DBS Offshore Wind

RWE Renewables UK Dogger Bank South (West) Limited

RWE Renewables UK Dogger Bank South (East) Limited

Dogger Bank South Offshore Wind Farms

Kittiwake Compensation and Artificial Nesting Structure (ANS) Update

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Contents

1 ANS Update 5
1.1 Introduction 5
1.2 Current status of the ANS 5
1.2.1 ANS Base case design rationale 6
1.2.2 Updated Compensation Package 7
1.2.3 Summary 7
1.3 Post Application changes in assumptions on Compensation Quantum 8
1.3.1 Natural England's End of Examination Position 8
1.3.2 BTO Methodology 9
1.4 The Applicants' position 11

Tables

Table 1-1 Influence of productivity on CQ (green shading indicates scenarios that can be delivered with Applicants ANS design; red where it cannot) 10
Table 1-2 The Predicted Level of Compensation Required Calculated Using the Hornsea Three, Hornsea Four and BTO Approaches (U95% CI in parentheses, black border indicates NE end of examination position, success and scaling values in bold). 12
Table 1-3 Summary Of The Applicants Compensation Proposal For Kittiwake In Relation To Natural England's Checklist Criteria 14

Glossary

Term	Definition
Dogger Bank South (DBS) Offshore Wind Farms	The collective name for the two Projects, DBS East and DBS West.
The Applicants	The Applicants for the Projects are RWE Renewables UK Dogger Bank South (East) Limited and RWE Renewables UK Dogger Bank South (West) Limited. The Applicants are themselves jointly owned by the RWE Group of companies (51% stake) and Masdar (49% stake).
The Projects	DBS East and DBS West (collectively referred to as the Dogger Bank South offshore wind farms).

Acronyms

Acronym	Definition
ANS	Artificial Nesting Structure
BTO	British Trust for Ornithology
CIMP	Compensation Implementation and Monitoring Plan
CIV	Central Impact Value
CQ	Compensation Quantum
DBS	Dogger Bank South
DCO	Development Consent Order
FFC	Flamborough and Filey Coast
KSCP	Kittiwake Strategic Compensation Plan
MLA	Marine Licence Application
ODOW	Outer Dowsing Offshore Wind Farm
RFI	Request for Information
SPA	Special Protection Area
UCI	Upper Confidence Interval

1 ANS Update

1.1 Introduction

1. The purpose of this document is to provide an update to Natural England on the position of the Dogger Bank South (DBS) East and Dogger Bank South West Offshore Wind Farms ('the Projects') on the offshore artificial nesting structure (ANS) proposed to provide compensation for effects upon kittiwake (and auks) from the Flamborough and Filey Coast (FFC) Special Protection Area (SPA).

2. The contents of this report were discussed with Natural England on 25th November 2025, and this report has been provided to the Secretary of State to allow Natural England to make reference to the points raised in it. **Appendix 1 - Project Level Kittiwake Compensation Plan) (Revision 8)** [document reference 6.2.1] and **Outline Kittiwake Compensation Implementation and Monitoring Plan (Revision 4)** [document reference 6.2.1.2] submitted at this deadline have been updated based on the discussions with Natural England on 25th November 2025.

3. The information presented covers the points discussed in the meeting of the 12th November 2025 between the Applicants and Natural England and represents the case that the Applicants will be presenting to Secretary of State in their submissions to the Request for Information (RFI) (issued on 6th November 2025) which are due on 6th December 2025. The intention is to provide Natural England with this information so that this can inform their response to the RFI and provide comfort on those areas discussed in the meeting.

4. This document therefore provides:

- A brief discussion of how the design of the ANS was developed;
- The current status of the ANS design and delivery plan;
- Changes to assumptions of compensation calculations during the examination and beyond; and
- The Applicants summary of the position and how the ANS meets the requirements for compensation.

1.2 Current status of the ANS

5. A marine licence application (MLA) has been submitted for the ANS (MLA/2025/00344) with the consultation completed on 14th November 2025. As part of the process of consultation, the Applicants presented the ANS design basis to the Kittiwake Strategic Compensation Steering Group at a meeting in October 2025 and received positive feedback on the design parameters presented. This paper presented:

- Key design principles;
- Process to date with design contractors;

- ANS schematics;
- Programme issues (Steering Group/ Compensation Implementation and Monitoring Plan (CIMP) challenges); and
- Next steps.

