

**RWE Renewables UK Dogger Bank
South (West) Limited**

**RWE Renewables UK Dogger Bank
South (East) Limited**

Dogger Bank South Offshore Wind Farms

**Annex A - Outline Guillemot [and Razorbill] Compensation
Implementation and Monitoring Plan (Revision 2) (Clean)**

Volume 6

Submission for Deadline 4

April 2025

Application Reference: 6.2.2.1

APFP Regulation: 5(2)(q)

Revision: 02

Company:	RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited	Asset:	Development
Project:	Dogger Bank South Offshore Wind Farms	Sub Project/Package:	Consents
Document Title or Description:	Annex A - Outline Guillemot [and Razorbill] Compensation Implementation and Monitoring Plan (Revision 2) (Clean)		
Document Number:	005173991-02	Contractor Reference Number:	PC2340-RHD-OF-ZZ-RP-Z-0154

COPYRIGHT © RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited, 2024. All rights reserved.

This document is supplied on and subject to the terms and conditions of the Contractual Agreement relating to this work, under which this document has been supplied, in particular:

LIABILITY

In preparation of this document RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited has made reasonable efforts to ensure that the content is accurate, up to date and complete for the purpose for which it was contracted. RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited makes no warranty as to the accuracy or completeness of material supplied by the client or their agent.

Other than any liability on RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited detailed in the contracts between the parties for this work RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited shall have no liability for any loss, damage, injury, claim, expense, cost or other consequence arising as a result of use or reliance upon any information contained in or omitted from this document.

Any persons intending to use this document should satisfy themselves as to its applicability for their intended purpose.

The user of this document has the obligation to employ safe working practices for any activities referred to and to adopt specific practices appropriate to local conditions.

Rev No.	Date	Status/Reason for Issue	Author	Checked by	Approved by
01	June 2024	Final for DCO Application	RHDHV	RWE	RWE
02	April 2025	Submission For Deadline 4	RHDHV	RWE	RWE

Revision Change Log			
Rev	Page	Section	Description
01	N/A	N/A	Final for DCO Application
02	Throughout	All	Document populated with current implementation and monitoring proposals

Contents

1	Introduction.....	5
2	Background.....	6
3	Consultation	8
4	Predator Eradication / Control – Project-led.....	9
4.1	Scale and Location of Compensation.....	9
4.1.1	Scale.....	9
4.1.2	Location.....	10
4.2	Design of Predator Eradication / Control.....	11
4.2.1	Planning.....	11
4.2.2	Eradication.....	13
4.2.3	Biosecurity.....	14
4.3	Delivery Mechanism.....	15
4.4	Monitoring and Adaptive Management.....	16
4.4.1	Monitoring.....	16
4.4.1.1	Predator monitoring.....	16
4.4.1.2	Seabird monitoring.....	16
4.4.2	Adaptive management.....	17
4.5	Reporting	18
4.6	Programme for Implementation and Delivery	18
4.7	Discharge of Consent Condition.....	20
5	Collaborative and Strategic Compensation	21
6	References	23

1 Introduction

1. RWE Renewables UK Dogger Bank South (East) Limited and RWE Renewables UK Dogger Bank South (West) Limited ('the Applicants') have applied for a single Development Consent Order (DCO) for both the Dogger Bank South (DBS) East and DBS West Offshore Wind Farms (hereafter referred to as 'the Projects'). When fully operational, the Projects would have the potential to generate renewable power for over 3 million homes¹ in the United Kingdom (UK) from up to 200 wind turbines.
2. This document comprises the outline Guillemot [and Razorbill] Compensation Implementation and Monitoring Plan (G[R]CIMP) that will be further developed by the Applicants, in consultation with the proposed Guillemot [and Razorbill] Compensation Steering Group (G[R]CSG), should consent for the Projects be granted and compensation for guillemot [and razorbill] be required.
3. This outline G[R]CIMP has been developed in accordance with the **Appendix 2 - Guillemot [and Razorbill] Compensation Plan (Revision 4)** [document reference 6.2.2] which provides a detailed account of the strategy supporting the potential compensation measures for guillemot [and razorbill]. The detailed G[R]CIMP, developed based on this outline plan, will be submitted to the Secretary of State, post-consent, for approval.
4. The outline G[R]CIMP is structured as follows:
 - Section 1: Introduction
 - Section 2: Background
 - Section 3: Consultation
 - Section 4: Predator eradication / control
 - Section 4.1: Scale and location of compensation
 - Section 4.2: Design of predator eradication / control
 - Section 4.3: Delivery mechanism
 - Section 4.4: Monitoring and adaptive management

