D Offshore Wind Farm Project, also referred to as DBD in this PEIR.
Wind Turbines	Power generating devices located within the DBD Array Area that convert kinetic energy from wind into electricity.

13.1 Consultation Responses for Offshore and Intertidal Ornithology

1. **Volume 1, Chapter 13 Offshore and Intertidal Ornithology** for the Dogger Bank D Offshore Wind Farm (hereafter ‘the Project’ or ‘DBD’) has been informed by consultation with the Planning Inspectorate and stakeholders following the publication of the Scoping Report (Royal HaskoningDHV, 2024) and the comments contained within the Scoping Opinion (Planning Inspectorate, 2024). This appendix contains details of the relevant comments for **Chapter 13 Offshore and Intertidal Ornithology** and the Applicant’s responses in **Table 13.1-1**.
2. The Applicant previously submitted a Scoping Report in 2023 based on project parameters at that time. The 2024 Scoping Report (Royal HaskoningDHV, 2024) and adopted Scoping Opinion (Planning Inspectorate, 2024) have superseded the 2023 Scoping Report and as such consultation responses on the 2023 Scoping Report are not considered further in this document except where they are included in the 2024 consultee responses and remain relevant to the Project.

Table 13.1-1 Consultation Responses for Offshore and Intertidal Ornithology

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>The Inspectorate notes the reference to the Evidence Plan Process (EPP) in the Scoping Report and the limited information provided in the Scoping Report with regards to specific assessment methodologies, acknowledging that this will also depend on the outcomes of the bird surveys.</p> <p>In the context of intertidal and offshore ornithology, the Inspectorate advises that, amongst other matters, effort is made to agree with relevant consultation bodies via the EPP, the assessment methodologies and parameters to be used for the assessment, including collision risk modelling and displacement/ disturbance assessments. The ES and/ or accompanying appendices should detail the methodological approach taken.</p>	<p>Within the Preliminary Environmental Impact Report (PEIR), details of the methodological approaches taken for the assessments are provided in Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.5. In addition, Appendix 13.3 Offshore Collision Risk Modelling and Appendix 13.4 Offshore Displacement Analysis Report provide detailed methods on the collision risk impact assessment methods and the displacement assessment methods, respectively.</p>
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>The Scoping Report does not explain why barrier effects are to be scoped out of construction or the decommissioning phases. However, the Inspectorate notes the proposed inclusion of an assessment of displacement effects for all phases, and an assessment of both displacement and barrier effects during operation. On this basis, the Inspectorate agrees that an assessment of barrier effects due to presence of wind turbines and other offshore infrastructure on offshore ornithology receptors (including migratory non-seabirds) during the construction and decommissioning phases can be scoped out of the assessment.</p>	<p>The Project welcomes the agreement from the Planning Inspectorate that an assessment of Barrier effects during the construction and decommissioning phases can be scoped out.</p> <p>Barrier effects for the operation and maintenance phase have been addressed in Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.7.2.4. In addition, displacement assessments have been completed for all phases of the Project.</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>(ID 2.2.1) Baseline Conditions:</p> <p>The Scoping Report indicates that the ES will utilise existing data collected for other similar projects within the Dogger Bank Zone (updated where relevant), alongside data collected by the Applicant specifically for the Proposed Development. In addition, opportunities for coordination with other planned developments are currently being explored by the Applicant to share relevant information.</p> <p>The Inspectorate notes that some of the data collected specifically for the Proposed Development (e.g. data to inform the ornithology and marine mammal baseline collected between October 2021 to September 2023) will be at, or approaching, five years old by the expected time of submission of the DCO application in Q3 2026.</p> <p>The ES should include an explanation of why such data is considered applicable and (where not updated) considered to remain representative of the current state of the environment. This should be supported by evidence of agreement with relevant consultation bodies on this point.</p>	<p>The five-year vintage data has been discussed in the Expert Topic Group (ETG) 2 (Offshore Ornithology EIA / HRA) meeting on 23rd May 2024 and further discussions were held on 21st October 2024 following the collection of data from aerial surveys in October 2021. ES / DCO application submission is planned for Q3 2026, therefore submission would occur within five years of the commencement of baseline surveys. Therefore, it is considered that the baseline survey data will be sufficient and is appropriate for assessment purposes. The Dogger Bank D ETG2 (Offshore Ornithology EIA/HRA) Meeting 2 Stakeholder Response Note (PC6250-RHD-XX-OF-ME-EV-0001) was circulated to stakeholders via email on 29th August 2024.</p> <p>In the ETG dated 21st October 2024, Natural England noted understanding of the stance, particularly with the construction of Dogger Bank C which would create difficulties for the collection of additional project baseline data. Natural England would prefer other datasets be used to contextualise the baseline and determine how representative it is (e.g. other Dogger Bank projects), outlining two years of data is a minimum only. The Project will incorporate data from other Dogger Bank wind farms into the ornithological baseline for the ES.</p>
The Planning Inspectorate	Scoping Opinion (02/08/24)	In regard to collision risk impacts:	The Project welcomes the agreement from the Planning Inspectorate that an assessment of collision risk during the construction and decommissioning phases can be scoped out.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
		The Inspectorate acknowledges that this potential impact is associated with the presence of operational wind turbines and agrees to scope this matter out of the construction and decommissioning phases.	
The Planning Inspectorate	Scoping Opinion (02/08/24)	Based on the information provided on the proposed mitigation and control measures, the Inspectorate agrees that significant effects from accidental release of pollution during all phases are unlikely. The ES should provide full details of the proposed mitigation measures for all project phases and describe how they are to be secured through the dDCO or other legal mechanism.	Information on the mitigation measures proposed by the Project which affect intertidal and offshore ornithology features are provided within Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.4.3 . The proposed mitigation measures for the Project may be subject to further change between submission of the PEIR and Environmental Statement (ES). Details of how any proposed mitigation measures are to be secured is provided within the Commitments Register (Appendix 6.3 Commitments Register).
Natural England	Scoping Opinion (02/08/24)	In regard to characterization of the existing environment: We are broadly in agreement with the methodology presented, but note that it has not been presented in sufficient detail to be able to provide detailed comments at this stage. We look forward to seeing the methodology presented in detail in the PEIR.	Detailed baseline characterisation is presented within Appendix 13.2 Offshore Ornithology Baseline Characterisation Report and Appendix 13.5 Intertidal Ornithology Baseline Characterisation Report , which include all relevant information requested by Natural England for inclusion during the Expert Topic Group (ETG) meetings.
Natural England	Scoping Opinion (02/08/24)	In regard to whether all the intertidal and offshore impacts resulting from the Project have been identified in the Scoping Report: We are broadly in agreement with the impacts identified in the scoping report.	The Project welcomes this agreement from Natural England, and corresponding impact assessments for the agreed impact pathways are presented within Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.7 .

