



NORTH FALLS

*Offshore Wind Farm*

# HABITATS REGULATIONS ASSESSMENT

Annex 5A Outline Guillemot and Razorbill  
Implementation and Monitoring Plan  
(Tracked)

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## Glossary of Acronyms

AEoI	Adverse Effect on Integrity
<del>AOE</del>	<del>Alder-Ore Estuary</del>
CIMP	Compensation Implementation and Monitoring Plan
DCO	Development Consent Order
DESNZ	Department of Energy Security and Net Zero
<del>FFC</del>	<del>Flamborough and Filey Coast</del>
<del>GCSG</del>	<del>Guillemot Compensation Steering Group</del>
GGOW	Greater Gabbard Offshore Wind Farm
<del>GRCSG</del>	<del>Guillemot and Razorbill Compensation Steering Group</del>
<del>LA</del>	<del>London Array</del>
<del>MRF</del>	<del>Marine Recovery Fund</del>
NFOW	North Falls Offshore Wind Farm Limited
OWF	Offshore Wind Farm
RIAA	Report to Inform Appropriate Assessment
RWE	RWE Renewables UK Swindon Limited
<del>SoS</del>	<del>Secretary of State</del>
SPA	Special Protection Area
SSER	SSE Renewables Offshore Windfarm Holdings Limited
<del>SSSI</del>	<del>Site of Special Scientific Interest</del>
UK	United Kingdom

## Glossary of Terminology

The Applicant	North Falls Offshore Wind Farm Limited (NFOW).
The Project Or 'North Falls'	North Falls Offshore Wind Farm, including all onshore and offshore infrastructure.

## 1 Revision 1 Updates at Deadline 1

1. This document has been updated at Deadline 1 to provide content regarding the delivery of the compensatory measures, as requested by the Planning Inspectorate and Natural England.

## 1.2 Introduction

### 1.2.1 Background

- 1.2. The North Falls Offshore Wind Farm (hereafter 'North Falls' or 'the Project') is an extension to the existing Greater Gabbard Offshore Wind Farm (GGOW), located approximately 40km off the East Anglian coast in England. When operational, North Falls would have the potential to generate renewable power for approximately 400,000 United Kingdom (UK) homes from up to 57 wind turbines.
- 2.3. The Applicant, North Falls Offshore Wind Farm Ltd (NFOW), is a joint venture between SSE Renewables Offshore Windfarm Holdings Limited (SSER) and RWE Renewables UK Swindon Limited (RWE), both of which are highly experienced developers.
- 3.4. As part of the Development Consent Order (DCO) application, the Applicant must provide information to support the Habitats Regulations Assessment (HRA) to be completed by the Competent Authority, the Secretary of State for the Department of Energy Security and Net Zero (DESNZ).
- 4.5. With respect to guillemot and razorbill from the Flamborough and Filey Coast Special Protection Area (FFC SPA), the Applicant's RIAA concludes that there will be no adverse effect on integrity (AEoI) of the guillemot and razorbill features of the FFC SPA from North Falls alone or in-combination with other plans and projects.
- 5.6. In the event that the Secretary of State (SoS) concludes an AEoI on guillemot and/or razorbill in the Appropriate Assessment, the Applicant has developed a compensatory measure that could be applied to fully compensate for the predicted effects for either or both species. The predicted effects, which are detailed in the Report to Inform Appropriate Assessment (RIAA) Part 4 (Document Reference: 7.1 [APP-178]) and summarised in Section 4 of the Guillemot and Razorbill Compensation Document (Document Reference: [7.2.5, Rev 1]).

### 1.2.2 Purpose of document

- 6.7. The Guillemot Compensation Implementation and Monitoring Plan (CIMP) and/or Razorbill CIMP will be produced post-consent and will detail the delivery proposals for the agreed compensatory measure. This document provides an outline of the measure(s) which would form the basis of the final Guillemot CIMP and/or Razorbill CIMP based on the measure set out in Appendix 5 Guillemot and Razorbill Compensation Document (Document Reference: 7.2.5). As

described in the sections below, for the project-led<sup>1</sup>/collaborative measure to be implemented, the CIMP(s) will detail the:

- Scale and location;
- Design;
- Delivery programme;
- Permits and licenses;
- Arrangements for monitoring, maintenance and adaptive management;
- Reporting requirements;
- Implementation and delivery programme; and
- How the CIMP(s) can be approved.

8. The purpose of this document is to outline the contents of the Guillemot CIMP and/or Razorbill CIMP, which will in due course be developed in consultation with stakeholders through the Guillemot and Razorbill Compensation Steering Group (GRCSG) or a Guillemot Compensation Steering Group (GCSG)<sup>2</sup> and later submitted to the SoS for approval.