¹ Calculation based on 2021 generation, and assuming average (mean) annual household consumption of 3,509 kWh, based on latest statistics from Department of Energy Security and Net Zero (Subnational Electricity and Gas Consumption Statistics Regional and Local Authority, Great Britain, 2021, Mean domestic electricity consumption (kWh per meter) by country/region, Great Britain, 2021

- Section 4.5: Reporting
- Section 4.6: Programme for implementation and delivery
- Section 4.7: Discharge of consent condition
- Collaborative and strategic compensation

2 Background

5. The Applicants submitted, as part of their DCO application, **Report to Inform Appropriate Assessment (RIAA)** [document reference 6.1], which provides the information necessary for the competent authority to undertake an appropriate assessment (AA) to determine if there is any adverse effect on integrity (AEol) of sites within the UK National Site Network (NSN).
6. For guillemot from the Flamborough and Filey Coast Special Protection Area (FFC SPA), the Applicants' **RIAA Part 4 of 4 (Revision 4)** [document reference 6.1] considers the effects of disturbance and displacement mortality and concludes that AEol can be ruled out for the Projects alone. However, the Applicants, taking cognizance of the most recent decisions (i.e. Hornsea Project Four and the Sheringham Shoal and Dudgeon Extensions) on offshore wind farms by the Secretary of State (SoS), conclude that an AEol for guillemot at the FFC SPA could not be ruled out for in-combination displacement risk. The Applicants have therefore proposed compensation measures for guillemot.
7. For razorbill from the FFC SPA, the Applicants' **RIAA Part 4 of 4 (Revision 4)** [document reference 6.1] considers the effects of disturbance and displacement mortality and concludes that AEol can be ruled out. This is consistent with the outcome of The Crown Estate's Plan-Level Habitats Regulations Assessment (HRA) (The Crown Estate, 2022) with respect to FFC SPA razorbill. However, it is possible that the SoS may not agree with this conclusion and as such the Applicants have proposed 'without prejudice' compensation measures for razorbill.

8. The FFC SPA was designated in 2018. It is a geographical extension to the former Flamborough Head and Bempton Cliffs SPA, which was designated in 1993 (Natural England, 2018). Natural England (2023) has stated the target is to maintain the size of the guillemot breeding population at a level which is above 41,607 breeding pairs, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent. For razorbill the target is to maintain the size of the breeding population at a level which is above 10,570 breeding pairs whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent.
9. Through consultation with key stakeholders including Natural England, the Joint Nature Conservation Committee (JNCC) and the Royal Society for Protection of Birds (RSPB), the Applicants have developed compensation measures to offset the potential impacts to guillemot [and razorbill] from the FFC SPA.
10. The measure identified as being the most suitable for the Projects to deliver the required compensation is the eradication or control of invasive mammalian predators from seabird islands or colonies. The proposed compensation measures and the evidence for effectiveness are presented in the **Appendix 2 – Guillemot [and Razorbill] Compensation Plan (Revision 4)** [document reference 6.2.2].
11. In February 2024, the SoS for Defra approved the following compensatory measures as recommended by Collaboration on Offshore Wind Strategic Compensation (COWSC) for inclusion within the library of strategic compensatory measures (LoSCM) and for strategic delivery as compensation for offshore wind projects (Defra, 2024):
 - For benthic habitats:
 - Designation and / or extension of Marine Protected Areas (MPAs).
 - For seabirds:
 - Offshore ANS for kittiwake in English waters (only available for projects up to and including Round 4); and
 - Predator eradication and reduction.
12. The implementation of predator eradication and reduction as a compensatory option has also been included as a centrally approved measure by DESNZ (DESNZ, 2025) within guidance regarding strategic compensation in relation to the Marine Recovery Fund (MRF), and in Defra's Written Ministerial Statement (Defra, 2025). The inclusion of this option in such publications highlights confidence in this measure by UK Government

13. This Guillemot [and Razorbill] CIMP sets out the delivery proposal for the compensatory measure and provides an outline of the measure which will form the basis of the final Guillemot [and Razorbill] CIMP to be delivered to the SoS.

