

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

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

# **Dogger Bank South Offshore Wind Farms**

**Habitats Regulations Derogation: Provision of Evidence  
Volume 6**

**Appendix 2 - Guillemot [and Razorbill] Compensation Plan  
(Revision 8) (Tracked)**

**December 2025**

**Application Reference: 6.2.2**

**APFP Regulation: 5(2)(q)**

**Revision: 08**

Company:	<b>RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited</b>	Asset:	<b>Development</b>
Project:	<b>Dogger Bank South Offshore Wind Farms</b>	Sub Project/Package:	<b>Consents</b>
Document Title or Description:	Appendix 2 - Guillemot [and Razorbill] Compensation Plan (Revision 8) (Tracked)		
Document Number:	005028821-08	Contractor Reference Number:	PC2340-RHD-OF-ZZ-RP-Z-0150

*COPYRIGHT © RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited, 2025. 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.*

<b>Rev No.</b>	<b>Date</b>	<b>Status/Reason for Issue</b>	<b>Author</b>	<b>Checked by</b>	<b>Approved by</b>
01	June 2024	Final for DCO Application	RHDHV	RWE	RWE
02	October 2024	Submission at pre-examination procedural deadline	RHDHV	RWE	RWE
03	November 2024	Submission on 22nd November 2024	RHDHV	RWE	RWE
04	April 2025	Submission at Deadline 4	RHDHV	RWE	RWE
05	May 2025	Submission at Deadline 5	RHDHV	RWE	RWE
06	June 2025	Submission at Deadline 6	RHDHV	RWE	RWE

# RWE

07	October 2025	Post-Examination Update	Haskoning	RWE	RWE
08	December 2025	Request for Information 1	Haskoning	RWE	RWE

Revision Change Log			
Rev	Page	Section	Description
01	N/A	N/A	Final for DCO Application
02	31	4.4	Text amendment to reflect updated razorbill SPA popFulation in response to Natural England Relevant Representation.
02	48	Table 5-1	Text amendment to remove RSPB recommendation of Isles of Scilly, in response to Relevant Representation.
02	49	5.3.1.2.3	Additional section added to present results of the shortlist refinement surveys undertaken since application.
02	55	5.3.1.5	Text amendment to reflect result of the site shortlist refinement.
02	55	5.3.1.6	Text amendment to reflect updated timescales relevant to refined site shortlist.
02	58	5.3.1.8.1	Section removed to reflect completion of the shortlist refinement.
02	58	5.3.1.8.1	Change of terminology from 'feasibility' study to 'pre-eradication' study.
02	62	5.3.1.8.3	Text amendment to include more detail on monitoring in response to Natural England Relevant Representation.
02	63	Plate 5-2	Replacement Plate to reflect updated implementation programme
02	71	Table 7-1	Text amendment to reflect that in-principle agreements are being sought throughout examination.
03	Throughout	Throughout	Updated document references and minor amendments
03	33-44	4.5	Updated impacts and compensation requirements
03	46-76	5.3.1	Text amendments to include updates on site selection and delivery

Revision Change Log			
04	Throughout	Throughout	Minor text amendments and updated document references
04	19-22	1.3.1	New text regarding recent guidance and consultation on the strategic compensation and MRF.
04	23-24	1.4	Text amendments to reflect updates to the Outline Guillemot [and Razorbill] CIMP.
04	33	Table 3-1	Update to include April 2025 meeting
04	39-50	4.5	Updated impact and compensation values to reflect recently consented projects, Natural England consultation and correction of an error in razorbill compensation calculations.
04	58-65	5.3.1.2.3	Text updates to reflect updates in compensation site selection.
04	66-72	5.3.1	Text updates on delivery of strategic compensation
04	68-69	5.3.1.5.1	Removal of Sheep Island
04	86	5.4.2.3	Text update to reference anticipated OWIC bycatch reduction studies
04	88-90	Table 7-1	Updated to reflect status of strategic compensation
05	Throughout	Throughout	Minor text amendments
05	19	1.3.1	Text update to reflect Applicants position on DESNZ guidance
05	51-77	5.3.1	Updates on compensation site selection and delivery
05	85-87	Table 7-1	Clarification on points regarding strategic compensation
06	45	Table 4-4	Correction of error in razorbill 3:1 ratio column
06	46-48	5	Inclusion of section for guillemot at the Farne Islands SPA
07	31-33	Table 3-1	Addition of further meeting with Natural England

Revision Change Log			
07	54-69	6.3.1.2 6.3.1.3 6.3.1.5 6.3.1.6 6.3.1.7	Updates to reflect progress in compensation site identification
07	70	Plate 6-1	Updated outline implementation roadmap for project-led option.
08	20	1.3.1	Update to reflect submission of the Marine Recovery Funds Regulations into Parliament.
08	33-34	Table 3-1	Inclusion of meetings with Natural England and NatureScot into the table of stakeholder meetings
08	42-43	4.5.1.5	Clarification of Natural England's advised compensation requirement for guillemot at FFC SPA
08	48	4.5.2.5	Clarification of Natural England's advised compensation requirement for razorbill at FFC SPA
08	52	5.3.6	Clarification of Natural England's advised compensation requirement for guillemot at Farne Islands SPA
08	63-69	6.3.1.2.4	Additional information added in relation to Scottish predator eradication sites.
08	72	6.3.1.3.2	Inclusion of reference to Heads of Terms and letter of support from landowners
08	72-74	6.3.1.4	Addition of information on the scale of compensation that can be achieved at the Scottish compensation sites.
08	80-84	6.3.1.8 Plate 6-1	Updated timeline/roadmap for project-led predator eradication
08	87-88	6.4.1	Inclusion of number of nesting spaces to be included on the ANS.

Revision Change Log			
08	95-96	8	Updated summary of compensation package
08	102	Annex A	Addition of Annex A – Letter of support

## Contents

1	Introduction.....	18
1.1	Background .....	18
1.2	The Crown Estate's Plan Level HRA .....	19
1.3	Strategic Compensation for Offshore Wind.....	19
1.3.1	Library of Strategic Compensation Measures and the MRF .....	20
1.3.2	Offshore Wind Industry Council (OWIC) .....	23
1.4	Environmental Compensatory Measures Reforms (ECMR) for offshore wind .....	24
1.5	Purpose of Document.....	25
1.6	Implications of the Proposed Development Scenarios .....	26
2	Legislation and Guidance.....	28
2.1	UK National Legislation.....	28
2.2	Guidance on Compensatory Measures.....	29
3	Development of Compensatory Measures.....	32
3.1	General Approach .....	32
3.2	Stakeholder Engagement.....	33
4	Flamborough and Filey Coast Special Protection Area.....	37
4.1	Overview .....	37
4.2	Conservation Objectives .....	37
4.3	Designated Feature – Guillemot.....	38
4.4	Designated Feature – Razorbill .....	39
4.5	Summary of Potential Impacts.....	41
4.5.1	Guillemot.....	41
4.5.1.1	Overview .....	41
4.5.1.2	Quantification of Effect – Displacement.....	42
4.5.1.3	Dogger Bank South Projects Alone .....	42
4.5.1.4	In-Combination with Other Offshore Wind Farm Projects .....	43
4.5.1.5	Compensation Requirement .....	44
4.5.2	Razorbill.....	45
4.5.2.1	Overview .....	45
4.5.2.2	Quantification of Effect – Displacement.....	46
4.5.2.3	Dogger Bank South Projects Alone .....	46



4.5.2.4	In-Combination with Other Offshore Wind Farm Projects .....	47
4.5.2.5	Compensation Requirement .....	48
5	Farne Islands SPA .....	51
5.1	Overview .....	51
5.2	Conservation Objectives .....	51
5.3	Designated Feature – Guillemot.....	51
5.3.1	Summary of Potential Impacts .....	51
5.3.2	Overview.....	51
5.3.3	Quantification of Effect – Displacement .....	52
5.3.4	Dogger Bank South Projects Alone .....	52
5.3.5	In-Combination with Other Offshore Wind Farm Projects .....	53
5.3.6	Compensation Requirement.....	53
6	Compensatory Measures.....	54
6.1	Potential Measures Considered.....	54
6.2	Strategic Fisheries Management (Prey Enhancement).....	55
6.3	Measures Taken Forward .....	56
6.3.1	Predator Eradication / Control.....	56
6.3.1.1	Overview .....	56
6.3.1.2	Screening of Potential Sites .....	57
6.3.1.3	Delivery Mechanism.....	71
6.3.1.4	Scale .....	73
6.3.1.5	Location.....	76
6.3.1.6	Timescales.....	79
6.3.1.7	Monitoring and Adaptive Management.....	80
6.3.1.8	Outline Implementation and Delivery Roadmap.....	81
6.3.1.9	Consideration of Potential Impacts from Implementation of the Compensatory Measure .....	90
6.4	Potential Adaptive Management Measures.....	90
6.4.1	Artificial Nesting Structure .....	90
6.4.2	Bycatch Reduction .....	92
6.4.2.1	Introduction.....	92
6.4.2.2	Overview .....	92
6.4.2.3	Techniques to Reduce Bycatch .....	94

6.4.2.4 Outline Delivery Mechanism for Bycatch Reduction .....	95
7 Funding .....	96
8 Summary .....	97
9 References .....	101
Annex A – Letter of Support .....	106

### Tables

Table 3-1 Details of ETG and relevant SNCB meetings regarding auk compensation .....	33
Table 4-1 Productivity and survival rates for guillemot (Horswill and Robinson, 2015) .....	44
Table 4-2 Productivity and survival rates for razorbill (Horswill and Robinson, 2015) .....	48
Table 4-3 Predicted operational impact (individuals) as a result of DBS (worst case scenario) based on the mean impact value (95% UCI). Percentages in brackets represent apportionment of impacted birds to the FFC population. Applicants' preferred values in bold .....	49
Table 4-4 Compensation requirement (breeding pairs) based on the mean impact value (95% UCI) for a range of ratios. Percentages in brackets represent apportionment of impacted birds to the FFC population. Applicants' preferred values in bold. ....	50
Table 5-1 Predicted operational impact and compensation requirements as a result of DBS (worst case scenario) based on the mean impact value (95% UCI). ....	54
Table 6-1 Stakeholder feedback on predator eradication site list .....	59
Table 6-2 Shortlisted sites for DBS Predator Eradication at pre-application stage .....	60
Table 6-3 Results of shortlist refinement studies .....	62
Table 6-4 Results of site refinement for secondary shortlist .....	64
Table 6-5 Example adaptive management measures for predator eradication .....	81
Table 8-1 Assessment of the proposed compensation against Natural England's checklist .....	97

### Plates

Plate 6-1 Outline implementation and delivery roadmap for project-led compensation ...	69
Plate 6-2 Outline implementation and delivery roadmap for strategic compensation at the Isles of Scilly .....	70

## Glossary

Term	Definition
Array Areas	The DBS East and DBS West offshore Array Areas, where the wind turbines, offshore platforms and array cables would be located. The Array Areas do not include the Offshore Export Cable Corridor or the Inter-Platform Cable Corridor within which no wind turbines are proposed. Each area is referred to separately as an Array Area.
Array cables	Offshore cables which link the wind turbines to the Offshore Converter Platform(s).
Baseline	The existing conditions as represented by the latest available survey and other data which is used as a benchmark for making comparisons to assess the impact of the Projects.
Concurrent Scenario	A potential construction scenario for the Projects where DBS East and DBS West are both constructed at the same time.
Development Consent Order	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Development Scenario	Description of how the DBS East and / or DBS West Projects would be constructed either in isolation, sequentially or concurrently.
Dogger Bank South (DBS) Offshore Wind Farms	The collective name for the two Projects, DBS East and DBS West.
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the value, or sensitivity, of the receptor or resource in accordance with defined significance criteria.
Environmental Statement (ES)	A document reporting the findings of the EIA and produced in accordance with the EIA Directive as transposed into UK law by the EIA Regulations.

Term	Definition
European Site	Sites designated for nature conservation under the Habitats Directive and Birds Directive. This includes candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas, and is defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017.
Expert Topic Group (ETG)	A forum for targeted engagement with regulators and interested stakeholders through the EPP.
Habitats Regulations	Conservation of Habitats and Species Regulations 2017 and Conservation of Offshore Marine Habitats and Species Regulations 2017.
Habitats Regulations Assessment (HRA)	The process that determines whether or not a plan or project may have an adverse effect on the integrity of a European Site or European Offshore Marine Site.
High Voltage Alternating Current (HVAC)	High voltage alternating current is the bulk transmission of electricity by alternating current (AC), whereby the flow of electric charge periodically reverses direction.
High Voltage Direct Current (HVDC)	High voltage direct current is the bulk transmission of electricity by direct current (DC), whereby the flow of electric charge is in one direction.
Impact	Used to describe a change resulting from an activity via the Projects, i.e. increased suspended sediments / increased noise.
In Isolation Scenario	A potential construction scenario for one Project which includes either the DBS East or DBS West array, associated offshore and onshore cabling and only the eastern Onshore Converter Station within the Onshore Substation Zone and only the northern route of the onward cable route to the proposed Birkhill Wood National Grid Substation.

Term	Definition
Inter-Platform Cable Corridor	The area where Inter-Platform Cables would route between platforms within the DBS East and DBS West Array Areas, should both Projects be constructed.
Inter-Platform Cables	Buried offshore cables which link offshore platforms.
Offshore Converter Platforms (OCPs)	The OCPs are fixed structures located within the Array Areas that collect the AC power generated by the wind turbines and convert the power to DC, before transmission through the Offshore Export Cables to the Project's Onshore Grid Connection Points.
Offshore Development Area	The Offshore Development Area for ES encompasses both the DBS East and West Array Areas, the Inter-Platform Cable Corridor, the Offshore Export Cable Corridor, plus the associated Construction Buffer Zones.
Offshore Export Cable Corridor	This is the area which will contain the Offshore Export Cables between the Offshore Converter Platforms and Transition Joint Bays at the landfall.
Offshore Export Cables	The cables which would bring electricity from the offshore platforms to the Transition Joint Bays (TJBs).
Ramsar site	Wetlands of international importance, designated under the Ramsar convention.
Sequential Scenario	A potential construction scenario for the Projects where DBS East and DBS West are constructed with a lag between the commencement of construction activities. Either Project could be built first.
Special Area of Conservation (SAC)	Strictly protected sites designated pursuant to Article 3 of the Habitats Directive (via the Habitats Regulations) for habitats listed on Annex I and species listed on Annex II of the Directive.

Term	Definition
Special Protection Area (SPA)	Strictly protected sites designated pursuant to Article 4 of the Birds Directive (via the Habitats Regulations) for species listed on Annex I of the Directive and for regularly occurring migratory species.
Statutory Nature Conservation Bodies (SNCBs)	Comprised of JNCC, Natural Resources Wales, Department of Agriculture, Environment and Rural Affairs/Northern Ireland Environment Agency, Natural England and Scottish Natural Heritage, these agencies provide advice in relation to nature conservation to government.
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).
Wind turbine	Power generating device that is driven by the kinetic energy of the wind.

