



N O R T H F A L L S

Offshore Wind Farm

HABITATS REGULATIONS

ASSESSMENT

Annex 2A Outline Lesser Black-backed Gull
Compensation Implementation and
Monitoring Plan (Clean)

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Offshore Wind Farm

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Glossary of Acronyms

AEoI	Adverse Effect on Integrity
AOE	Alde-Ore Estuary
AON	Apparently Occupied Nests
CIMP	Compensation Implementation and Monitoring Plan
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
GGOW	Greater Gabbard Offshore Wind Farm
LBBG	Lesser Black-backed Gull
LBCSG	Lesser Black-backed Gull Compensation Steering Group
MRF	Marine Recovery Fund
NFOW	North Falls Offshore Wind Farm Limited
OWF	Offshore Wind Farm
RFI	Request for Information
RIAA	Report to Inform Appropriate Assessment
RSPB	Royal Society for the Protection of Birds
RWE	Renewables UK Swindon Limited
SoS	Secretary of State
SPA	Special Protection Area
SSER	SSE Renewables Offshore Windfarm Holdings Limited
UK	United Kingdom
UXO	Unexploded Ordnance

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 4 Updates following the Request for Further Information from The Secretary of State

1. This document provides an update to the Outline Compensation Implementation and Monitoring Plan (CIMP) for lesser black-backed gull (LBBG) in response to Point 33 from The Secretary of State (SoS) Request for Information (RFI) received on 26th November 2025: *The Applicant is requested to include the provision of data-sharing within each Compensation Implementation and Monitoring Plan, which must require the regular submission of all relevant pre-implementation and operational survey and monitoring data to the Marine Data Exchange (The Crown Estate) and relevant Local Environmental Records Centres.*
2. In addition, since the close of the Examination, the Applicant has been exploring the potential for land within Lantern Marshes, adjacent to the area referred to as the 'VE2 site'. This area of land (referred to as the 'Cobra Mist Ltd (CML) site') has been included in this updated Outline CIMP. See also the HRA Land Rights Tracker [**Document reference: 9.75**].

2 Introduction

2.1 Background

3. 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.
4. The Applicant, NFOW, is a joint venture between SSE Renewables Offshore Windfarm Holdings Limited (SSER) and RWE, both of which are highly experienced developers.
5. 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 for Energy Security and Net Zero (DESNZ).
6. In reference to LBBG from the Alde-Ore Estuary (AOE) Special Protection Area (SPA), the Applicant's Report to Inform Appropriate Assessment Part 4 (RIAA) [**Document Reference: APP-178**] determines that Adverse Effect on Integrity (AEoI) cannot be ruled out due to predicted LBBG mortality from collisions, when considered in-combination with other offshore wind farms (OWF). Therefore, a suite of documents is presented by the Applicant as part of their DCO application in relation to the obligation for compensatory measures, in which this document, the outline LBBG CIMP is included.

2.2 Purpose of document

7. The LBBG CIMP will be produced post-consent, as secured by Schedule 15 of the Draft DCO [**Document Reference: REP8-005**] and will detail the delivery proposals for agreed compensatory measures. This Outline LBBG CIMP

provides the information which would form the basis of the final LBBG CIMP. As described in the sections below, for the Project-led measure to be implemented the CIMP will detail the:

- Scale
 - Location;
 - Design;
 - Delivery programme;
 - Permits and licenses;
 - Arrangements for monitoring, maintenance and adaptive management;
 - Reporting requirements;
 - Implementation and delivery programme; and
 - Governance/ approval process for the Lesser Black-backed Gull CIMP.
8. The purpose of this document is to outline the Lesser Black-backed Gull CIMP, which will be developed post consent in consultation with stakeholders through the Lesser Black-backed Gull Compensation Steering Group (LBCSG) and later submitted to the Secretary of State for approval, in line with the DCO.
9. As discussed above, this document outlines the Project-led compensatory measure, however all or some of the approach described in this document may be substituted by a strategic compensation measure (see the LBBG Compensation Document [**Document Reference: REP8-021**]).