3 Consultation

14. This section summarises all relevant consultation undertaken in the development of the G[R]CIMP. Following consent, this section will contain details surrounding any key decisions, agreements, and where relevant any outstanding issues under discussion (with clarity as to the steps necessary to resolve any such matters).
15. Details of the meetings held with the ETG and Natural England related to the identification of the most appropriate compensation measure and site(s) are presented in **Appendix 2 – Guillemot [and Razorbill] Compensation Plan (Revision 4)** [document reference 6.2.2].
16. Post-consent, a guillemot [and razorbill] compensation steering group (G[R]CSG) will be formed. Ongoing engagement will be added to this document once the G[R]CSG has been formed.
17. The main purpose of the G[R]CSG will be to advise on delivery of the guillemot [and razorbill] compensatory measures for the Projects and therefore discussion will be focused on:
 - Project compensatory measure(s) design;
 - Monitoring programme;
 - Success criteria;
 - Adaptative management options; and
 - Adaptive management triggers.

4 Predator Eradication / Control – Project-led

4.1 Scale and Location of Compensation

18. This section currently sets out the scale of compensation proposed - the quantum of compensation required is still under discussion via examination. The final post-consent G[R]CIMP will detail the agreed compensation quantum and how this relates to the consent decision made by the Secretary of State. This section will then also detail the specific location(s) at which the compensation will be delivered and how the necessary land rights in those locations have been / will be secured.

4.1.1 Scale

19. As highlighted in section 3 agreement has yet to be reached on the predicted level of impact (annual mortality as a result of displacement) of the Projects. The range of predicted impacts at the time of writing is presented in **Table 4-1**. The final impact and compensation requirement will be confirmed by the Secretary of State's HRA and used to develop the detailed G[R]CIMP. For reasons explained in detail in **Precaution in the Ornithology Assessment and Implications for Compensation Quantum** [REP3-030], the Applicants consider a predicted impact of 162.8 individuals for guillemot [and 50.2 for razorbill] to be the most appropriate.

Table 4-1 Predicted operational impact (individuals) as a result of DBS based on the mean impact value (95% upper confidence interval (UCI)). Percentages in brackets represent apportionment of impacted birds to the FFC population. The Applicants' proposed value in bold.

Species	50% displacement, 1% mortality	70% displacement, 2% mortality
Guillemot (55.2%)	122.9 (253.5)	344.1 (709.8)
Guillemot (100%)	162.8 (313.6)	455.9 (878.2)
Razorbill (61.3%)	44.7 (143.5)	125.1 (401.9)
Razorbill (100%)	50.2 (153.4)	140.4 (429.6)

20. To determine the appropriate scale of compensation required to offset the predicted impacts of the Projects the Applicants adopted the same approach as other recently consented wind farms (Hornsea Four and Sheringham and Dudgeon Extensions), using productivity and age-specific survival to calculate the number of additional breeding pairs required to produce enough fledglings to replace the adults lost from the population. This approach is detailed in the **Appendix 2 – Guillemot [and Razorbill] Compensation Plan (Revision 4)** [document reference 6.2.2].

21. The range of values for the required compensation are presented in **Table 4-2**. Recent consultation with Natural England has indicated that compensation requirement (target) should be based upon the mean impact value but that the proposed compensation measure should have capacity to provide compensation based upon the 95% upper confidence interval (UCI). For reasons explained in detail in **Precaution in the Ornithology Assessment and Implications for Compensation Quantum** [REP3-030], the Applicants consider a compensation requirement of 719 guillemot breeding pairs [and 195 razorbill breeding pairs] to be the most appropriate.

Table 4-2 Compensation requirement (breeding pairs) based on the mean impact value (95% UCI in brackets) for a range of ratios. Percentages in brackets represent apportionment of impacted birds to the FFC population. The Applicants' proposed value in bold.

Species	50% displacement, 1% mortality			70% displacement, 2% mortality		
	1:1	2:1	3:1	1:1	2:1	3:1
Guillemot (55.2%)	543 (1120)	1086 (2241)	1629 (3361)	1521 (3137)	3042 (6274)	4562 (9411)
Guillemot (100%)	719 (1386)	1439 (2772)	2158 (4158)	2015 (3881)	4029 (7762)	6044 (11,643)
Razorbill (61.3%)	174 (557)	347 (1115)	521 (1672)	486 (1561)	972 (3122)	1457 (4683)
Razorbill (100%)	195 (596)	390 (1192)	584 (1788)	545 (1669)	1091 (3337)	8182 (25,029)

4.1.2 Location

22. The detailed site selection process is provided in the **Appendix 2 - Guillemot [and Razorbill] Compensation Plan (Revision 4)** [document reference 6.2.2]. The Applicants have identified Worms Head, South Wales as the most suitable site for proposed project-led compensation by means of predator eradication / control. Surveys undertaken in June 2024 to obtain seabird colony counts, and in January 2025 to assess and quantify habitat suitability for 'nesting' guillemot and razorbill are reported in the **Guillemot and Razorbill Compensation Site Shortlist Refinement Report (Revision 2)** [REP3-019]. These surveys highlighted that Worms Head has the potential to provide the Projects' required compensation (at most combinations of displacement/mortality rates and ratios). Further surveys are proposed in June 2025 to revisit the site during the seabird breeding season to update the population counts and confirm the quantity of unoccupied suitable habitat. These surveys will inform the scale in the detailed G[R]CIMP.