## Acronyms

Term	Definition
AA	Appropriate Assessment
AEoI	Adverse Effect on Integrity
AfL	Agreement for Lease
ANS	Artificial Nesting Structure
BDMPS	Biologically Defined Minimum Population Scales
BESS	British Energy Security Strategy
BEIS	Business, Energy and Industrial Strategy
CIMP	Compensation Implementation and Monitoring Plan
COWSC	Collaboration on Offshore Wind Strategic Compensation
DBS	Dogger Bank South
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
DML	Deemed Marine Licence
DNA	Deoxyribonucleic acid
Defra	Department for the Environment and Rural Affairs
EC	European Commission
EEZ	European Economic Zone
ES	Environmental Statement
ETG	Expert Topic Group
FFC	Flamborough and Filey Coast

Term	Definition
FID	Financial Investment Strategy
GIS	Geographic Information System
GPS	Global Positioning System
HRA	Habitats Regulations Assessment
IROPI	Imperative Reasons of Over-riding Public Interest
JNCC	Joint Nature Conservation Committee
LEB	Looming Eye Buoy
MMO	Marine Management Organisation
MPA	Marine Protected Area
MRF	Marine Recovery Fund
NRW	Natural Resources Wales
NSN	National Site Network
OWEIP	Offshore Wind Environmental Improvement Programme
OWF	Offshore Wind Farm
OWIC	Offshore Wind Industry Council
PVA	Population Viability Analysis
RIAA	Report to Inform Appropriate Assessment
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SEP and DEP	Sheringham Shoal and Dudgeon Offshore Extension Projects
SNCB	Statutory Nature Conservation Body



Term	Definition
SPA	Special Protection Area
SoS	Secretary of State
UK	United Kingdom

## 1 Introduction

### 1.1 Background

1. RWE Renewables UK Dogger Bank South (East) Limited and RWE Renewables UK Dogger Bank South (West) Limited ('the Applicants') are applying 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 homes<sup>1</sup> in the United Kingdom (UK) from up to 200 wind turbines.
2. The Applicants submitted as part of their DCO application **Volume 6, Report to Inform Appropriate Assessment (RIAA) (application ref: 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). Following receipt of Relevant Representations, an update of **Volume 6, Report to Inform Appropriate Assessment (RIAA) Part 4 of 4 (Revision 3)** [AS-085] was provided to the Examining Authority in the pre-examination period and has been further updated throughout examination in response to representations received.
3. For guillemot from the Flamborough and Filey Coast Special Protection Area (FFC SPA), the Applicants' **Volume 6, RIAA Part 4 of 4 (Revision 4) (document ref: 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.

---

<sup>1</sup> 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.

4. For razorbill from the FFC SPA, the Applicants' **Volume 6, RIAA Part 4 of 4 (Revision 4) (document ref: 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 (see section 1.2 for further information). 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.
5. This document has been updated to provide the updated estimates of the compensation required, following the updated ornithological assessment **Volume 6, RIAA Part 4 of 4 (Revision 4) (document ref: 6.1)** regarding the impact of the Dogger Bank South (DBS) East and DBS West projects on guillemot and razorbill. An update is also provided regarding the identification of suitable sites at which compensation could be delivered.

## 1.2 The Crown Estate's Plan Level HRA

6. As part of the Plan-Level HRA (The Crown Estate, 2022) for the Fourth Offshore Wind Seabed Leasing Round (the 'Round 4 Plan'), The Crown Estate (as the competent authority) concluded that an AEol as a result of the Round 4 Plan, could not be ruled out for the FFC SPA breeding kittiwake feature and the Dogger Bank Special Area of Conservation (SAC) sandbanks feature, in-combination with other plans and projects. With respect to guillemot and razorbill the HRA concluded that there would be no AEol as a result of the Round 4 Plan.
7. On 15<sup>th</sup> July 2022, the SoS for Business, Energy and Industrial Strategy (BEIS) (now the Department for Energy Security and Net Zero (DESNZ)) approved The Crown Estate's derogation case and thus, The Crown Estate adopted the Round 4 Plan and subsequently entered into Agreements for Lease (AfL) for the six projects comprising Round 4.
8. Each of the Round 4 projects is required to undertake their own project-level assessment of effects on the designated sites of the UK NSN. The DBS project-level assessment is presented in **Volume 6, RIAA Part 4 of 4 (Revision 4) (document ref: 6.1)**.

## 1.3 Strategic Compensation for Offshore Wind

9. In April 2022, the UK Government published the 'British Energy Security Strategy' (BESS) (HM Government, 2022). The BESS committed to implementing an Offshore Wind Environmental Improvement Package (OWEIP), which included, among others, measures to:

- Revise the HRA process for offshore wind to facilitate the delivery of compensation measures whilst maintaining valued protection for wildlife;
  - Facilitate the delivery of strategic environmental compensation measures, including development of a library of compensation measures, through the Collaboration on Offshore Wind Strategic Compensation (COWSC)<sup>2</sup>;
  - Implement an industry-funded Marine Recovery Fund (MRF) to which developers can choose to contribute to meet their environmental compensation obligations; and
  - Implement a strategic monitoring programme to improve understanding of the environmental impacts of offshore wind projects.
10. The purpose of the OWEIP and these measures is to accelerate and de-risk, the consenting of offshore wind whilst ensuring environmental protections are maintained and domestic and international law is adhered to.

### 1.3.1 Library of Strategic Compensation Measures and the MRF

11. As outlined in National Policy Statement (NPS) for renewable energy infrastructure EN-3 (DESNZ, 2023a), the UK Government is still developing its policies on strategic compensation through the COWSC programme. However, in February 2024, the SoS for the Department for Environment, Food and Rural Affairs (Defra) approved the following compensatory measures recommended by COWSC for inclusion within the library of strategic compensatory measures (LoSCM) and for strategic delivery as compensation for offshore wind projects (Defra, 2024a):
- For benthic habitats:
    - Designation and / or extension of Marine Protected Areas (MPAs).
  - For seabirds:
    - Offshore artificial nesting structures (ANS) for kittiwake in English waters (only available for projects up to and including Round 4); and
    - Predator eradication and reduction.

---

<sup>2</sup> COWSC brings together industry, environmental non-government organisations (NGOs), statutory nature conservation bodies (SNCBs), the UK Government and Devolved administrations and other relevant stakeholders with the purpose of finding strategic compensation solutions that enable the required development of offshore wind, whilst offsetting any impacts to the environment.

12. Sections 291 and 292 of the Energy Act 2023 enable the use of strategic compensation measures and the SoS to make regulations related to the establishment, operation and management of one or more MRFs for the development of offshore wind and associated infrastructure, respectively.
13. Interim guidance was published by DESNZ in January 2025 (DESNZ, 2025) to support offshore wind developers in understanding how they can refer to the strategic compensation measures in the LoSCM ahead of the MRF being operational. Crucially, the guidance confirms the eligibility of the Projects, as Round 4 projects, for strategic compensation.
14. The Guidance was accompanied by a Ministerial Statement from Defra (Defra, 2025a) confirming consultation on reforms to the environmental compensation requirements for offshore wind projects, with an intention to bring in legislation in Autumn 2025. This will: *“aim to increase the number of measures available to developers to offset the adverse impacts of offshore wind developments, whilst retaining a robust process that ensures damage to our precious marine environment remains compensated for”*. Furthermore, the guidance confirmed<sup>eds</sup> the launch of a MRF in late 2025 to provide an optional mechanism for developers to fund strategic compensation measures. The Marine Recovery Funds Regulations 2025 were laid before Parliament on the 25<sup>th</sup> November 2025 and are expected to come into force on the 17<sup>th</sup> December 2025.
15. In the case of predator reduction, where offshore wind developers wish to rely on this measure ahead of the MRF being operational, developers will be required to deliver the measure either themselves or in collaboration with other projects.
16. Applicants may include a provision within their draft DCO allowing for a contribution to be made to the MRF as an alternative to delivering predator reduction themselves, once it is operational. However, this does not guarantee the availability of the measure, and the relevant SNCB must be consulted. Such a provision within the draft DCO would most likely restrict works predicted to result in an adverse impact to guillemot [and razorbill] (in the case of the Projects, this would be from the point of turbine installation) until evidence is provided that:
  - An appropriate level of compensation has been secured through the MRF;
  - The amount of any such contribution into the MRF has been agreed between Defra/the MRF Operator and the applicant; and
  - Payment has been made for the compensation measure.

17. Note that, at this time, provision for contributions to the MRF alone cannot satisfy the derogation requirement to compensate for an AEol in isolation and must be provided alongside project-led measures. However, the Applicants consider that, since release of the DESNZ (2025) guidance there has been a significant shift in the willingness of organisations to work with developers, reducing the ability of developers to secure project-led compensation (see section 6.3.1.2.3 for details).
18. COWSC has established implementation groups for each of the strategic compensation measures, including Implementation Group 2 – Predator Reduction. It is the Applicants' understanding that this group will be responsible for developing implementation and monitoring plans for predator reduction to be utilised by developers and future MRF operators. The intention is for that plan (once drafted) to be presented to the COWSC Programme Board by May 2025 or 12 months after the group was established, prior to the MRF being established. The Applicants will continue to engage with Defra, the COWSC group (through OWIC) and relevant industry forums post-application on progress with respect to the implementation of these strategic compensatory measures.
19. 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. The Marine Recovery Funds Regulations 2025 were laid before Parliament on the 25th November 2025 and are expected to come into force on the 17th December 2025. The consultation ran until 12<sup>th</sup> May 2025, with final guidance to be published in autumn 2025 alongside the Statutory Instrument, after which developers will be able to make applications to the MRF.
20. Further guidance on the MRF is expected however, ~~The~~ the consultation document confirms that Defra will be the MRF operator (MRFO), with the ability to delegate or subcontract certain responsibilities. Defra will be responsible for approving strategic compensation measures into the LoSCM, with advice from COWSC and SNCBs, and the MRF will only deliver measures from the LoSCM. If a compensatory measure no longer has capacity to provide further compensation to new applicants, or the status of the deliverability of the measure changes, it will be removed from the LoSCM and reintroduced if further capacity becomes available. If the LoSCM does not contain an SCM that suits the applicant's requirements, the applicant will not be able to use the MRF.



21. 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.
22. 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.
23. 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.

### 1.3.2 Offshore Wind Industry Council (OWIC)

~~23.~~24. The Applicants are active members of the Offshore Wind Industry Council (OWIC) derogation sub-group which was formed in 2021 to support the work of the Pathways to Growth<sup>3</sup> (P2G) Coordination Group and to aid collaboration across the offshore wind industry. The P2G is the Sector Deal's workstream focussed on identifying and addressing the key environmental and consenting challenges that will be a barrier to the UK meeting its offshore wind 2030 target and playing its full role in delivering net zero. This includes HRA derogation, which is recognised as a key barrier to the growth of offshore wind.

---

<sup>3</sup> <https://www.owic.org.uk/our-work/pathways-to-growth> (accessed April 2024). The Sector Deal's workstream focussed on identifying and addressing the key environmental and consenting challenges that will be a barrier to the UK meeting its offshore wind 2030 target and playing its full role in delivering net zero. Recognising the scale of the challenge, P2G brings together government representatives, SNCBs and industry across the UK's Devolved Administrations to work together in partnership.

25. The OWIC derogation sub-group has supported the work of the COWSC group in developing strategic compensation measures for offshore wind. The Applicants will continue to actively engage in the OWIC derogation sub-group and support the development and delivery of strategic compensation measures for the relevant sites / features through this collaborative initiative.

## **1.4 Environmental Compensatory Measures Reforms (ECMR) for offshore wind**

26. On 3rd December 2025 morning DEFRA published the Government's response to its consultation on proposed Environmental Compensatory Measures Reforms (ECMR) for offshore wind, confirming that the Government will go ahead with reforms as part of its wider Offshore Wind Environmental Improvement Package. Ministers presented these reforms as central to the clean power mission, arguing they will help de-risk and accelerate consenting for offshore wind, while continuing to protect the marine environment and the UK's network of Marine Protected Areas (MPAs).
27. The legislative changes will be made via secondary legislation to the Habitats Regulations only. The Marine and Coastal Access Act regime for Marine Conservation Zones (MCZs), and measures of equivalent environmental benefit, will not be amended. Much of the detail will sit in guidance, which the Government intends to keep flexible and update over time. The immediate next steps are for the Government to draft and lay the secondary legislation under section 293 of the Energy Act 2023 to amend the Habitats Regulations, and to publish accompanying guidance setting out how the new regime will operate in practice.
28. An outcome of the reforms will be enabling wider compensatory measures. Government will allow compensatory measures that deliver environmental benefits beyond the directly impacted feature or site. These wider measures must still provide a demonstrable ecological benefit to the UK's Marine Protected Area (MPA) network and must be "reasonably proportionate" to the damage caused. Guidance will clarify what this means, emphasising environmental, not socio-economic, considerations. Decisions must rely on best available scientific evidence and be supported by monitoring and adaptive management.



24.29. Additionally compensatory measures will not always need to be fully operational before impacts occur. Existing legislation already provides sufficient flexibility, so new legal provisions are unnecessary. Guidance will explain when post-impact delivery is acceptable and define key terms such as “secured”, “in place” and “operational”. Higher compensation ratios (overcompensation) may be required where there are time lags or uncertainties. The reforms will apply to projects already in the planning system.

## **1.41.5 Purpose of Document**

25.30. This document sets out the detail of the proposed compensatory measures for guillemot and razorbill (without prejudice). It demonstrates how the proposed compensatory measures can be secured and that the mechanism for delivery can be implemented.

26.31. As such this document provides the following details for the predator eradication / control measure taken forward for guillemot [and razorbill] (section 6.3.1):

- Overview;
- Delivery mechanism;
- Scale;
- Location;
- Outline design details;
- Timescales;
- Monitoring, maintenance and adaptive management;
- Outline implementation and delivery roadmap; and
- Potential impact from the implementation of the compensation.

27.32. This Guillemot [and Razorbill] Compensation Plan is accompanied by the **Volume 6, Appendix A - Outline Guillemot [and Razorbill] Compensation Implementation and Monitoring Plan (Revision 43) (document ref: 6.2.2.1)**, which sets out an outline of the delivery proposals for the proposed compensatory measures based on those set out in this Guillemot [and Razorbill] Compensation Plan. The Guillemot Compensation Implementation and Monitoring Plan (CIMP) will be produced by the Applicants post-consent, based on the outline CIMP, and approved by the SoS prior to the start of construction. Should compensation for razorbill be required, a combined Guillemot and Razorbill CIMP will be produced.

## **1.51.6 Implications of the Proposed Development Scenarios**

~~28.33.~~ The Projects may be delivered under a range of project Development Scenarios. Details of the scenarios and how these are assessed in the DCO application are set out in section 5.1.1 of **Volume 7, Chapter 5 Project Description (application ref: 7.5)** of the Environmental Statement (ES). The Applicants' approach to the development of the proposed compensatory measures has assumed that both DBS East and DBS West are developed and that the package of measures proposed for each of the relevant sites and features outlined in section 6.3 is considered to deliver the necessary level of compensation (factoring in the risks and uncertainty associated with delivering successful compensation) to address the worst-case impacts of both DBS East and DBS West, as required by draft Defra guidance (Defra, 2021).

~~29.34.~~ The Development Scenarios for the Projects include:

- In Isolation Scenario – where only DBS East or DBS West is developed;
- Concurrent Scenario– where DBS East and DBS West are both constructed at the same time; or
- Sequential Scenario – both DBS East and DBS West are developed sequentially.

~~30.35.~~ As outlined in **Volume 7, Chapter 5 Project Description (application ref: 7.5)** of the ES, the Applicants would develop DBS East and DBS West transmission infrastructure as co-ordinated projects and where practicable, the Projects would co-locate infrastructure to reduce overall environmental impacts and disruption. However, there is no predicted impact on guillemot or razorbill from the development of the Projects transmission infrastructure.

~~31.36.~~ For guillemot [and razorbill], it is the disturbance and displacement mortality as a result of turbine construction and operation that requires compensation. In all three Development Scenarios, turbine installation for one or both Projects is expected in Q3 2029 at the earliest. Up to 100 wind turbines will be installed at each of DBS East and DBS West (subject to the final turbine technology), equating to a maximum of 200 turbines across the two Projects.

- 32.37. Where DBS East and DBS West are delivered in the Sequential Scenario, the overall final package of compensation to be delivered will be the same as in the Concurrent Scenario. The Applicants therefore consider it practical to deliver all of the compensation together under either the Sequential or Concurrent Scenario (although if two or more sites are required, implementation could be staggered under the Sequential Scenario). In the Sequential Scenario, this may mean that one project delivers compensation earlier than may have otherwise been required if it were a standalone project, which could be at risk e.g. prior to Final Investment Decision (FID). The Applicants consider however that the second project would have the benefit of the compensation being in place slightly longer than the first project thereby reducing pressure on the onward project programme.
- 33.38. Should DBS East or DBS West be delivered in isolation then it would be necessary to deliver only the scale of measures required to achieve adequate compensation in proportion to the impacts predicted from the given project (DBS East or DBS West). Compensation would be delivered on a scale appropriate to the nature and extent of the predicted impact from DBS East, or DBS West.
- 34.39. The scale of compensation to be delivered by the Projects will be confirmed within the Guillemot [and Razorbill] Compensation and Implementation Monitoring Plan (CIMP) once project-level impacts have been determined by the SoS.