2.3 Consultation

10. Pre-consent consultation is described in the Compensatory Measures Overview Document Reference [**Document Reference: REP8-015**] and the Habitats Regulations Assessment Compensation Consultation [**APP-185**].
11. In addition, an expert topic group (ETG) meeting was held with Natural England and the Royal Society for the Protection of Birds (RSPB) on the 19th November 2025. The ETG was held to provide Natural England and the RSPB with updates on the North Falls LBBG compensation since examination. The Orfordness landowner engagement and Outer Trial Bank surveys carried out in summer 2025 were discussed and results shared with the attendees.
12. An introductory meeting regarding Outer Trial Bank was held with King's Lynn and West Norfolk Council on the 10th November 2025.
13. This section will provide a summary of the consultation that has taken place within the LBCSG during the creation of the Lesser Black-backed Gull CIMP (including any relevant consultation undertaken prior to formal inception of the LBCSG), which will include:
- Key decisions;
 - Agreements; and
 - Issues that remain under discussion.

14. 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.
15. Matters of discussion for inclusion within the LBCSG, and therefore the group's purpose, will be regarding:
 - Compensation design and site selection;
 - Monitoring;
 - Adaptive management options; and
 - Associated triggers.
16. The specific focus of the LBCSG will be to oversee the delivery of the LBBG compensation measure for North Falls.

3 Breeding enhancement

3.1 Implementation and Delivery Roadmap

17. The proposed compensatory measure is breeding enhancement. The delivery mechanisms to achieve breeding enhancement at each location option is described in Section 3.1.1.
18. The steps that would be followed by the Applicant to deliver the compensation measures are as follows:
 - Establish the LBCSG (Section 3.10);
 - Selection of the locations for deployment of compensation (Section 3.3);
 - Detailed design of the measures (Section 3.4);
 - Secure necessary permits (Section 3.6);
 - Development of the LBBG CIMP in accordance with this document and in consultation with the LBCSG (Section 3.10);
 - Deploy the measures in accordance with the LBBG CIMP;
 - Undertake regular inspections and maintenance of measures (Section 3.7);
 - The effectiveness of compensatory measures will be monitored (Section 3.8.1) and the results reported to stakeholders; and
 - Adaptive management measures (Section 3.8.3) would be adopted should the measure be shown to be unsuccessful. Consultation will be undertaken with the LBCSG to help determine the most appropriate course of action.
19. Amendments to, or variations of, the LBBG CIMP would be in accordance with the principles and evidence base set out in the LBBG Compensation Document [**Document reference: REP8-021**] or informed by new evidence which may emerge. This would be discussed with the LBCSG and agreed with the Secretary of State (SoS).

3.1.1 Delivery mechanism

20. The first stage in delivery of the compensation will be selection of an appropriate location (discussed further in Section 8.3 of the Lesser Black-backed Gull Compensation Document [**Document Reference: REP8-021**]). The measures adopted will be tailored to the relevant pressures on LBBG at the selected site.
21. Table 3.1 outlines the likely compensatory measures at each location option (discussed in Section 3.3).

Table 3.1 Compensatory measures

Measure	Description	Compensation location options		
		Gedgrave Marshes	CML site	Outer Trial Bank
Predator exclusion	Predator-proof fencing around to aid colonisation efforts by LBBG into a 'safe' area	✓	✓	? May be considered as adaptive management if required
Predator control	Removal of predators e.g. lethal control/eradication of rats or foxes	? May be required if predators such as foxes are found within the fence	? May be required if predators such as foxes are found within the fence	✓ Lethal control of rats by rodenticides. If required, lethal traps may also be used for long term control.
Habitat management	Planting, grassland cutting and/or scrub clearance to create optimal ground cover and sward height.	✓	✓	? May be considered subject to surveys and consultation with the LBCSG
	Further complimentary measures could be consider to enhance the breeding habitat if required, such as provision of features for birds to nest against (e.g. railway sleeper or similar), construction of raised platforms and posts to provide perches	?	?	?
Anthropogenic disturbance management	Awareness campaigns during the breeding season (e.g. signage)	? Disturbance of LBBG from users of the coastal path would be reviewed during post consent design if this site is selected and/or as part of adaptive management	N/A No significant anthropogenic disturbance at this site	N/A No significant anthropogenic disturbance at this site

Measure	Description	Compensation location options		
		Gedgrave Marshes	CML site	Outer Trial Bank
Measures to encourage birds to investigate and settle	Placement of decoy birds in visible locations and playback of colony calls	✓	✓	N/A LBBG already present

3.2 Scale

22. This section will detail the scale of compensation proposed and how this conforms with the consent decision made by the SoS.
23. The Applicant's position is that for North Falls compensation is required to support 20 breeding pairs if located in or adjacent to the AOE SPA or 37 breeding pairs if located at a remote site. (see Section 5 of the Lesser Black-Backed Gull Compensation Document [**Document Reference: REP8-021**]).