23. The island of Middle Mouse, North Wales is also still under consideration as a potential compensation site. Surveys undertaken in June 2024, which assessed the amount of available nesting habitat, indicated that Middle Mouse has potential to provide the necessary compensation at the Applicants' preferred rates of displacement and mortality (see **Table 4-2**). Surveys undertaken in February 2025 which aimed to confirm the presence of rats, were inconclusive and further surveys would be required to determine if rats are seasonally present when the breeding birds are on site.

4.2 Design of Predator Eradication / Control

24. Predator (rat) eradication follows a relatively established process as detailed in the UK Rodent Eradication Best Practice Toolkit (Thomas *et al.*, 2017), which provides guidelines adapted from international standards for use in the UK. The following sections describe the approach according to best practice, however, design of the eradication must be tailored to the chosen compensation site and will be developed in consultation with the G[R]CSG, and the landowners post-consent.
25. Factors that will influence the design include:
- Accessibility of the site;
 - Topography and landscape of the site;
 - Distribution and abundance of predators;
 - Presence of non-target species;
 - Mainland connection;
 - Habitation of the site; and
 - Public access.

4.2.1 Planning

26. An extensive planning stage will be required during which the scope of the project and access permissions are finalised. The licensing and permitting requirements will also be confirmed at this stage and relevant applications submitted, including to the Health and Safety Executive for a Critical Situation Permit to approve rodenticide use and wildlife licences for any potential disturbance.
27. A number of detailed plans will be developed including:
- Eradication operational plan;
 - Biosecurity and incursion response plan;

- Species monitoring and management plan;
- Health and safety plan;
- Waste management plan; and
- Stakeholder engagement plan.

28. Best practice recommends a ground-based rat eradication programme using bait stations containing an anticoagulant rodenticide, which is currently the most widely recognised effective method of eradicating rodents from islands (DIISE, 2018). Risk assessments carried out by regulators, including HSE, have shown that second generation anticoagulants (SGARs) present a high risk to non-target species. However, it is also recognised that alternative methods of rodent control may have limitations or may not always be suitable to tackle a landscape scale rat eradication project. Under GB Biocidal Products Regulations (BPR) products with unacceptable levels of risk may still be authorised if it can be shown that the negative impact on society and/or the environment of not allowing their use would outweigh the risks of using them, as is the case with SGARs. An industry-led stewardship scheme (Campaign for Responsible Rodenticide Use (CRRU)) is in place in the UK for professional use of SGARs, with the key aim being to reduce the exposure of non-target wildlife to SGARs. Stewardship is overseen by a Government Oversight Group (GOG) led by the Health and Safety executive (HSE) with representatives of other government stakeholders.
29. The specialist predator eradication contractor will, during the pre-eradication planning phase, carry out a diligent method selection process including the completion of a comprehensive environmental risk assessment where all methods and active rodenticide ingredients are ranked with due consideration of environment, non-target species and efficacy criteria. Preference will be given to the use of alternatives to anti-coagulant products, lethal (break-back) traps, however, should the selection process determine that rodenticide is the most appropriate method and a new approval is required for one or more recommended active ingredients, the contractor will follow best practice / precedent (including that followed successfully for the derogation to use rodenticide on the Rathlin Island rat eradication project by the RSPB and its consultants) and work alongside the preferred supplier(s), the CRRU, and HSE to seek approval (Critical Situation Permit) to use the preferred product(s) outdoors for seabird habitat restoration purposes for the duration of the Project.