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	Scoping Opinion (02/08/24)	<p>In regard to whether Natural England agree with the intertidal and offshore ornithology impacts that have been scoped in/ out for further consideration within the EIA:</p> <p>We are broadly in agreement with the impacts that have been scoped in for further consideration within the EIA. We welcome the Applicant's stated commitment to include all seabird and waterbird species recorded during the baseline surveys in the impact assessment.</p>	<p>The Project has further engaged with Natural England via ETG2 meetings 1, 2 and 3 to agree key receptors requiring impact assessment for each pathway scoped in for assessment following compilation of the full 24 months of site-specific Digital Aerial Survey (DAS) data. Rationale for species inclusion within assessment for each effect pathway is provided in Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.6.4.</p>
Natural England	Scoping Opinion (02/08/24)	<p>In regard to whether all relevant data sources have been identified in the Scoping Report:</p> <p>We are broadly in agreement with the identified data sources identified but would welcome consideration of the feasibility of collecting additional project-specific data on flight heights, flight speeds, and nocturnal activity factors to improve the accuracy of collision risk models. We recommend that the Applicant continues to engage with Natural England to consider how the species and colonies of concern and their densities at sea may have been affected by Highly Pathogenic Avian Influenza (HPAI) and how best to factor these impacts into the assessment.</p>	<p>The Project has not collected the further data sets recommended by Natural England in relation to collision risk modelling. This is due to an existing two full years of site-specific data having already been collected following best practice guidance by the time the Scoping Opinion comment was received, with no opportunity to collect the recommended additional data within the Project programme. The Project has included a significant amount of additional information within Appendix 13.2 Offshore Ornithology Baseline Characterisation Report, beyond that typically presented by other projects, to accommodate other requests made by Natural England.</p> <p>The Project has actively engaged with Natural England on the topic of HPAI via ETG2 meetings 1, 2 and 3 on how to best consider HPAI within assessments. Consequently, the Project has provided a literature review of HPAI potential effects for key seabird species within Appendix 13.2 Offshore Ornithology Baseline Characterisation Report, as agreed within Natural England.</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	Scoping Opinion (02/08/24)	<p>In regard to the proposed assessment approach:</p> <p>We are broadly in agreement with the methodology presented but note that it has not been presented in sufficient detail to be able to provide detailed comments at this stage, and look forward to seeing the methodology presented in detail in the PEIR. We note that the appropriate seasonal definitions to use may be informed by the results of the baseline surveys.</p>	<p>Details of the methodological approaches to assessment are provided in Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.5. In addition, Appendix 13.3 Offshore Collision Risk Modelling and Appendix 13.4 Offshore Displacement Analysis Report provide detailed methods on the collision risk impact assessment methods and the displacement assessment methods, respectively. Appendix 13.2 Offshore Ornithology Baseline Characterisation Report also provides information and context on appropriate seasonality for assessment.</p>
Natural England	Scoping Opinion (02/08/24)	<p>The report states: “Where possible, the Applicant will use as-built project parameter information (if available) as opposed to consented parameters to reduce inaccuracies and avoid an overly precautionary Cumulative Effect Assessments (CEA) approach”. If this includes updating CRM estimates from other OWFs with 'as-built' parameters, NE require proof that new collision figures are 'legally secured', and any CRM parameters etc. are agreed with NE. We recommend that for the offshore ornithology assessments the consented collision predictions should be used for projects included within the cumulative/incombination collision assessments. We recommend that DBD consider our advice regarding as built vs consented scenarios provided during the recent Norfolk Boreas examination and on Non-Material Changes (NMCs) during the East Anglia One North/East Anglia Two examinations.</p>	<p>At the request of Natural England, the cumulative/ in-combination collision assessments are based on consented collision predictions and not the as-built predictions, unless the as-built design has been 'legally secured'. Cumulative assessments are provided in Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.8. In-combination assessments are found in the separate Special Protection Area (SPA) sections within the Report to Inform an Appropriate Assessment (RIAA) (Document Reference: 5.3).</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	Scoping Opinion (02/08/24)	We welcome the inclusion in the impact assessment of all seabird and waterbird species recorded within the survey areas during baseline surveys, and recognise that the definitive list of species to be included will depend on the results of these surveys.	The Project has further engaged with Natural England via ETG2 meetings 1, 2 and 3 to agree key receptors requiring impact assessment for each pathway scoped in for assessment following compilation of the full 24 months of site-specific DAS data. Rationale for species inclusion within assessment for each effect pathway is provided in Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.6.4.
Natural England	Scoping Opinion (02/08/24)	<p>We recognise that the definitive list of species to be included will depend on the result of the baseline surveys and that the list presented is indicative only. We also note that existing baseline survey data has not been presented and so comment on this is not possible at this time.</p> <p>We note that the seasonal definitions provided in Table 7-19 are likely to be appropriate for species at a broad population scale such as that assessed for EIA, unless more up-to-date information becomes available that suggests changes are required or the results of the baseline surveys indicate that a change is required.</p> <p>However, we recommend that colony and project-specific data be used to inform the seasons used in the Habitat Regulations Assessment (HRA). As such, while the seasons presented in Table 7-19 are likely to be appropriate for the EIA, they are not necessarily appropriate for the HRA, and we would welcome further engagement with the Applicant on the appropriate seasonal definitions once results of baseline surveys are available.</p>	Information regarding the use of the Project area by seabird species seasonally is provided in Appendix 13.2 Offshore Ornithology Baseline Characterisation Report , the results of which have been used to inform assessment approaches provided within the PEIR and RIAA (Document Reference: 5.3).