3.3 Location

24. This section will detail the specific location where compensation will be delivered, the suitability of the site for the delivery of the compensation measure, and how the required land rights at this location have been secured.
25. Based on a predicted nesting density of 0.04-0.047 pairs per square metre (Section 5 of the Lesser Black-Backed Gull Compensation Document [**Document Reference: REP8-021**]), within or adjacent to the SPA an area of 0.05 ha would be required to support the number of pairs given above, and at a remote site, 0.09ha. However, a site of at least 4ha will be selected if fencing to exclude predators is adopted for a North Falls alone site, recognising that LBBG may not use a smaller enclosed space. If a site is selected in collaboration with another project, the total size of the enclosure would be agreed with the LBCSG.
26. To select a suitable site for compensation, further surveys and data review will be completed to:
 - Collate and assess information available at preferred sites on the presence of LBBG habitats and colonies;
 - Identify the potential scale of mammal populations present within the site which could impact on the LBBG breeding population through predation of eggs, chicks and possibly adults; and
 - Confirm the presence of other protected habitats and species to inform detailed site selection/micrositing to mitigate impacts.
27. The primary locations being considered for North Falls project-led measure are Gedgrave Marshes near Orford, East Suffolk, adjacent to the SPA and Outer Trial Bank, a remote site in The Wash.
28. The Five Estuaries' 'VE2' site (which is located on land owned by CML) is a potential adaptive management and/or collaboration option (see Section 3.8 and 4). VE2 is within the AOE SPA.

29. Since Examination, the Applicant has explored the potential for land on part of Lantern Marshes owned by CML, adjacent to the VE2 site (hereafter the potential North Falls option in this area is referred to as the 'CML site'). The CML site would provide additionality to the VE2 option, should Five Estuaries select this site. The precise boundary for this potential site would be informed by further landowner engagement and site surveys should this site be taken forward. Final site selection will be discussed with the ETG and/or LBCSG.
30. The base of evidence for these locations and ongoing site selection process is described in Section 8 of the Lesser Black-Backed Gull Compensation Document [**Document Reference: REP8-021**].
31. In the event that an alternative site to those listed above is identified during the final site selection process, this would also be informed by surveys to determine its ecological effectiveness and impacts on other receptors, and consultation with the LBCSG would be undertaken.

3.4 Design of Measure

32. This section will detail the design for each element provided as part of the compensation measure following site selection. This will include the ecological design considerations specific to LBBG to allow for the best chance of success for the given measure, including consideration of climate change resilience to ensure the measure will be effective for the life of the Project. A summary of the likely measures at each location option is provided in Section 3.1.1. An important part of the design will include the evidence provided in support of the measure that is set out in Lesser Black-backed Gull Compensation Document [**Document Reference: REP8-021**].

3.4.1 Pre-construction surveys and data analysis

33. Field surveys will be undertaken prior to construction and will be tailored to the relevant considerations for the final site which is selected (discussed further in the following sections). The scope and timing of these surveys will be discussed with the LBCSG.

3.4.1.1 Gedgrave Marshes

3.4.1.1.1 LBBG breeding surveys

34. No prior records of LBBG breeding at Gedgrave Marshes have been found, and it is not expected that there would be any breeding prior to any management for compensation. However, this can be confirmed in parallel with other ornithology surveys during March to August.

3.4.1.1.2 Habitat and species surveys

35. As this site is farmland (confirmed by broadscale habitat surveys in 2024) and outside the SPA, no further habitat and species surveys are proposed.