6. The location and design of the ANS has been determined using the site selection and design principles set out by the Kittiwake Strategic Compensation Steering Group in the **Round 4 Kittiwake Strategic Compensation Plan (KSCP)** [APP-053] and the Hornsea 3 kittiwake ANS pattern book (LDA Design, 2021).

7. The **Outline Kittiwake CIMP (Revision 3)** [document reference 6.2.1.2] was updated with the latest details and provided to Secretary of State on the 14th November, ahead of the RFI letter.

8. The Applicants have included within the design of the ANS to have one ledge around the bottom of the ANS (above 20m lowest astronomical tide) with a wider ledge (50cm) for guillemot and razorbill (included as adaptive management within the **Guillemot [and Razorbill] Compensation Plan (Revision 7)** [document reference 6.2.2]). This would accommodate an estimated 415 guillemot and 62 razorbill. The ANS would also be manufactured to allow up to three additional rows to be retrofitted under the ANS (which will still be above highest expected wave height), which could increase capacity to allow for an additional 1,247 and 187 razorbill). The additional rows are not intended to be added unless a) they were needed (i.e. adaptive management needed) and b) the ANS was proven to be successful for auks. This is additional nest space and does not affect the number of kittiwake spaces.

1.2.1 ANS Base case design rationale

9. Given the long lead in times for development and the need to have the ANS operational prior to the operation the Projects, the Applicants began the design process of the ANS in 2023, with a 'base case' design fixed in mid-2024. This base case was set at 2,500 nest spaces using the following rationale:

- The mean impact of the Projects on adult kittiwakes from FFC SPA is estimated to be 104 to 191 birds per year (205 to 377 U95%CI)[1].
- The worst case scenario for nesting spaces was based on the application of a combination of the following (assuming 100% adults apportionment to FFC SPA:
  - Hornsea 3 part 2 (H3)
  - Mean value
  - 2:1
- This resulted in a nesting space requirement of 2,112 kittiwake breeding pairs. This was based on the assumption of the application of the H3 methodology, noting that the Applicants' favoured method at that time, Hornsea 4 (which was

[1] Original estimations were slightly lower ahead of RIAA updates in examination (mean of 100 – 182 and 196 - 359U95%CI)

the most recently used method for a consented project at that time) would have required approximately 1,000 nest spaces.

10. Therefore, a base case design with approximately 2,500 nesting spaces was considered suitable and precautionary and fell within the range for compensation determined through the KSCP of 2,500 – 5,500 for the Projects & Outer Dowsing Offshore Wind Farm (ODOW).

1.2.2 Updated Compensation Package

11. Following further iteration to the design of the ANS the number of nesting spaces that can be delivered per the base-case foundation and topside design is up to **4,200**. Re-designing the offshore ANS to accommodate higher numbers than this would cost millions, and take a significant amount of time, increasing the existing cost burden to the industry and the end-consumer on top of the already large cost to mean impact value ratio.

12. The Project also plans to deliver nesting spaces on the ODOW ANS to mitigate risk, however, this is on a reciprocal basis with ODOW and therefore does not represent an overall increase in capacity for the Projects. The latest information from ODOW states that the number of nest spaces will be 720[2]. While a Memorandum of Understanding exists between the Applicants and ODOW, this is covered by an Non-Disclosure Agreement, and the Applicants are not at liberty to disclose the number of nesting spaces that will be shared.

13. On this basis, the number of nesting spaces to be provided by Round 4 projects, **up to 4,920** greatly exceeds the minimum requirement of the KSCP of 2,500.

14. In addition, as adaptive management, the Applicants have already constructed an onshore ANS at Gateshead. This has a built capacity of 240 but a consented capacity of 480 – 720[3] nesting spaces. Note that the existing 240 nesting spaces are proposed to be shared with three other projects, and therefore, the potential share of nest spaces is subject to other consents but is a minimum of 96 nest spaces for the Projects. Should the onshore ANS capacity be increased, the increased capacity would be assigned to the Projects.