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	Scoping Opinion (02/08/24)	We recognise that the full list of SPAs and Ramsar sites relevant to the project will be presented in the HRA screening report and therefore have no comment to make on these designated sites or their features at this time. This will be covered in HRA screening process.	The list of SPA and Ramsar sites screened in for assessment are provided within Section 9.3.3 of the RIAA (Document Reference: 5.3)
Natural England	Scoping Opinion (02/08/24)	We advise that any tern species identified as present within the survey areas by the baseline surveys are included for assessment in the EIA.	Information on the presence of tern species within the Project is provided within Appendix 13.2 Offshore Ornithology Baseline Characterisation Report , with frequency and abundance also summarised in Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.6.4 . Connectivity between the Project and tern species was limited to migratory months alone and therefore tern species were considered for migratory collision risk only, the assessment of which is presented in Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.7.2 .
Natural England	Scoping Opinion (02/08/24)	Natural England welcomes planned further consultation on survey requirements to evidence whether intertidal birds of conservation concern are foraging in intertidal habitats (and indeed inshore waters) that may be subject to permanent or temporary habitat loss. Consideration will also need to be given to impacts to functionally linked land used by species of conservation concern.	Noted.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	Scoping Opinion (02/08/24)	<p>We welcome the inclusion of a quantitative assessment of displacement impacts of the array and offshore Export Cable Corridor (ECC) during construction. We note that the species to be included for displacement assessment will depend on the result of the baseline surveys.</p> <p>We note that insufficient detail has been provided here for us to be able to comment on displacement assessment methodology at this time. We look forward to further engagement with the applicant around the appropriate methodology and parameters to use as part of the EPP process and to seeing more detail on methodology presented in the PEIR/ES.</p>	<p>The Project has engaged further with Natural England via ETG2 meetings 1 and 3 in relation to assessment requirements for the ECC, following route refinement. The species for inclusion and subsequent most appropriate dataset to inform baseline characterisation was discussed and agreed with Natural England during ETG2 meetings 1, 2 and 3.</p>
Natural England	Scoping Opinion (02/08/24)	<p>Natural England welcome the Applicant's commitment to the development of a Vessel Management Plan and look forward to further engagement with the Applicant on the development of this plan.</p>	<p>An overview of embedded mitigation, including a Vessel Management Plan, is provided within Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.4.4. The Project will engage with Natural England on appropriate commitments within the plan which will benefit ornithology receptors.</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	Scoping Opinion (02/08/24)	<p>2023 comments:</p> <p>We are broadly in agreement with the proposed collision risk methodology presented, but note that insufficient detail has been provided here for us to be able to comment in detail on collision risk methodology and parameters at this time. We look forward to further engagement with the applicant around the appropriate methodology and parameters to use as part of the EPP process and to seeing more detail on methodology presented in the PEIR/ES.</p> <p>2024 Updated Comments:</p> <p>In December 2023 we provided the Applicant with Natural England's updated advice on calculating abundance estimates, and their associated standard deviations, for use in sCRM. We highlight that this updated guidance should be used to inform the ornithological impacts assessments presented at PEIR.</p>	The Project can confirm that latest Statutory Nature Conservation Body (SNCB) guidance in relation to collision risk modelling has been followed as detailed in Appendix 13.3 Offshore Collision Risk Modelling .
Natural England	Scoping Opinion (02/08/24)	We would welcome additional consideration of the evidence gaps surrounding flight heights, flight speeds, and nocturnal activity factors, and the fact that these are likely to be influenced by site, season, and weather conditions. Consideration of the feasibility of collecting additional project-specific data on flight heights, flight speeds, and nocturnal activity factors to improve the accuracy of collision risk models would be welcomed.	The Project has not collected the further data sets recommended by Natural England in relation to collision risk modelling. This is due to an existing two full years of site-specific data having already been collected following best practice guidance at the date of the request, with no opportunity to collect the recommended additional data within the Project programme. Consideration of evidence gaps surrounding collision risk input parameters is provided within Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.7.2.2 .

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Natural England	Scoping Opinion (02/08/24)	We note that a definitive list of species to be assessed for collision risk will depend on the results of the baseline surveys and that the list presented is therefore indicative only.	The Project has further engaged and agreed the species for assessment of collision risk during the ETG meetings.
Natural England	Scoping Opinion (02/08/24)	We are broadly in agreement with the proposed displacement assessment methodology presented, but note that insufficient detail has been provided here for us to be able to comment in detail on methodology and parameters at this time. We look forward to further engagement with the applicant around the appropriate methodology and parameters to use as part of the EPP process and to seeing more detail on methodology presented in the PEIR.	The Applicant has further engaged and agreed the approach taken for assessment of displacement during the ETG2 meetings 1, 2 and 3. Detail is provided within Appendix 13.4 Offshore Displacement Analysis Report on the methods employed by the Project to assess displacement effects.
Natural England	Scoping Opinion (02/08/24)	We note that a definitive list of species to be assessed for displacement will depend on the results of the baseline surveys and that the list presented is therefore indicative only.	The Project has further engaged with Natural England during ETG2 meetings 1, 2 and 3 to discuss and agree species for inclusion within displacement assessments for PEIR.
Natural England	Scoping Opinion (02/08/24)	We advise that disturbance and displacement impacts on ornithological receptors due to O&M activities within the offshore ECC should be scoped into the assessment, and would welcome the development and implementation of a Vessel Management Plan to mitigate these.	The Project has committed to the adoption of a Vessel Management Plan for work activities within the ECC. The Project will engage with Natural England on appropriate commitments within the plan which will benefit ornithology receptors.

