

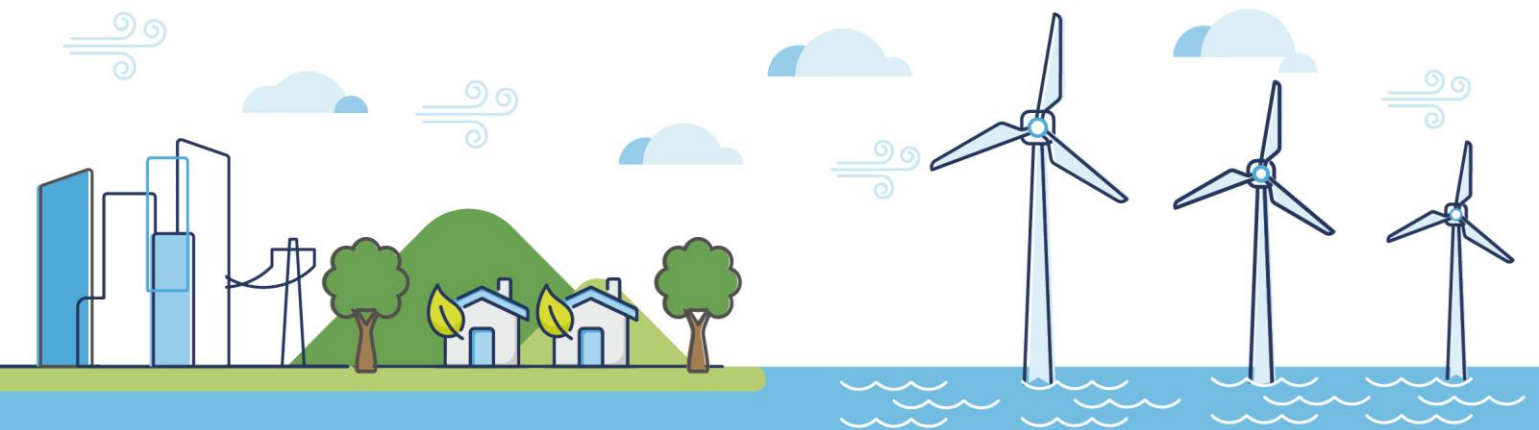


Morecambe Offshore Windfarm: Generation Assets

Lesser Black-Backed Gull Compensation: Steep Holm Implementation and Monitoring Plan 2026-2030

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1 Introduction

1.1 Project background

1. In December 2025, the Secretary of State (SoS) for Energy Security and Net Zero granted the Development Consent Order (DCO) for the Morecambe Offshore Windfarm Generation Assets ('the Project'). The Project will comprise an offshore windfarm with a capacity of up to 480MW. It will be located in the Eastern Irish Sea, approximately 30km from the Lancashire Coast, and comprise up to 35 fixed bottom wind turbine generators (WTGs) and associated infrastructure. It is expected that construction of the windfarm will commence in 2028, with commissioning in 2030.
2. In their Habitats Regulations Assessment (HRA) of the Project (DESNZ, 2025), the SoS determined that an adverse effect on integrity (AEol) could not be ruled out in respect of potential in-combination effects on breeding lesser black-backed gull *Larus fuscus* (LBBG) populations at two Special Protection Areas (SPAs); Morecambe Bay and Duddon Estuary SPA and Ribble and Alt Estuaries SPA. The predicted combined LBBG mean mortality, due to the risk of collision with WTGs, for the two SPAs as a result of the Project alone would be 1.02 individuals per annum (upper 95% confidence limit mortality of 3.43 individuals per annum).
3. Prior to the determination of the DCO, the Applicant (Morecambe Offshore Wind Limited) considered that AEol for the LBBG feature of the two SPAs could be ruled out, due to the small contribution of the Project to in-combination effects. However, notwithstanding this position, the Applicant prepared a 'without prejudice' derogation case and compensation proposals, which were submitted to the Examination of the DCO (Examination reference REP5a-011). The Applicant acknowledged that should the SoS decide that AEol could not be ruled out (which has subsequently proved the case), it would be necessary to initiate compensation measures ahead of the DCO determination. This is because LBBGs take four years to reach breeding age, and therefore, in order that breeding age birds are entering the population by the time that the impacts of the Project occur, compensation measures would need to be implemented at least four years before operation of the windfarm commenced.
4. In light of this requirement, compensation measures for the Project commenced during 2025. A summary of the works undertaken to date is presented in **Section 2.3**. The remainder of the document details the management and monitoring that will be delivered for the period until commencement of full operation of the windfarm. This has been assumed to be the period between 2026 and 2030, but will be updated should the

operational date change. It also outlines the further management and monitoring that will be required for the remaining 35-year operational period of the Project.