1.2.3 Summary

15. The Applicants have made good progress on the delivery of the kittiwake compensation requirement, with:

- Offshore ANS MLA submitted

[2] Kittiwake Compensation Plan dated 13th November 2025

[3] The onshore ANS has an installed capacity of 240 nesting spaces. A further 240 nesting spaces could be added through the addition of barn doors. Note that, the ANS and its foundation have been designed to allow the installation of a second Kittiwakery unit, hence further 240 nesting spaces could be added with a variation to the planning permission.

- Onshore ANS for adaptive management already in place
- Reciprocal compensation to be provided by ODOW
- The above in line with expectations at the time of application and in line with the KSCP.

1.3 Post Application changes in assumptions on Compensation Quantum

16. Following submission of the Development Consent Order Application in 2024, there have been ongoing discussions in relation to the position of Natural England on compensation quantum (CQ) and the methodology used to derive this. Key points are captured below. At the time of writing there is no agreement between the Applicants and Natural England on the CQ required.

1.3.1 Natural England's End of Examination Position

17. In their final position during the examination Appendix H8 - End of Examination Position on The Applicant's Proposed Offshore Ornithology Compensatory Measures [REP8-054] (see section 3) Natural England state that using the H3 method with a *U95% CI*:

*"Given the uncertainties associated with the proposed measures, the potential for indirect impacts on prey to intensify impacts on kittiwake, Natural England advise it would be necessary to **scale** the measures at a ratio of a minimum of 2:1 (sufficient space for 4,172 breeding pairs), and that there would be good justification for using a 3:1 ratio (sufficient space for 6,258 breeding pairs) should the lead-in time be reduced."*

18. The Applicants note that this statement refers to the scale of CQ but not the success value. The success value (assuming this is based on the **mean, H3 and 1:1 ratio**) would be **1,056 breeding pairs**. There is currently no precedent for scaling compensation, and while the Applicants intend to accommodate substantial headroom in the ANS design (with up to 4,200 nest spaces), there are major financial and programme implications for scaling compensation to the upper 95%CI.

19. In addition, the Applicants question the logic of applying a 3:1 ratio to address uncertainty over the timing of the measure. Any delay (i.e. implementation of the ANS less than 4 years before operation of the Projects) would simply shift the point of 'pay-off' of the compensation by the same period as that delay (see **Reduction in Kittiwake Breeding Seasons Prior to Artificial Nesting Structure Installation (Revision 2)** [REP4-083]). The likelihood of success is not contingent on the year of implementation.

20. Following the design and planning work outlined in section 1.2, the Applicants can now confirm that the ANS can be installed **three breeding seasons prior to first generation**. In addition, the Applicants have committed to maintain the ANS beyond the lifetime of the Projects if required (see paragraph 87 of the **Outline Kittiwake Compensation Implementation and Monitoring Plan (Revision 3)** [document reference 6.2.1.2]), therefore mitigating any effect of a delay and removing the need for a disproportionate ratio to be applied.

1.3.2 BTO Methodology

21. In addition to discussions around the existing methodologies for calculating CQ, at the end of examination a new methodology from the British Trust for Ornithology (BTO) was published.[4] This methodology was devised by BTO in order to deal with the noted deficiencies with the previously used methods (H3 and H4). The Applicants and Natural England have reviewed the methodology and consider that it is superior to previous methods. In response to the Secretary of State's Consultation for ODOW[5], Natural England state that they are "*cognisant of the advanced stage at which Outer Dowsing and the other Round 4 Projects are currently, and the risk of causing delays to consent in the context of meeting the 2030 clean power objective. We therefore suggest the Secretary of State (SoS) consider whether it is appropriate or reasonable to request that Outer Dowsing update their calculations of the compensation requirement for kittiwake at this stage in the determination phase, particularly given the range of compensation 'scenarios' already presented by Outer Dowsing (including presentation of different ratios)*". Natural England have confirmed with the Applicants that their advice for the Applicants remains consistent with that provided to ODOW. As such, while the Applicants do not support the application of the BTO methodology at this stage, the implications should it be used have been considered.

22. The Applicants provided the **Position Statement on Kittiwake Compensation Calculations** [document reference 20.8] with initial calculations of CQ based on the BTO method to the Secretary of State (14th November 2025). This was for information only, but followed a request made to ODOW by the Secretary of State.