4.2.2 Eradication

30. Predator eradication methods will be dependent on the target predator species however it is assumed at this stage that the target predator will be brown rat.
31. In line with best practice (Thomas *et al.*, 2017), stations (either non-toxic baited lethal traps or toxic bait boxes) may be positioned in a grid, ranging from 25 m x 25 m to 50 m x 50 m, across the chosen compensation area. Each station will be individually numbered and plotted using GPS. Once in position, stations should be left for one week or more with traps unset or without rodenticide in them, allowing the rats to become accustomed to them. Following this, the traps can be set or rodenticide will be added to the stations.
32. Stations should be checked a minimum of every two days, removing rat carcasses, resetting traps and replacing bait as it is consumed. Partially eaten bait should be replaced with a new block. Old or partially eaten toxic bait must be securely stored by the licenced eradication contractor and transported for disposal at a registered landfill or incineration facility as recommended by the safety data sheets. Checking stations regularly enables constant monitoring of bait take and the resulting die-off of rats which can be recorded into GIS-linked database apps in the field for ongoing analysis. Refinements to the eradication phase can then be made from this real time data. Hot spots can be identified quickly and targeted throughout the programme allowing for real time adaptive management, such as increased density of stations or altered quantity of toxic bait within stations.
33. It is proposed that the eradication phase will be carried out in the winter (September to February) when rodent numbers are naturally at their lowest, and when natural food supplies are low. This means that there are fewer rodents to catch, and those that do remain are more likely to take the bait in the absence of other food sources. It is anticipated that stations will be baited for a period of up to six weeks during which time the bait taken is expected to be reduced to zero.
34. Following the initial period (up to six weeks) of baiting, it will be vital to establish an intensive monitoring programme to detect any rats which may have escaped eradication. This will involve searching, recovering and disposing of rat carcasses, installing and maintaining a monitoring network.

35. A grid of rat-attractive food items as well as chew cards will be pegged out as monitoring tools across enclosed area(s). Tracking tunnels and trail cameras can also be used. The coverage of the monitoring grid should extend beyond that of the bait stations; one monitoring point at the station and one in-between two stations. All intensive monitoring points will be recorded on GPS and mapped on the GIS linked database to ensure coverage of the fenced area.
36. Each monitoring site should be checked every two days to detect rat signs (for example teeth marks or footprints or footage on camera). If any rat sign is detected, an intensive targeted baiting or trapping programme would be started until rat signs in the area ceases.
37. The intensive monitoring phase of the programme would start immediately following the eradication phase and continue until the end of winter (February/March). If rat signs are detected at the end of winter a second eradication programme should continue in the following winter (after the breeding bird season). This cycle would be repeated until no further signs of rat are detected at the chosen compensation site.

4.2.3 Biosecurity

38. The success of a predator eradication is dependent on the ability to maintain a predator free area. The way in which this is achieved will differ for each location and be tailored to focus on the main incursion risks for each location.
39. In general, biosecurity is anticipated to involve the placement of baited or lethal traps at points where incursion risk has been identified. For island locations, this is likely to be quays, harbours, slipways and other areas where vessels are likely to depart the mainland and access the island. Locations where distance between the island and mainland is short and a rat may swim across, should also be targeted.

40. For mainland sites or those with a mainland location, such as Worms Head the direct incursion risk is higher and could require more robust biosecurity measures, such as the installation of predator-proof fencing. Predator-proof fencing is widely used by conservation projects in the southern hemisphere and, although not widely used in the UK to date, there is a wealth of evidence to draw upon to support an effective design (Burns *et al.*, 2012; Young *et al.*, 2018; Long and Robley, 2004; Zealandia, 2021). It is possible that, for sites such as Worms Head, where there is a natural restriction on the ability of rats to access provided by the tidal causeway, control can be achieved through the use of traps, such as for island sites. However, this could only be determined following detailed pre-eradication studies to determine the level of rat activity and incursion risk.
41. A key component of long-term biosecurity is engagement with stakeholders, such as landowners, land managers, tenants and members of the public. The best practice toolkit (Thomas *et al.*, 2017) states that stakeholders should be informed, motivated and equipped to implement biosecurity measures. Therefore, depending on the nature of the chosen compensation site, stakeholder should be given the information about the biosecurity measures, with the benefits to the seabird colony clearly explained and the necessary equipment provided. In the case of landowners, land managers and tenants this could be provided in the form of a specialist training and a biosecurity toolkit containing all of the information and equipment to enable implementation of the biosecurity measures with relatively limited input from the Applicants. For publicly accessible sites, information boards may be required at strategic locations, again providing information, explaining the benefits and highlighting specific actions that individuals are required to take.
42. Biosecurity will be an ongoing commitment for the lifetime of the Projects.

4.3 Delivery Mechanism

43. Delivery of project-led predator reduction / control will be secured through legal agreement between the Applicants and landowners.
44. The Applicants have already secured the services of a specialist predator eradication contractor, who has undertaken the feasibility work to date and is positioned to undertake the eradication post-consent.
45. Delivery of potential strategic compensation is discussed in section 5.