1.2 Lesser black-backed gull Compensation Steering Group

5. The Lesser Black-Backed Gull Compensation Steering Group (LBBGCSG) was established in January 2025 to help steer the delivery of compensation implementation and maintenance, monitoring, reporting and any other relevant matters, as determined by the conditions of the consent. Core members of the LBBGCSG are Natural England, the Royal Society for the Protection of Birds (RSPB), the Kenneth Allsop Memorial Trust (KAMT) (who own and are responsible for the management of Steep Holm Island) and the Morecambe Generation Project Team. Other technical specialists may attend meetings and provide advice, where invited by the LBBGCSG.

1.3 Purpose of document

6. This document sets out the management and monitoring measures that will be implemented at Steep Holm Island to deliver compensation for the potential Project effects on the LBBG populations of Morecambe Bay and Duddon Estuary SPA and Ribble and Alt Estuaries SPA. This covers the period from determination of the DCO (i.e. from 2025) to the operation of the windfarm (anticipated 2030). The document has been subject to consultation with the LBBGCSG, details of which are provided in Annex 1. It will be submitted for approval by the SoS as an appendix to the Compensation Implementation and Monitoring Plan (CIMP), in accordance with the Schedule 7 Part 1 of the DCO. This document also sets out the outline requirements for delivery of the compensation measures for the remaining 35-year operational period of the windfarm. These measures will be detailed in an update to this document/CIMP prior to commencement of that phase, and will be subject to further consultation with the LBBGCSG and approval by the SoS.

2 Management Measures

2.1 Overview

7. The compensation measure on Steep Holm for the Project comprises scrub clearance and vegetation management to increase available nesting habitat for LBBG, one of the species that nests on the island.
8. Steep Holm is a Site of Special Scientific Interest (SSSI) which lists breeding LBBG (as well as herring gull and great black-backed gull) colonies as a feature of interest, although they are not a reason for designation of the SSSI.

Steep Holm is not directly connected with either the Morecambe Bay & Duddon Estuary SPA or the Ribble & Alt Estuaries SPA, which may be impacted by the Project, but the island is potentially connected with other SPAs in the National Site Network (NSN), including the Skomer, Skokholm and the Seas off Pembrokeshire SPA. Therefore, LBBG recruited into this SPA from Steep Holm could potentially benefit the wider NSN.

2.2 Site location and access

9. The Steep Holm compensation measures are being undertaken at Steep Holm Island (approximate centroid 51°20.375'N; 3°6.503'W), which is located in the Bristol Channel approximately 8.5km west of Weston-super-Mare and 13km south of Cardiff. Measures are being implemented on an area known as the plateau, in the centre of the island, the location of which is shown on **Figure 2-1**.
10. Steep Holm is owned and managed by the KAMT. The island is accessed by boat either from Weston-super-Mare or Cardiff. The boat is arranged by KAMT and their preferred charter company (currently Bay Island Voyages¹).
11. All required personnel and equipment, which is not already available on-site, for the implementation of the compensation measure is transported by boat. Other vessel contractors may be required for specialist delivery of bulkier equipment, and some equipment is stored on the island to reduce potential transport delays.

¹ Bay Island Voyages: <https://www.steeptholm.online/sailings2>

Figure 2-1: Location plan



2.3 Summary of existing management and monitoring

12. The first phase of the implementation of the compensation measures was undertaken during 2025. Further details are provided in the 2025 annual report (MOR001-FLO-CON-ENV-RPT-0165), but in summary, this comprised:
- Baseline vegetation surveys, comprising daytime drone surveys supplemented with ground truthing to determine the extent of existing vegetation (including scrub) across the island. These surveys were undertaken in April and July 2025.
 - Nest count surveys of the island using thermal (nighttime) and RGB (daytime) drones, to estimate the number of active LBBG and herring gull *Larus argentatus* nests on the island. These surveys were undertaken in April and May 2025.
 - Nest monitoring and colour marking of LBBG chicks to provide an estimate of the breeding population and productivity and provide a baseline against which philopatry (and potentially recruitment to other colonies) can be estimated. This work was undertaken between April and July 2025.
 - The clearance of approximately 0.75ha scrub² on the plateau, to increase the available nesting area for LBBG. This work was undertaken at the end of September 2025.
13. In addition, ongoing site management is undertaken by KAMT for the island's historic environment features, nature conservation interests, and for visitor access and safety. This has included some rotational clearance of the 'open' Alexanders *Smyrnium olusatrum* dominated vegetation on the plateau, and clearance along the footpath network. Together, these areas are currently the core LBBG nesting habitat on the island. The compensation measures being implemented by the Project are in addition to works being undertaken by KAMT, and works undertaken by KAMT are not included in the 0.75ha scrub clearance described above.

2.4 Aims and objectives

14. The key aim of the compensation measure is to increase the number of breeding LBBGs at Steep Holm, through management to restore/create suitable LBBG gull nesting habitat. Monitoring of the LBBG population is also being undertaken, to assess the success of the measure (i.e. to demonstrate that aims and objectives are being met), and inform any adaptive management that may be needed.

² The clearance area is an estimate and will be confirmed through vegetation monitoring proposed for 2026 – refer to **Section 3.2**.