23. Whilst the Applicants consider the BTO methodology is sound and reduces the uncertainty in the calculation of CQ from previous methods, they highlight that the method is highly sensitive to the assumptions used on kittiwake productivity (the F value, i.e. breeding success) at the ANS. This is illustrated in **Table 1-1**.

[4] Rhoades, J., Johnston, D.T., Humphreys, E.M. & Boersch-Supan, P.H.(2025) Review of methods used to calculate scale of artificial nesting structures proposed as a compensation measure for Kittiwake mortality at offshore wind farms BTO Research Report 788

[5] Natural England Letter to Department for Energy Security and Net Zero - Response to Secretary of State's Consultation for ODOW, 24 October 2025

Table 1-1 Influence of productivity on CQ (green shading indicates scenarios that can be delivered with Applicants ANS design; red where it cannot)

	Compensation quantum			
F	Mean Mortality (191) @1:1	U95%CI Mortality (377) @1:1	Mean Mortality (191) @2:1	U95%CI Mortality (377) @2:1
0.819	1,681	3,317	3,362	6,634
1.0	940	1,856	1,880	3,712
1.2	646	1,275	1,292	2,550

24. Using the F value of 0.819 (which the BTO report categorises as 'low'[6]) results in a CQ almost double that using an F value of 1.0 (which the BTO report categorises as 'medium'). This is critical, because one of the key drivers of the rationale for placing the ANS offshore is that there is anticipated to be higher productivity (because the birds are closer to the food supply and use less energy in feeding this translates into better reproductive success).

25. Applying the Natural England's end of examination position to the BTO methodology incorporates **three levels of precaution** in determining the CQ:

- Scaling against U95% CI rather than the mean,
- Use of low productivity (0.819) when siting the ANS offshore should lead to higher productivity
- Adding a ratio for uncertainty (2:1)

26. However, uncertainty has already been mitigated as far as possible via:

- Confidence in CQ value:
  - Apportionment in the assessment of 100% adult mortalities to FFC SPA which is a precautionary over-estimate of the mortality (in addition to other sources of precaution)[7]
  - Application of BTO method which both parties agree is more robust and Natural England have stated[8]
    a higher degree of confidence in the compensation requirement, as a result of the application of a more robust method that considers all relevant demographic features, may justify the use of a less precautionary compensation ratio which, as Rhoades et al notes, has previously been used to account for such uncertainties. This would particularly be the case where the

[6] Noting that below this value a colony will actually be in decline and the compensation will not be delivered

[7] See Precaution in the Ornithology Assessment and Implications for Compensation Quantum {REP3-030]

[8] In Natural England response to SoS on ODOW RFI dated 9th September 2025

other uncertainties under consideration are taken into account in the calculations used by an Applicant e.g. use of the 95% Upper Confidence Interval (UCI) impact value to account for the potential for impacts to be greater than the Central Impact Value (CIV).

- Increasing likelihood of success:
  - Redundancy provided by nesting spaces on ODOW ANS
  - Rigorous site selection process for the ANS using agreed methodology (from the KSCP)
  - Adaptive management options, including provision of onshore ANS since February 2023.

27. Therefore, the Applicants consider that if the BTO method were applied, regard needs to be given to how it is applied, and that the assumptions on inputs and ratios used for the H3 method may not be appropriate.

1.4 The Applicants' position

28. The Applicants design for the ANS could deliver up to **4,200** nest spaces, **three breeding seasons prior to first generation** if required by the Secretary of State, which would meet Natural England's end of Examination [REP8-054] **success criteria** for the measure (i.e. delivery of a sufficient number of breeding pairs with sufficiently high productivity to provide enough fledglings to ultimately result in 191 additional adult kittiwake entering the breeding pool per annum) of 1,056 breeding pairs (using H3, the mean and 1:1 ratio) and the **scale criteria** of 4,172 breeding pairs (H3, the U95%CI and a 2:1 ratio). As discussed in section 1.3.1 the Applicants consider that a higher ratio than 2:1 is not appropriate, given the commitment to extending the life of the ANS as mitigation if required.