## 2 Legislation and Guidance

35.40. The HRA process covers those features designated under the European Council Directive 2009/147/EC on the Conservation of Wild Birds (the ‘Birds Directive’) and Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the ‘Habitats Directive’).

36.41. The Birds Directive provides a framework for the conservation and management of wild birds in Europe. The relevant provisions of the Directive are the identification and classification of SPAs for rare or vulnerable species listed in Annex I of the Directive and for all regularly occurring migratory species (required by Article 4). The Directive requires national Governments to establish SPAs and to have in place mechanisms to protect and manage them. The SPA protection procedures originally set out in Article 4 of the Birds Directive have been replaced by the Article 6 provisions of the Habitats Directive.

37.42. Further details of the relevant legislative and policy context are provided in **Volume 6, Habitats Regulations Derogation Provision of Evidence (application ref: 6.2)**.

### 2.1 UK National Legislation

38.43. In England and Wales, the Conservation of Habitats and Species Regulations 2017 (‘the Habitats Regulations’), the Wildlife and Countryside Act 1981 and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (the Offshore Habitats Regulations) (which applies outside of 12 nautical miles) transposed the Habitats Directive and Birds Directive into English and Welsh law. The UK is also required to meet its obligations under relevant international agreements such as the Ramsar Convention.

39.44. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (EU Exit Regulations) make changes to the Habitats Regulations so that they continue to work (are operable) following the UK’s exit from the EU on 31<sup>st</sup> January 2020. While the basic legal framework for HRA is maintained, the EU Exit Regulations transfer functions previously undertaken by the European Commission (EC) to UK Ministers. Furthermore, where the Habitats Regulations continue to use the term ‘European sites’, those sites now form part of a UK NSN rather than the European ‘Natura 2000’ site network.

[40.45.](#) The Habitats Regulations place an obligation on ‘competent authorities’ to carry out an AA of any proposal likely to significantly affect a designated site, to seek advice from Natural England and not to approve an application that would have an adverse effect on a designated site unless certain conditions are met (where there are no alternative solutions, the plan or project can only proceed if there are Imperative Reasons of Over-riding Public Interest (IROPI) and if the necessary compensatory measures can be secured). The competent authority in the case of the Projects is the SoS for the DESNZ.

## 2.2 Guidance on Compensatory Measures

[41.46.](#) If the competent authority determines, after conducting an AA, that an AEol on a European site cannot be ruled out, and that there are no alternative solutions and IROPI, Regulation 36 of the Conservation of Offshore Marine Habitats and Species Regulations 2017 requires that *“The appropriate authority must secure that any necessary compensatory measures are taken to ensure that the overall coherence of Natura 2000 is protected.”*

[42.47.](#) The European Commission (EC) (2019) explains that for SPAs, the overall coherence of the European site network can be maintained by:

- Compensation that fulfils the same purposes that motivated the site’s designation;
- Compensation that fulfils the same function along the same migration path; and
- The compensation site(s) are accessible with certainty by the birds usually occurring on the site affected by the project.

[43.48.](#) Defra has recently released for consultation<sup>4</sup>, updated policy information for Marine Protected Area (MPA) assessments (Defra, 2024b). This document expands upon the best practice guidance for developing compensatory measures in relation to MPAs which was consulted upon in July 2021 (Defra, 2021) and is intended to inform updated guidance which is anticipated to be published in late 2024.

---

<sup>4</sup> Consultation ran from 9 February 2024 to 1 April 2024. The consultation document (Defra, 2024) expressly states in section 3.1 that *“the draft guidance set out below for consultation should not be relied upon by stakeholders, statutory bodies or decision makers during the planning process”*.

[44.49.](#) Defra (2021) introduced a hierarchical approach for determining appropriate compensatory measures within the marine environment. The central tenet of this approach is to prioritise compensatory measures that address the same impact at the same location. However, in cases where this isn't feasible, measures supporting similar or comparable ecological functions at alternative locations could serve as adequate compensation and should be considered. This hierarchical approach offers flexibility, acknowledging that it may not always be practical to compensate for the same feature at risk within the impacted site. Defra (2024b) proposes refinements to the hierarchical approach outlined in Defra (2021) but maintains this core principle, stating:

“The location of measures should not take priority over the ecological outcomes that might be secured. Proximity and local circumstances are considerations which must be balanced against the confidence that measures will be effective and the ecological outcomes which will be secured.”

[45.50.](#) Ideally, compensation should be functioning before the effect takes place, although it is recognised that this may not always be possible, as stated in the Defra (2021) guidance:

“A protected feature should not be impacted before compensation is secured. Ideally, measures should be in place, functioning and contributing to the network before development begins. Defra recognises that in some cases and for certain habitats and species this could take several years and therefore it may not be feasible for the compensatory measures to be complete before the impact takes place. Where this is not possible, it is important that necessary licences are in place, finances are secured, and realistic implementation plans have been agreed with the appropriate bodies to demonstrate that the compensatory measure is secured.”

[46.51.](#) Compensatory measures for the guillemot [and razorbill] features of the FFC SPA [and guillemot from the Farne Islands SPA] are presented in the following sections in line with Defra's draft best practice guidance (Defra, 2021) and the hierarchy presented within it.

[47.52.](#) In addition, Natural England has developed a list of those aspects of compensatory measures that it considers need to be described in detail when developers are submitting or updating applications where impacts on marine MPAs are anticipated. Whilst not exhaustive, it lists key areas where Natural England considers sufficient detail is needed to provide the SoS with appropriate confidence that compensatory measures can be secured. The list is summarised below:



- What, where, when: clear and detailed statements regarding the location and design of the proposal.
- Why and how: ecological evidence to demonstrate compensation for the impacted site feature is deliverable in the proposed locations.
- Demonstrate that on ground construction deliverability is secured and not just the requirement to deliver in the DCO i.e. landowner agreement is in place.
- Policy/legislative mechanism for delivering the compensation (where needed).
- Agreed DCO / DML conditions.
- Clear aims and objectives of the compensation.
- Mechanism for further commitments if the original compensation objectives are not met – i.e. adaptive management.
- Clear governance proposals for the post-consent phase – we do not consider simply proposing a steering group is sufficient.
- Ensure development of compensatory measures is open and transparent as a matter of public interest, including how information on the compensation would be publicly available.
- Timescales for implementation esp. where compensation is part of a strategic project, including how timescales relate to the ecological impacts from the development.
- Commitments to monitoring specified success criteria.
- Proposals for ongoing ‘sign off’ procedure for implementing compensation measures throughout the lifetime of the project. Including implementing feedback loops from monitoring.
- Continued annual management of the compensation area and ensure other factors are not hindering the success of the compensation e.g. changes in habitat, increased disturbance as a result of subsequent plans / projects.

48.53. The Applicants have prepared this Compensation Plan in accordance with the Natural England checklist outlined above, and an equivalent list provided by Royal Society for the Protection of Birds (RSPB). The necessary information is provided in section 6. A summary of the status of the Applicants’ overall compensatory proposal for guillemot [and razorbill] against the Natural England checklist is provided in section 8.

## 3 Development of Compensatory Measures

### 3.1 General Approach

49.54. The approach taken by the Applicants to identify potential compensatory measures followed the process below:

- Review of the compensatory measures in Furness *et al.* (2013).
- Iterative development of the proposals through consultation with relevant stakeholders, in the form of the Auk Compensation Expert Topic Group (ETG) which group includes the Marine Management Organisation (MMO), Natural England, RSPB and Lincolnshire Wildlife Trust. Details of the consultation undertaken are provided in **Volume 5, Consultation Report (application ref: 5.1)**.
- Engagement with other stakeholders where necessary including with other offshore wind farm (OWF) developers, Natural England and Defra through the Offshore Wind Industry Council (OWIC) Derogation Subgroup.
- Ongoing review of other OWF applications for which compensatory measures have been presented (e.g. Hornsea Project Three, Hornsea Project Four and Sheringham Shoal and Dudgeon Offshore Extension Projects (SEP and DEP)), including those accepted as appropriate in the determination.
- Consideration of emerging evidence on wind farm and seabird interactions and influences on seabird ecology more widely to determine whether novel options may be appropriate.
- Consideration of the feasibility of delivery and confidence of success of each measure.

50.55. The Applicants were (and remain) mindful of the strategic nature of compensation measures for features other than guillemot and razorbill and the ongoing development of potential strategic measures for auks. However, in the absence of a definitive timeframe for this or for implementation of the MRF, a focus was placed on measures suitable for delivery on a project-led basis or in collaboration with other developers.



## 3.2 Stakeholder Engagement

~~51.56.~~ The Applicants have consulted with a range of stakeholders during the consideration of compensation measures for guillemot [and razorbill]. This has predominantly taken the form of engagement with the Auk Compensation Expert Topic Group (ETG) and has been used to shape the development of compensatory measures. A summary of the ETG meetings to date is given in **Table 3-1**. Engagement with the ETG will continue throughout the post-application process.

Table 3-1 Details of ETG and relevant SNCB meetings regarding auk compensation

Meeting Date	Main Points of Discussion
9 <sup>th</sup> May 2023	<p>This meeting was intended to cover all potential options for compensation measures and refine the options to a shortlist for further consideration. The following potential measures were discussed:</p> <ul style="list-style-type: none"> <li>• ANS – instances of auks nesting on ANS do occur, but insufficient evidence exists on the scale and if there are particular features that could increase uptake. This was not deemed suitable as compensation at this meeting but worthy of further investigation.</li> <li>• Prey Management – This was deemed suitable only as a strategic measure, not at a project level. On-going consultation with regards to the closure of the sandeel fishery was noted, so it was considered that this may be worth considering another species such as sprat.</li> <li>• Designation of additional SPAs – It was agreed that there was no opportunity for designation of additional SPAs. However, it was noted that compensation being delivered for the Dogger Bank SAC (i.e. potentially new seabed designation) could provide benefits to prey species and by extension auks.</li> <li>• Reduction of bycatch – It was considered that the evidence base for bycatch exists for gannets but not for auks. RSPB have ongoing trials [Rouxel <i>et al.</i>, 2023]. It was considered that given the unknowns further trials would be beneficial.</li> <li>• Predator management – It was considered that, in principle, predator eradication would work as compensation, however there is a lack of evidence specific to auks. There was discussion around some specific sites</li> </ul>

Meeting Date	Main Points of Discussion
	<p>and the difficulties associated with reinvasion and proving connectivity of auk populations.</p> <ul style="list-style-type: none"> <li>• Marine Recovery Fund – this was discussed as a generic compensation measure, however uncertainties around timing and implementation of the MRF were raised.</li> <li>• OWIC studies – uncertainty over timescales aligning with DBS.</li> </ul>
29 <sup>th</sup> February 2024	<p>Discussions focussed on the results of the RIAA and the utilisation of different displacement and mortality rates in various assessments. Compensation measures were also discussed:</p> <ul style="list-style-type: none"> <li>• Predator reduction – The ETG agreed that this is a feasible measure. Focus needs to be on identifying suitable sites. It was noted that this measure had been put forward by COWSC for inclusion within the LoSCM. Delivery is likely to be project-led but may be collaborative with other OWF developers. A short list of potential sites was discussed as well as how this measure would be undertaken.</li> <li>• Bycatch reduction – measure not confirmed by COWSC for inclusion within the LoSCM. Still a lack of evidence however it should be kept in the plan.</li> <li>• ANS - measure not confirmed by COWSC for inclusion within the LoSCM.</li> <li>• Discussion around new guidance on additionality and the implications for compensation within existing SPAs.</li> </ul>
10 <sup>th</sup> April 2024	<p>Brief discussion around the updated results of the RIAA.</p> <ul style="list-style-type: none"> <li>• Predator eradication – discussions about the short list of sites and their potential feasibility provide the required compensation. Agreement to revisit some sites. Importance of social acceptability highlighted. The plan for taken forward feasibility on sites was presented to the ETG, with an update on progress to be provided by Deadline 1 of the Examination.</li> <li>• Bycatch reduction and ANS – agreement that there is not sufficient evidence to propose these as primary or supporting compensatory measures but that they should remain in the plan under adaptive management.</li> </ul>

Meeting Date	Main Points of Discussion
	<ul style="list-style-type: none"> <li>Discussion around potential collaboration with other OWF developers on emerging visitor management measures on the south coast.</li> <li>The Applicants proposed to update the ETG post-submission of the DCO application and prior to the start of examination.</li> </ul>
30 <sup>th</sup> September 2024	The results of the shortlist refinement surveys and the proposed next steps were presented to the stakeholders.
20 <sup>th</sup> November 2024	Meeting to discuss options for strategic and project-led auk compensation and the development of a strategic route
2 <sup>nd</sup> April 2025	<p>Meeting to present the results of the surveys at Worms Head and to discuss the proposed next steps.</p> <p>Limited discussion around Natural England's position on the use of mean impact values and upper confidence intervals.</p>
16 <sup>th</sup> September 2025	<p>Meeting with Natural England to present progress on the compensation site selection, including preliminary results of Scottish site visits.</p> <p>Natural England indicated that they would defer to NatureScot on site specific matters but that they would consider compensation in Scotland to be contributing to the UK National Site Network.</p>
3 <sup>rd</sup> October 2025	<p>Meeting with NatureScot to introduce the Projects, including the requirement for auk compensation. The Applicants provided a summary of the current situation regarding auk compensation and the reasons for now considering sites in Scotland. The Applicants also presented the results of the work done to date with regards to Scottish sites.</p> <p>NatureScot provided some comment on ecological aspects that they would expect to be addressed by any compensation proposal in addition to highlighting uncertainties with the process of delivering transboundary compensation.</p>
<u>12<sup>th</sup> November 2025</u>	<u>Meeting with Natural England to present the progress made with the guillemot [and razorbill] compensation, specifically in relation to the Scottish sites under consideration and the number of auk nesting spaces that have been included in the ANS design.</u>

Meeting Date	Main Points of Discussion
	<u>Natural England confirmed that the Applicants' understanding of the success and scaling criteria in relation to compensation quantum was correct.</u>
<u>25<sup>th</sup> November 2025</u>	<p><u>Meeting to discuss the information provided to Natural England in the <b>Guillemot [and Razorbill] Compensation Update [document reference 20.8]</b> and to present the results of the habitat refinement for the Pabaigh Islands. The nesting densities used to predict the amount of compensation available at each location was discussed.</u></p> <p><u>Natural England indicated that due to the range of compensation options that were being proposed they would be unlikely to advise that philopatry need to be taken into account in the calculation of compensation quantum.</u></p>

## 4 Flamborough and Filey Coast Special Protection Area

### 4.1 Overview

52.57. 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).

53.58. The SPA is located on the Yorkshire coast between Bridlington and Scarborough and is composed of two sections. The northern section runs from Cunstone Nab to Filey Brigg, and the southern section from Speeton, around Flamborough Head, to South Landing. The seaward boundary extends 2km offshore and applies to both sections of the SPA.

54.59. The predominantly chalk cliffs of Flamborough Head rise to 135m and have been eroded into a series of bays, arches, pinnacles and gullies. The cliffs from Filey Brigg to Cunstone Nab are formed from various sedimentary rocks including shales and sandstones. The adjacent sea out to 2km off Flamborough Head as well as Filey Brigg to Cunstone Nab is characterised by reefs supporting kelp forest communities in the shallow subtidal, and faunal turf communities in deeper water. The southern side of Filey Brigg shelves off gently from the rocks to the sandy bottom of Filey Bay. This site does not support any priority habitats or species (Natural England, 2018).

55.60. The coastal areas of the SPA cover cliffs supporting internationally important breeding populations of seabirds, the marine extension includes areas close to the colony used by seabirds for maintenance behaviours (loafing, preening etc).

56.61. None of the qualifying features of the SPA are priority species. This compensation document considers only guillemot [and razorbill].

### 4.2 Conservation Objectives

57.62. The site's conservation objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the aims of the Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The populations of each of the qualifying features; and
- The distribution of qualifying features within the site.

## 4.3 Designated Feature – Guillemot

~~58.63.~~ Guillemot is an abundant species of seabird in the northern hemisphere and can be found nesting in, often large densely packed, colonies on coastal cliffs around the UK. Like many seabirds, guillemot are resident in UK waters year-round, but come to shore only during the summer breeding season. The guillemot diet comprises primarily small fish species including clupeids (sprat and herring) and sandeels.