15. Objectives of the habitat management measure include:
- To increase the area of suitable LBBG nesting habitat on the plateau at Steep Holm through clearance of scrub, to create vegetation of suitable height and cover favoured by LBBGs, and prevent further scrub encroachment.
 - To maintain the extent of suitable habitat through ongoing vegetation and scrub management.
 - To ensure works do not adversely affect other features of ecological or historic importance.
16. Objectives of the monitoring include:
- To confirm the increase and subsequent maintenance of the extent of suitable breeding habitat for LBBG.
 - To estimate the breeding population of LBBGs on Steep Holm and demonstrate the required increase to meet the compensation requirements.
 - To monitor productivity within the Steep Holm LBBG population.
 - To monitor philopatry within the Steep Holm LBBG population, and as far as possible understand recruitment to other colonies.

2.5 Scale and location

17. The proposed locations of the scrub clearance and vegetation management works are illustrated on **Figure 2-2**.
18. Scrub clearance will be undertaken on the Steep Holm plateau in an area adjacent to the existing LBBG colony. The plateau is the core nesting location on the island, and historic aerial imagery shows that this area was effectively scrub-free in the past³. It has been agreed with Natural England and KAMT that the current extent of scrub is limiting the LBBG nesting population on the island.
19. It is proposed that the scale of the scrub clearance works on Steep Holm (at the location illustrated in **Figure 2-2**) to create new breeding habitat for LBBG will be approximately 0.96 hectares. As set out below, this scale of clearance has the potential to significantly over-compensate for the potential loss of LBBG at the Project. Approximately 0.75ha of scrub was cleared as part of the first phase of the compensation delivery in autumn 2025, and therefore approximately 0.21ha remains to be cleared. The exact extent of the cleared

³ E.g. [EAW049107 ENGLAND \(1953\). Steep Holm island, Steep Holm, 1953 | Britain From Above](#)

area will be determined as part of the monitoring to be undertaken in spring 2026.

20. Compensation is required for a predicted mean mortality of 1.02 adult LBBG individuals per annum lost to the SPA populations (combined Morecambe Bay & Duddon Estuary SPA and the Ribble & Alt Estuaries SPA) due to predicted collisions at the Project. Therefore, to quantify successful compensation for the Project, the compensation measure needs to deliver a minimum of 1.02 adult LBBG into the population each year.
21. There was disagreement between the Applicant and Natural England during the course of the Examination regarding the calculation used to quantify the quantum of compensation required. However, in their HRA of Project (REF) the SoS confirmed that the mean (or central impact value; CIV) predicted mortality should form the basis of the compensation quantum, together with a 3:1 compensation ratio to provide confidence that sufficient birds would enter the population. The SoS also confirmed that philopatry (i.e. the likelihood that birds will return to their natal site to breed, and conversely the likelihood that they would enter the wider population) should be taken into account.
22. The calculation of the required quantum of compensation is therefore as follows:

Predicted mortality (CIV) = 1.02 adults

Fledglings required to reach 1.02 adults of breeding age: $1.02 / (0.798 \times 0.885 \times 0.885 \times 0.885^4) = 2.08$ fledglings

To account for philopatry: $2.08 / 0.470^5 = 4.42$ fledglings

Adjusted for productivity: $4.42 / 0.45^6 = 9.83$ nesting pairs

3:1 compensation ratio: $3 \times 9.83 = 29.50$ nesting pairs

23. Assuming, therefore, that a minimum of 30 nests is required to deliver the required compensation, and based on a density of 452 nests/ha; (Ross-Smith

⁴ Based on Horswill and Robinson (2015) LBBG demographic rates, except herring gull rate (0.798) for juvenile survival due to low confidence in LBBG rate.