9. As discussed above, this document outlines the without prejudice Project-led compensatory measure, however all or some of the approach described in this document may be substituted by a strategic measure (see Section 4 and Section 11 of the Guillemot and Razorbill Compensation Document [7.2.3, Rev 1]).

7-10. It is expected that should guillemot and/or razorbill compensation be required, the CIMP would be secured through the DCO and that it would require to be submitted to the Secretary of State for approval prior to construction.

#### **4.32.3 Consultation**

11. Pre-consent consultation is described in the Compensatory Measures Overview [Document Reference 7.2.1, Rev 1] and the Habitats Regulations Assessment Compensation Consultation [APP-185].

8-12. This section will provide a summary of the consultation that has taken place within the GRCSG/GCSG during the creation of the Guillemot CIMP and/or Razorbill CIMP (including any relevant consultation undertaken prior to formal inception of the GRCSG/GCSG), which will include:

- Key decisions;
- Agreements; and
- Issues that remain under discussion.

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<sup>1</sup> While this document focuses on project-led compensation for North Falls, consideration is still being given to potential collaboration with other protects (Section 4).

<sup>2</sup> should the SoS conclude an AEoI for guillemot only, as per Hornsea Project Four, SEP and DEP

~~9.13.~~ Where any of these outstanding issues occur, information on proposed steps toward resolution will be provided. Additionally, details of proposed future engagements will also be detailed, including the sharing of and further action on monitoring outcomes.

~~10.14.~~ Matters of discussion for inclusion within the GRCSG/GCSG, and therefore the group's purpose, will be regarding:

- ~~Project / study~~Compensation design and site selection;
- Monitoring;
- Adaptive management options; and
- Associated triggers.

~~11.15.~~ The specific focus of the GRCSG/GCSG will be to oversee the delivery of the compensation measures for ~~NFOW~~North Falls.

## **23 Management measures at south west breeding colonies**

### **3.1 Implementation and Delivery Roadmap**

16. Whether the compensatory measure is for one species or two (guillemot and/or razorbill), the same steps would need to be taken:

- Site selection (Section 3.3) informed by surveys and consultation, taking into account;
  - Existing pressures at the site(s);
  - Existing management measures;
- Identification of appropriate measure(s) and detailed design of the measure(s) (Section 3.4);
  - Where measures which involve working with recreational stakeholders (Section 3.4) are selected, consultation would be undertaken with relevant stakeholders to gauge support for proposed measures and seek further feedback;
- Secure necessary permits (Section 3.6);
- Development of the CIMP in accordance with this document and in consultation with the GRCSG/GCSG (Section 3.10);
- Deploy the measures in accordance with the CIMP;
- Undertake inspections and maintenance where relevant (e.g. signs and noticeboards) (Section 3.7);
- The compensatory measures will be monitored (Section 3.8.1) and the results reported to the GRCSG/GCSG; and
- Adaptive management measures (Section 3.8.2) would be adopted should the measure(s) be unsuccessful. Consultation will be undertaken with the GRCSG/GCSG to help determine the most appropriate course of action.

### **3.2 Scale and**

17. Further information on quantification of the scale of compensation is provided in Section 5 of the Guillemot and Razorbill Compensation Document [7.2.3, Rev 1].
18. It is the Applicant's position that the scale of compensation should support 11 breeding pairs of guillemot and five razorbill, if required.

### **2.43.3 Location**

19. This section of the final CIMP will detail the scale of compensation proposed and how this conforms with the consent decision made by the SoS. This section will go on to detail the specific location(s) where compensation will be delivered and, the suitability of the site(s) for the delivery of the compensation measures, and how any required land rights at those locations have been secured.
20. The compensatory measure(s) will be located in Devon or Cornwall, the Applicant's initial short-listed sites are:
- Carters Rocks
  - Cow and Calf
  - Gull Rock (Falmouth)
  - Gulland Rock
  - Highveer Point
  - Lynton 1 & 2
  - North Cliffs 1
  - North Cornwall 3
  - Rillage Point to Ramsay Beach
  - Seal Hole to Trevaunance
  - St Agnes Head to Newdowns Head
  - Wringapeak
21. The final site selection will be completed post consent as part of the development of the final CIMP. This process will be informed by ongoing stakeholder consultation, surveys of breeding colonies<sup>3</sup> and studies into levels of potential disturbance.
22. The base of evidence included in aid of the measures regarding site selection is detailed in Appendix 5 Section 8 of the Guillemot and Razorbill Compensation Document (Document Reference [7.2.5, Rev 1]) will provide information on these aspects.

