



NORTH FALLS

Offshore Wind Farm

HABITATS REGULATIONS ASSESSMENT

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

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Glossary of Acronyms

AEoI	Adverse Effect on Integrity
CIMP	Compensation Implementation and Monitoring Plan
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
FFC	Flamborough and Filey Coast
GCSG	Guillemot Compensation Steering Group
GGOW	Greater Gabbard Offshore Wind Farm
GRCSG	Guillemot and Razorbill 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
RWE	RWE Renewables UK Swindon Limited
R2	Rampion 2
SoS	Secretary of State
SPA	Special Protection Area
SSER	SSE Renewables Offshore Windfarm Holdings Limited
SSSI	Site of Special Scientific Interest
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 3 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 guillemot and razorbill 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 Introduction

2.1 Background

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.
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.
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 for Energy Security and Net Zero (DESNZ).
5. With respect to guillemot and razorbill from the Flamborough and Filey Coast Special Protection Area (FFC SPA), the Applicant's RIAA [APP-178] 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. However, for guillemot, it is noted that in consenting R2, the Secretary of State concluded that an AEoI could not be ruled out beyond reasonable scientific doubt for in-combination effects on guillemot at FFC SPA and the Farne Islands SPA. Noting that the effects of R2 are similar to North Falls for this species from the FFC and Farne Islands SPA, the Applicant accepts that the Competent Authority is likely to consider the contribution of North Falls to be material also. Thus, for guillemot the Applicant has developed compensatory measures to fully compensate for the predicted effects at both SPAs. For FFC SPA, the effects are summarised in Section 4 and detailed in the RIAA Part 4 [APP-178], and for the Farne Islands, in the shadow appropriate assessment for guillemot submitted at Deadline 1 [REP4-063].
6. In the event that the Secretary of State (SoS) also concludes an AEoI on razorbill in the Appropriate Assessment, the Applicant has developed a without prejudice compensatory measure that could be applied to fully compensate the

predicted effects for razorbill. The predicted effects of razorbill from FFC SPA are detailed in the Report to Inform Appropriate Assessment (RIAA) Part 4 [APP-178].

7. The predicted effects for both species are summarised in Section 4 of the Guillemot and Razorbill Compensation Document [REP6-023].

2.2 Purpose of document

8. 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. As described in the sections below, for the project-led¹ 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.
9. The purpose of this document is to outline the contents of the Guillemot 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)² and later submitted to the SoS for approval.
10. The guillemot compensation is secured through the draft DCO [REP8-005] and in the event that razorbill compensation is required, this can be secured in accordance with the Without Prejudice HRA DCO Schedules [9.73, Rev 1].

2.3 Consultation

11. Pre-consent consultation is described in the Compensatory Measures Overview [APP8-015] and the Habitats Regulations Assessment Compensation Consultation [APP-185]. In addition, an expert topic group meeting was held with Natural England and RSPB on the 19th November 2025.

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

² should the SoS conclude an AEoI for guillemot only, as per Hornsea Project Four, SEP and DEP and R2

12. The ETG was held to provide Natural England and RSPB with updates on the North Falls auks compensation since examination. An overview of the auk surveys conducted in summer 2025 were discussed and results shared with the attendees.
13. 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.
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 GRCSG/GCSG, 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 GRCSG/GCSG will be to oversee the delivery of the compensation measures for North Falls.

3 Management measures at south west breeding colonies

3.1 Implementation and Delivery Roadmap

17. 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 3.8.3) 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

18. Further information on quantification of the scale of compensation is provided in Section 5 of the Guillemot and Razorbill Compensation Document [REP6-023].
19. It is the Applicant's position that the scale of compensation should support 20 breeding pairs of guillemot (11 (10.6) pairs for the FFC SPA and nine (8.8) pairs for the Farne Islands SPA) and five (4.1) razorbill, if required. This scale of compensation is based on the scenario of 50% displacement and 1% mortality of displaced birds, which is considered an appropriate precautionary scenario.
20. It is acknowledged that in consenting recent offshore wind farm (OWFs) in the southern north sea (Hornsea Project Four, Sheringham and Dudgeon Extension Projects and R2), the Secretary of State has applied a more precautionary scenario of 70% displacement and 2% mortality. If this scenario were to be applied, the equivalent calculations of compensation scale for North Falls would be 54 pairs for guillemot (30 (29.2) for the FFC SPA and 25 (24.7) pairs for the Farne Islands), and 11 (10.8) pairs for razorbill at the FFC SPA.

3.3 Location

21. This section of the final CIMP will detail the specific location(s) where compensation will be delivered and the suitability of the site(s) for the delivery of the compensation measures.
22. 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
23. 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 colonies³ and studies into levels of potential disturbance.
 24. The base of evidence included regarding site selection is detailed in Section 8 of the Guillemot and Razorbill Compensation Document [REP6-023].
 25. Reduction of recreational disturbance at small breeding colonies in the southwest of England is also being considered by other OWF projects (e.g. Five Estuaries, Outer Dowsing R2 and Dogger Bank D). 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.
 26. 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 5.4 of the Guillemot and Razorbill Compensation Document [REP6-023] and to be informed by surveys).
 27. 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 3.8.3.

3.4 Design

28. 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;

³ As discussed in Section 3.5, the surveys must be undertaken in late May/June and initial surveys have been commissioned in 2025.

- 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
29. 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 [7.2.5, Rev 1].