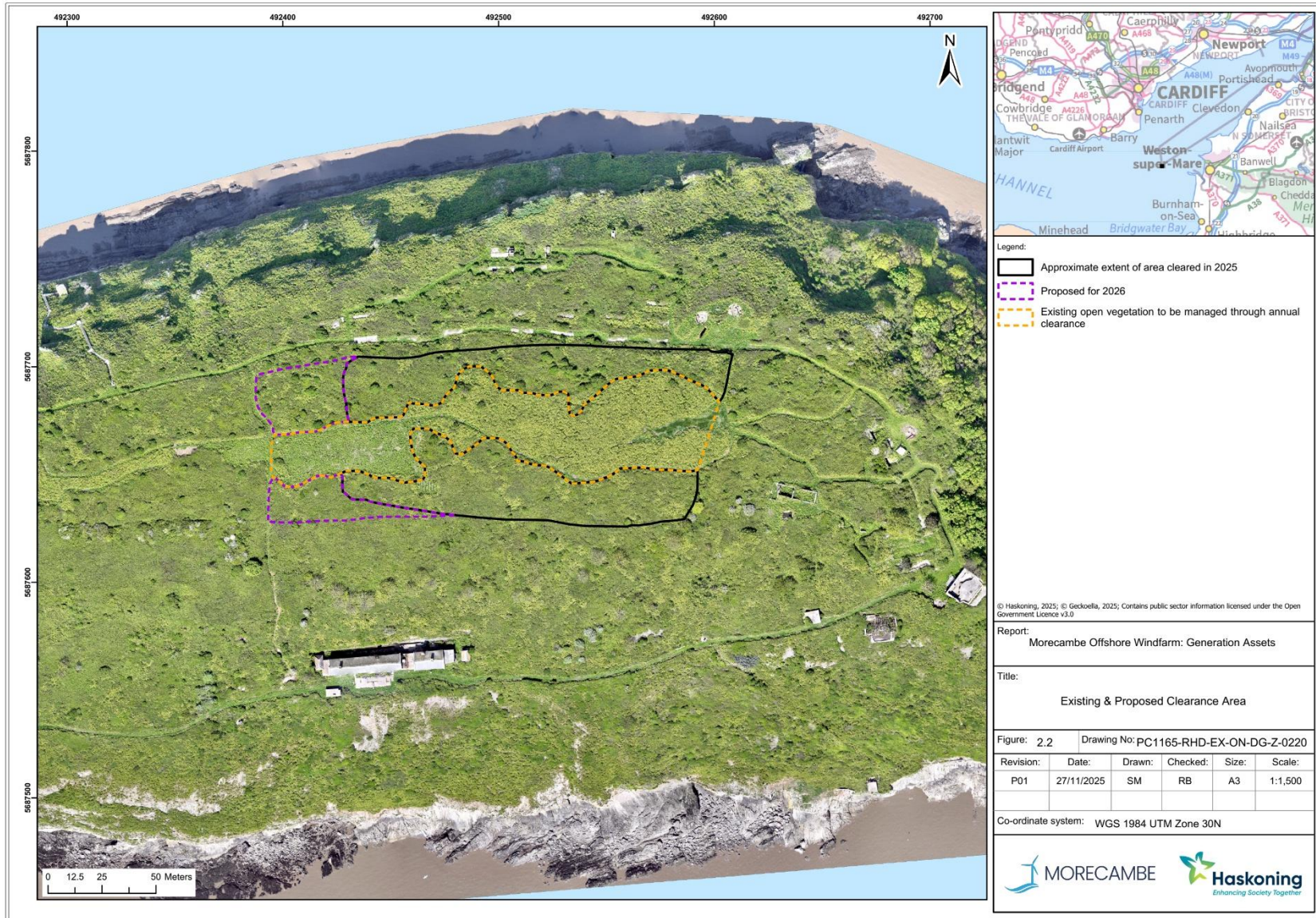
⁵ From Horswill and Robinson (2015). This rate was proposed by Natural England in its submission to the Examination [REP5a-070]. It is noted that the ExA and SoS suggested that the inverse of this value should be used (i.e. $1 - 0.470 = 0.530$). However, The Applicant agrees that Natural England is correct in this respect, as natal dispersal (0.470) represents the proportion of chicks entering the wider population, which is the number relevant to delivery of the compensation to the wider NSN. The inverse (0.530) would estimate the number of birds returning to the island to breed.

⁶ From JNCC (2021)

et al., 2015), approximately 664 m² (0.07 ha) additional nesting habitat would be required.

24. The Project is proposing to clear approximately 0.96ha. This is approximately 14 times the required area, with the potential to support approximately 434 LBBG nests (at 452 nests/ha). There is therefore high confidence that the scale of clearance will significantly over-compensate for the potential loss of LBBGs from the respective SPAs. As set out in **Section 2.3**, approximately 0.75ha of this area was cleared in 2025, with the remainder proposed for clearance in 2026. Notwithstanding this remaining clearance, the 0.75ha cleared to date would provide more than sufficient area to deliver the required quantum of compensation, overcompensating by more than ten times the area required.

Figure 2-2: Location of management works



2.6 Timing

25. Scrub clearance and vegetation management works on Steep Holm will be implemented during the LBBG non-breeding season (i.e. between September and February), after the birds have departed the island for their wintering grounds. As winter weather conditions are likely to result in logistical constraints for the scrub clearance and vegetation management works, the aim will be to complete the scrub clearance and vegetation management works between September and November, with the option to undertake the work in the late winter period (i.e. January/February) if completion earlier in the winter is not possible.
26. The remaining scrub clearance work will be undertaken in winter 2026/27, and vegetation management of existing open areas also undertaken at this time. Subsequently, maintenance management will be undertaken annually for the duration of this plan period (i.e. to 2030).
27. Monitoring will be undertaken between April and August annually for the duration of this plan period.