~~59.64.~~ The SPA breeding population at classification was 41,607 pairs (83,214 breeding adults) for the period 2008 to 2011 (Natural England, 2018). The most recent published count was of 111,925 individuals in 2022 (Clarkson *et al.*, 2022), which once adjusted using standard approaches gives an AON of 74,989 (or 149,978 breeding adults) (**Volume 6, RIAA Part 4 of 4 (Revision 4) (document ref: 6.1)**). It is clear that the population of guillemot at the FFC SPA has increased between designation and 2022 (JNCC, 2023; Clarkson *et al.*, 2022).

~~60.65.~~ Supplementary advice on the conservation objectives were added for qualifying features (Natural England, 2023a). For guillemot, these are:

- Maintain the size of the 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;
- Maintain safe passage of birds moving between nesting and feeding areas;
- Restrict the frequency, duration and / or intensity of disturbance affecting roosting, nesting, foraging, feeding, moulting and / or loafing birds so that they are not significantly disturbed;
- Restrict predation and disturbance caused by native and non-native predators;
- Maintain or recover productivity so that breeding success is maximised within the constraints of the site;
- Maintain concentrations and deposition of air pollutants at below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System;
- Maintain the structure, function and supporting processes associated with the feature and its supporting habitat through management or other measures (whether within and / or outside the site boundary as appropriate) and ensure these measures are not being undermined or compromised;



- Maintain the extent, distribution and availability of suitable breeding habitat which supports the feature for all necessary stages of its breeding cycle (courtship, nesting, feeding) at: current extent;
- Maintain the distribution, abundance and availability of key food and prey items (e.g. sandeel, herring, sprat) at preferred sizes;
- Reduce aqueous contaminants to levels equating to High Status according to Annex VIII and Good Status according to Annex X of the Water Framework Directive, avoiding deterioration from existing levels;
- Maintain the DO concentration at levels equating to High Ecological Status (specifically  $\geq 5.7$  mg per litre (at 35 salinity) for 95% of the year), avoiding deterioration from existing levels;
- Maintain water quality at mean winter dissolved inorganic nitrogen levels where biological indicators of eutrophication (opportunistic macroalgal and phytoplankton blooms) do not affect the integrity of the site and features, avoiding deterioration from existing levels; and
- Maintain natural levels of turbidity (e.g. concentrations of suspended sediment, plankton and other material) across the habitat.

## 4.4 Designated Feature – Razorbill

~~61.66.~~ Razorbill are found throughout UK coastal waters, coming to shore to breed on small ledges or in cracks of rocky cliffs and in associated scree and boulder fields. The main prey species of razorbill are sandeel, sprat and herring.

~~62.67.~~ The FFC SPA breeding razorbill population was 10,570 pairs or 21,140 breeding adults, for the period 2008 to 2012 (Natural England, 2018). The most recent published count was 30,673 pairs or 61,345 breeding individuals in 2022 (Clarkson *et al.*, 2022). Note that an older population count was used in the original assessment, however the updated assessment submitted **(RIAA HRA Part 4 of 4 (Revision 3) [AS-085])** in mid-November has used this updated count as recommended by Natural England in their Relevant Representations [RR-039].

~~63.68.~~ Supplementary advice on the conservation objectives were added for qualifying features (Natural England, 2023a). For razorbill, these are:

- 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;
- Maintain safe passage of birds moving between nesting and feeding areas;

- Restrict the frequency, duration and / or intensity of disturbance affecting roosting, nesting, foraging, feeding, moulting and/or loafing birds so that they are not significantly disturbed;
- Restrict predation and disturbance caused by native and non-native predators;
- Maintain or recover productivity so that breeding success is maximised within the constraints of the site.
- Maintain concentrations and deposition of air pollutants at below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System;
- Maintain the structure, function and supporting processes associated with the feature and its supporting habitat through management or other measures (whether within and/or outside the site boundary as appropriate) and ensure these measures are not being undermined or compromised;
- Maintain the extent, distribution and availability of suitable breeding habitat which supports the feature for all necessary stages of its breeding cycle (courtship, nesting, feeding);
- Maintain the distribution, abundance and availability of key food and prey items (e.g. sandeel, herring, sprat) at preferred sizes;
- Reduce aqueous contaminants to levels equating to High Status according to Annex VIII and Good Status according to Annex X of the Water Framework Directive, avoiding deterioration from existing levels;
- Maintain the DO concentration at levels equating to High Ecological Status (specifically  $\geq 5.7$ mg per litre (at 35 salinity) for 95% of the year), avoiding deterioration from existing levels;
- Maintain water quality at mean winter dissolved inorganic nitrogen levels where biological indicators of eutrophication (opportunistic macroalgal and phytoplankton blooms) do not affect the integrity of the site and features, avoiding deterioration from existing levels.; and
- Maintain natural levels of turbidity (e.g. concentrations of suspended sediment, plankton and other material) across the habitat.



## 4.5 Summary of Potential Impacts

[64.69.](#) The following sections provide a summary of the potential impacts on guillemot and razorbill at FFC SPA in order to set the context for the proposed compensatory measures. The SoS will determine the level of effect based on the AA conclusions for the potential impact of the Projects on the breeding adult birds associated with the FFC SPA.

### 4.5.1 Guillemot

#### 4.5.1.1 Overview

[65.70.](#) The ornithological assessment presented in **Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)** of the ES identified guillemot as being recorded in high numbers during baseline surveys and classified the species as having medium sensitivity to disturbance and displacement during construction.

[66.71.](#) DBS East and DBS West are 125km and 103km respectively from the FFC SPA. The mean maximum foraging range of guillemot is 153.7km (73.2km + 80.5km, Woodward *et al.*, 2019). Therefore, the Projects are both within potential foraging range for breeding guillemot from the FFC SPA. The proportion of adult guillemots attributed to the FFC SPA was estimated in **Volume 6, RIAA Part 4 of 4 (Revision 4) (document reference 6.1)** to be 55.2%, based on species demographics. Following feedback received from the ETG, the proportion of the guillemots recorded at the Projects during the breeding season that could be breeding adult birds from the FFC SPA is calculated as 100%.

[67.72.](#) Outside the breeding season, breeding guillemots from the SPA are assumed to range widely and to mix with guillemots from breeding colonies in the UK and beyond. The relevant non-breeding season reference population is the UK North Sea and Channel Biologically Defined Minimum Population Scales (BDMPS), consisting of 1,617,306 individuals (August to February) (Furness, 2015).

[68.73.](#) During the non-breeding season, 90% of the FFC SPA breeding adults are assumed to be present in the BDMPS. It is estimated that 4.4% of birds present at the Projects are considered to be breeding adults from the FFC SPA, and impacts are apportioned accordingly. Note, this percentage has been calculated using the populations in Furness (2015) in order to ensure consistent colony estimates have been applied.

## 4.5.1.2 Quantification of Effect – Displacement

~~69.74.~~ The displacement mortality from the Projects together (i.e. DBS West and East) is assessed in **Volume 6, RIAA Part 4 of 4 (Revision 4) (document reference 6.1)** based on a range of displacement and mortality values. Two combinations of displacement effect and mortality are discussed in this compensation plan. One combination based on the precautionary rates of 70% displacement and 2% mortality of displaced birds, as has been accepted for recently consented projects. The second combination, the Applicants' preferred approach, based on evidence in MacArthur Green (2019), applying a 50% displacement rate combined with 1% mortality. Based on advice from Natural England, displacement impacts on offshore ornithological interests during construction have been assessed in the **Volume 6, RIAA Part 4 of 4 (Revision 4) (document reference 6.1)** for the duration of construction (taken here as construction of foundations and installation of turbines) on the basis these on average represent 50% of the impact for the constructed wind farm.

## 4.5.1.3 Dogger Bank South Projects Alone

~~70.75.~~ For construction the displacement mortality from the Projects together is presented in **Volume 6, RIAA Part 4 of 4 (Revision 4) (document reference 6.1)**. Using precautionary rates of displacement (35%) and mortality (2%) the estimated mortality is 190.1 (55.2% adults) to 251.8 (100% adults). The Applicants' preferred estimates assuming a 25% displacement rate (APEM, 2022) and 1% mortality of displaced birds reduces the predicted impact to 79.5 (55.2% adults) to 105.3 (100% adults) individuals. Using the precautionary rates this could represent an adverse effect on integrity of the FFC SPA (increase in background mortality of between 2.1 – 2.7%). Using the Applicants' preferred estimates this would be a maximum increase in mortality of 0.9 – 1.1%.

~~71.76.~~ For operation the displacement mortality from the Projects together is presented in **Volume 6, RIAA Part 4 of 4 (Revision 4) (document reference 6.1)**. Using the precautionary rates of displacement (70%) and mortality (2%) the estimated mortality is 344.1 (55.2% adults) to 455.9 (100% adults). The Applicants' preferred estimates assuming a 50% displacement rate (APEM, 2022) and 1% mortality of displaced birds reduces the predicted impact to 122.9 (55.2% adults) to 162.8 (100% adults) individuals. Using the precautionary rates this could represent an adverse effect on integrity of the FFC SPA (increase in background mortality of between 3.8 – 4.9%). Using the Applicants' preferred estimates this would be a maximum increase in mortality of 1.34 – 1.78%.

[72.77.](#) After further consideration of this effect via Population Viability Analysis (PVA) it was concluded that even based upon the 70% displacement and 2% mortality figures, this displacement does not represent an adverse effect on integrity of the FFC SPA.

#### 4.5.1.4 In-Combination with Other Offshore Wind Farm Projects

[73.78.](#) The estimated total number of guillemots at risk of displacement from all OWFs within the UK North Sea BDMPS combined is 632,968. The estimated number of these that are adults from FFC SPA is 110,102, of which 33,012 are at projects for which compensation has been agreed (Hornsea 4, Dudgeon and Sheringham Extensions) (see **Volume 6, RIAA Part 4 of 4 (Revision 4) (document reference 6.1)**). Using displacement rates of 50% to 70% and a mortality rate of 1% to 2% for displaced birds, the number of FFC SPA birds predicted to die each year would be between 551 and 1,541.

[74.79.](#) It is worth noting the current assessment methods suggests that over 73% of the FFC SPA guillemot population is apparently present on UK wind farms through the course of the year and at risk of displacement. This highlights the precautionary basis of the methods used to estimate seasonal abundance and apportioning since offshore wind farms make up approximately 6% of the area within 300km of the FFC SPA, 12 times less than the in-combination assessment indicates. Indeed, it is not difficult to envisage that, with the addition of a small number of wind farms the current assessment methods could predict more birds are at risk of displacement than are present in the population.

[75.80.](#) After further consideration of this effect via PVA it was concluded this displacement does not represent an adverse effect on integrity of the FFC SPA.

[76.81.](#) Notwithstanding the above conclusion, the Applicants acknowledge that previous decisions on offshore wind farms by the SoS have concluded that an AEol for guillemot at the FFC SPA could not be ruled out for in-combination displacement risk (e.g. Hornsea Project Four). Given this, it is the Applicants' assumption that the SoS will conclude AEol in this case also. Therefore, the Applicants do not consider it worthwhile to contest this point and on this basis concede AEol on the FFC SPA.

4.5.1.5 Compensation Requirement

~~77.82.~~ The compensation requirement for guillemot has been calculated as the number of breeding pairs required to produce enough fledglings to replace the adults lost from the population as a result of DBS. This was done using the equation below, taking account of the national average productivity and the mean survival rate each year, as detailed in **Table 4-1**, and based on a recruitment age of six years (Horswill and Robinson, 2015).

~~78.83.~~ Applying these demographic rates estimates that 4.42 breeding pairs are required to replace a single recruiting adult guillemot.

$$N_{\text{Fledglings required}} = \frac{N_{\text{New breeding recruits required}}}{\prod_{\text{Age}=0}^{\text{Age}=6} \text{Survival}_{\text{Age}}}$$
$$N_{\text{Breeding pairs required}} = \frac{N_{\text{Fledglings required}}}{\text{Productivity}}$$

Table 4-1 Productivity and survival rates for guillemot (Horswill and Robinson, 2015)

Parameter	Demographic Rate
Productivity	0.672
Survival 0-1 year	0.560
Survival 1-2 year	0.792
Survival 2-3 year	0.917
Survival ≥4 year	0.939

~~79.84.~~ ~~Recent e~~Consultation with Natural England (~~November~~~~April~~ 2025) ~~confirmed~~~~indicated~~ that it would be acceptable to base compensation requirements upon the mean impact value ~~at a ratio of 1:1~~, but that the proposed compensation measures should have the capacity to accommodate the requirements based upon the 95% upper confidence interval (UCI) of the impact value ~~at a ratio of 2:1~~. Therefore the compensation requirements for the range of potential impacts for both the mean and 95% UCI is shown in **Table 4-4**.

~~80.85.~~ Using the Applicants' preferred 50% displacement and 1% mortality rates with 100% apportionment gives a compensation requirement of 719 breeding pairs at a 1:1 ratio, 1,438 breeding pairs at a 2:1 ratio and 2,158 breeding pairs at a 3:1 ratio. Using Natural England's advised success and scaling criteria gives compensation requirements of 2,015 breeding pairs and 7,762 breeding pairs respectively.

## 4.5.2 Razorbill

### 4.5.2.1 Overview

~~81.86.~~ Razorbill were reported in **Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)** of the Environmental Statement as being recorded in high numbers during baseline surveys and were classified as having medium sensitivity to disturbance and displacement during construction.

~~82.87.~~ DBS East and DBS West are 125km and 103km respectively from the FFC SPA. The mean maximum foraging range of razorbill is 164.6km (88.7 + 75.9km, Woodward *et al.*, 2019). Therefore, the Projects are both within potential foraging range for breeding razorbill from the FFC SPA. The proportion of adult razorbills attributed to the FFC SPA was estimated in **Volume 6, RIAA Part 4 of 4 (Revision 4) (document reference 6.1)**, to be 61.3%, based on species demographics. The estimated proportion of the razorbills recorded at the Projects during the breeding season that could be breeding adult birds from the FFC SPA (based on the most recent count of 61,345 breeding adults) is calculated as 100%.

~~83.88.~~ Outside the breeding season, breeding razorbills from the SPA are assumed to range widely and to mix with razorbills from breeding colonies in the UK and further afield. The relevant background population is considered to be the UK North Sea and Channel BDMPs, consisting of 591,874 individuals during autumn and spring passage periods (August to October and January to March), and 218,622 individuals during winter (November and December) (Furness, 2015). Natural England advised (RR-039) that razorbills in the post-breeding period should also be apportioned predominantly to FFC SPA at a rate of 69.93%.



[84.89.](#) During the spring migration, 100% of the FFC SPA breeding adults are assumed to be present in the BDMPS, representing 3.4% of the BDMPS population. During the winter season, 30% of the SPA breeding adults are assumed to be present in the BDMPS, representing 2.7% of the BDMPS population. These percentages (i.e. 3.4% and 2.7%) are the proportions of birds present at the Projects that are presumed to originate from the FFC SPA during the relevant seasons. Note, these percentages have been calculated using the populations in Furness (2015) in order to ensure consistent colony estimates have been applied.

#### 4.5.2.2 Quantification of Effect – Displacement

[85.90.](#) The displacement mortality from the Projects together (i.e. DBS East and West) is assessed in **Volume 6, RIAA Part 4 of 4 (Revision 4) (document reference 6.1)** based on a range of displacement and mortality values. Two combinations of displacement effect and mortality are discussed in this compensation plan. One combination based on the precautionary rate of 70% displacement and 2% mortality of displaced birds, as has been accepted for recently consented projects. The second combination, the Applicants' preferred approach, based on evidence in MacArthur Green (2019), applied a 50% displacement rate combined with 1% mortality. Based on advice from Natural England, displacement impacts on offshore ornithological interests during construction have been assessed in the **Volume 6, RIAA Part 4 of 4 (Revision 4) (document reference 6.1)** for the duration of construction (taken here as construction of foundations and installation of turbines) on the basis these on average represent 50% of the impact for the constructed wind farm.