3.4.1.1.3 Ornithological surveys

36. A review of available ornithological data, including WeBS data will be completed.
37. In addition, ornithology surveys will be undertaken to inform the post consent planning application to confirm the presence of qualifying features of the AOE SPA and Ramsar in order to inform mitigation (e.g. seasonal restrictions). The results of these surveys will inform the construction programme and detailed site

selection within Gedgrave Marshes. Subject to the timing of these surveys in relation to the construction programme, they may also form a baseline for monitoring. Alternatively, further surveys may be undertaken in the year prior to construction to provide the baseline for further monitoring. As discussed above, the scope and timing of surveys will be discussed with the LBCSG.

3.4.1.1.4 Unexploded Ordnance surveys

38. No UXO is expected at Gedgrave Marshes and this will be confirmed by desk-based review. Should a risk of UXO be identified, UXO surveys will be undertaken and any UXO found would be avoided or cleared appropriately.

3.4.1.1.5 Invasive non-native species surveys

39. The fence line will be surveyed for invasive non-native plant species in advance of the works. Any found will be removed and appropriately disposed of.

3.4.1.2 CML site

3.4.1.2.1 LBBG breeding surveys

40. The Applicant would ensure there is a LBBG breeding survey in the breeding season prior to the deployment of the compensation, to provide a baseline for future monitoring. This will determine the baseline LBBG population size (if applicable) and breeding success at the CML site.

3.4.1.2.2 Habitat and species surveys

41. Habitat surveys would be undertaken to determine the presence of any protected habitats and non-bird species (e.g. mammals, invertebrates, plants). This will inform detailed site selection, including micro-siting of the fence line.
42. The habitat surveys would also inform the type of habitat management, which is required, in order to achieve suitable habitat for LBBG breeding.

3.4.1.2.3 Ornithological surveys (further to the LBBG breeding surveys)

43. A review of available ornithological data, including Wetland Bird Survey (WeBS) data will be completed.
44. In addition, ornithology surveys would be undertaken to inform a post consent planning application to confirm the presence of qualifying features of the AOE SPA and Ramsar within the CML site, in order to inform mitigation (e.g. seasonal restrictions). The results of these surveys would inform the construction programme and detailed design of the compensatory measure. Subject to the timing of these surveys in relation to the construction programme, they may also form a baseline for monitoring. Alternatively, further surveys may be undertaken in the year prior to construction to provide the baseline for further monitoring. As discussed above, the scope and timing of surveys would be discussed with the LBCSG.

3.4.1.2.4 Unexploded Ordnance surveys

45. The compensation area would be surveyed for UXO and any UXO found would be avoided or cleared appropriately.

3.4.1.2.5 Invasive non-native species surveys

46. The fence line would be surveyed for invasive non-native plant species in advance of the works. Any found would be removed and appropriately disposed of.

3.4.1.3 Outer Trial Bank

47. The Applicant commissioned surveys in 2025. Surveys of nesting LBBG (and herring gulls which also nest on Outer Trial Bank) were undertaken by Natural England which confirmed the potential for this site to deliver compensation for LBBG at an appropriate scale. The survey informed recommendations for next steps which will inform the ongoing design of the compensatory measure, if this site is selected. Surveys for the presence of mammals including rats, and evidence for predation on nesting gulls, were also undertaken by APEM.
48. The LBBG survey methodology is based on that described by Gilbert et al (1998) with some adaptations to take into account the unique form of The Outer Trial Bank and its location in The Wash Estuary. The surveys include:
- Walk-over survey during May to August;
 - Count of Apparently Occupied Nests (AON);
 - Record signs of predation or other causes of nest/chick loss;
 - Count of hatched fledglings to estimate productivity; and
 - Drone survey and image analysis.
49. The findings of these surveys and consultation with the LBCSG would inform the scope and timing of further surveys on the Outer Trial Bank if this site is selected.

3.4.2 Mitigation

3.4.2.1 Gedgrave Marshes

50. In accordance with the Lesser Black-backed Gull Compensation; Gedgrave Marshes Impact Assessment [**Document Reference: REP5-072**], and subject to the results of further impact assessment to be undertaken post consent to inform a Planning Application, if Gedgrave Marshes is selected the following mitigation would be undertaken:
- The fence line avoids areas of predicted erosion up to 2105 (Defra, 2024a) and this will be checked for any updates pre-construction;
 - The fence line will be surveyed for existing invasive non-native plant species in advance of the works. Any found will be removed and appropriately disposed of;
 - All machinery, materials and equipment to be brought onto site will be cleaned and checked for the presence of INNS and mud;
 - Construction of the fence to take place outside nesting seasons of relevant bird species present on Gedgrave Marshes to avoid causing significant disturbance, where possible;
 - Scheduled habitat management and fence maintenance will take place outside of LBBG prospecting and nesting season, where possible, to avoid causing significant disturbance; and
 - Speed limits for vehicles associated with construction and management/maintenance;