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Natural England	Scoping Opinion (02/08/24)	<p>See comments on section 5.6 above.</p> <p>"It is stated that "Projects that are sufficiently implemented and are expected to be completed before the commencement of the proposed Project will be considered as part of the baseline for the EIA". As advised for Sheringham and Dudgeon Extension projects, Natural England does not consider projects to be 'part of the baseline' in terms of cumulative or in-combination effects, unless the data under-pinning the designation of a site (e.g., distribution, population size, survival rate) were all collected subsequent to the construction or operation of projects.</p> <p>Consideration should therefore be given to built and operational projects to ensure that those excluded from CEA were operational when the environmental characterisation surveys were undertaken, that residual impacts have had the time to be fed through to and captured in estimates of baseline conditions and that ongoing impacts are as predicted. Where this is not the case, projects may need to be considered through CEA rather than as part of the baseline. Furthermore, any projects with ongoing impacts should be considered as part of the cumulative impact assessment."</p> <p>"It is stated that "Where possible, the Applicant will use as-built project parameter information (if available) as opposed to consented parameters to reduce inaccuracies and avoid an overly precautionary CEA approach". If this includes updating CRM estimates from other OWFs with 'as-built' parameters, NE require proof that new collision figures are legally secured i.e., there is no way that any remaining consented capacity could be</p>	<p>The Project has followed the advice provided by Natural England to inform CEA within Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.8.</p>
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		<p>constructed in the future thus invalidating the modelling. Furthermore, any CRM parameters etc. need to be agreed with NE. Currently there is no legal mechanism for this, although there are ongoing discussions between regulators in order to achieve this.</p> <p>Given the above issues, we therefore recommend that for the offshore ornithology assessments the consented collision predictions should be used for projects included within the cumulative/in-combination collision assessments. We also recommend Dogger Bank D consider our advice regarding as built vs consented scenarios provided during the recent Norfolk Boreas examination 4,5 and regarding Non-Material Changes (NMCs) during the East Anglia One North/East Anglia Two examinations."</p>	
Natural England	Scoping Opinion (02/08/24)	We welcome the inclusion of designated sites outwith the UK that are within foraging range of the project area.	Consideration of transboundary effects on designated sites within foraging range for key seabirds was considered by the Project within the HRA Screening Report (further information can be found in the RIAA (document reference 5.3)). For all transboundary designated sites the potential for a Likely Significant Effect (LSE) was confidently ruled out.

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Natural England	Scoping Opinion (02/08/24)	We are broadly in agreement with the proposed method for establishing the offshore ornithological baseline, the inclusion of 24 months of digital aerial survey data and the coverage of the array area plus 4km buffer. However, we note that there is not much detail presented here on the survey methodology and as such we cannot comment at this time as to whether the coverage will be sufficient. We continue to engage in the EPP.	The Project has further engaged with Natural England on the approach to baseline characterisation during ETG2 meetings 1, 2 and 3. Detailed methodology of the digital aerial survey methods, including coverage of surveys, is provided within Section 2.2.4 of Appendix 13.2 Offshore Ornithology Baseline Characterisation Report .