2.7 Management actions

2.7.1 Vegetation clearance

28. Scrub clearance (location illustrated on **Figure 2-2**) will be undertaken using appropriate tools (e.g. chainsaw/clearing saw/brushcutter).
29. Vegetation management (location illustrated on **Figure 2-2**) will also be undertaken using appropriate tools (e.g. flail-mower or brushcutter).
30. The method for scrub clearance will comprise:
 - A pre-commencement check of the clearance area will be undertaken (by walking through the scrub as far as possible, or progressively as areas are cleared) to identify ecological constraints or other sensitivities (such as the presence of sensitive plant species, slow-worms, deer or features of heritage importance).
 - Areas of scrub clearance will be visually marked (e.g. with stakes or other method) prior to clearance, and GPS positions taken.
 - As far as possible, an initial high cut of scrub (above 100mm) will be undertaken to mitigate for the presence of any reptiles in the clearance areas, and subsequently cut to ground level.
 - Clearance will be undertaken progressively from the edge of the clearance area.
 - Photographs will be taken of the cleared area before, during and following completion of the works.

- Arisings will be either (a) stacked neatly in ‘habitat piles’, locations to be agreed on-site with KAMT; or (b) cut into small pieces and spread evenly *in situ*. The preferred approach is (a), but (b) may be required if suitable areas to stack material are not available, in agreement with KAMT.
31. The method for vegetation management will comprise:
- Within areas subject to scrub clearance, annual cutting will be undertaken each autumn/winter (i.e. commencing the year after scrub clearance has been undertaken) to establish and maintain scrub-free vegetation. Cutting will be undertaken using a pedestrian flail mower (suitable machinery is already owned by KAMT and kept on the island) or, if this is not possible, using a brushcutter. Cut material will be mulched by the flail mower or chopped to small pieces by the brushcutter operator, and left *in situ* to break down.
 - In areas of existing ‘open’ alexanders-dominated vegetation, these will also be cut each autumn/winter, to maintain the open character of these areas. The extent of the existing open areas is shown on **Figure 2-2**. Clearance will be undertaken using a flail mower (or brushcutter, if required), as above.
 - Subject to monitoring, it is possible that the frequency of cutting for the scrub clearance and ‘open’ areas could be reduced to a rotational cut (i.e. 50% of the area cut annually, on rotation) at the end of the plan period, i.e. post 2030; refer to **Section 5**. This would be dependent on a reduction in the vigour of the scrub and alexanders-dominated vegetation, meaning that the open character of these areas could be maintained with the reduced cutting frequency.

2.7.2 Routine maintenance

32. Routine maintenance of the cleared and existing open areas will be undertaken through annual cutting, as set out above. Subject to monitoring, it is expected that this will continue beyond the end of the plan period, i.e. post 2030; refer to **Section 5**, though potentially with reduced frequency.

2.7.3 Adaptive management

33. In the event that monitoring indicates that the LBBG population has not increased sufficiently to achieve the required compensation requirement, adaptive management may be required. The threshold to trigger the requirement for adaptive management will be agreed with the LBBGCSG, taking into account, for example, the time since implementation of the measures, any identified trajectory in population size (e.g. the rate at which the population is growing), and any external factors that may be impacting the outcome. This will also be reviewed against population trends for other LBBG colonies in the region and nationally, to ensure that wider issues beyond the

control of the Project are not likely to be impacting population growth on the island.

34. It is not considered that adaptive management would be required during the plan period, as it is unlikely that any clear population trends will be established in this relatively short time.
35. In the event that it is agreed by the LBBGCSG that adaptive management is required, it is likely that this could be delivered through further scrub clearance on the plateau. Additional suitable areas to the west of the existing clearance areas have been identified, so it is known that additional nesting capacity could be provided on the island.

3 Monitoring

3.1 Introduction

36. Monitoring is proposed to enable the effective delivery of the compensation measures to be validated. This will be achieved through vegetation monitoring (i.e. to confirm that additional areas suitable for LBBG have been established), and monitoring of the LBBG population on the island, to confirm that the predicted population increase occurs. LBBG productivity monitoring will also be undertaken, as this will also affect the number of birds that will enter the population.
37. The monitoring will be undertaken against a baseline established through surveys undertaken in 2025, and will therefore focus on changes to that baseline.

3.2 Habitat monitoring

38. Habitat monitoring in 2026 and 2027 will comprise a repeat of the drone survey undertaken in 2025. This will be used to confirm the extent of scrub clearance completed. Although coverage of the whole island is not necessary for the purposes of the compensation, this will be included to assist KAMT with wider management of the island. A further repeat survey will be undertaken in 2030 to identify any changes in scrub and other vegetation during the period of this plan.
39. A drone will be used to record aerial imagery over the whole of Steep Holm Island. Ground truthing surveys (which were undertaken in 2025) will not be required for the 2026 and 2027 surveys, as significant changes in vegetation type are unlikely to have occurred. However, ground truthing will be undertaken alongside the 2030 drone surveys, to validate the survey results.
40. The drone and ground truthing survey methodology will follow the same approach as the 2025 surveys, as set out in the survey report (Geckoella,

2025), although adjustments to accommodate technology advancements may be undertaken, if required. In summary, the survey will comprise:

- A drone (unmanned aerial system; UAS) survey of the whole island to capture remote sensing data and aerial imagery.
 - The UAS will be operated by a suitably experienced operator, holding relevant Civil Aviation Authority (CAA) certification. The survey should also be undertaken in accordance with a site-specific risk assessment, taking into account the likely presence of island visitors.
 - The UAS will capture high resolution images of the whole island, which will be processed into a single georeferenced orthomosaic and digital elevation model.
 - Suitable analysis of the model will be undertaken to produce a habitat map of the island. Habitats on the island will be classified in accordance with the approach used for the 2025 surveys:
 - Alexanders scrub
 - Bramble scrub
 - Mixed scrub
 - Woodland / individual trees
 - Grassland
 - Bare ground
 - Bare rock
 - Buildings / built structure
 - Water
 - Ground truthing (in 2030 only) will be undertaken by suitably experienced ecologist(s) for randomly generated locations across the island, following the same approach as the 2025 survey (Geckoella, 2025).
41. The 2026 and 2027 surveys will be used to confirm the extent of scrub clearance undertaken in 2025 and 2026, by comparing the habitat extents between the surveys. 2030 (and subsequent) surveys will be used to identify wider changes in vegetation extent and composition, and identify changes in extent of open habitats suitable for nesting gulls. This information will be used to identify any changes to management, including any requirement for adaptive management measures, should the objectives of the compensation not be achieved.
42. In addition to drone-based monitoring of vegetation extent, checks of vegetation structure and regrowth will be undertaken as part of the proposed gull monitoring and management works. The checks will be undertaken twice

each year, once early in the season (April) and one late in the season (August or September) prior to vegetation management. This will comprise photographs from a minimum of four fixed locations (marked with a stake or other suitable , providing vantage points over the plateau area. These locations will be finalised on completion of the scrub clearance in 2026. In addition to the photographs, a qualitative assessment of the vegetation structure will be undertaken, to assess suitability for LBBG nesting. This information will be used to inform subsequent management. This would be undertaken by contractors working on the island, or by KAMT volunteers as part of existing planned visits, as appropriate.

3.3 Lesser black-backed gull monitoring

43. LBBG monitoring will be implemented to monitor the success of the compensation measure, i.e. to confirm that the required increase in the LBBG population is being achieved. The monitoring will include nest counts, bird ringing and productivity monitoring. It is noted that surveys undertaken in 2025 used two different approaches to estimate the number of nests present on the island (drone survey and mark-recapture estimation), and that there was some disparity between the results generated by the two methods. The reason for this disparity is not known, but the two contractors who undertook the different survey techniques have agreed to work closely during 2026 to better understand these differences, should they still occur. Notwithstanding this difference, it is considered that both approaches can be used as an index of the LBBG population, against which future changes and the success of the compensation measure can be monitored.

3.3.1 Drone nest counts

3.3.1.1 Drone survey

44. Nest count surveys by drone will be undertaken using the same approach as the 2025 surveys. This will be used to monitor changes in the LBBG population following the implementation of the compensation measures. It is proposed that surveys are undertaken annually for the duration of this plan (i.e. to 2030).
45. The surveys will comprise a combination of daytime (RGB⁷) surveys and nighttime thermal surveys. A minimum of three daytime flights and one nighttime flight will be undertaken. The daytime flights will be undertaken in April/May each year that the surveys are undertaken, with the survey times spread as far as possible. The thermal survey should be undertaken on the night before or after one of the RGB surveys, if possible. Flights should seek

⁷ Red Green Blue

to avoid periods where disturbance to nesting gulls is likely to occur, e.g. when visitors are present or when other surveys are being conducted.

46. The flights will follow a pre-programmed route, ensuring appropriate image overlap to enable orthomosaic generation. Flight heights should accord with those for the 2025 surveys (i.e. c. 50m above ground level (AGL), noting that a reduction in absolute height (i.e. above sea level) is required to cover the cliff slopes). If any evidence of disturbance is recorded, flight heights will be reviewed and increased accordingly.

3.3.1.2 Ground truthing

47. Ground truthing surveys will be focussed on the plateau of Steep Holm, using the same area as for the 2025 survey (including areas cleared for the compensation project). The ground truthing will be coordinated with the productivity surveys, to ensure, as far as possible, consistency between the two surveys.
48. Ground truthing surveys will be conducted as close in time as possible (i.e. within two days) to the thermal drone survey to ensure that the assemblage and distribution of gulls is as close as possible between the two survey types.
49. GPS coordinates will be recorded for each gull nest (LBBG and herring gull) encountered; nest coordinates recorded on the ground will be compared with geo-referenced drone outputs. This comparison will allow for the establishment of a correction factor (if required), which should serve to address the potential discrepancy between the number of birds recorded by drone and the number of actual nests present (Hälterlein et al, 1995; Corregidor-Castro et al, 2022).