- Monitoring methods to be designed in consultation with the LBCSG to minimise disturbance to LBBG and other receptors;
- Where practicable, site visits/surveys will be combined to minimise disturbance; and
- Regular checks of fence line for damage and debris. Repairs and clearance to be undertaken as required.

3.4.2.2 CML site

51. An impact assessment would be undertaken post consent, informed by site surveys and consultation with the LBCSG, if this site is to be taken forward.
52. The required mitigation will be informed by the impact assessment and agreed with the LBCSG. It is expected to include:
 - The fence line would avoid areas of predicted erosion up to 2105 (Defra, 2024a);
 - The fence line will be surveyed for existing invasive non-native plant species in advance of the works. Any found will be removed and appropriately disposed of;
 - All machinery, materials and equipment to be brought onto site will be cleaned and checked for the presence of INNS and mud;
 - Construction of the fence to take place outside nesting seasons of relevant bird species present on the CML site and appropriate buffer areas to avoid causing significant disturbance, where possible;
 - Scheduled habitat management and fence maintenance will take place outside of LBBG prospecting and nesting season, where possible, to avoid causing significant disturbance; and
 - Speed limits for vehicles associated with construction and management/maintenance;
 - Monitoring methods to be designed in consultation with the LBCSG to minimise disturbance to LBBG and other receptors;
 - Where practicable, site visits/surveys will be combined to minimise disturbance; and
 - Regular checks of fence line for damage and debris. Repairs and clearance to be undertaken as required.

3.4.2.3 Outer Trial Bank

53. If Outer Trial Bank is selected, mitigation measures will be developed in consultation with the LBCSG, informed by surveys and tailored to the final design of the compensatory measure. Expected mitigation measures include:
 - Flood risk:
 - An erosion and flood risk assessment would be undertaken to inform post consent site selection and development of compensatory measures;

- During use of rodenticides, control measure would be undertaken in accordance with the Campaign for Responsible Rodenticide Use (CRRU) Code of Best Practice (2024) where appropriate, such as:
 - Bait points will be recorded and revisited at appropriate intervals
 - Uneaten bait will be removed at the end of treatment;
 - Searches will be undertaken during and after the treatment period and rodent bodies found will be removed where possible and safely disposed of;
 - Bait placement will aim to minimise risk to other species;
 - Habitat management:
 - If required, scheduled habitat management would take place outside the nesting season for relevant species, to avoid causing significant disturbance.
54. Should adaptive management be required, the approach and relevant mitigation would be agreed with the LBCSG.

3.5 Delivery Programme

55. This section will lay out the programme for the application and long-term delivery of the compensation. It will confirm the programme for all consents, land access agreements, and any other relevant approvals that are necessary to enable the enactment of the compensation measures.
56. The compensatory measure(s) would be installed three breeding seasons prior to operation and remain in place for the operational lifetime of the Project. The aim would be to install the compensatory measure between September and January so that it is available to LBBGs prospecting for nest sites from late February in the first of the three breeding seasons prior to operation.

3.6 Permits and Licenses

57. The Project would secure necessary land rights for the selected site.
58. The Project would also secure any further permissions required to deliver the compensatory measure. These may include:
- Planning permission for the installation of predator-proof fencing would be determined under the Town and Country Planning Act 1990 (as amended); and
 - Site of Special Scientific Interest (SSSI) Assents from Natural England for the works.

3.7 Routine Maintenance and Management

59. This section will detail any routine maintenance and management requirements and responsibilities for the compensation measure.