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	Scoping Opinion (02/08/24)	<p>2023 comments:</p> <p>We note that the baseline surveys began in October 2021, prior to the 2022 outbreak of highly pathogenic avian influenza (HPAI) in seabird populations, but will be completed in September 2023, after the impacts of HPAI in 2022 and 2023. We expect that data collected prior to summer 2022 will be a valid representation of ‘typical’ seabird distribution and density. However, data collected at sea after summer 2022 will need discussion with Natural England to understand how the species and colonies of concern and their densities at sea may have been affected by HPAI. See Annex C Natural England’s note ‘Highly Pathogenic Avian Influenza (HPAI) outbreak in seabirds and Natural England advice on impact assessment (specifically relating to offshore wind)’ from September 2022. Further engagement with Natural England will be required on the potential impacts of HPAI on results of baseline surveys.</p> <p>2024 Updated Comments:</p> <p>Natural England’s HPAI note is no longer attached as an Annex to this response given that it is now already included in the Applicant’s list of data sources used.</p>	<p>The Project has actively engaged with Natural England on the topic of HPAI via ETG2 meetings 1, 2 and 3 on how to best consider HPAI within assessments. Consequently, the Project has provided literature reviews of HPAI potential effects for key seabird species within Appendix 13.2 Offshore Ornithology Baseline Characterisation Report, as agreed within Natural England.</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	Scoping Opinion (02/08/24)	Natural England note that the seasonal definitions provided by Furness (2015) are likely to be appropriate for species at a broad population scale such as that assessed for EIA, unless more up-to-date information becomes available that suggests changes are required or the results of the baseline surveys indicate that a change is required. Natural England would welcome further engagement with the Applicant on the appropriate seasonal definitions once baseline surveys are available.	<p>Appendix 13.2 Offshore Ornithology Baseline Characterisation Report, Section 2.3.2 provides information on the seasons taken forward for assessment. These are based on the bio-seasons presented within Furness (2015). The Project awaits agreement by Natural England once they have reviewed Appendix 13.2 Offshore Ornithology Baseline Characterisation Report.</p> <p>As recommended by Natural England, the seasonal definitions provided by Furness (2015) have been used to inform assessments within Volume 1, Chapter 13 Offshore and Intertidal Ornithology. Context of the appropriateness of the Furness (2015) seasonal definitions for the Project assessments is provided in Appendix 13.2 Offshore Ornithology Baseline Characterisation Report.</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	Scoping Opinion (02/08/24)	<p>2023 comments:</p> <p>Natural England are broadly in agreement with the data sources listed in Table 7-21, but refer the Applicant to previous comments above on seasonality and flight heights. Natural England also note that the results of the last full Seabird census should become available in 2023, and that this should be included as a source of information on seabird population sizes. Natural England also note that there are likely to be sources of data on the impacts of HPAI on seabird populations and colonies that can be included, and recommend that the Applicant engages with Natural England to ascertain how the species and colonies of concern and their densities at sea may have been affected by HPAI and how best to factor these impacts into the assessment. See Annex C Natural England's note 'Highly Pathogenic Avian Influenza (HPAI) outbreak in seabirds and Natural England advice on impact assessment (specifically relating to offshore wind)' from September 2022. Consider inclusion of latest seabird census results, feasibility of collecting site specific information on flight heights, flight speeds, and nocturnal activity factors, and sources of information on impacts of HPAI on relevant seabird populations.</p>	<p>As per previous comments, the Project has actively engaged with Natural England on the topic of HPAI via ETG2 meetings 1, 2 and 3 on how to best consider HPAI within assessments. Consequently, the Project has provided literature reviews of HPAI potential effects for key seabird species within Appendix 13.2 Offshore Ornithology Baseline Characterisation Report, as agreed with Natural England.</p> <p>Where relevant, the project utilised the most contemporary seabird census data to inform assessments within Volume 1, Chapter 13 Offshore and Intertidal Ornithology and RIAA (Document Reference: 5.3).</p> <p>The Project has not collected the further data sets recommended by Natural England in relation to collision risk modelling. This is due to an existing two full years of site-specific data having already been collected at the date of the request. The request has therefore been unable to be implemented in the Project's programme to accommodate any changes / add-ons to pre-existing collection methods.</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
		2024 Updated Comments: We welcome that both the 2023 Seabird census data and Natural England's note on the HPAI outbreak have now been considered by the Applicant. Our advice still stands regarding investigating the feasibility of collecting the site-specific data listed above.	
Natural England	Scoping Opinion (02/08/24)	Natural England are broadly in agreement with the proposed methodology presented, but note that insufficient detail has been provided here for us to be able to comment in detail on abundance and density estimate methodology at this time. We look forward to further engagement with the Applicant around the appropriate methodology and parameters to use as part of the EPP process and to seeing more detail on methodology presented in the PEIR/ES.	Detailed methodology in relation to calculation of abundance and density estimates are provided in Section 2.3 of Appendix 13.2 Offshore Ornithology Baseline Characterisation Report .
Natural England	Scoping Opinion (02/08/24)	Natural England recognise that the full list of SPAs and Ramsar sites relevant to the project will be presented in the HRA screening report and look forward to further engagement with the Applicant on this.	The list of SPA and Ramsar sites screened in for assessment are provided within Section 9.3.3 of the RIAA (Document Reference: 5.3).
Natural England	ETG2: Meeting 1 (25/10/2023)	Does the ETG agree on the use of benchmark approach to characterize the baseline for ECC assessments? Natural England agreed with this approach.	As discussed within the ETG, the benchmark approach would consider red-throated diver for assessment within the PEIR when understanding impacts at the ECC. These impacts are outlined in Section 13.7.1, Volume 1, Chapter 13 Offshore and Intertidal Ornithology .

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	ETG2: Meeting 1 (25/10/2023)	<p>Does the ETG agree with the proposed datasets to be used within the Benchmark Approach for assessment of the ECC.</p> <p>Natural England support the use of the SeaMAST on the basis that it is used alongside additional data sources that consider species' use of the Greater Wash SPA. See our written response (DAS/426551 sent 9th November 23) for further details.</p>	<p>For the assessment of the ECC, the sources outlined within the Natural England response note (DAS/426551) have been used, rather than the SeaMAST data. The data to be used were also discussed in ETG2 Meeting 3. During ETG2 Meeting 3, the Lawson <i>et al.</i> (2016) data were identified as the most up to date publicly available data to inform assessments at the time of drafting the PEIR. The use of the Lawson <i>et al.</i> (2016) data is outlined in Appendix 13.4 Offshore Displacement Analysis Report and the assessment of displacement for the ECC is provided in Section 13.7.1, Volume 1, Chapter 13 Offshore and Intertidal Ornithology.</p>
Natural England	ETG2: Meeting 1 (25/10/2023)	<p>Does the ETG agree with only red-throated diver requiring ECC assessment at an EIA level.</p> <p>Natural England recommend reviewing data from the Greater Wash SPA before determining whether common scoter can be scoped out of the EIA ECC assessment. See our written response (DAS/426551 sent 9th November 23) for further details.</p>	<p>Following review of the Lawson <i>et al</i> (2016) data and refinement of the ECC route, a displacement assessment was not carried out for common scoter as there is no overlap with the species distribution within the SPA and the ECC. Details are provided within Appendix 13.4 Offshore Displacement Analysis Report.</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	ETG2: Meeting 1 (25/10/2023)	Does the ETG agree with the use of the McGregor (2018) stochastic CRM (sCRM) model run stochastically, over the Caneco (2022) model to inform potential collision risk impacts from the Project.	<p>Natural England agreed with the use of McGregor et al. (2018) version of the sCRM, due to the Caneco (2022) still being a BETA version.</p> <p>Since the ETG meeting, the Joint Advice Note from the SNCBs Regarding Bird Collision Risk Modelling for Offshore Wind Developments has been published (SNCBs, 2024), now approving the Caneco (2022) sCRM for modelling. The Caneco (2022) model has therefore been used for CRM. The proposed modelling methods and input parameters within the updated guidance have been followed to inform potential collision impacts from the Project as detailed within Appendix 13.3 Offshore Collision Risk Modelling.</p>
Natural England	ETG2: Meeting 1 (25/10/2023)	<p>Does the ETG agree with the proposed CRM input parameters proposed for CRM?</p> <p>Natural England do not support use of the flight heights and speeds detailed in Skov et al., (2018) and advise using only the parameters presented in “Natural England interim advice on updated Collision Risk Modelling parameters (July 2022)”. See our written response (DAS/426551 sent 9th November 23) for further details.</p>	<p>Discussion regarding appropriate input parameters for CRM during ETG2 Meeting 1 have been superseded by the publication of the Joint Advice Note from the SNCBs Regarding Bird Collision Risk Modelling for Offshore Wind Developments has been published (SNCBs, 2024). The proposed modelling methods and input parameters within the updated guidance have been followed to inform potential collision impacts from the Project as detailed within Appendix 13.3 Offshore Collision Risk Modelling.</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	ETG2: Meeting 1 (25/10/2023)	<p>Does the ETG agree with the proposed displacement and mortality rates for the SNCB approach to displacement assessments using the matrix approach.</p> <p>Natural England agreed with the proposed rates.</p>	<p>Due to expected disagreement between the Applicant and Natural England in relation to appropriate displacement and mortality rates to inform assessments, two sets of rates were presented for discussion. The two sets of rates are referred to as the 'Applicant's' and 'SNCB's' preferred approaches.</p> <p>Natural England agreed that the displacement and mortality rates for the SNCB approach aligned with their preferred approach to displacement assessments for key receptors.</p> <p>The predicted displacement impact when using the SNCB rates are provided for context within Volume 1, Chapter 13 Offshore and Intertidal Ornithology, with the focus of displacement assessments being based on the Applicant's preferred rates. Appropriate justification for the Applicant's deviation from the SNCB approach is provided within Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.7.2.1.</p>
Natural England	ETG2: Meeting 1 (25/10/2023)	<p>Does the ETG agree with the Project's conclusion that the use of SeabORD for displacement assessment is not necessary for this project.</p> <p>Natural England agree that the use of SeabORD is not necessary.</p>	As agreed with Natural England, SeabORD has not been undertaken for the Project.
Natural England	ETG2: Meeting 1 (25/10/2023)	<p>Does the ETG agree with proposed method within the assessment methodology note to inform EIA cumulative assessments.</p> <p>Natural England agrees with the method.</p>	Full methodology outlining the agreed approach to CEA for the Project is provided within Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.8 .