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<sup>3</sup> As discussed in Section 3.5, the surveys must be undertaken in late May/June.



23. Reduction of recreational disturbance at small breeding colonies in the southwest of England is also being considered by other offshore wind farm (OWF) projects (e.g. Five Estuaries, Outer Dowsing and Rampion 2). There is therefore potential for collaboration between North Falls and these other projects and work is ongoing to identify potential collaboration opportunities (see Section 4). Where appropriate, any site (including those not currently short-listed) may be considered further, subject to evidence of ecological effectiveness.

24. The number of sites required will be determined by both the scale of required compensation (Section 3.2) and the compensation potential of shortlisted sites (discussed further in Section 8.2 of the Guillemot and Razorbill Compensation Document [7.2.5, Rev 1] and to be informed by surveys).

12-25. Given the number of potential sites identified and small scale of compensation required, the Applicant is confident that a sufficient site(s) can be secured. In the unlikely event that this is not possible, the Applicant would deliver adaptive management as described in Section 3.8.2.

13. —

## **2.23.4 Design**

26. This section will detail the plans for delivering small-scale management measures. This will be informed by studies to understand the relevant pressures on the selected site(s). Reduction of recreational disturbance at a breeding colony could include one or more management intervention. Subject to the nature of the site(s) and relevant pressures measures could include:

- Onsite interventions:
  - Wardens/guides could be employed to influence visitor behaviour;
  - Fencing or buoyage can be used to enforce set back distances from sensitive areas;
  - Signs/information boards to educate visitors on appropriate behaviour around breeding seabirds; and
  - Time or seasonal restrictions – the above could be implemented for sensitive times or seasons e.g. inhibiting approach to the colony within a certain distance by people during the breeding season.
- Working with recreational stakeholders:
  - Codes of practice could be developed with activity or equipment hire businesses and recreational activities. This could apply both onshore and offshore, where applicable; and
  - Mechanisms to educate visitors on best practice e.g.
  - information provided on stakeholder websites.
  - signs / interpretation boards.
  - delivered as part of a site / activity briefing

27. An important part of measure design and planning will include the evidence provided in support of the measures that is set out in Appendix 5 Guillemot and Razorbill Compensation Document (Document Reference **[7.2.5, Rev 1]**).

### **2.33.5 Delivery Programme**

28. This section **of the final CIMP** will lay out the programme for the application and long-term delivery of the compensation. It will confirm the purpose and stage of all consents, land access agreements, and any other relevant approvals that are necessary to enable the enactment of the compensation measures and will detail how any outstanding consents will be delivered.
29. The Applicant will establish the GRCSG/GCSG post consent to inform the development of the compensatory measure(s).
30. Monitoring would commence at least one breeding season prior to commencement of the compensatory measure. It is expected that monitoring will be required for the first three years or until the measure is deemed to be operating successfully. The need for ongoing monitoring will be discussed with the GRCSG/GCSG and agreed with the SoS.
31. The compensatory measure would be deployed 3 breeding seasons prior to operation of North Falls. The measure would be deployed by March prior to the first breeding season, with timing informed by data where possible (discussed further in Section 9.3 of the Guillemot and Razorbill Compensation Document [7.2.5, Rev 1].
- 14.32. The compensatory measure(s) would remain in place for the operational lifetime of the Project.

### **3.6 Permits and Licenses**

33. The majority of measure(s) outlined in Section 3.4 are not anticipated to require planning permission/licenses, however this will be kept under review as the plans develop post consent and will be informed by consultation with the relevant Local Authority (for onshore measures) and the Marine Management Organisation (MMO) (for offshore measures). It is recognised a marine license may be required if a measure such as buoy deployment is selected.
34. Where a site is within a Site of Special Scientific Interest (SSSI), SSSI Assent would be sought from Natural England.
35. Access rights would be agreed with the landowner(s) where required for monitoring and deployment of onshore measures (e.g. installation and maintenance of signs, notice boards or fencing).

### **2.43.7 Routine Maintenance and Management**

36. The Applicant will maintain the measure(s) for the life of the Project.
- 15.37. This section will lay out any routine maintenance and management requirements and responsibilities for the compensation measure.

### **3.8 Monitoring and Adaptive Management**

38. This section will detail the monitoring and adaptive management principles and processes that have been agreed between the Applicant and the GRCSG/GCSG, including under what scenarios adaptive management measures will be required. These measures will be developed in accordance with the evidence provided in Appendix 5 Guillemot and Razorbill Compensation Document (Document Reference 7.2.5). Following the approval of the Guillemot CIMP and/or Razorbill CIMP, the GRCSG/GCSG will be engaged in the context of implementing monitoring and adaptive management in an ongoing programme.