3.5 Delivery Programme

30. 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.
31. The Applicant will establish the GRCSG/GCSG post consent to inform the development of the compensatory measure(s).
32. Monitoring would commence at least one breeding season prior to commencement of the compensatory measure. It is expected that monitoring will be required annually for the first three years or until the measure is deemed to be operating successfully. Thereafter, monitoring throughout the operational life-span of North Falls will be undertaken and the frequency of this monitoring will be discussed with the GRCSG/GCSG and agreed with the SoS.
33. Site selection and design of the compensatory measure will be informed by surveys. Initial surveys are underway throughout late May to early July 2025. The GRCSG/GCSG will be consulted on the findings of these surveys.
34. The compensatory measure would be deployed 3 breeding seasons prior to the 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 [REP6-023].
35. The compensatory measure(s) would remain in place for the operational lifetime of the Project.

3.6 Permits and Licenses

36. 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.
37. Where a site is within a Site of Special Scientific Interest (SSSI), SSSI Assent would be sought from Natural England.
38. 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).

3.7 Routine Maintenance and Management

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

3.8 Monitoring and Adaptive Management

41. 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 [REP6-023]. 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 Objectives and Success criteria

42. The objective of the compensatory measure is to produce sufficient adult guillemot per year to compensate the predicted mean mortality of 2.2 (mean) birds per annum (1.2 at the FFC SPA and 1.0 at the Farne Islands SPA), and if required, to also produce sufficient adult razorbill per year to compensate the predicted mean mortality of 0.6 (mean) birds per annum at the FFC SPA (Guillemot and Razorbill Compensation Document, Section 4 [REP6-023]).
43. The compensatory measure will be required to support an average of 20 guillemot pairs per year, and if required, to also support an average of five razorbill per year (See Section 3.2 above and Section 5.3 of the Guillemot and Razorbill Compensation [REP6-023], submitted at Deadline 6).
44. The above targets are based on the Applicant's recommended scenario of 50% displacement and 1% mortality of displaced birds. Based on the more precautionary scenario of 70% displacement and 2% mortality, the predicted mean mortality of guillemot would be 6.1 birds per annum (3.3 at the FFC SPA and 2.8 at the Farne Islands SPA), and 1.6 razorbill at the FFC SPA. The required

compensation scale would be 54 breeding pairs of guillemot (30 (29.2) for the FFC SPA and 25 (24.7) for the Farne Islands SPA) and 11 pairs of razorbill.

3.8.2 Monitoring

45. 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. As discussed in Section 3.5, monitoring would commence at least one breeding season prior to commencement of the compensatory measure to provide a baseline. It is expected that monitoring will be required annually for the first three years or until the measure is deemed to be operating successfully. Thereafter, monitoring throughout the operational life-span of North Falls will be undertaken and the frequency of this monitoring will be discussed with the GRCSG/GCSG and agreed with the SoS.
46. Given the nature and scale of the proposed measure(s), it may be difficult to derive direct 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 and this will be discussed with the GRCSG/GCSG and agreed with the Secretary of State.
47. The results from the proposed monitoring, taken for pre-implementation and operational purposes, would be shared to the Marine Data Exchange (The Crown Estate) and relevant Local Environmental Records Centres.

3.8.3 Adaptive management

48. 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.
49. As discussed in Section 3.5, the Applicant will be required to deploy the compensatory measure at least three breeding seasons prior to the operation of North Falls. As discussed in Section 9.3 of the Guillemot and Razorbill Compensation Document [REP6-023], it is recognised that the average age of recruitment for guillemot and razorbill is six years and five years, respectively, however three years is required in order to avoid delays to the Project and to meet the Project objectives detailed in the Habitats Regulations Provision of Evidence [REP7-015]. During the first years of operation predicted annual mortality of guillemot and razorbill would accrue as mortality debt. This mortality debt will be considered during site selection and design of the compensatory measure to ensure it is recovered over the life of the compensatory measure.
50. Following three years of North Falls operation (at least six breeding seasons of the North Falls compensatory measure), a review of the success of the compensatory measure would be undertaken, in consultation with the GRCSG/GCSG, to determine if the compensatory measure is meeting the required success criteria (Section 3.8.1). It is expected that the mortality debt accrued within the first three years could be recovered during the life of the project and therefore this is deemed to be an appropriate timescale to review the compensation success.

51. In the event that the compensation is not yet delivering the average requirement of annual compensation 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 GRCSG/GCSG. For example, should nesting pairs be showing an increasing trend, it may be preferable to continue to review progress over the next 1-2 years, than to deploy adaptive management immediately, and this would be discussed with the GRCSG/GCSG.
52. Over the life of the Project, should the compensatory measure not deliver the average requirement for three consecutive years, the GRCSG/GCSG 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.
53. Adaptive management could include identifying additional/alternative sites to deploy further compensatory measures or moving to a collaborative or strategic measure (Section 4).

3.9 Reporting

54. 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.
55. 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

56. 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.
57. 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.
58. 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.
59. 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.

3.10.1 Approval of the Guillemot CIMP and/or Razorbill CIMP

60. 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.

4 Collaborative and Strategic Compensation

4.1 Collaborative measure

61. The Applicant is considering collaboration with other OWF 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. A Letter of Comfort from Cornwall Wildlife Trust [REP3-010] shows that Cornwall Wildlife Trust can provide the necessary services that would be required to deliver the potential collaborative measure.
62. 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 Marine Recovery Fund

63. 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.
64. 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.
65. If a 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.

5 Summary

66. 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>

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NORTH FALLS

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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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