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	ETG2: Meeting 1 (25/10/2023)	Does the ETG agree with the proposed consented project values within the assessment methodology note. Natural England agrees with the method.	Full methodology outlining the agreed approach and impact assessment values for the cumulative effects assessment for the Project is provided within Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.8.
Natural England	ETG2: Meeting 1 (25/10/2023)	Does the ETG agree with the Project's conclusion that the CEF tool is not suitable to inform cumulative assessments for this project. Natural England agrees with this approach.	As agreed with Natural England, the CEF tool has not been used to inform CEA for the Project.
Natural England	ETG2: Meeting 1 (25/10/2023)	Does the ETG agree with the Project's proposed approach to calculation of the EIA level breeding and non-breeding populations for assessment, presented within the assessment methodology note. Natural England broadly agree with the proposed approach but will comment further once sufficient detail on the methodology is provided.	As set out within the Offshore and Intertidal Ornithology Method Statement, the Project originally proposed a regional approach to defining the breeding bio-season populations and the use of the relevant Furness (2015) cited population sizes for the non-breeding bio-seasons. Natural England broadly agreed with this approach during ETG2 Meeting 1. Natural England and Natural Resources Wales (NRW) have since published an interim advice note regarding demographic rates, EIA scale mortality rates and reference populations for use in offshore wind impact assessments (Natural England & NRW, 2024), which now supersedes the method discussed during ETG2 Meeting 1. Accordingly, the approach to inform EIA level reference populations follows the recommended approach within the interim advice note (Natural England & NRW, 2024), as detailed within Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.6.2.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	ETG2: Meeting 2 (23/05/2024)	<p>Does the ETG agree with the incorporation of the recent Dunn et al paper on temporal and spatial differences in availability bias?</p> <p>Stakeholders to provide feedback on the recent Dunn et al paper as to whether this is applicable.</p>	<p>Subsequent feedback received by Natural England on availability bias recommended the use of the older Thaxter <i>et al</i> (2010 and Spencer (2012) rates for assessment, though welcomed the consideration of the Dunn <i>et al</i> (2024) alongside for comparison. The Project has therefore used the older correction rates for assessments presented within Volume 1, Chapter 13 Offshore and Intertidal Ornithology.</p>
Natural England	ETG2: Meeting 2 (23/05/2024)	<p>Does the ETG agree with the species taken through for displacement analysis?</p> <p>Natural England mostly agree with the species taken through, however, they want further investigation into white-billed diver, great northern diver and little auk at PEIR stage through literature review.</p>	<p>As requested within the ETG, the Project has quantitatively assessed auk species, gannet and great northern diver for displacement related effects within the Project Array Area during operation. The Project has also assessed little auk and white-billed diver qualitatively for displacement effects. All such assessments are found in Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.7.1.</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	ETG2: Meeting 2 (23/05/2024)	<p>Does the ETG agree with the species taken through for collision risk analysis?</p> <p>Natural England asked whether for the species described whether a migratory CRM approach would be used. Agreed Natural England would be consulted prior to running final migratory CRM.</p>	<p>The Project explained that kittiwake and gannet would be assessed against collision risk impacts. Since this meeting, the Project decided to also include herring gull, lesser black-backed gull and great black-backed gull for transparency.</p> <p>As discussed with Natural England, the Project has not undertaken migratory CRM to inform assessment conclusions within Volume 1, Chapter 13 Offshore and Intertidal Ornithology, though a qualitative assessment of migratory collision risk is provided in Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.7.2.2. The Project will further engage with Natural England post-PEIR, if migratory collision risk is required to inform ES assessments.</p>
Natural England	ETG2: Meeting 2 (23/05/2024)	<p>Does the ETG agree with the 24 months of baseline characterisation data (collected between October 2021 – September 2023) collected for the project and to be used to inform the ES?</p> <p>Natural England raised that given the programmed time of submission, some data may be beyond the five year mark. Natural England stated “updated surveys do need consideration but this does not nullify the original data”. DBD suggested a technical note setting out methods to which the changes in distribution over time could be addressed. Natural England were supportive of this.</p>	<p>The Project is currently on schedule which would put it within the agreed upon five-year cut off for data to inform the baseline.</p> <p>Changes in distribution of species within the Dogger Bank area is provided for key species in Appendix 13.2 Offshore Ornithology Baseline Characterisation Report.</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	ETG2: Meeting 2 (23/05/2024)	Does the ETG agree with the use of maximum likelihood flight height data to be used in CRM, as recommended in Parker et al, 2022? Natural England are to respond to the flight height data query in writing.	Further engagement with Natural England during ETG2 Meeting 3 confirmed the inbuilt flight heights within the Caneco (2022) should be used to inform species flight heights for CRM, which is the approach taken by the Project.
Natural England	ETG2: Meeting 2 (23/05/2024)	Does the ETG agree with the use of the SNH apportionment tool? The use of SNH apportionment tool is okay. SNH tool calculated a weighted distance on an English perspective, overestimating apportioning to larger distant colonies. Therefore, requires sense checking against tracking studies to ensure site-specific data on connectivity and bird distributions is used and factored in to calculations where possible. Natural England said it would be a case of recognising the bias rather than discounting it. Suggest start from site-specific data.	The SNH apportioning tool has been used for apportionment of impacts to individual designated sites. As suggested by Natural England, tracking studies (where available) have been used to inform the appropriateness of the SNH apportionment results. Details on applicable tracking studies are provided within Appendix 13.2 Offshore Ornithology Baseline Characterisation Report , whilst apportionment methods and results are presented within Appendix A.3 Apportionment Report in the RIAA (Document Reference: 5.3). .
Natural England	ETG2: Meeting 2 (23/05/2024)	Does the ETG agree with the use of a proportional approach to age classes? Natural England are of the view that unless birds are specifically classified as non-breeders they are to be assumed to be adult birds. Therefore, an Applicant's Approach and an SNCB Approach will be presented.	The Project used site-specific data to calculate the age ratios of birds using the site. Where no age identification was given, birds were assumed as being adults as a precaution. This follows the advice provided by Natural England to inform age classes of species recorded. A full methodology of the HRA apportionment process is provided in the Appendix A.3 Apportionment Report in the RIAA (Document Reference: 5.3)..