4.4 Monitoring and Adaptive Management

46. In the detailed G[R]IMP this section will identify the monitoring and adaptive management principles and processes that have been agreed with the G[R]CSG post-consent, including the scenarios under which adaptive management measures are required. This outline G[R]IMP has been developed in line with the evidence base that has been provided in support of the **Appendix 2 - Guillemot [and Razorbill] Compensation Plan (Revision 4)** [document reference 6.2.2] and details the monitoring and adaptive management proposed by the Applicants at this stage.
47. Following discharge of the G[R]IMP, the G[R]CSG will be engaged in relation to implementing adaptive management if required as outlined in the Consultation section above.

4.4.1 Monitoring

4.4.1.1 Predator monitoring

48. Intensive monitoring undertaken as part of the eradication process is described in section 4.2.2. This section considers the long-term monitoring required following the eradication, which aims to detect re-incursion of rats to the compensation site.
49. The long-term monitoring cannot make use of lethal traps or bait but will make use of stations containing rat-attractive food items designed to detect signs of rat activity, such as wax blocks and chew cards, combined with tracking tunnels. Sim-card enabled trail cameras may also be used to enable quick, remote detection of rat activity.
50. The frequency of the long-term monitoring will be determined post-consent, in consultation with the G[R]CSG.

4.4.1.2 Seabird monitoring

51. The following activities are proposed to form the core requirements of monitoring the response of guillemot [and razorbill] to the predator eradication / control.
- Counts of relevant species in accordance with methods described in Walsh *et al.* (1995);
 - Estimation of productivity of relevant species, acknowledging that this can be difficult to ascertain for guillemot [and razorbill];
 - Noting opportunistic observations which may be affecting seabirds at the compensation site including things such as disturbance activity, changes in habitat and instances of avian predation; and

- Creation of a high-resolution photographic record of the colony.

52. The frequency of seabird monitoring will be determined in consultation with the G[R]CSG post-consent. It is anticipated that monitoring will be more frequent in the years immediately following the eradication and that, depending on results, may be reduced in frequency in subsequent years.

4.4.2 Adaptive management

53. The need for adaptive management will be considered following the appraisal of monitoring data collected following implementation of the compensation measure. Adaptive management measures will aim to specifically address any issues understood to be impeding the successful delivery of compensation at the chosen compensation site. There may be an element of expert judgement when determining whether adaptive management is needed, scale, and how to implement it. As such, when related to ecological matters, adaptive management will be discussed with the G[R]CSG following the identification for potential need.
54. As part of the eradication plan phase (section 4.2.1) an Incursion Response Plan will be developed, which will detail the actions to be taken should monitoring detect a re-incursion of predators to the compensation site.
55. Potential adaptive management measures that could be applied to the predator eradication / control measure are shown in

Table 4-3 Potential adaptive management measures for predator eradication

Monitoring outcome	Timeframe	Potential adaptive management measure
Eradication is unsuccessful	After (or during) 1 year of baiting activity	Further eradication with alternative bait or modified baiting station structure.
		Review of waste management practices.
	After 2 years of baiting activity	Relocation to an alternative site.
No increase in target species population	After 3-5 years of baiting activity	Vegetation clearance from around nesting sites.
		Use of attraction methods such as decoys, sound playback, and paint to simulate guano.
		Provision of artificial ground cover if avian predation is an issue.

Monitoring outcome	Timeframe	Potential adaptive management measure
	2 years after all other management measures have been exhausted	Relocation to an alternative site or exploration of alternative compensation method.

56. In the event that all adaptive management measures have been exhausted and the compensation measure is not delivering the necessary compensation, the Applicants, in consultation with the G[R]CSG will explore alternative compensation measures (e.g. artificial nesting structures, bycatch reduction, or contribution to strategic compensation fund) as adaptive management. These are discussed in the **Appendix 2 - Guillemot [and Razorbill] Compensation Plan (Revision 4)** [document reference 6.2.2].

4.5 Reporting

57. The **Draft DCO (Revision 7)** [document reference 3.1] outlines the reporting requirements for the Applicants in relation to the delivery of compensation via predator eradication.
58. An annual report will be produced by the Applicants detailing the effectiveness of the measure. This will comment on survey methods, success criteria, any requirement or consideration of adaptive management. This report will be submitted to the SoS following the annual analysis of data collected throughout the breeding season. Any barriers to success will be identified, and any requirement for adaptive management and details regarding consultation with the G[R]CSG will be outlined.