29. In terms of the BTO methodology, **Table 1-1** illustrates that 4,200 nest spaces would deliver the required compensation in all but the worst case, exceeding Natural England's end of Examination [REP8-054] **success criteria** using the mean and a 2:1 ratio and delivering a ratio of 1.2:1 on the U95%CI **scale criteria**.

30. This illustrates that the Secretary of State can be confident that the measure proposed by the Applicants meets the requirements of the compensation as each step in the process is robust:

- The kittiwake assessment is suitably precautionary (in line with Natural England advice – see Table 2 of [REP8-053]);
- The compensation method is suitably robust (either BTO or H3 following Natural England advice, in line with their end of examination position) and ratios and scaling and applied proportionately;
- The ANS design & location are optimised (following KSCP, Natural England advice & consultation feedback);
- The delivery of the ANS is underway with the MLA submitted and development at a mature design stage;

- The ANS will be in place three breeding seasons prior to first generation
- Adaptive management is provided for in the in CIMP through extended ANS maintenance beyond the Projects lifespan if required, or contribution to a Strategic Compensation Fund;
- Adaptive management in place since 2023 in the form of the onshore ANS; and
- The proposals are in line with the expectations of the Round 4 plan as presented in the KSCP.

31. **Table 1-2** reproduces Table 2-2 from the Applicants' **Position Statement on Kittiwake Compensation Calculations** [document reference 20.8], colour coded to show, based on the ANS design of 4,200 nest spaces, which scenarios would be met (green = can be met, red = cannot be met).

Table 1-2 The Predicted Level of Compensation Required Calculated Using the Hornsea Three, Hornsea Four and BTO Approaches (U95% CI in parentheses, black border indicates NE end of examination position, success and scaling values in bold).

	Hornsea Three Approach (numbers of pairs required to offset impact)		Hornsea Four Approach (numbers of pairs required to offset impact)		BTO method (numbers of pairs required to offset impact)	
	Assuming 53% adult birds	Assuming 100% adult birds	Assuming 53% adult birds	Assuming 100% adult birds	Assuming 53% adult birds	Assuming 100% adult birds
DBS East + DBS West (1:1 ratio)	576 (1134)	**1056** (2086)	278 (548)	510 (1,007)	915 (1,804)	1,681 (3,317)
2:1 ratio	1,152 (2,268)	2,112 **(4,172)**	556 (1,096)	1,021 (2,015)	1,830 (3,608)	3,362 (6,634)
3:1 ratio	1,728 (3,402)	3,168 (6,258)	834 (1,644)	1,530 (3,021)	2,746 (5,412)	5,043 (9,951)

Note that values have been presented based on different breeding season impacts estimated assuming 53% of birds present were adults and also 100%. Values for 1:1, 2:1 and 3:1 are presented.

32. In summary, the Applicants have been proactive in ensuring the delivery of the compensation, and to that end made early decisions that were considered precautionary at the time. Notwithstanding the changes in advice on CQ and the advent of the BTO method, the proposed ANS built to the current design of up to **4,200 nesting spaces** will be able deliver robust compensation over and above the quantum of both the **success and scale criteria** proposed by Natural England in their end of Examination position.

Table 1-3 Summary Of The Applicants Compensation Proposal For Kittiwake In Relation To Natural England's Checklist Criteria

NE Compensation Criteria	Offshore ANS (primary compensation measure)	Onshore ANS (supporting or adaptive management measure)
a) What, where, when: clear and detailed statements regarding the location and design of the proposal.	What – Two offshore ANS to be delivered the following mechanisms: • A single project-led ANS developed by the Applicants. • A single ANS developed by ODOW. • The two projects will share nesting spaces to provide reciprocal resilience across the compensation measure (an MoU has been signed by the two parties), • Therefore delivering the strategic measure and approach in line with the KSCP, collaboratively through the installation of individual project-led ANS. • and / or strategically via a Strategic Compensation Fund (e.g. MRF). Where – The location of the offshore ANS is dependent on the delivery mechanism. The locations of offshore ANS are presented on **Figure 6-7** of the **Appendix 1 - Project Level Kittiwake Compensation Plan (Revision 7)** [REP9-007] and are discussed in section 6.3.4. A single candidate site (Site 6a) has been subject to geophysical surveys which have confirmed its suitability for ANS installation, resulting in a marine licence application being submitted in July for an area approximately 58km off the Yorkshire coast (see **Project Level Kittiwake Artificial**	What – The Applicants existing onshore ANS at Gateshead – the 'Kittiwakery'. Where – Gateshead, River Tyne's southern bank. The onshore ANS was constructed next to the Saltmeadows tower which supports approximately 100 pairs of breeding kittiwake. When –The Applicants onshore ANS at Gateshead was installed in 2023.