#### 4.5.2.3 Dogger Bank South Projects Alone

[86.91.](#) For construction displacement mortality from the Projects together is presented in **Volume 6, RIAA Part 4 of 4 (Revision 4) (document reference 6.1)** for two combinations of displacement effect and mortality. Using Natural England's precautionary rates of displacement (35%) and mortality (2%) the estimated mortality is 62.5 (63.1% adults) to 70.2 (100% adults). The Applicants' preferred estimates assuming a 25% displacement rate (APEM, 2022) and 1% mortality of displaced birds reduces the predicted impact to 22.3 (63.1% adults) to 25.1 (100% adults) individuals. Using the precautionary rates this could represent an adverse effect on integrity of the FFC SPA (increase in background mortality of 0.99 – 1.11%). Using the Applicants' preferred estimates this would be a maximum increase in mortality of 0.44 – 0.50%.

~~87.92.~~ For operation displacement mortality from the Projects together is presented in **Volume 6, RIAA Part 4 of 4 (Revision 4) (document reference 6.1)**. Using the precautionary rates of displacement (70%) and mortality (2%) the estimated mortality is 125.1 (63.1% adults) to 140.4 (100% adults). The Applicants' preferred estimates assuming a 50% displacement rate (APEM, 2022) and 1% mortality of displaced birds reduces the predicted impact to 44.7 (63.1% adults) to 50.2 (100% adults) individuals. Using the precautionary rates this could represent an adverse effect on integrity of the FFC SPA (increase in background mortality of 1.94 – 2.18%). Using the Applicants' preferred estimates this would be a maximum increase in mortality of 0.69 – 0.78%.

~~88.93.~~ After further consideration of this effect via PVA it was concluded that even based upon the worst case prediction (using 70% displacement and 10% mortality) this displacement this does not represent an adverse effect on integrity of the FFC SPA.

#### 4.5.2.4 In-Combination with Other Offshore Wind Farm Projects

~~89.94.~~ The Round 4 RIAA (NIRAS, 2022) states that the Round 4 projects (which include the Projects) would not '*make an appreciable difference to any in combination impact*'.

~~90.95.~~ The Applicants' assessment is presented in **Volume 6, RIAA Part 4 of 4 (Revision 4) (document reference 6.1)**. The estimated total number of razorbills at risk of displacement from all OWFs within the UK North Sea BDMPs combined is 209,286 of which between 24,512 are estimated to be breeding adults from FFC SPA. It is worth noting the total the suggests that 40% of the FFC SPA razorbill population is apparently present on UK wind farms through the course of the year and at risk of displacement. This highlights the precautionary basis of the methods used to estimate seasonal abundance and apportioning since offshore wind farms make up approximately 6% of the area within 300km of the FFC SPA, seven times less than the in-combination assessment indicates. Indeed, it is not difficult to envisage that, with the addition of a small number of wind farms the current assessment methods could predict more birds are at risk of displacement than are present in the population.

~~91.96.~~ Using displacement rates of 50% to 70% and a mortality rate of 1% to 2% for displaced birds, the number of FFC SPA birds predicted to die each year would be between 123 and 343. The predicted annual in-combination mortality on the breeding razorbill population would result in a predicted change in adult mortality rate of between 1.9% and 5.3%.



[92.97.](#) After further consideration of this effect via PVA it was concluded that this displacement does not represent an adverse effect on integrity of the FFC SPA.

[93.98.](#) Recognising that in-combination displacement may lead the SoS to conclude AEoI for the FFC SPA, the Applicants have therefore proposed compensation measures for razorbill on a without prejudice basis.

#### 4.5.2.5 Compensation Requirement

[94.99.](#) The compensation requirement for razorbill has been calculated as the number of breeding pairs required to produce enough fledglings to replace the adults lost from the population as a result of DBS. This was done using the equation below, taking account of the national average productivity and the mean survival rate each year, as detailed in **Table 4-2**, and based on a recruitment age of five years (Horswill and Robinson, 2015).

$$N_{\text{Fledglings required}} = \frac{N_{\text{New breeding recruits required}}}{\prod_{\text{Age}=0}^{\text{Age}=5} \text{Survival}_{\text{Age}}}$$

$$N_{\text{Breeding pairs required}} = \frac{N_{\text{Fledglings required}}}{\text{Productivity}}$$

Table 4-2 Productivity and survival rates for razorbill (Horswill and Robinson, 2015)

Parameter	Demographic Rate
Productivity	0.570
Survival 0-2 year	0.630
Survival ≥3 year	0.895

[95.100.](#) Applying these demographic rates estimates that 3.88 breeding pairs are required to replace a single recruiting adult razorbill.

~~96.101.~~ Recent Consultation with Natural England (~~November~~ April 2025) ~~indicated~~ confirmed that it would be acceptable to base compensation requirements upon the mean impact value at a ratio of 1:1, but that the proposed compensation measures should have the capacity to accommodate the requirements based upon the 95% upper confidence interval (UCI) of the impact value at a ratio of 2:1. Therefore the compensation requirement for the range of potential impacts for both the mean and 95% UCI is shown in **Table 4-4**.

~~97.102.~~ Using the Applicants' preferred 50% displacement and 1% mortality rates with 100% apportionment to the SPA gives a compensation requirement of 195 breeding pairs at a 1:1 ratio, 390 breeding pairs at a 2:1 ratio and 584 at 3:1. Using Natural England's advice on the success criteria and scaling requirements gives a compensation requirement of 545 breeding pairs and 3,337 breeding pairs respectively.

Table 4-3 Predicted operational impact (individuals) as a result of DBS (worst case scenario) based on the mean impact value (95% UCI). Percentages in brackets represent apportionment of impacted birds to the FFC population. Applicants' preferred values in bold.

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

Table 4-4 Compensation requirement (breeding pairs) based on the mean impact value (95% UCI) for a range of ratios. Percentages in brackets represent apportionment of impacted birds to the FFC population. Applicants' preferred values in bold, \* represents Natural England's success criteria and ^ represents the scaling criteria.

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%)	<b>719</b> (1386)	1439 (2772)	2158 (4158)	2015* (3881)	4029 (7762 <sup>^</sup> *)	6044 (11,643)
Razorbill (61.3%)	174 (557)	347 (1115)	521 (1672)	486 (1561)	972 (3122)	1457 (4683)
Razorbill (100%)	<b>195</b> (596)	390 (1192)	584 (1788)	545* (1669)	1091 (3337 <sup>^</sup> *)	1636 (5006)

## 5 Farne Islands SPA

### 5.1 Overview

~~98.103.~~ The Farne Islands are a group of low-lying islands situated between 2km and 6km off the coast of Northumberland in northeast England. The islands are important nesting areas for a range of seabirds, especially terns, gulls and auks. Seabirds breeding at the SPA feed outside it in nearby waters, as well as more distantly in the North Sea. The site was classified as an SPA in 1985.

### 5.2 Conservation Objectives

~~99.104.~~ The Farne Islands SPA's over-arching conservation objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The populations of each of the qualifying features; and
- The distribution of qualifying features within the site.

### 5.3 Designated Feature – Guillemot

~~100.105.~~ The SPA breeding population at classification was 32,875 pairs (65,750 breeding adults) for the period 2010 to 2014 (Natural England, 2017). Burnell *et al.* (2023) give an updated count of 64,042 individuals which has been used in the assessment in the **Volume 6, RIAA Part 4 of 4 (Revision 5) (document reference 6.1)**.

#### 5.3.1 Summary of Potential Impacts

#### 5.3.2 Overview

~~101.106.~~ DBS East and DBS West are 247km and 213km respectively from the Farne Islands SPA. The mean maximum foraging range of guillemot is 153.7km (73.2km + 80.5km, Woodward *et al.*, 2019). Therefore, as DBS East and DBS West are both outside the potential foraging range for breeding guillemot from the Farne Islands SPA, there is no connectivity between the SPA and the Projects during the breeding season and this species is considered for potential impacts during the non-breeding season only.

~~102.~~107. Outside the breeding season, breeding guillemots from the SPA are assumed to range widely and to mix with guillemots from breeding colonies in the UK and beyond. The relevant non-breeding season reference population is the UK North Sea and Channel BDMPS, consisting of 1,617,306 individuals (August to February) (Furness, 2015).

~~103.~~108. It is estimated that 3.7% of birds present at the Projects are breeding adults from the Farne Islands SPA, and impacts are apportioned accordingly. Note, this percentage has been calculated using the populations in Furness (2015) in order to ensure consistent colony estimates have been applied.

### 5.3.3 Quantification of Effect – Displacement

~~104.~~109. The quantification of effects on guillemot at the Farne Islands SPA follows the same approach as for the FFC SPA, with the Applicants' preferred values of 50% displacement and 1% mortality, and the SNCB advised values of 70% displacement and 2% mortality. Detail is provided in section 4.5.1.2 and in the **Volume 6, RIAA Part 4 of 4 (Revision 5) (document reference 6.1)**.

### 5.3.4 Dogger Bank South Projects Alone

~~105.~~110. For construction the displacement mortality from the Projects together is presented in **Volume 6, RIAA Part 4 of 4 (Revision 5) (document reference 6.1)**. Using precautionary rates of displacement (35%) and mortality (2%) the estimated mortality is 6.6 (100% adults). The Applicants' preferred estimates assuming a 25% displacement rate (APEM, 2022) and 1% mortality of displaced birds reduces the predicted impact to 3.0 (100% adults) individuals. This would represent an increase in mortality rate of 0.08% – 0.17%, below the 1% threshold for further assessment.

~~106.~~111. For operation the displacement mortality from the Projects together is presented in **Volume 6, RIAA Part 4 of 4 (Revision 5) (document reference 6.1)**. Using the precautionary rates of displacement (70%) and mortality (2%) the estimated mortality is 13.0 (100% adults). The Applicants' preferred estimates assuming a 50% displacement rate (APEM, 2022) and 1% mortality of displaced birds reduces the predicted impact to 4.6 (100% adults) individuals. This would represent an increase in mortality rate of 0.12% – 0.33%, below the 1% threshold for further assessment.

~~107.~~112. It is concluded that predicted guillemot mortality due to construction and operational phase disturbance and displacement impacts at the DBS Projects alone would not adversely affect the integrity of the Farne Islands SPA.

## 5.3.5 In-Combination with Other Offshore Wind Farm Projects

~~108.113.~~ The other offshore wind farms considered in combination with the DBS Projects are detailed in the **Volume 6, RIAA Part 4 of 4 (Revision 5) (document reference 6.1)**.

~~109.114.~~ The annual total number of guillemot from the Farne Islands SPA estimated to be at risk of displacement from other wind farms in combination with the DBS Projects is 31,050. Using displacement rates of 50% to 70% and a mortality rate of 1% to 2% for displaced birds, the number of Farne Islands SPA birds predicted to die each year would be between 155 and 435 which represents an increase in mortality of between 3.9% and 11.1%.

~~110.115.~~ After further consideration of this effect via PVA it was concluded this displacement does not represent an adverse effect on integrity of the Farne Islands SPA.

~~111.116.~~ Notwithstanding the above conclusion, the Applicants acknowledge that Natural England have advised that they are unable to conclude no AESI on guillemot at the Farne Islands SPA in combination with other offshore wind farms. Recognising that in-combination displacement may lead the SoS to conclude AEoI for the Farne Islands SPA, the Applicants have therefore proposed compensation measures for guillemot on a without prejudice basis.

## 5.3.6 Compensation Requirement

~~112.117.~~ The compensation requirement for guillemot from the Farne Islands SPA, shown in **Table 5-1**, has been calculated as described in section 4.5.1.5. Using the Applicants' preferred displacement and mortality rates of 50% and 1% the compensation requirement of 20 breeding pairs at a 1:1 ratio, 40 breeding pairs at a 2:1 ratio and 60 breeding pairs at 3:1. Using Natural England's success and scaling criteria the compensation requirements would be 57 breeding pairs and 162 breeding pairs respectively.

Table 5-1 Predicted operational impact and compensation requirements as a result of DBS (worst case scenario) based on the mean impact value (95% UCI). *Applicants' preferred values in bold, \* represents Natural England's success criteria and ^ represents the scaling criteria*

	Impact (adults)	Compensation Requirement (breeding pairs)		
		1:1	2:1	3:1
50% displacement, 1 % mortality	<b>4.6</b> (6.5)	<b>20</b> (29)	40 (57)	60 (86)
70% displacement, 2% mortality	13 (18.3)	57* (81)	115 (162 <sup>^</sup> )	172 (243)

## 6 Compensatory Measures

### 6.1 Potential Measures Considered

~~113.~~118. Initial thoughts on guillemot [and razorbill] compensation options were discussed with stakeholders at a 'Non-kittiwake Compensation' ETG meeting on 9<sup>th</sup> May 2023 (see **Table 3-1**). The stakeholders represented were Natural England, Marine Management Organisation and RSPB<sup>5</sup>.

~~114.~~119. Potential measures were based in part on Furness (2013) and consisted of:

- Designation of additional SPAs;
- Strategic fisheries management (prey enhancement);
- Predator eradication from a breeding colony;
- Artificial Nesting Structure (ANS); and
- Fishery bycatch reduction.

~~115.~~120. Of the measures discussed at the ETG meeting, one was discounted. The designation of new SPAs was discounted as a possible compensation measure at the ETG meeting in May 2023, as it is considered that locations meeting the criteria for designation, are already designated.

<sup>5</sup> Note that The Wildlife Trusts and Lincolnshire Wildlife Trust were also invited and could not attend but were provided with meeting materials and the minutes.



~~116.121.~~ The other measures are discussed in the relevant sections throughout this document. In summary, strategic fisheries management (prey enhancement) is considered unlikely to be available at the project-level and feedback is awaited on whether the recent closure of the North Sea sandeel fishery can be considered as strategic compensation for the Round 4 projects. Predator eradication/control is being progressed by the Applicants as the preferred compensatory measure, while ANS and fishery bycatch reduction may be considered at a later date as potential adaptive management measures, should information become available on their success.

## 6.2 Strategic Fisheries Management (Prey Enhancement)

~~117.122.~~ Sandeel species (*Ammodytidae*) are a component prey species for guillemot and a main prey species for razorbill in the FFC SPA (Clarkson, 2023) but are also subject to commercial fisheries. Ecosystem modelling suggests the cessation of the sandeel fishery in the North Sea could result in a 40% increase in the biomass of the sandeel stock and consequently result in a 42% increase in the number of seabirds within the first 10-15 years after closure of the sandeel fishery (Bayes and Kharadi, 2022).

~~118.123.~~ There is significant potential for the measure to provide far greater compensation than even the most precautionary estimates of losses incurred due to the Round 4 plan and other UK offshore wind proposals in the pipeline. Consequently, a financial contribution towards the establishment of prey enhancement via management of fisheries was recommended as a strategic compensation measure for the Round 4 Plan (NIRAS, 2024).

~~119.124.~~ In January 2024 the UK and Scottish governments announced closure of commercial sandeel fisheries in English waters of the North Sea and all Scottish waters, effective from March 2024. As such, there is potential that the management of fisheries to increase prey availability may not be an available compensation option for the Round 4 Plan. At the time of writing this compensation document, no information was available to indicate whether the closure would be permitted as compensation. Therefore, this measure remains within the compensation document until information confirms its availability or not as a compensation measure for the Round 4 Plan.

## 6.3 Measures Taken Forward

### 6.3.1 Predator Eradication / Control

#### 6.3.1.1 Overview

~~120.125.~~ Seabirds in general are ground nesting birds and have evolved to avoid predation from mammals by nesting on remote islands and inaccessible cliffs. However, the introduction of invasive and non-native mammals, such as rats *Rattus* spp. and American mink *Mustela vison*, to these areas can have devastating effects on seabird colonies, where these predators are known to take eggs, chicks and even some small-bodied adult birds (Moors & Atkinson, 1984; Towns *et al.*, 2006).

~~121.126.~~ Eradication or control of predators in these locations has been shown, in several instances, to result in significant improvements in seabird colony success. Although not often the target species of such conservation efforts, guillemot and razorbill have been seen to respond positively to predator eradication or control. For example, eradication of rats from Lundy, off the Devon coast, although targeted at the conservation of burrow nesting seabirds, resulted in guillemot breeding numbers increasing from 2,348 to 6,198 individuals. An increase in breeding distribution of this species was also seen on the island into areas that would have been accessible to rats; therefore, the increase is attributed to the removal of the pressure of predation by rats (Booker *et al.*, 2019).