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	ETG2: Meeting 2 (23/05/2024)	Does the ETG agree with the incorporation of sabbatical breeders in apportionment? Natural England do not consider sabbatical rates for apportionment and so an Applicant's Approach and a SNCB Approach will be taken forward.	Sabbatical rates have not been considered as part of the apportionment process as per the recommendation of Natural England. A full methodology is provided in Appendix A.3 Apportionment Report in the RIAA (Document Reference: 5.3).
Natural England	ETG2: Meeting 2 (23/05/2024)	Does the ETG agree with the non-breeding apportionment method using Furness (2015) as outlined in the Natural England best practice guidance? Yes, but with caveat that where there is site specific data a different approach should be taken. Natural England confirmed that this is still their preferred approach with caveat that exceptions where site-specific data warrants a different approach. Forthcoming BDMPS review expected soon and Natural England will inform the project on timeline for this.	The approach for non-breeding apportionment using the Furness (2015) approach has been applied as per agreement with Natural England. A full methodology of the apportionment process is provided in the Appendix A.3 Apportionment Report in the RIAA (Document Reference: 5.3).
Natural England	ETG2: Meeting 2 (23/05/2024)	Does the ETG agree with the inclusion of offshore breeders in the apportionment process? Natural England are still considering their response to the Outer Dowsing incorporation of offshore breeders. They request that more details on methods would be welcomed. Providing with and without offshore breeder scenarios would be welcomed.	To confirm, offshore breeders have not been included within the apportionment undertaken for the Draft RIAA, however the Project is considering the feasibility of inclusion for the Final RIAA. A full methodology of the HRA apportionment process is provided in the Appendix A.3 Apportionment Report in the RIAA (Document Reference: 5.3).

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	ETG2: Meeting 2 (23/05/2024)	Does the ETG agree with the use of Outer Dowsing data on offshore breeders? Natural England will be providing feedback on Outer Dowsing data and so use for DBD will be based on this response.	Offshore breeders have not been included within the apportionment undertaken for the RIAA, however the Project is considering the feasibility of inclusion for the Final RIAA.
Natural England	ET2: Meeting 3 (21/10/2024)	Can Natural England confirm that the baseline data is acceptable for this programme? Natural England would prefer other datasets be used to contextualise the baseline and determine how representative it is (e.g. other Dogger Bank projects), outlining two years of data is a minimum only. Given the length of time before submission and examination, an attempt to add extra baseline characterisation data would be helpful, with a short description on how these datasets have fed into the baseline and assessment. See DAS/492226 provided on the 04/11/2024 for further detail.	Within Appendix 13.2 Offshore Ornithology Baseline Characterisation Report , contextualisation through the use of other Dogger Bank projects has been provided on a species level within Section 4 .
Natural England	ETG2: Meeting 3 (21/10/2024)	Does the ETG agree with the scope of the intertidal ornithology assessment? As per DAS/492226 provided on the 04/11/2024.- Natural England agrees with this scope.	Noted.
Natural England	ETG2: Meeting 3 (21/10/2024)	Does the ETG agree with the approach to defining the intertidal study area?	Noted.

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		As per DAS/492226 provided on the 04/11/2024, reflecting the agreement log to ETG6 (Onshore Ecology, Ornithology and Land Use).	
Natural England	ETG2: Meeting 3 (21/10/2024)	Does the ETG agree with the approach to the assessment of intertidal ornithology? As per DAS/492226 provided on the 04/11/2024.	Noted.
Natural England	ETG2: Meeting 3 (21/10/2024)	Does the ETG agree with the approach to intertidal ornithology data collection? As per DAS/492226 provided on the 04/11/2024, noting inclusion of data from Bird Track being potentially useful.	Noted.
Natural England	ETG2: Meeting 3 (21/10/2024)	Do Natural England agree with the updated avoidance rates and nocturnal activity factors in the latest guidance (SNCBs, 2024)? Natural England agrees with this but raised the need to check the lesser black-backed gull nocturnal activity factor value. (Since the ETG this has been checked and the Project can confirm it was a typo in the slides and that lesser black-backed gull was modelled with the correct NAF of 0.30 (0.18)).	The Project has used the recommended parameters within the latest guidance note (SNCBs, 2024), as per the recommendation by Natural England. Full methods and parameters of the sCRM are provided within Appendix 13.3 Offshore Collision Risk Modelling .