3.7.1 Fencing

60. To ensure that the fence remains an effective barrier to mammalian predators for the duration of the proposed compensation, it will be essential that regular checks of the full length of fence are undertaken, and any damaged areas quickly repaired, in accordance with guidance provided by White and Hirons (2019):
- During breeding season (March to August).
 - Inspections of the fence at intervals to be agreed with the LBCSG.
 - Any damaged areas to be repaired as soon as practicably possible, ensuring disturbance to nesting birds is reduced.
 - Outside of the breeding season
 - Inspections 2-3 times between September and February, with additional inspections after severe weather.
 - Substantial/routine maintenance of the fence (e.g. replacement of degraded wire or posts) should be undertaken during this period to avoid risk of disturbance to nesting birds, ensuring that sufficient time is allowed for completion before the breeding season (before the end of February).
 - Clearance of significant debris accumulation on the fence.
61. Any identified damage to the fence that has the potential to allow access by predators would be accompanied by monitoring to confirm presence and undertake additional predator control, if required.

3.7.2 Habitat maintenance

62. There may be a requirement for ongoing management of vegetation to provide and maintain suitable habitat for the gulls to nest. Such work would be undertaken outside the LBBG breeding season to avoid disturbance and would also need to be done in accordance with suitable management for other designated features if present.

3.7.3 Rat control

63. Regular monitoring of rats on Outer Trial Bank would be undertaken if this site is selected. This would inform the need for further management, and if required the approach would be agreed with the LBCSG.

3.8 Monitoring and Adaptive Management

64. This section will detail the monitoring and adaptive management principles and processes to be developed by the Applicant in consultation with the LBCSG, including under what scenarios adaptive management measures will be required. These measures will be developed in accordance with the evidence provided in support of Lesser Black-backed Gull Compensation Document [**Document Reference: REP8-021**]. Following the approval of the Lesser Black-backed Gull CIMP, the LBCSG will be engaged in the context of implementing monitoring and adaptive management in an ongoing programme.

3.8.1 Objectives and success criteria

65. The objective of the compensatory measure is to produce sufficient adult LBBG per year to compensate for the predicted mean mortality of 2.3 birds per annum at the AOE SPA.
66. The compensatory measure will be deemed successful if it supports:
- An average of 20 breeding pairs, if located in or adjacent to the AOE SPA; or
 - An average of 37 breeding pairs if located at a remote site
67. The rationale for the scale of compensation is discussed further in Section 5 of the Lesser Black-Backed Gull Compensation Document [**Document Reference: REP8-021**].

3.8.2 Monitoring

68. For North Falls, the success of compensation would be determined through annual monitoring of LBBG breeding numbers within the compensation site using standardised breeding seabird survey methods (and/or novel methods such as drones subject to agreement with the LBCSG, see below) until such time that the compensatory measure is found to be delivering the scale of required compensation (Section 3.1.1). Beyond this, monitoring throughout the operational life of North Falls will be undertaken and the frequency of this monitoring will be agreed with the LBCSG.
69. It is proposed that monitoring will include a combination of the following activities, which are principally derived from Gilbert et al. (1998) and Walsh et al. (1995). The monitoring methods will be agreed with the LBCSG, and will be undertaken from the first breeding season following installation of the compensatory measure:
- The number of pairs in Apparently Occupied Nests (AON) of breeding LBBG using the compensatory measure will be recorded. As it is unlikely that all nests will be visible from any given location it will be necessary to map observed nests to cross-check between vantage points;
 - Productivity will be estimated at the compensation colony by monitoring breeding success and number of chicks fledged at a representative sample of nests throughout the colony. Mapped pairs will be monitored until such time as chicks can no longer be associated with their nest. Productivity monitoring would include information on failed nests, including evidence such as signs of disease or starvation within the colony, changes in behaviour, and appearance of plastic or other sources of pollution;
 - Implementation of a colour ringing scheme to monitor survival and productivity of LBBGs would greatly aid in attaining data on the colony, and would help show levels of natal philopatry once the project has been underway long enough to recruit birds produced on site back into the breeding population, as well as movement of birds from Orford Ness i.e. where they go to forage or where they recruit (if not on their natal site). This would be conducted by licensed professionals with as minimal disturbance as possible; and will tie into the below measure on observations;