~~122.127.~~ The Lundy case study provides strong evidence that eradication of rats can benefit guillemots in some colonies, but this may depend on the amount of boulder and cave nesting habitat (rather than cliff ledges) and whether or not guillemot numbers can increase into such habitat or are constrained by other factors such as food availability.

~~123.~~128. The island of Canna, off the west coast of Scotland, was subject to a rat eradication programme in 2005-2006. Prior to this, guillemots and razorbills were affected by rat predation on the island. After eradication of rats, there was a slowing of the rate of decline of the guillemot population, but the anticipated increase in abundance and breeding success was not observed. It was considered that other factors, such as adult mortality during severe storms and food shortages, prevented the population from recovering despite removal of the predation by rats (Luxmoore *et al.*, 2019). Numbers of breeding razorbills showed a sharp jump in 2006, following the eradication of rats. Luxmoore *et al.* (2019) attributed this to a reduction in predation by rats, noting that razorbill eggs were laid in areas that had previously been clear of nesting because of the presence of rats. As with guillemot, the razorbill population was thought to be affected by factors other than rat eradication, and breeding success remained low potentially as a result of food shortages (Luxmoore *et al.*, 2019).

~~124.~~129. At the Shiant Isles, of the north-west of Scotland, following successful eradication of the black rat, razorbill breeding success was higher on average in each of the post eradication years compared to the pre-eradication year (RSPB, 2019).

## 6.3.1.2 Screening of Potential Sites

~~125.~~130. At the pre-application stage a methodical approach was taken to the identification and creation of a longlist of potential sites at which predator eradication could be undertaken to provide compensation. The first step involved collation of the following information:

- Location of known colonies of these key species with potential predator issues on the UK mainland and its islands;
- Land ownership details (where known);
- Publicly available information on predator populations at each colony (current and historic); and
- Existing or proposed previous proposals for eradication at sites (e.g. current RSPB Biosecurity for Life Priority Projects or Scottish Marine Environmental Enhancement Fund [SMEEF], enabling investment in tangible, effective marine and coastal restoration projects, amongst others).

~~126.~~131. Consideration was given firstly to locations at which like-for-like compensation could be provided (i.e. compensation for guillemot [and razorbill]) but also to sites where non like-for-like compensation may be possible (i.e. for qualifying species of the SPA, other than guillemot [and razorbill]).

127.132. A high-level preliminary feasibility assessment was undertaken based on the following criteria in the UK Rodent Eradication Best Practice Toolkit (Thomas *et al.*, 2017) and used to apply a red, amber, green categorisation (red – criteria unlikely to be met, amber – criteria likely to require further study or consultation, green – criteria likely to be met):

- Technically feasible – the entirety of the site can be accessed and bait stations distributed so as to remove every last individual of the population at a rate faster than the target species ability to breed;
- Sustainable – the likelihood of reinvasion by the target species is low, or the risks of reinvasion leading to population re-establishment can be reduced through realistic and affordable biosecurity measures;
- Socially acceptable – the project has full support from the community, landowners and key island users, all of whom understand and accept the implications of the project. Access will be granted to every property and all privately-owned land;
- Politically and legally acceptable – All required permits and consents can be/expect to be obtained. The techniques, equipment and materials required are all legal to import / use in the UK;
- Environmentally acceptable – the impact on the environment can be reduced to an acceptably low level. Removal of the target species is unlikely to lead to permanent negative changes in the ecosystem. However short-term negative impacts should not be shied away from and stakeholders and the public should not expect the project to be ‘all gain no pain’;
- Capacity – All the required resources, skilled people, and equipment are available, or can be sourced in a timely manner for the duration of the project; and
- Affordable – The total cost of the project and ongoing biosecurity can be funded before the project commences, including an additional contingency (c. 20%) for unforeseen complications.

128.133. At this stage insufficient information was available to assign any sites on the longlist to the green category (i.e. criteria likely to be met). However, an initial shortlist of eight sites was created by removal of sites in the red category, which included sites where political or public support is unlikely, or where the technical feasibility of successful eradication is low.

~~129.134.~~ The longlist of sites is provided in **Volume 6, Annex B - Guillemot [and Razorbill] Compensation Predator Eradication / Control Site Longlist (application ref: 6.2.2.2)**. The shortlist of sites is detailed in section 6.3.1.2.2.

## 6.3.1.2.1 *Pre-Application Consultation Feedback*

~~130.135.~~ The ETG meetings undertaken to date are detailed in section 3.2. During the course of this consultation, feedback has been provided by stakeholders on the perceived suitability of the sites considered. The pertinent feedback is given in **Table 6-1**.

Table 6-1 Stakeholder feedback on predator eradication site list

Stakeholder Comment	Applicants' Response
It has been acknowledged that there may be a shortage of suitable sites in England, and it may be necessary to look elsewhere in the UK. However, it will be important to demonstrate connectivity of the auk populations with the FFC SPA.	The Applicants will follow the hierarchy as detailed in the draft Defra guidance (2021, 2024b) looking for sites close to the impacted area but prioritising sites which are more likely to provide effective compensation whilst maintaining benefit to the NSN.
Natural England expressed their opinion that keeping Scottish sites in the list would significantly de-risk the project, whilst acknowledging that there may be challenges in securing these sites.	The Applicants will focus the feasibility studies on the existing shortlisted sites but will re-visit Scottish sites if none of the shortlisted sites prove feasible.
Natural England stated concern over the length of the short-list, indicating that other OWF have previously considered and subsequently ruled out some of the shortlisted sites.	The Applicants note Natural England's concern but considers that more detailed and updated information may be available on these sites which is worth investigating.
Natural England strongly encouraged the Applicants to re-consider the Scilly Isles as a potential location.	The Applicant will continue with the existing shortlist but will investigate the situation with the Scilly Isles and may reincorporate them into the shortlist.

## 6.3.1.2.2 *Initial Shortlist*

~~131.136.~~ The initial eight shortlisted sites are shown in **Table 6-2**. In addition, as per **Table 6-1**, the Applicants further investigated options in the Scilly Isles as requested by Natural England. Scottish sites will be revisited if none of the shortlisted sites are suitable after further survey.

Table 6-2 Shortlisted sites for DBS Predator Eradication at pre-application stage

Rank	Location	Island/ Headland	Approximate Area (ha)	Comment
1	Sheep Island, Antrim	Island	4	Auks and rats both present
2	Muck Island, Antrim	Island	5	Auks present, rats likely
3	Gobbins, Antrim	Headland	20	Auks present, rats likely
4	St Tudwals East and West, Wales	Islands	20	Auks present, rats likely
4	Middle Mouse, Wales	Island	4	Auks present, rats possible
6	Worms Head, Wales	Headland and Island	16	Auks present, rats likely
6	Needles, Isle of Wight	Headland and Island	10	Auks present, rats likely
8	St Bees, England	Headland	300	Auks present, rats likely
9	Isles of Scilly	Island Group	1,600	Auks and rats both present

### 6.3.1.2.3 Shortlist Refinement

132.137. In order to refine the shortlist, further studies were undertaken by the Applicants to address four key questions:

- Would a potential eradication be approved and supported?
- Are invasive predators present?
- Is habitat suitable for breeding auks?
- Is there space for additional breeding auks and are they likely to be attracted?

133.138. In order to address these questions, the Applicants have progressed the following:



- Initial contact with landowners to determine level of support for eradication studies;
- Consultation with landowners, managers and local stakeholders (including local wildlife groups and conservation bodies) to collate local knowledge around seabird breeding activity and the presence of rats and other predators;
- Site specific surveys to support the above inquiries, to observe and photograph breeding seabird activity and obtain evidence of rat presence; and
- Creation of a photographic record and delineation of areas of unoccupied and suitable habitat for additional nesting to enable projections of potential number of pairs of target auk species which could be accommodated by the areas following a predator eradication.

~~134.~~139. The details and results of the shortlist refinement studies are presented in the **Guillemot [and Razorbill] Compensation Site Shortlist Refinement Report (Revision 2)** (REP3-020). The output is summarised in **Table 6-3**.

~~135.~~140. Following an extensive programme of field survey and landowner consultation between June 2024 and May 2025 it was determined that none of the shortlisted sites were suitable to provide project-led compensation. This was either due to lack of landowner support (for a developer-led project) as with Isles of Scilly, Sheep Island, Worms Head, St Tudwals East, St Tudwals West, Gobbins, St Bees, and Muck Island or due to lack of confirmed predator presence, as in the case of Middle Mouse, or lack of auks, as with the Needles. Therefore, none of these sites will be progressed further.

~~136.~~141. Surveys at the Isles of Scilly in June 2024, reported in the **Isles of Scilly Guillemot and Razorbill Survey and Habitat Assessment** [document reference 14.12] and **Guillemot [and Razorbill] Compensation Site Shortlist Refinement Report (Revision 3)** [document reference 10.20], highlighted that the Isles of Scilly have significant potential to provide the compensation required by the Project, as they have an abundance of suitable habitat and a considerable issue with rat predation on seabird colonies. However, a predator eradication in this location would be large-scale and complex due to the number of individual islands in close proximity and the amount of community engagement required.



~~137.~~142. The Duchy of Cornwall is the majority landowner on the Isles of Scilly, with a large amount of the area above high water managed by the Isles of Scilly Wildlife Trust. Both organisations have expressed a desire to see any potential predator eradication scheme delivered on the Isles of Scilly as a strategic compensation package.

~~138.~~143. The Wildlife Trusts and the National Trust have made it clear that their preference would be for any predator eradication compensation projects to be delivered via the MRF, not associated with an individual developer. Thereby limiting the Applicants' ability to progress projects that would benefit many of the notable seabird colonies in England, Wales and Northern Ireland.

Table 6-3 Results of shortlist refinement studies

Location	Landowner support for predator eradication scheme*	Preferred delivery route of landowner /manager	Predators Present	Auks Present	Available Auk Habitat	Potential to provide required compensation
Isles of Scilly	Yes	Strategic	Yes	Yes	Yes	Yes
Sheep Island	Yes	Pursuing own scheme	Yes	Yes	Yes	No
Worms Head	No	Strategic	Yes	Yes	Yes	No
Middle Mouse	Likely	Project-led	Not confirmed	Yes	Yes	Unlikely
St Tudwals East	Not confirmed	N/A	Not confirmed	Yes	Yes	No
St Tudwals West	No	N/A	No	Yes	Yes	No
Gobbins	Not confirmed	N/A	Likely	Yes	Yes	No

Location	Landowner support for predator eradication scheme*	Preferred delivery route of landowner /manager	Predators Present	Auks Present	Available Auk Habitat	Potential to provide required compensation
St Bees	No	N/A	Likely**	Yes	Yes	No
Needles	No	N/A	Unlikely	No	No	No
Muck Island	No	N/A	Not confirmed	Not confirmed	Not confirmed	No

\* Supportive of future eradication scheme – not specifically though DBS

\*\* Although predators are likely to be present, consultation with the RSPB has indicated that there is no evidence of predation pressure on the seabird colony

~~139.144.~~ As none of the sites from the initial shortlist are available as project-led compensation sites, the Applicants have revisited the **Annex B - Guillemot [and Razorbill] Compensation Predator Eradication / Control Site Longlist** [APP-058] in addition to considering new sites that may have become available, including those in Scotland, and have commenced engagement with landowners. The Applicants are also actively pursuing collaboration with other developers and organisations, with regards to the Isles of Scilly.

#### 6.3.1.2.4 Secondary Shortlist

~~140.145.~~ After removal of the last site from the initial shortlist during the post-Examination period, the Applicants have subsequently developed a secondary shortlist comprising a number of Scottish islands which were identified through desk based assessment as possibly having the potential to provide compensation through predator eradication.

~~141.146.~~ Surveys ~~have been were~~ undertaken at six locations (**Table 6-4**) in June / July 2025 to assess the availability of habitat suitable for guillemot [and razorbill]. These surveys are reported in the **Guillemot [and Razorbill] Compensation Secondary Shortlist Site Refinement Report** [(document reference 20.5)]. The results of the secondary shortlist refinement following the desk assessment, initial site visit and landowner consultation are provided in **Table 6-4**.

Table 6-4 Results of site refinement for secondary shortlist

Location	Landowner Support	Predators Present	Auks Present	Available Auk Habitat	Further Assessment Proposed
Taransay, Harris, Outer Hebrides	Yes	Unlikely***	Observed on water but not nesting	Yes	No
Bearasaigh island group, Lewis, Outer Hebrides	Yes	Likely**	Yes – observed nesting	Yes	Yes
Pabaigh islands, Lewis, Outer Hebrides	Yes	Yes***	Observed on water Anecdotal evidence of historical nesting	Yes	Yes
Fiaraidh, Barra, Outer Hebrides	Yes	Yes*	Observed on water but not nesting	Yes	No
Gighay & Hellisay, Barra, Outer Hebrides	Yes	Likely*	Observed on water but not nesting	Yes	No
Out Skerries, Shetland	Yes	Yes*	Observed on water Historical records of nesting	Yes	Yes

\* landowner consultation/desk assessment

\*\* incidental field signs and potential thermal drone sighting

\*\*\* dedicated survey

- ~~142.147.~~ Further surveys ~~are ongoing~~ have been undertaken at three of the secondary shortlist locations, Bearasaigh<sup>6</sup> island group, Pabaigh islands, and Out Skerries, to refine the assessment of compensation potential. Following these surveys and detailed assessment, the Applicants have taken the decision to combine the Bearasaigh islands and Pabaigh islands into a single Outer Hebrides scheme, which will continue to be progressed alongside the Out Skerries scheme. A significant amount of information has been gathered in relation to the two potential schemes and this is presented in **Table 6-5**. These surveys, detailed in the **Guillemot [and Razorbill] Compensation Secondary Shortlist Site Refinement Report** (document reference 20.5), have so far recorded the presence of rats on the Pabaigh islands and Out Skerries and will be undertaken at Bearasaigh in October 2025.
- ~~143.148.~~ Heads of Terms have been issued to landowners and a letter of support has been received from the owner of Pabaigh Mor (**Annex A**) of the three options to be progressed for further assessment, namely Out Skerries, Bearasaigh and Pabaigh Islands. The applicants are expecting further letters of support and these will be shared with the SoS once received.
- ~~149.~~ The Applicants presented the results of the studies on the secondary shortlist sites to NatureScot on 3<sup>rd</sup> October 2025 (**Table 3-1**) and the information in **Table 6-5** was provided to both Natural England and NatureScot in the **Guillemot and Razorbill Compensation Update** [document reference 20.8] prior to submission to the Secretary of State.:

---

<sup>6</sup> Multiple alternative spellings of the islands in the Outer Hebrides scheme are available. While they are consistent within this report alternative spellings, such as Pabay Mohr, Pabay Beag and Bearasay may appear in other documents.