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Natural England	ETG2: Meeting 3 (21/10/2024)	<p>Do Natural England agree with large gulls being removed from the cumulative assessment due to a minimal contribution due to having low collision estimates?</p> <p>Natural England advises to continue carrying out cumulative assessments for all of the species listed by looking at the cumulative total for the most recent consent and adding Dogger Bank D's on to present the updated total. The impacts on gulls are starting to become evident and cumulative assessments are increasingly important in quantifying impacts (as per DAS/492226 provided on the 04/11/2024).</p>	<p>As per the request of Natural England, and in order to provide an audit trail for future project cumulative assessments, the large gull species have been included within the Project CEA. The assessments are provided in Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.8.</p>
Natural England	ET2: Meeting 3 (21/10/2024)	<p>Can Natural England advise displacement and mortality rates for great northern diver?</p> <p>Natural England can share the most recent displacement advice note which may be helpful, but agree with 4km. Displacement and mortality is the same for red-throated diver. There is a 4km buffer for great northern diver, with a displacement rate of 90-100 and a mortality rate of 1-10 (as per DAS/492226 and the Joint SNCB1 Interim Displacement Advice Note provided on the 04/11/2024).</p>	<p>The Project have used the recommended buffer and the recommended displacement and mortality rates for great northern diver. Context on the appropriateness of such rates to inform assessments is provided within Volume 1, Chapter 13 Offshore and Intertidal Ornithology, Section 13.7.2.1.3.</p>

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Natural England	ET2: Meeting 3 (21/10/2024)	<p>Does Natural England agree with the seasons used for each species as part of the disturbance and displacement assessment?</p> <p>Natural England would require sight of the baseline data in the displacement note prior to agreeing fully (monthly data for kittiwake, guillemot and other auk species before we can feedback on the seasons and apportioning).</p>	<p>Appendix 13.2 Offshore Ornithology Baseline Characterisation Report, Section 2.3.2 provides information on the seasons taken forward for assessment. These are based on the bio-seasons presented within Furness (2015). The Project awaits agreement by Natural England once they have reviewed Appendix 13.2 Offshore Ornithology Baseline Characterisation Report.</p>
Natural England	ET2: Meeting 3 (21/10/2024)	<p>Would Natural England agree with a qualitative HPAI review drawing on the data sources in Slide 23?</p> <p>The RSPB HPAI Seabird Survey, colony growth trends and relevant scientific papers would be the most beneficial to DBD, the DEFRA incident reports are less relevant.</p>	<p>HPAI has been thoroughly considered within Appendix 13.2 Offshore Ornithology Baseline Characterisation Report, with reviews provided for key seabird species.</p>

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Natural England	ET2: Meeting 3 (21/10/2024)	<p>Would Natural England consider a mixture of DAS and other literature to form appropriate age classes? – Furness (2015) or Horswill and Robinson (2015) or latest guidance document on demographic rates (Natural England and NRW)?</p> <p>Natural England disagrees with the use of a theoretical generalized stable age structure to apportion impacts to adults from SPA colonies as it is unlikely to represent actual proportions of adults present and may lead to underestimation of impacts. There is currently a lack of research to inform where birds of different ages go, therefore if there is no site-specific evidence regarding ages and data based on tracking, Natural England’s assumption is if it looks like an adult then they must presume it is an adult.</p>	As per the request of Natural England, site-specific data to determine age classes have been used, as derived from the DAS. In addition, where no site-specific information is available, the assumption is that 100% are adults. A full methodology of the HRA apportionment process is provided in the Appendix A.3 Apportionment Report in the RIAA (Document Reference: 5.3).
NatureScot	Introductory meeting (14/10/2024)	<p>With the Project being in English waters, the assessment will be following Natural England’s approach. Is this okay with NatureScot?</p> <p>NatureScot will not be looking for Scottish assessment for English waters.</p>	As per the agreement with NatureScot, the English assessment methods have been taken forward for the Scottish SPA assessments. Section 9.13 of the RIAA provides assessments of the Scottish sites.
NatureScot	Introductory meeting (14/10/2024)	NatureScot stated that some of the Scottish sites that have been screened in are unusual and that all sites should be reviewed by assessing tracking studies to understand connectivity.	As recommended by NatureScot, a review of the Scottish SPAs screened in for assessment was conducted and screening conclusions were updated accordingly, with details provided in Section 9.3 of the RIAA.
NatureScot	Introductory meeting (14/10/2024)	Effects on Scottish SPAs will be addressed in a stand-alone section for ease of access and review for NatureScot.	As per agreement and appreciated from NatureScot, Scottish SPAs have been considered in a standalone section (Section 9.13 of the RIAA). Forth Islands SPA is also considered in Section 9.9 .

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		NatureScot appreciated and agreed with this approach.	

References

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List of Acronyms

Acronym	Definition
CEA	Cumulative Effect Assessments
CRM	Collision Risk Modelling
DAS	Digital Aerial Survey
DCO	Development Consent Order
DBD	Dogger Bank D Offshore Wind Farm
dDCO	Draft Development Consent Order
EIA	Environmental Impact Assessment
ECC	Export Cable Corridor
EPP	Evidence Plan Process
ES	Environmental Statement
ETG	Expert Topic Group
HPAI	Highly Pathogenic Avian Influenza
HRA	Habitat Regulations Assessment
LSE	Likely Significant Effect
NRW	Natural Resources Wales
OWF	Offshore Wind Farm
O&M	Operation and maintenance
PEIR	Preliminary Environmental Impact Report
RIAA	Report to Inform an Appropriate Assessment
SPA	Special Protection Area