- Observations to obtain both productivity and count data will be conducted in such a way as to minimise disturbance. For example, observations will be made from within a vehicle or through use of portable hides where possible;
- Consideration will be given to the use of drones to obtain aerial images of monitored nests and suitable breeding habitat across the site, particularly if areas cannot be effectively viewed from site boundaries without risk of disturbance. Drones would only be used if agreed with the landowner and if they could be used without causing disturbance. A review of best practice drone use indicates that nesting gulls can be intolerant of drones (Edney et al., 2023), although disturbance can be limited with the use of smaller modern drones with better cameras (Natural England, *pers. comm.*, 2024). Use of a thermal imaging drone may also be considered (which may be more effective in identifying nests hidden by vegetation). Drones would only be used if there is high degree of confidence that it would not have any detrimental effects;
- The availability of suitable breeding ground (i.e. habitat distribution) will be monitored annually at the compensation site;
- Surveyors will also collect opportunistic observations, such as instances of predation by avian species (e.g., other large gull species and corvids), and human disturbance;
- Monitoring of predator activity will be undertaken, through searches for signs (e.g. tracks and paths, droppings, mammal hair) and use of camera traps. This will be linked to maintenance of the fence (see below); for example the requirement for monitoring may be triggered by evidence of damage or breach of the fence; and
- The above methods will be complemented with high resolution photography, to provide a permanent record of how the site is being used.

70. The results from the proposed monitoring, taken for pre-implementation and operational purposes, will be shared to the Marine Data Exchange (The Crown Estate) and relevant Local Environmental Records Centres.

3.8.3 Adaptive Management

71. Proposed monitoring, as set out in Section 3.8.1 above, would be designed in consultation with the LBCSG to demonstrate whether the targets for compensation are being met.
72. The Applicant will be required to install the compensatory measure at least three breeding seasons prior to the operation of North Falls. Should the compensation not yet be producing the required number of nests at the point of operation commencing, a mortality debt will be accrued which will need to be recovered over the life of the compensatory measure and this would be incorporated in the success criteria, in consultation with the LBCSG.
73. Following three years of North Falls operation (at least six breeding seasons of the compensatory measure), a review of the success of the compensatory measure would be undertaken, in consultation with the LBCSG, to determine if

the compensatory measure is meeting the required success criteria (Section 3.8.1).

74. The mortality debt which could be accrued within 3 years of operation would be only 6.9 (mean) mortalities and it is expected that this debt could be recovered during the life of the Project and therefore this is deemed to be an appropriate timescale to review the compensation success.
75. In the event that the compensation is not yet delivering the full requirement after 3 years of wind farm operation, consideration would be given to its future potential to meet the requirements, including mortality debt, in consultation with the LBCSG. For example, should breeding pairs/productivity be showing an increasing trend, it may be preferable to continue to review progress over the next 1-2 years, rather than to deploy adaptive management immediately, and this would be discussed with the LBCSG.
76. In the event that the success criteria are not being met in an appropriate timescale, adaptive management measures would be implemented to address any shortfall. Such measures would take into account the monitoring results and advice from the steering group.
77. Where a shortfall in breeding success is identified, there would be a requirement to seek to understand the reasons for this.
78. This would be considered in the context of LBBG breeding success elsewhere, using available data at both a local (i.e. SPA) and regional scale. If low breeding success at the compensation colony was reflected by similar performance at other colonies, then this could be attributed to wider issues (e.g. prey availability, weather or disease), and would not necessarily indicate that remedial measures (i.e. adaptive management) would be required. Conversely, performance at the compensation site below that of other colonies is likely to indicate that the adaptive management measures would be required.
79. In the initial years of the compensation, it is likely that this would be focused on colonisation factors. For example, there may be evidence that birds are not prospecting within the compensation site, or prospecting but not settling, or settling but abandoning during nest building, and each of these would lead to a requirement for different remedial measures. Data will be collected with the aim of understanding the reasons for whichever of these may be occurring, such as the suitability of the vegetation or disturbance (e.g. mammal movements outside the fence or vehicle movements) and the most appropriate corresponding responses. Once colonisation is established, if rate of growth is below expected levels then the causes would be investigated, to establish whether there are particular areas that are affected, or features that are the likely cause. For example, this could be the result of topography, vegetation structure, the proximity to fences, or areas favoured by predatory bird species (such as corvids or other gull species).
80. If required, adaptive management measures would depend on the circumstances, but could include:
 - Additional habitat management, conducted over winter and prior to LBBG arrival in spring, to enhance the attractiveness to nesting birds, e.g., through closer sward mowing, patchwork strimming, vegetation

suppression with a covering, creation of bare ground, placement of old sleepers (or similar) to provide structures for birds to nest against;