3.3.1.3 Data analysis

50. For each survey, imagery will be combined to create a high resolution orthomosaic. These images will then be manually compared, and where gulls are recorded consistently in the same position and orientation for all surveys, this will be assumed to be an occupied nest. In some areas, where thermal surveys are not able to detect birds, an assumed nest will be identified based on consistent presence of a bird during RGB surveys only. Where possible, birds will be identified to species (i.e. LBBG or herring gull) from the RGB surveys; differentiation from thermal surveys is not possible. The outputs of the data analysis will comprise:
 - A total count of apparently occupied nests (AON) for LBBG and herring gull present on the whole island and broken down into sectors, both within the plateau and other areas.

- Individual counts of LBBG and herring gull as far as possible, together with unidentified gulls, also broken down by sector.
- A corrected estimate of AON for LBBG and herring gull, if required, based on the ground truthing.
- An Excel Spreadsheet and GIS Shapefile containing a georeferenced location for each individual gull recorded in the images, and also presented on suitable plans within a survey report.

3.3.2 Productivity monitoring

51. LBBG productivity monitoring will be repeated following the same method as for the 2025 surveys. This will comprise a minimum of four visits each year to:
 - Undertake nest and egg counts within the LBBG colony on the plateau.
 - Undertake colour ringing of chicks to enable subsequent identification of individuals.
 - Undertake a mark-recapture study of ringed birds to provide an estimate of the number of chicks likely to fledge from the population.
52. It is proposed that surveys are undertaken annually for the duration of this plan (i.e. to 2030). Further detail is provided below.

3.3.2.1 Nest and egg counts

53. Nest and egg counts will be undertaken in two areas on the plateau, on two visits (late April and mid-May). The two count areas will comprise the management area and a control (unmanaged) area, in accordance with the 2025 surveys. The two survey areas will be systematically walked by ornithologists to record the location (as a grid reference), number of eggs and parent species for each nest encountered. A photo of each nest will be taken to aid pairing between future surveys. The first visit will be undertaken, if possible, following completion of the drone surveys, to assist the verification of the drone nest count estimates. Evidence of interaction with the resident muntjac deer *Muntiacus reevesi* population would also be noted during nest surveys, specifically any evidence that nests have been trampled, or other evidence of muntjac activity that could affect nesting LBBGs.

3.3.2.2 Colour ringing

54. Two visits will be undertaken in late June and mid-July to colour-ring 'large' LBBG and herring gull chicks (from feather stage 'Feather Small' (the point at which a feather is more than one quarter emerged from the pin at around three weeks old) and where the tarsus was sufficiently developed). The ringing will cover all safely accessible parts of the island. Each bird will be identified to species (using plumage characteristics) and ringed with a coded British Trust

for Ornithology (BTO) metal ring and a separate alpha/numeric coded colour ring, to allow future identification with optics in the field without the need to recapture. Ringing will be undertaken by suitably qualified BTO permit holders, with appropriate biometrics recorded for each bird.

3.3.2.3 Mark-recapture

55. A mark-recapture study will be undertaken as soon as possible after the ringing, ideally the following day, to mitigate the risk of birds entering or leaving the population. The study will comprise the visual observation (using binoculars or telescopes, where required) of gull chicks old enough to have been encountered and marked during the previous visit (that is, approximately over three weeks), to count the total marked and unmarked birds. Any dead birds encountered would be excluded from the sample. The survey will cover all accessible parts of the island (as above, using optics where needed). A simple estimate of the total population of large chicks (i.e. productivity, P) can be calculated as:

$$P = M \times C / R$$

56. Where M is the number marked in the first sample, C is the total recorded in the second sample (i.e. both marked and unmarked birds), and R is the number of marked animals encountered in the second sample. An estimate of the number of LBBG chicks will be made using the proportion of LBBG to herring gulls encountered during the ringing visit as a proxy for unmarked LBBGs, as identification of chicks to species can only be made during handling. This method will provide a consistent index against which inter-annual change can be monitored. It is noted that this method makes a number of assumptions that may limit accuracy in terms of absolute population (refer to 2025 survey report for further information) but is considered to provide a suitable index to enable change to be monitored.
57. All results will be set out in an annual report that details the methods and results, and comparison with previous surveys.

4 Implementation programme

58. The implementation programme for delivery of the proposed management and monitoring is set out in **Table 4.1**.

Table 4.1 – Implementation Programme

Activity	2026					2027					2028					2029					2030																		
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D			
Habitat Management																																							
Scrub clearance																																							
Vegetation management																																							
Monitoring																																							
Habitat survey: drone																																							
Habitat survey: ground truth																																							
Assessment of vegetation and photo-monitoring																																							
LBBG nest counts: drone																																							
LBBG nest counts: ground truth																																							
LBBG productivity monitoring																																							
Reporting																																							
LBBGCSG meeting																																							
Annual report																																							
Key:																																							