Table 6-5 Relevant information on the Scottish potential compensation sites

Criteria	Outer Hebrides	Out Skerries
Location	<p>Island group on the west coast of Lewis in the Outer Hebrides. The focal islands in the group where compensation would be delivered (i.e. where there is habitat for guillemot and razorbill) are Sean Bheinn, Bearasaigh, Pabaigh Mor and Pabaigh Beag. Additional islands which are not expected to support significant numbers of guillemots and razorbills, but would be included within the biosecurity zone due to being within rat swimming distance include Flodaigh, Bhacasaigh and Siaram Mor. In addition, a portion of the Lewis mainland at Bhaltos would need to be included in the biosecurity zone.</p> <p>None of the islands in this group are permanently inhabited although bothies are present on Pabaigh Mor and Pabaigh Beag that are utilised by the landowners' families.</p> <p>The islands are not within any designated sites. The closest Special Protection Area (SPA) for which guillemot are a feature of interest is The Flannan Isles SPA, is approximately 35km west.</p>	<p>Island group in the east of Shetland.</p> <p>The focal islands in the group are Housay, Grunay, Bruray and Bound Skerry. Additional islands include Benelips, Filla and Guens.</p> <p>Housay and Bruray are connected by a bridge and have a small population of approximately 40 residents. An irregular commercial ferry services Housay / Bruray. None of the other islands are inhabited.</p> <p>The islands are not within any designated sites. The closest SPA for which guillemot are a feature of interest is Noss SPA approximately 26km south of the Out Skerries.</p>
Ecological Evidence		
Evidence base	<p>Surveys undertaken by HAR for the Applicants. Initial site visit in June 2025 and drone survey in October 2025 (limited by poor weather).</p> <p>British Trust for Ornithology (BTO) / Joint Nature Conservation Committee (JNCC) Seabird Monitoring Programme (SMP) data.</p> <p>JNCC seabird censuses.</p> <p>Consultation with landowners and residents.</p> <p>Desk-based literature search, including grey literature.</p>	<p>Surveys undertaken by HAR for DBS. Initial site visit in June 2025 and drone survey in October 2025 (limited by poor weather).</p> <p>BTO/JNCC SMP data.</p> <p>JNCC seabird censuses.</p> <p>Consultation with landowners and residents.</p> <p>Desk-based literature search, including grey literature.</p>
Predator presence	<p>Confirmed thermal imagery of rats on Pabaigh Mor, Pabaigh Beag, Bhacasaigh and camera trap images on the adjacent mainland. Landowner confirmation that rats are present around the bothies on Pabaigh Mor and Pabaigh Beag.</p> <p>Potential thermal image of rats on Flodaigh.</p> <p>Predators presence is unconfirmed on Sean Bheinn and Bearasaigh (due to poor weather limiting the survey effort) along with other adjacent islands within the biosecurity zone. Further predator surveys would be undertaken as part of pre-eradication studies in 2026/2027 to inform biosecurity planning.</p> <p>Confirmation from members of the community that rats are present in Bhaltos (mainland closest to the islands, within the biosecurity zone).</p>	<p>Confirmed thermal imagery and trapping of rats on Housay, Bruray and Grunay. Landowner confirmation of rats on Housay and Bruray.</p> <p>Unconfirmed on the other adjacent islands. This information would be gathered as part of pre-eradication studies in 2026/2027 to inform biosecurity planning.</p> <p>Presence of Atlantic puffin on North Benelips during the July 2025 site visit suggest there may not be rats on that island.</p>
Suitability of habitat	<p>Initial assessment indicates suitable habitat on Pabaigh Mor, Pabaigh Beag, Sean Bheinn and Bearasaigh (<b>Guillemot and Razorbill Compensation Site Secondary Shortlist Refinement Report</b> [document reference 20.5]).</p> <p>Refined habitat assessment for Pabaigh Mor and Pabaigh Beag where high resolution drone footage was gathered estimates that 5,420m<sup>2</sup> of suitable habitat is available (accounting for</p>	<p>Initial assessment indicates suitable habitat on all of the islands (<b>Guillemot and Razorbill Compensation Site Secondary Shortlist Refinement Report</b> [document reference 20.5]).</p> <p>Refined assessment of the habitat for Housay, Bruray and Bound Skerry where high resolution drone footage was gathered estimates that 6,445m<sup>2</sup> of suitable habitat is</p>

Criteria	Outer Hebrides	Out Skerries
	<p><u>exposure and terrain) sufficient to support 13,550 guillemot pairs at 2.5 pairs/m<sup>2</sup> and 2,710 razorbill pairs at 0.5 pairs/m<sup>2</sup>. Further detail is presented in <b>Appendix A</b> of the <b>Guillemot and Razorbill Compensation Update</b> [document reference 20.8]].</u></p> <p><u>Drone survey of Sean Bheinn and Bearasaigh was restricted by poor weather. It is proposed to gather this information when a suitable weather window is identified.</u></p>	<p><u>available (accounting for exposure and terrain) sufficient to support 13,434 guillemot pairs at 2.5 pairs/m<sup>2</sup> and 2,687 razorbill pairs at 0.5 pairs/m<sup>2</sup>. Further detail is presented in <b>Appendix A</b> of the <b>Guillemot and Razorbill Compensation Update</b> [document reference 20.8]].</u></p> <p><u>It was not possible to gather high resolution drone footage of the other locations during the survey window. This can be gathered at a later date if necessary.</u></p>
<u>Accessibility of habitat to predators</u>	<p><u>Refined habitat assessment has been undertaken for Pabaigh Mor and Pabbaigh Beag (see row above). Only habitat considered to be accessible to rats was included in the quantification of suitable habitat. Inaccessible areas were discounted.</u></p> <p><u>Drone survey of Sean Bheinn and Bearasaigh was restricted by poor weather. It is proposed to gather this information when a suitable weather window is identified.</u></p> <p><u>However, site visit photographs indicate that much of the habitat it is accessible.</u></p>	<p><u>Refined assessment has been undertaken for Housay, Bruray and Bound Skerry (see row above). Only habitat considered to be accessible to rats was included in the quantification of suitable habitat. Inaccessible areas were discounted.</u></p> <p><u>It was not possible to gather high resolution drone footage of the other locations during the survey window. This can be gathered at a later date if necessary.</u></p> <p><u>However, site visit photographs indicate that much of the habitat is accessible.</u></p>
<u>Auk populations</u>	<p><u>During the June 2025 no guillemots and razorbills were recorded nesting on the islands. There were several small groups of auks observed feeding close to the islands amongst other seabirds. Further surveys will be undertaken as part of eradication planning in 2026/2027.</u></p> <p><u>SMP data reports a count of five razorbill on Bearasaigh and 27 razorbill on Sean Bheinn in 2021. These islands do not appear to be regularly monitored and lack of data does not necessarily mean lack of a population.</u></p> <p><u>37km from the nearest potential donor auk colony, the Flannan Isles. Whilst a large colony, the Flannan Isles auks have undergone a decline between the seabird census in 2000 and 2023. The guillemot population has decreased 40-77%, whilst the razorbills have decreased by 18-52%. The next nearest potential donor colony in good health is the Shiants, 48km away.</u></p> <p><u>The Western Isles population of guillemot from the most recent seabird census was 72,913 individuals and 30,708 individuals for razorbill. However, previous populations were much higher (120,714 guillemot and 37,434 razorbill in the 2000 seabird census) and the seabird populations on many of these islands have been subject to pressure from mammalian predators for many years and the low populations are likely to be reflective of that.</u></p>	<p><u>No nesting guillemot or razorbill recorded during site visit in July 2025, however this may be due to the timing of the site visit. Several groups of auks were recorded in the sea around the islands. Further surveys will be undertaken as part of eradication planning in 2026/2027.</u></p> <p><u>SMP data reports 47 individual guillemot on Housay in 1986, 25 in 1989 and 0 in 2021. For razorbill the SMP data reports one individual on North Benelip in 1986 and in 2001 two individuals on Bruray and three on Housay. A count of 0 was recorded for Housay in 2021. These islands do not appear to be regularly monitored and lack of data does not necessarily mean lack of a population. There is anecdotal evidence of a large breeding colony of guillemot.</u></p> <p><u>The nearest potential donor colony of 24,000 guillemots is 32km away on Noss with several smaller colonies throughout Shetland. The populations of most colonies in Shetland are decreasing in the period between the seabird census in 2000 to 2023.</u></p> <p><u>The Shetland population of guillemot from the most recent seabird census (JNCC, 2024) was 78,477 individuals and 4,180 individuals for razorbill. However, previous populations were much higher (175,427 guillemot and 12,238 razorbill in the 2000 seabird census (JNCC, 2024)) and the seabird populations on many of these islands have been subject to pressure from mammalian predators for many years with the low populations likely to be reflective of that.</u></p>
<u>Other species</u>	<p><u>Seabird counts are infrequent at these locations and there is a relative lack of data, however, other species recorded in the SMP database for Pabaigh Mor include fulmar, shag, great cormorant, common gull, great black backed gull, herring gull, lesser black backed gull, black guillemot. Artic tern were also recorded on Floddaigh although the colony has decreased from a count of 138 in 1999 to 42 in 2021. Anecdotal information from the landowner of Pabaigh Mor confirmed the historic presence of an abundance of sea bird and suggested that bird populations in general on the island have declined in recent years along with an increase in the rat population.</u></p>	<p><u>Seabird counts at the Out Skerries are infrequent and there is a relative lack of data, however other species recorded in the SMP database for Out Skerries include Arctic tern, Atlantic puffin, common gull, fulmar, great black backed gull, herring gull, kittiwake, lesser black backed gull and shag. With the exception of fulmar the counts for all species have declined in the most recent counts. Counts of puffin in 2001 showed an apparent increase from extremely low counts in 1986, however the 2001 counts were of birds at sea and therefore may not reflect the nesting population.</u></p>



Criteria	Outer Hebrides	Out Skerries
	<u>Species recorded on Bearasaigh are fulmar, shag, great cormorant, great black backed gull, herring gull and razorbill. With the exception of great cormorant and a single great skua all counts have declined between 1999 and 2021. A single count is available for Sean Bheinn which recorded kittiwake, fulmar and shag.</u>	
Aim	<u>To remove invasive mammalian predators from the island group (and prevent re-incursion) to enable seabird populations, primarily guillemot and razorbill to recover in a predator-free environment. Removal of predators will increase the amount of safe habitat available allowing colonies to grow, and will result in increased colony productivity due to reduced chick and egg losses.</u>	<u>To remove invasive mammalian predators from the island group (and prevent re-incursion) to enable seabird populations, primarily guillemot and razorbill to recover in a predator-free environment. Removal of predators will increase the amount of safe habitat available allowing colonies to grow, and will result in increased colony productivity due to reduced chick and egg losses.</u>
<b><u>Feasibility of a successful eradication</u></b>		
Biosecurity requirements	<u>Locations that are within a 1km biosecurity zone are Flodaigh, Bhacasaigh, Siaram Mor, Mas Sgeir and a section of the mainland at Bhaltos.</u> <u>Bhaltos is a small township of approximately 35 residences and has a known rat problem. The other locations are uninhabited and no passenger services are known to visit them.</u> <u>It would be necessary to include all islands and the mainland section within the 1km zone in a biosecurity programme. Biosecurity guidance/training would be provided to residents of Bhaltos.</u>	<u>Locations within 1km of the focal islands are Benelips, Filla and Guens.</u> <u>Housay and Bruray are connected by a bridge and have a small population of approximately 40 residents. An irregular commercial ferry services Housay / Bruray. The other locations are uninhabited and no passenger services are known to visit them.</u> <u>It would be necessary to include all islands within the 1km zone in a biosecurity programme. Biosecurity guidance / training would be provided to ferry operators.</u>
Accessibility to personnel	<u>From initial assessments access to most of the islands in the group appears to be relatively straightforward due to the presence of sheltered bays for vessel landing. Sean Bheinn and Bearasaigh appear more challenging but not insurmountable, with the potential to require anchor points and rope access.</u> <u>Further assessment will be undertaken once high resolution drone footage has been gathered.</u>	<u>Access to the main islands of Housay and Grunay is by ferry. Grunay and Bound Skerry are easily accessed by boat.</u> <u>Accessibility of the other islands is assumed but requires further investigation.</u>
Eradication method	<u>Eradication is anticipated to make use of rodenticide baited traps, although consideration will be given to the use of non-toxic lethal traps.</u> <u>Investigation of the most appropriate trap/rodenticide will form part of eradication planning and pre-eradication studies in 2026/2027 to determine if rodenticide resistance is present in the population.</u> <u>No predator-proof fencing is required as part of the Scheme.</u> <u>Long-term biosecurity would make use of non-toxic traps with a monitoring plan to be developed as part of the eradication planning in 2026/2027.</u>	<u>Eradication is anticipated to make use of rodenticide baited traps, although consideration will be given to the use of non-toxic lethal traps.</u> <u>Investigation of the most appropriate trap / rodenticide will form part of eradication planning and pre-eradication studies in 2026/2027 to determine if rodenticide resistance is present in the population.</u> <u>No predator-proof fencing is required as part of the Scheme.</u> <u>Long-term biosecurity would make use of non-toxic traps with a monitoring plan to be developed as part of the eradication planning in 2026/2027.</u>
Timescales	<u>Assessment of the amount of suitable habitat and accessibility to predators will be completed for the sites which high resolution drone footage has been gathered is anticipated to be available prior to responding to the RFI on 6<sup>th</sup> December. If further information is required this would be gathered in early 2026.</u>	<u>Assessment of the amount of suitable habitat and accessibility to predators will be completed for the sites which high resolution drone footage has been gathered is anticipated to be available prior to responding to the RFI on 6<sup>th</sup> December. If further information is required this would be gathered in early 2026.</u>



Criteria	Outer Hebrides	Out Skerries
	<p><u>Eradication planning, including stakeholder engagement, rodenticide resistance testing, and development of the necessary plans (implementation, biosecurity, monitoring, etc.) will be undertaken throughout 2026 and 2027.</u></p> <p><u>Eradication activity will begin in September / October 2027, at least two breeding seasons ahead of turbine installation.</u></p> <p><u>The timescales for the proposed compensation is provided in <b>Plate 6-1</b>.</u></p>	<p><u>Eradication planning, including stakeholder engagement, rodenticide resistance testing, and development of the necessary plans (implementation, biosecurity, monitoring, etc.) will be undertaken throughout 2026 and 2027.</u></p> <p><u>Eradication activity will begin in September / October 2027, at least two breeding seasons ahead of turbine installation.</u></p> <p><u>The timescales for the proposed compensation is provided in <b>Plate 6-1</b>.</u></p>
<b>Securing the scheme</b>		
Stakeholders	<p><u>All islands in the group are in private ownership although not permanently inhabited. Bearasaigh, Sean Bhein and Floddaigh are all under the ownership of a single landowner. The mainland area around Bhaltos, within the biosecurity zone is under community ownership. Individual landowner agreements will be put in place. Heads of Terms have already been issued to the landowners of Pabaigh Beag, Pabaigh Mor, Bearasaigh, Sean Bhein and Floddaigh. Letters of support for submission to the Secretary of State have been requested and are provided in <b>Annex A</b>.</u></p> <p><u>It is known that crofter's rights are exercised on Pabaigh Beag and Pabaigh Mor. There are no crofters on Sean Bheinn or Bearasaigh. This is being investigated for the other islands. There would be no impact on the ability of crofters to exercise their rights and therefore this is not anticipated to represent a significant issue and means of securing right of access have been identified if required.</u></p> <p><u>Structured stakeholder engagement likely to include in-person community events and meetings with landowners and tenants, would be undertaken as part of the eradication planning to be undertaken throughout 2026/2027.</u></p>	<p><u>The Out Skerries are owned by a single landowner. Contact has been established with the landowner and Heads of Terms have been issued. A letter of support for submission to the Secretary of State have been requested.</u></p> <p><u>Tenants are present on Housay and Bruray. Initial discussions undertaken during the site visit indicate that an eradication would be positively received.</u></p> <p><u>The presence of crofters / crofter's rights on the islands is being explored. There would be no impact on the ability of crofters to exercise their rights and therefore this is not anticipated to represent a significant issue and means of securing right of access have been identified if required.</u></p> <p><u>Structured stakeholder engagement likely to include in-person community events and meetings with landowners and tenants, would be undertaken as part of the eradication planning to be undertaken throughout 2026/2027.</u></p>
DCO Conditions	<p><u>Suspensive condition contained within the Draft DCO</u></p>	<p><u>Suspensive condition contained within the Draft DCO</u></p>
Financial	<p><u>Estimated costs of a predator eradication scheme, including biosecurity has been developed by the experienced specialist contractor. Dogger Bank South would fund the Scheme in its entirety.</u></p>	<p><u>Estimated costs of a predator eradication scheme, including biosecurity has been developed by the experienced specialist contractor. Dogger Bank South would fund the Scheme in its entirety.</u></p>
<b>Other considerations</b>		
Secondary ecological impacts	<p><u>The islands are not within any designated sites.</u></p> <p><u>The southern extent of the biosecurity zone on the mainland at Bhaltos is within the Tràigh na Berie Special Area of Conservation (SAC), designated for machair. This area would be visited as part of pre-eradication planning and careful consideration would be given to the location of biosecurity measures and the frequency of access for monitoring to ensure no damage to the habitat.</u></p> <p><u>Species of conservation concern that have been identified as potentially be present with the Scheme area include golden eagle, white-tailed eagle, greater black backed gull, lesser black backed gull and herring gull. Anecdotal evidence from the landowner on Pabaigh Mor suggests that corncrake and snipe have previously been recorded on the island. Traps, either baited or lethal non-</u></p>	<p><u>The Out Skerries are not within any designated sites.</u></p> <p><u>A variety of bird species have been reported from the Out Skerries including fulmar, shag, kittiwake, puffin, common gull, great black backed gull, herring gull and lesser black lacked gull and Arctic tern.</u></p> <p><u>With the exception of domestic cat observed during the survey no native predators are known to occur on the islands although there is anecdoteal evidence that otters may be present on the islands. While the traps would not be accessible or attractive to these species, this along with the presence of scavenging species may be present the risk of secondary poisoning of these species which would be a consideration in the choice of</u></p>