NE Compensation Criteria	Offshore ANS (primary compensation measure)	Onshore ANS (supporting or adaptive management measure)
	Nesting Structure (ANS) Site Selection Report (Revision 2) [REP8-035]). Strategic delivery of offshore ANS would be overseen by Defra in collaboration with COWSC and would be delivered alongside project led measures. When – The Applicants' offshore ANS could be installed at least two breeding seasons prior to operation of the DBS Projects.	
b) Why and how: ecological evidence to demonstrate compensation for the impacted site feature is deliverable in the proposed locations.	As evidenced by the SoS's decision for the Hornsea Four Project, offshore ANS is an accepted compensation measure for FFC SPA kittiwake and has also recently been approved as a strategic compensatory measure (Defra, 2024a). Offshore ANS is therefore considered to be both feasible and implementable. NIRAS on behalf of The Crown Estate identified six ecologically suitable offshore AoS for implementation of ANS with a further five identified by ODOW and one by Hornsea Four Project (Appendix D of the **KSCP** [APP-053]). Several of these sites were taken forward by the Applicants alongside newly identified AoS for further appraisal. A preferred site (Site 6a) has been identified by the Applicants for development. This site has been chosen following a rigorous site selection process in consultation with key stakeholders including Natural England. A geophysical survey at Site 6a is complete and has confirmed suitable seabed conditions for the installation of an ANS.	Onshore ANS are proven to support breeding kittiwake. The Applicants onshore ANS is located adjacent to an existing ANS (Saltmeadows tower) that supports over 100 kittiwake pairs.

NE Compensation Criteria	Offshore ANS (primary compensation measure)	Onshore ANS (supporting or adaptive management measure)
c) For measures on land, demonstrate that on ground construction deliverability is secured and not just the requirement to deliver in the DCO e.g., landowner agreement is in place. For measures at sea, demonstrate that measures have been secured e.g. agreements with other sea or seabed users.	As outlined in section 6.3.8, work is in progress to secure the deliverability of offshore ANS on either a collaborative or project-led basis. This includes the necessary agreements, consents, licences and leases. The Applicants have submitted a Marine Licence in July 2025 (case reference MLA/2025/00344) and are in negotiation for the terms with The Crown Estate over an Agreement for Lease for the offshore ANS within the examination period.	The Applicants existing onshore ANS is already implemented and is therefore readily available to deliver a proportion of predicted compensation requirements for the Projects if required.
d) Policy/legislative mechanism for delivering the compensation	The mechanism is outlined in the **Habitats Regulation Derogation: Provision of Evidence** [APP-051].	
e) Agreed DCO/DML conditions	A draft schedule for FFC SPA kittiwake compensation is provided within **Draft DCO (Revision 10)** [REP8-003]. The condition wording proposed is still to be agreed upon with the relevant statutory stakeholders.	
f) Clear aims & objectives & links to the conservation	The Applicants aim to compensate for the kittiwake losses incurred as a result of mortality associated with the development of the Projects through the provision of new nesting sites either onshore or offshore. This	