- Additional mammalian control measures;
 - If avian predation is identified as causing significant loss of eggs then options for reducing this which are not detrimental either to LBBGs or other AOE SPA conservation objectives will be investigated;
 - If initial recruitment is below the target level, then colony call playback and placement of decoy birds within the compensation site will be undertaken (although it should be noted that decoys may also be used to encourage birds to colonise the site from the first breeding season year following compensation installation, in which case this would represent an enhancement of the compensation measure already delivered); and
 - In the event that the above methods are undertaken, and the compensation site remains under-utilised or unused, then careful consideration would be given to the potential of alternative or additional locations, such as Outer Trial Bank if this is not selected as the primary location.
81. Over the life of the Project, should breeding fail for three consecutive years, the KCSG will be consulted on the potential need for adaptive management, unless a sufficient mortality 'credit' has been accrued to cover the remaining period of wind farm operation.

3.9 Reporting

82. 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.
83. An annual monitoring report would be produced that would set out the results of gull and predator monitoring, and details of any maintenance undertaken. The report would be produced after the breeding season, with results discussed with the LBCSG.
84. The report would include:
- Results from LBBG colony monitoring (colony counts, mapped nest locations and productivity monitoring);
 - Evidence of mammalian presence within the compensation site;
 - Assessment of whether LBBG population/productivity targets are being met;
 - Details of maintenance and/or predator management measures;
 - Identification of any required adaptive management; and
 - Approach to management and monitoring for the following year.

3.10 Governance

85. Following project consent, a LBCSG will be convened with relevant stakeholders and experts invited to be members. Invitees would include Natural England, the RSPB, and the relevant Planning Authority. Other invitees, such as the National Trust will be included where applicable.
86. The LBCSG will be consulted on the final LBBG CIMP which will build on the information in this Outline LBBG CIMP and set out the steps to be taken to put the measures in place. It is envisaged that in the run up to submitting the LBBG CIMP to the SoS, the LBCSG will meet at regular intervals (e.g. 3-4 per year). An independent chair will be appointed to oversee these meetings.
87. The LBBG CIMP will then be submitted to the SoS for approval.
88. Following approval of the LBBG CIMP the Project will begin the steps as outlined and report to the LBCSG as set out in the final LBBG CIMP. As a minimum, this is likely to comprise an annual meeting following the LBBG breeding season at which the results of the monitoring and next steps will be discussed.
89. The LBCSG will also be provided with the draft monitoring reports for comment before these are finalised for submission to the SoS no later than the January following each breeding season.

3.10.1 Approval of the Lesser Black-backed Gull CIMP

90. This section will detail how the SoS can approve the Lesser Black-backed Gull CIMP, with which the delivery of all agreed compensatory measures must be compliant.

4 Collaborative or Strategic Compensation

91. If a collaborative or strategic compensation measure is selected, this would wholly or partly, replace the Project's proposed project-led measure. Alternatively, this could be part of adaptive management if required.

4.1 Collaboration

92. North Falls is in discussions with Five Estuaries offshore wind farm regarding potential collaboration at, or adjacent to their selected VE2 site or at Outer Trial Bank. Should a collaborative option be taken forward, the extent of compensation would meet the combined scale of compensation required for both projects and would be discussed with the LBCSG.

4.2 Strategic Compensation

93. In accordance with guidance DESNZ (2025), a contribution to the Marine Recovery Fund (MRF) could be made in wholly or partly in substitution for project-led or collaborative measures provided the MRF is operational and an appropriate measure to compensate for potential effects to LBBG are available.
94. The options in the Library of Strategic Compensation Measures which could be of relevance to LBBG is predator reduction.

95. If a contribution to a Strategic Compensation Fund becomes a viable compensation measure, this section will confirm how a contribution will be made to said Strategic Compensation Fund, such as the MRF, and how such contribution will wholly or partly replace the Applicant's initial proposal of project-led/collaborative measures or as part of adaptive management.

5 Summary

96. This section will provide a summary of the delivery proposals detailed above for the agreed compensatory measures for LBBG.

6 References

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