5 Post-2030 management

59. Full details of management during the windfarm operational period (post 2030) will be set out in further documentation. Broadly, it is expected that this will continue the measures set out in this document, comprising:
- Annual rotational management of the plateau (scrub clearance and existing open areas) through autumn cut with a pedestrian flail mower or brushcutter. It may be possible to reduce the frequency of mowing (e.g. to cut 50% of the area on a two-year rotation), depending on the results of vegetation monitoring.
 - Vegetation monitoring, through drone survey and ground truthing, to confirm that the extent of open habitat suitable for LBBG is maintained. It is suggested that this monitoring is undertaken every five years for the duration of the compensation.
 - LBBG nest counts and productivity monitoring, using drone surveys and ground-based nest counts and ringing. It is suggested that this monitoring is undertaken at the same interval as the vegetation monitoring (i.e. every five years), but noting that this will be dependent on confirmation that the required compensation quantum has been achieved. The frequency of ongoing monitoring will be agreed through the LBBGCSG, and will maintain a degree of flexibility to account for any changes on the island or the wider LBBG population. This will be informed through ongoing work by KAMT and Severnside Ringing Group. In addition, the survey will include checks for previously ringed birds, to indicate the level of philopatry to the island. Colour rings will also be registered to the European colour-ring birding website (<https://cr-birding.org/>) to enable observations of birds elsewhere to be registered, and enable some understanding of recruitment to the wider population to be understood.
 - Adaptive management measures, should the objectives of the compensation not be met.
60. All measures will be subject to discussion with the LBBGCSG and sign off by SoS, through submission of further documentation (i.e. as part of updates to, or appendices to, the CIMP) and any subsequent updates.

6 References

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Annex 1: Consultation with the LBBGCSG

Date	Consultee	Comment	Response
16/12/2025	All LBBGCSG members	Draft (Rev02) document circulated to LBBGCSG members (KAMT, RSPB, NE, contractors)	n/a
06/01/2026	All LBBGCSG members	Steering group meeting at which the report was discussed, with no major concerns raised by members. NE agreed to provide written comments by 12/01/2026.	n/a
12/01/2026	NE	Comments on Rev02 of report:	n/a
		1) Two different estimates of area cleared have been used (paras 12, 19, 24). Noting that these are only estimates, nevertheless to avoid confusion, we recommend that it might be useful to agree on a single estimated extent cleared, until such time as the actual area is quantified by habitat mapping in 2026 and 2027.	The report has been updated for consistency.
		2) We note that habitat mapping is planned for 2026 to quantify extent of scrub clearance undertaken in 2025 (para 38) but not in 2027 after clearance work later in 2026. We recommend that areas of cleared scrub are accurately mapped after each scrub clearance block of work, hence we advise that a habitat survey would also be useful in 2027. We concur that it is unlikely to be required annually thereafter, and another survey at the end of the plan period, in 2030, would seem sensible to check extent of regrowth, unless anecdotal observation suggests it may be required beforehand (see below).	Method has been updated to include habitat survey on 2027 (Section 3.2).
		3) Whilst we recognise that ground-truthing habitat surveys are unlikely to be required 2026-2029, we would recommend that some form of annual monitoring for regrowth be undertaken (e.g. photos of all cleared areas taken from specific locations i.e. camera points, at least twice a year, early and again late in the season) to help inform adaptive management if necessary. This could be done by KAMT staff or contractors during gull monitoring visitors.	Additional vegetation monitoring added (Paragraph 42 of Section 3.2).
		4) In light of the large number of muntjac deer estimated to be on the island from direct observation by contractors in 2025, we recommend that the plan addresses the potential for monitoring of deer-gull interactions (e.g. recording evidence of trampling of nests/eggs).	Checks for muntjac deer impacts added to nest count method (Section 3.3.2.1)
		5) We welcome efforts to address the discrepancy between the number of gull nests recorded by drone and the number of actual nests present (para 48). We consider that	Noted, the commitment for contractors to work together to

Date	Consultee	Comment	Response
		<p>establishing the size and distribution of the breeding gull population on Steep Holm is critical to evidencing success of the proposed measure.</p>	<p>minimise and understand any disparities is included in Section 3.3.</p>
		<p>6) Whilst we acknowledge that intensive annual monitoring of gull productivity may not be necessary for the entire lifetime of the Project (para 58), we advise that an increase in the LB nesting population sufficient to satisfy the Project's compensation quantum will need to be achieved and evidenced, and the increase well-established before monitoring schedules are considered for reduction in frequency. We highlight that monitoring at 5-yearly intervals may not be sufficiently frequent to detect any significant changes in the breeding population and consider that on-going collaboration with the Severnside Ringing Group and/or KAMT may be necessary to act as an early warning system should numbers start to decline.</p>	<p>Clarification and a commitment to review the monitoring interval post-2030 is included in Section 5.</p>
16/01/2026	RSPB	<p>Meeting between RSPB, Skopeo and Haskoning ornithologist to discuss the productivity monitoring approach, and identify any updated advice or guidance that RSPB might have.</p>	<p>RSPB agreed that the approach was suitable and no specific changes were required.</p>