#### **3.8.1 Monitoring**

39. The details of monitoring proposals will be discussed with the GRCSG/GCSG, as part of the development of the CIMP. Key details to be agreed will be the frequency, duration, and nature of monitoring methodology, as well as data analysis (if relevant) and reporting requirements.

40. Given the nature and scale of the proposed measure(s), it may be difficult to derive cause and effect relationships. Monitoring may need to be by indirect methods, such as visitor statistics or colony counts, comparing trends with control colonies in the region.

#### **3.8.2 Adaptive management**

41. Deriving any metrics for success or conversely understanding what would trigger remedial action will be dependent upon each site measure and will be agreed with the GRCSG/GCSG.

42. Adaptive management could include identifying additional/alternative sites to deploy further compensatory measures or moving to a collaborative or strategic measure (Section 4).

16.—

### **2.53.9 Reporting**

43. This section will set out the necessary reporting points in connection with the monitoring and adaptive management. This will therefore set out the objectives and timescales for the reporting.

17.44. It is expected that a monitoring report will be submitted to the GRCSG/GCSG for comment and to the SoS for sign-off annually during each year of monitoring.

### **3.10 Governance**

45. The Applicant will establish the GRCSG/GCSG post consent. It is envisaged members of the GRCSG/GCSG will be Natural England, the local planning authority and/or the MMO as applicable, and other interested parties such as the RSPB, Wildlife Trusts and National Trust, as appropriate.

46. This group will oversee the finalisation of the CIMP which will build on the information in this outline CIMP and set out the steps to be taken to put the measure(s) in place. The CIMP will then be submitted to the SoS for sign-off.
47. It is envisaged that in the run up to submitting the CIMP to the SoS the steering group will meet at regular intervals (e.g. 3-4 per year). An independent chair will be appointed to oversee these meetings.
48. Following ratification of the CIMP the project will begin the steps as outlined and provide updates and reporting to the GRCSG/GCSG as agreed. As a minimum, this is likely to comprise an annual meeting following the breeding season at which the results of the monitoring will be presented and discussed and the next steps agreed.

#### 2.6.03.10.1 Approval of the Guillemot CIMP and/or Razorbill CIMP

- ~~48.~~49. This section will detail how the SoS can approve the Guillemot CIMP and/or Razorbill CIMP, to which the delivery of the compensatory measure must be compliant.

### **34 Collaborative and Strategic Compensation**

#### **4.1 Collaborative measure**

50. The Applicant is considering collaboration with other offshore wind farmOWF developers which may be delivered in the following ways:
  - Shared monitoring, deployment and maintenance of measures across an appropriate number of shared sites, in an approach similar to that outlined in this document for the project alone measure(s);
  - Development of separate sites for each project with a shared monitoring programme; or
  - A broader, regional, compensation package led by a delivery partner and funded in collaboration with other developers.
- ~~49.~~51. If a feasible opportunity for the collaborative delivery of the compensatory measure arises within the required timescales for North Falls, this section will confirm how the collaborative compensatory measure will be delivered.

#### **4.2 Strategic Marine Recovery Fund**

52. In accordance with DESNZ (2025), a contribution to the Marine Recovery Fund (MRF) could be made in substitution for the project-led or collaborative measures, once the MRF is operational.
53. The options on the Library of Strategic Compensation Measures which could be of relevance to guillemot and razorbill are artificial nesting structures and predator reduction.
54. If a viable strategic compensation funding mechanism were to become available within the required timescales for North Fallsa contribution to the MRF is selected, this section will confirm how a contribution will be made to a Strategic

Compensation Fund, wholly or partly, replacing the Applicant's initial proposal of project-led/collaborative measures or as part of adaptive management.

## **45** Summary

**55.** This section will provide a summary of the delivery proposals detailed above for the agreed compensatory measures for guillemot and razorbill.

## **6 References**

DESNZ (2025). Strategic compensation measures for offshore wind activities: Marine Recovery Fund interim guidance. Available at: <https://www.gov.uk/government/publications/strategic-compensation-measures-for-offshore-wind-activities-marine-recovery-fund-interim-guidance/strategic-compensation-measures-for-offshore-wind-activities-marine-recovery-fund-interim-guidance#use-of-offshore-artificial-nesting-structures-ans-for-kittiwake-ahead-of-the-mrf>

Furness, R.W., 2015. Non-breeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Populations Scales (BDMPS). Natural England Commissions Reports, Number 164.



**NORTH FALLS**

*Offshore Wind Farm*



## **HARNESSING THE POWER OF NORTH SEA WIND**

*North Falls Offshore Wind Farm Limited*

*A joint venture company owned equally by SSE Renewables and RWE.*

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