4.6 Programme for Implementation and Delivery

59. An outline implementation roadmap for the delivery of the project-led predator eradication is provided in Figure 4-1. The dates provided are indicative and at this stage may be subject to change as the timings of key milestones e.g. consent award, FID, construction and start of operation are still to be confirmed. Further details on the steps the Applicants will take to deliver the project led compensation are detailed in the **Appendix 2 - Guillemot [and Razorbill] Compensation Plan (Revision 4)** [document reference 6.2.2].

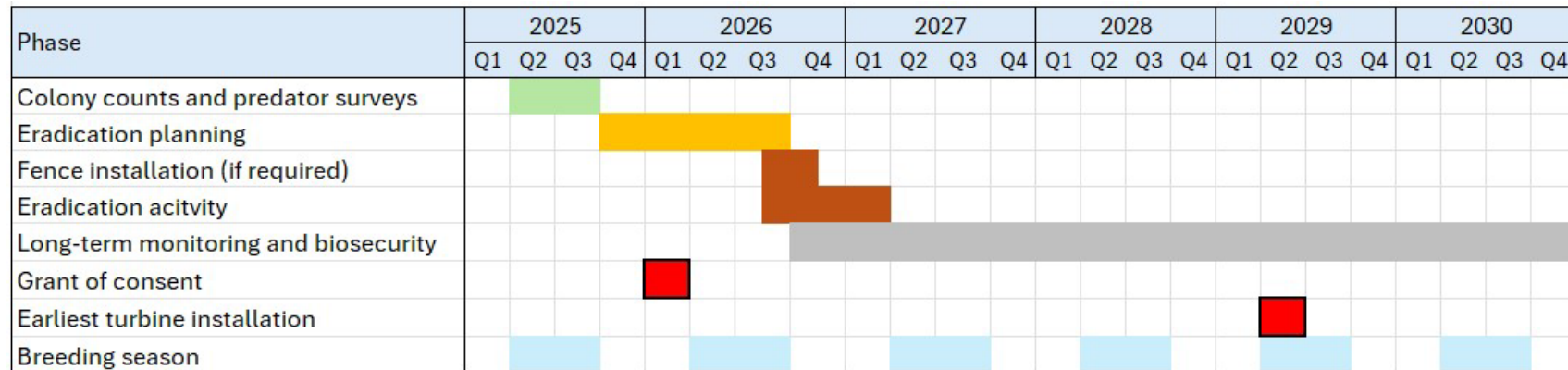


Figure 4-1 Indicative timeline for delivery of the predator eradication measure

4.7 Discharge of Consent Condition

60. This section when populated will confirm how, based on the content of this report, the Secretary of State can discharge the condition relating to the delivery of the compensation required for the guillemot [and razorbill] feature of the Flamborough and Filey Coast Special Protection Area.

5 Collaborative and Strategic Compensation

61. When fully populated, this section will, as secured by Schedule 18 of the **Draft DCO (Revision 7)** [document reference 3.1], confirm the nature of the collaborative compensatory measure/s to be delivered wholly or partly in place of the Applicants' proposed project led measures or as an adaptive management measure.
62. The Applicants identified the Isles of Scilly as a site with significant compensation potential. However, the Wildlife Trusts, in their response to the Examining Authority [AS-047] indicated that permission would not be granted to an individual developer to undertake an eradication on the Isles of Scilly and that the only way forward is a strategic approach.
63. In March 2025 Defra confirmed that a task and finish group, comprising Defra, DESNZ, Natural England, The Wildlife Trusts, OWIC, The Crown Estate and the RSPB has been formed *"to establish the mechanisms required to allow predator eradication to be delivered as a strategic compensation measure, noting the option for this to delivered by the Marine Recovery Fund"*. In order to avoid delays while the MRF is developed, OWIC confirmed in March 2025 that they have *"procured legal services to explore the establishment of a functioning developer-led delivery mechanism which would provide the offshore wind industry with a route to collaborative compensation whilst the Government-led MRF is in development"*.
64. Therefore, the Applicants consider that there is likely to be a strategic approach available to them in late 2025, either via the MRF or an interim fund established by OWIC.
65. In April 2025 Defra launched a consultation for the establishment of the MRF (Defra, 2025b). The consultation sets out draft guidance for how the MRF will operate and be managed, providing an opportunity for stakeholders to influence how the MRF will function. Final guidance to be published in autumn 2025 alongside the Statutory Instrument, after which developers will be able to make applications to the MRF.
66. The consultation document confirms that Defra will be the MRF operator (MRFO), with the ability to delegate or subcontract certain responsibilities.
67. The proposed MRF will allow applicants to 'reserve' compensation, if available, in agreement with SCNBs, in advance of submitting a DCO application. The amount of compensation reserved can be renegotiated with the MRFO throughout the examination and in response to the SoS's assessment of the level of compensation required. Developers can also choose to make up any shortfall by delivering their own compensation.