NE Compensation Criteria	Offshore ANS (primary compensation measure)	Onshore ANS (supporting or adaptive management measure)
objectives of the site or feature.	aligns with the conservation objective for FFC SPA of maintaining or restoring the population of the qualifying feature (breeding kittiwake) (section 4.2).	
g) Mechanism for further commitments if the original compensation objectives are not met – i.e., adaptive management.	**Round 4 KSCP** [APP-053] outlines several potential adaptive management measures and possible trigger points that were discussed with the KSCP Steering Group. Adaptive management options and approaches are being refined by the Applicants. Measures being considered are detailed in **Outline Kittiwake CIMP (Revision 2)** [REP4-020]. The Applicants have sought to align with this approach within this project level plan and as such, specific details regarding adaptive management are being developed in consultation with the relevant stakeholders and will be presented within the KSIMP and updates to the project level **Outline Kittiwake CIMP (Revision 2)** [REP4-020].	
h) Clear governance proposal for the post-consent phase (e.g. ToR agreed)	The Applicants offshore ANS proposal aligns closely with the information provided in **Round 4 KSCP** [APP-053] which was developed in accordance with the ToR for the Kittiwake Steering Group. Under these ToR, the Kittiwake Steering Group will continue to operate until all obligations have been discharged, including all post-consent requirements. It is currently unclear whether a separate governance process will be required for the delivery of compensation in accordance with the project-level derogation case (in addition to that required at the plan level). Nonetheless, a separate governance process has been outlined with respect to this project-level plan subject to the SoS confirming whether this is required. Further details will be agreed with the relevant stakeholders and provided post-consent in the KSIMP and project level Kittiwake CIMP (if required).	Installation of the onshore ANS was completed in 2023. Further details will be provided post-consent in the KSIMP and project level Kittiwake CIMP (if required).

NE Compensation Criteria	Offshore ANS (primary compensation measure)	Onshore ANS (supporting or adaptive management measure)
i) Ensure development of compensatory measures is open and transparent	The Applicants have actively participated in the Kittiwake Steering Group during the pre-application phase to support development of the **Round 4 KSCP** [APP-053]. This engagement has informed the Applicants' approach to compensation at the project level and has been supplemented with additional engagement with the kittiwake ETG, Defra and PINS in respect of the Applicants project level offshore ANS proposal. Key details in accordance with the NE Checklist, including an outline implementation and delivery roadmap (see section 6.3.8) is presented in this project level plan. Stakeholder engagement will continue post-application to support further development of the Applicants offshore ANS proposal.	The planning application process for the Applicants onshore ANS at Gateshead was undertaken in consultation with local and statutory stakeholders. All planning documents are publicly available (Gateshead Council, 2022 - DC/22/01188/FUL).
j) Timescales for implementation & how quickly the measures will contribute to the network	Both offshore ANS would be installed at least two breeding seasons prior to operation of the Projects.	Installation of the onshore ANS was completed in 2023.
k) Commitments to ongoing monitoring of measure performance against specified success criteria.	The Applicants have committed to commence monitoring the first breeding season following implementation of the measure. Monitoring would continue post-construction and at least until the success of the compensation has been demonstrated. The criteria against which success will be determined are being developed in consultation with the	Monitoring has been ongoing since installation in 2023 to assess the colonisation and productivity of the onshore ANS structure. Should this measure need to be relied upon either as compensation or adaptive management, a monitoring

NE Compensation Criteria	Offshore ANS (primary compensation measure)	Onshore ANS (supporting or adaptive management measure)
	relevant stakeholders, with updates provided in the **Outline Kittiwake CIMP (Revision 3)** [document reference 6.2.1.2].	programme would be agreed in consultation with the relevant stakeholders and presented within the KSIMP and project level Kittiwake CIMP (if required).
l) Proposals for ongoing sign off' procedure for implementing compensation measures throughout the lifetime of the project, including implementing feedback loops from monitoring.	A robust sign-off procedure will be developed post-consent in consultation with the relevant stakeholders and presented within the KSIMP and project level Kittiwake CIMP (if required).	Should this measure need to be relied upon either as compensation or adaptive management, a robust sign-off procedure would be agreed upon in consultation with the relevant stakeholders and presented within the KSIMP and project level Kittiwake CIMP (if required).
m) Commitment to continued annual management of the compensation area throughout the lifetime of the project	The Applicants have committed to regular management and maintenance of its offshore ANS throughout the lifetime of the Projects. Where there is room for improvements, modifications will be undertaken to help maximise the potential of the site. Further details regarding the maintenance programme for offshore ANS are provided in the **Outline Kittiwake CIMP (Revision 3)** [document reference 6.2.1.2].	The Applicants are committed to managing and maintaining its onshore ANS at Gateshead for the lifetime of the Projects. Where there is room for improvements, modifications will be undertaken to help maximise the potential of the site. Should this measure need to be relied upon either as compensation or adaptive management, information on monitoring and maintenance will be provided in the KSIMP and project level Kittiwake CIMP (if required) post-consent.

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