68. The applicant's DCO requirements pertaining to the reserved measure will be satisfied once DESNZ has received proof of the agreement of payment with the MRFO and evidence that the full payment, or the first of a series of instalments, has been made to the MRF. At this point, the MRFO will take on responsibility for the delivery of the agreed compensation as set out in the MRF IMP, including responsibility for monitoring and adaptive management. In instances with annualised or repeat scheduled payment plans the contractual agreement between the MRF and the developer will stipulate obligations imposed on the developer for the fulfilment of payment conditions.
69. If an applicant already has development consent and wishes to secure predator reduction as compensation via the MRF, the applicant may apply but will not be able to proceed to full payment until Defra (as MRFO) has determined the full cost of this compensation and prepared detailed IMPs.

6 References

Burns, B., Innes, J. and Day, T. 2012. The Use and Potential of Pest-Proof Fencing for Ecosystem Restoration and Fauna Conservation in New Zealand. In: Fencing for Conservation. pp. 65-90. New York: Springer.

Defra (2024) Letter to the Offshore Wind Industry Council. Approval of strategic compensation measures for offshore wind developments. 2 pp

Defra (2025a) Marine Environment - Statement made on 29 January 2025. Written statements - Written questions, answers and statements - UK Parliament.

Defra (2025b) Consultation for the Establishment of the Marine Recovery Fund (MRF).

DESNZ (2025) Strategic compensation measures for offshore wind activities: Marine Recovery Fund interim guidance.

DIISE (2018) The Database of Island Invasive Species Eradications. Island Conservation, Coastal Conservation Action Laboratory UCSC, IUCN SSC Invasive Species Specialist Group, University of Auckland and Landcare Research New Zealand. [REDACTED]

Long, K. and Robley, A. 2004. Cost effective Feral Animal Exclusion Fencing for Areas of High Conservation Value in Australia. A report for the Australian Government Department of the Environment and Heritage.

Natural England (2018) Flamborough and Filey Coast SPA Citation.

Natural England (2023) Flamborough and Filey Coast SPA Supplementary advice [online] available at:

[REDACTED]
[REDACTED] (accessed March 2024).

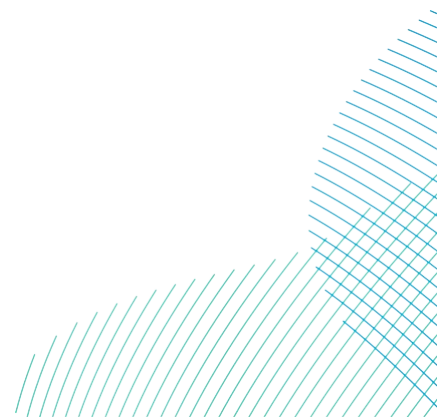
The Crown Estate (2022) Offshore Wind Leasing Round 4 Record of the Habitats Regulations Assessment. 38255-TCE-DOC-103.

Thomas, S., Varnham, K. and Havery, S. (2017) UK Rodent Eradication Best Practice Toolkit (Version 4.0). [REDACTED]
Royal Society for the Protection of Birds, Sandy, Bedfordshire.

Walsh, P.M., Halley, D.J., Harris, M.P., del Nevo, A., Sim, I.M.W. & Tasker, M.L. (1995). Seabird monitoring handbook for Britain and Ireland. JNCC / RSPB / ITE / Seabird Group, Peterborough. ISBN 1 873701 73 X.

Young, L.C., Behnke, J.H., Vanderwerf, E.A., Raine, A.F., Mitchell, C., Kohley, C.R., Dalton, M., Mitchell, M., Tonneson, H., DeMotta, M., Wallace, G., Nevins, H., Hall, C.S., and Uyehara, K. 2018. The Nihoku Ecosystem Restoration Project: A case study in predator exclusion fencing, ecosystem restoration, and seabird translocation. Pacific Cooperative Studies Unit Technical Report 198. University of Hawai'i at Mānoa, Department of Botany. Honolulu, HI.

Zealandia. 2021. Zealandia Te Māra a Tāne predator exclusion fence design and maintenance. Karori Sanctuary Trust, Wellington, New Zealand



**RWE Renewables UK Dogger
Bank South (West) Limited**

**RWE Renewables UK Dogger
Bank South (East) Limited**

**Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire, SN5 6PB**