Criteria	Outer Hebrides	Out Skerries
	<p><u>toxic would not be attractive or accessible to these species. The risk of secondary poisoning of these species would be a consideration in the choice of rodenticide and the use of non-toxic lethal traps.</u></p> <p><u>There are no designated seal haul outs in the vicinity of the islands although Floddaigh is a known grey seal pupping site. The pupping season for grey seals in the Outer Hebrides is considered to be October-November which may coincide with eradication activity. The need to avoid disturbance of seals during this period is a consideration. Further investigation of the location of the pupping site on Floddaigh will be undertaken and it may be necessary to consider the timing of eradication activity at this location.</u></p>	<p><u>rodenticide and the use of non-toxic lethal traps. There are records of hedgehogs on the Out Skerries. While this species will have much reduced climbing ability in comparison to rats, they are also non-native and may limit the benefit to ground nesting birds in accessible areas. It may therefore be necessary to consider this species as an additional target for eradication.</u></p> <p><u>Seals are likely to be present around the islands however no designated haul out or known pupping sites are present.</u></p>
Community impacts	<p><u>Discussions during the site visit in June 2025 indicated that the community of Bhaltois has a significant population of rats and would greatly welcome assistance with control (as part of the Scheme's biosecurity). The Project could provide guidance and training to the community to enable them to reduce the rat population and better protect their resources.</u></p> <p><u>There is potential that a small local employment boost could occur during the eradication phase and for biosecurity.</u></p>	<p><u>Discussion undertaken during the site visit in July 2025 suggested that the community has declined since closure of the fish farm and that any boost would be greatly received.</u></p> <p><u>There is potential that a small local employment boost could occur during the eradication phase and for biosecurity. An increase in the health of the seabird populations of the islands may also attract a small amount of additional tourism. This is unlikely to be of a scale that it would negatively impact the community.</u></p>
Monitoring and adaptive management	<p><u>The detailed monitoring and adaptive management plan will be developed during the eradication planning phase in 2026/2027. However, there will be a commitment to long-term monitoring of predator presence and guillemot and razorbill populations.</u></p> <p><u>Should monitoring indicate that the compensation measure is not meeting its objectives, the cause will be investigated and appropriate site-specific adaptations (such as additional/alternative biosecurity measures, habitat management or use of attraction methods) identified and implemented. Should these adaptive measures be unsuccessful the Project has identified wider adaptive management measures including auk-specific spaces on the Artificial Nesting Structure proposed as kittiwake compensation and the implementation of targeted by-catch reduction measures.</u></p> <p><u>There is a requirement, under the Draft Development Consent Order (DCO) conditions, for the monitoring and adaptive management plans to be included in the CIMP which must be approved by the Secretary of State.</u></p>	<p><u>The detailed monitoring and adaptive management plan will be developed during the eradication planning phase in 2026/2027. However, there will be a commitment to long-term monitoring of predator presence and guillemot and razorbill populations.</u></p> <p><u>Should monitoring indicate that the compensation measure is not meeting its objectives, the cause will be investigated and appropriate site-specific adaptations (such as additional/alternative biosecurity measures, habitat management or use of attraction methods) identified and implemented. Should these adaptive measures be unsuccessful the Project has identified wider adaptive management measures including auk-specific spaces on the Artificial Nesting Structure proposed as kittiwake compensation and the implementation of targeted by-catch reduction measures.</u></p> <p><u>There is a requirement, under the Draft DCO conditions, for the monitoring and adaptive management plans to be included in the CIMP which must be approved by the Secretary of State.</u></p>
Governance	<p><u>Post-consent an auk compensation steering group will be formed comprising the Statutory Nature Conservation Bodies (SNCBs), Natural England and NatureScot, and other relevant stakeholders.</u></p> <p><u>The CIMP, including details of the long-term monitoring and adaptive management must be produced in consultation with the steering group and approved by the Secretary of State.</u></p> <p><u>The schedule for provision of regular reports on the monitoring of effectiveness of the measure and the potential requirement for adaptive management to the steering group and Secretary of State will be contained within the approved CIMP.</u></p> <p><u>Dogger Bank South will remain responsible for the scheme for the lifetime of the windfarm, or for the period agreed through the CIMP.</u></p>	<p><u>Post-consent an auk compensation steering group will be formed comprising the SNCBs, Natural England and NatureScot, and other relevant stakeholders.</u></p> <p><u>The CIMP, including details of the long-term monitoring and adaptive management must be produced in consultation with the steering group and approved by the Secretary of State.</u></p> <p><u>The schedule for provision of regular reports on the monitoring of effectiveness of the measure and the potential requirement for adaptive management to the steering group and Secretary of State will be contained within the approved CIMP.</u></p> <p><u>Dogger Bank South will remain responsible for the scheme for the lifetime of the windfarm, or for the period agreed through the CIMP.</u></p>

## 6.3.1.3 Delivery Mechanism

~~144.150.~~ In the absence of a Round 4 strategic plan for auk compensation, the Applicants could deliver the compensation measure independently at a project-led level, or in collaboration/strategically with other developers.

~~145.151.~~ Should the Applicants progress any of the sites from the secondary shortlist these will be delivered as project-led compensation or in collaboration with another developer. However, delivery of compensation on the Isles of Scilly would require a strategic/collaborative approach with the Duchy of Cornwall, the Isles of Scilly Wildlife Trust, and potentially other OWF developers. It is also possible that the Isles of Scilly could be delivered through the MRF.

~~146.152.~~ Post-consent a Guillemot Compensation Steering Group (GCSG), consisting of relevant stakeholders, will be formed in accordance with the DCO. If it is determined that compensation for razorbill is also required, a combined steering group will be formed. The detailed implementation and monitoring of the compensatory measures will be agreed with the Steering Group.

### 6.3.1.3.1 Strategic Approach

~~153.~~ As identified by the Applicants in surveys undertaken in summer 2024, reported in the **Guillemot [and Razorbill] Compensation Site Shortlist Refinement Report (Revision 3) [document reference 10.20]** and the **Isles of Scilly Guillemot and Razorbill Survey and Habitat Assessment [document reference 14.12]**, the Isles of Scilly present a significant opportunity for ecologically effective compensation at a scale to provide significant benefit to the seabird populations and meet the requirements of several offshore wind developers. Based on the Applicant's assessment of the available habitat for guillemot and razorbill at the Isles of Scilly, even using the more conservative breeding density of 20 breeding pairs<sup>7</sup>/sq. m (Harris and Birkhead, 1985), this strategic scheme could deliver 24,296 rat free nesting spaces, therefore fulfil the Applicants compensation and scaling need.

<sup>7</sup>It is noted that in the recently approved Hornsea 4 Guillemot Compensation Implementation and Monitoring Plan for an eradication scheme in the Channel Islands was based a nesting density of 27 breeding pairs/sqm. EN010098-002435-Clean Amended Hornsea Four Guillemot Compensation Implementation and Monitoring Plan with Appendix (09368616\_A).pdf

~~147.~~154. The Applicants note the stakeholder desire for a strategic approach and agree that this is the most appropriate approach in this location and have been actively pursuing an approach to enable this to happen.

~~148.~~155. Ideally, strategic compensation at the Isles of Scilly would be delivered through the MRF. In the absence of the MRF, the Applicants have been working collaboratively with OWIC and other key stakeholders, including The Wildlife Trusts, to support a strategic approach to delivering a long-term predator eradication project in the Isles of Scilly for the purpose of seabird compensation, including provision of the detailed field report of the surveys undertaken by the Applicants in June 2024. The development work, being progressed by the Isles of Scilly Seabird Partnership (Isles of Scilly Wildlife Trust, the Duchy of Cornwall, RSPB, The Wildlife Trusts and a range of other local and national partners) includes the creation of an operational plan to remove predators from the islands, a long-term maintenance and biosecurity plan to ensure the islands remain predator free, a community engagement plan and a monitoring and evidence plan. It is expected the outputs of this work will be delivered by Spring 2027, with the delivery of the eradication programme to follow, potentially via the MRF.

~~149.~~156. 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*”. The statement went on to say “*All parties agree that predator eradication on the Isles of Scilly has great potential to provide compensation for the impacts of offshore wind projects and would support its inclusion in project specific compensation plans. Offshore wind projects currently seeking consent might wish to submit this statement to the examining authority to demonstrate progress with this scheme, if they seek to use it as strategic compensation for unavoidable impacts to protected species likely to be impacted by their projects*”.

~~150.~~157. 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”.

~~151.~~158. Therefore, the Applicants consider that there will be a strategic approach available to them in ~~late 2025~~2026, either via the MRF in line with the guidance discussed in section 1.3, or an interim fund established by OWIC.



## 6.3.1.3.2 *Project-led approach*

~~152.~~159. In addition to continuing to work collaboratively on a strategic scheme at the Isles of Scilly, the Applicants will continue to explore the potential compensation sites on the secondary shortlist to be progressed on a project-led basis.

~~153.~~160. The Applicants intend to secure any project-led compensation site(s) through voluntary agreement with the relevant landowner(s) to enable access for pre-eradication studies, eradication and monitoring for the lifetime of the Projects. Heads of Terms have been issued to the landowners for the Pabaigh Islands, Bearasaigh Islands and Out Skerries. A letter of support from the landowner of Pabaigh Mor is provided in Annex A. The applicants are expecting further letters of support and these will be shared with the SoS once received.

~~154.~~161. Although the Applicants intend to work with local wildlife organisations and/or landowners as far as practicable, the Applicants will have overall responsibility for ensuring the compensation and monitoring is effective and therefore any legal agreement will require as a minimum:

- Rights of access to install, monitor and maintain equipment in the relevant land parcels;
- Rights of access to undertake species and habitat monitoring for the lifetime of the Projects; and
- The option to undertake minor habitat improvement works as required (subject to obtaining the relevant consents).

## 6.3.1.4 *Scale*

~~162.~~ The scale of this compensatory measure is dictated by the number of nesting pairs predicted to be required to produce the necessary number of recruiting adults into the population (see section 4.5). Predator eradication is a scalable measure, with different locations capable of providing different levels of compensation. Due to practical considerations, the Applicants' preference is to progress a single ~~scheme~~ capable of providing the required compensation, however at this stage the Applicants are not ruling out the potential to measure could be deploy the measured at additional multiple locations as required.

## 6.3.1.4.1 *Strategic*

163. The scale of compensation available at the Isles of Scilly is reported in the **Isles of Scilly Guillemot and Razorbill Survey and Habitat Assessment [REP4-097]** in accordance with the Applicants' methodology. Based on the Applicants' assessment of the available habitat for guillemot and razorbill at the Isles of Scilly, even using the more conservative breeding density of 20 breeding pairs<sup>8</sup> / m<sup>2</sup> (Harris and Birkhead, 1985), this strategic scheme could deliver 24,296 rat free nesting spaces, therefore fulfil the Applicants compensation and scaling need. It is noted that in the recently approved Hornsea 4 Guillemot Compensation Implementation and Monitoring Plan for an eradication scheme in the Channel Islands, further south and therefore closer to the edge of the species geographic range, was based on a nesting density of 27 breeding pairs/sqm<sup>9</sup>.

164. It is understood that the Isles of Scilly task and finish group have undertaken their own assessment of the scale of compensation available and this will be made available to the Applicants and the Secretary of State in the near future.

## 6.3.1.4.2 *Project-led*

165. The **Guillemot [and Razorbill] Compensation Secondary Shortlist Site Refinement Report (document reference 20.5)** presents an indication of the scale of compensation available at the Scottish locations, although this will be subject to further refinement. The results of the habitat refinement for the Outer Hebrides and Out Skerries, presented in the **Guillemot and Razorbill Compensation Update** [document reference 20.8], indicate that each of the schemes individually has potential to meet the compensation requirements of the Projects.

---

<sup>8</sup> It is noted that in the recently approved Hornsea 4 Guillemot Compensation Implementation and Monitoring Plan for an eradication scheme in the Channel Islands was based a nesting density of 27 breeding pairs/sqm. EN010098-002435-Clean Amended Hornsea Four Guillemot Compensation Implementation and Monitoring Plan with Appendix (09368616\_A).pdf

<sup>9</sup> EN010098-002435-Clean Amended Hornsea Four Guillemot Compensation Implementation and Monitoring Plan with Appendix (09368616\_A).pdf

166. **Table 6-6** and **Table 6-7** demonstrate the compensation available for each of the schemes in accordance with the nesting densities for guillemot advised by Natural England in their Deadline 4 response [REP4-125] and the razorbill density discussed with Natural England in the meeting of 25<sup>th</sup> November 2025. Although high resolution drone footage is currently only available for a subset of the islands in each scheme, information on these islands alone indicate that each scheme can comfortably support the number of breeding pairs required under Natural England's success criteria.
167. The unrefined habitat estimate of 6,560m<sup>2</sup> for the Bearasaigh islands (Sean Bheinn and Bearasaigh) could potentially support 16,400 guillemot pairs at 2.5 pairs/m<sup>2</sup> and 3,280 razorbill pairs at 0.5 pairs/m<sup>2</sup>. For the Out Skerries, the unrefined habitat estimate for Housay and Filla (Guens was not subject to unrefined habitat assessment) results in an additional 8,236m<sup>2</sup> of potentially suitable habitat which could support up to 20,590 guillemot pairs at 2.5 pairs/m<sup>2</sup> and 4,118 razorbill pairs at 0.5 pairs/m<sup>2</sup>. With the addition of habitat that has not yet been subject to refined habitat assessment, each of the two schemes will also meet Natural England's the scaling criteria.

*Table 6-6 Compensation potential of the Outer Hebrides scheme. tbc represents locations where the habitat refinement has not yet been undertaken due to conditions at the time of survey.*

Island	Estimated areas of suitable habitat (m <sup>2</sup> )	Estimated number of pairs			
		Guillemot			Razorbill
		2.5 pairs/m <sup>2</sup>	5.5 pairs/m <sup>2</sup>	10 pairs/m <sup>2</sup>	0.5 pairs/m <sup>2</sup>
Pabaigh Beag	3,153	7,883	17,343	31,530	1,577
Pabaigh Mor	2,267	5,667	12,467	22,670	1,133
Sean Bheinn	tbc	tbc	tbc	tbc	tbc
Bearasaigh	tbc	tbc	tbc	tbc	tbc
Total	5,420	13,550	29,810	54,200	2,710
Success criteria ratio		6.5 : 1	14.4 : 1	26.2 : 1	5.0 : 1
Scaling criteria ratio		3.4 : 1	7.5 : 1	13.7 : 1	1.6 : 1



*Table 6-7 Compensation potential of the Out Skerries scheme. tbc represents locations where the habitat refinement has not yet been undertaken due to conditions at the time of survey.*

Island	Estimated areas of suitable habitat (m <sup>2</sup> )	Estimated number of pairs			
		Guillemot			Razorbill
		2.5 pairs/m <sup>2</sup>	5.5 pairs/m <sup>2</sup>	10 pairs/m <sup>2</sup>	0.5 pairs/m <sup>2</sup>
Bruray	571	1,428	3,142	5,713	286
Grunay	1,512	3,780	8,316	15,120	756
Bound Skerry	3,290	8,226	18,096	32,903	1,645
Housay	tbc	tbc	tbc	tbc	tbc
Filla	tbc	tbc	tbc	tbc	tbc
Guens	tbc	tbc	tbc	tbc	tbc
Total	6,445	13,434	29,554	53,735	2,687
Success criteria ratio		6.5 : 1	14.3 : 1	25.9 : 1	4.9 : 1
Scaling criteria ratio		3.4 : 1	7.5 : 1	13.6 : 1	1.6 : 1

## 6.3.1.5 Location

~~155.168.~~ The Isles of Scilly ~~has was been~~ identified as the only suitable location from the initial shortlisted sites outside Scotland, however this can only be progressed via a collaborative / strategic route.

~~156.169.~~ Having considered and ruled out all potential project-led sites on the initial shortlist which focused on sites in England, Wales and Northern Ireland, the Applicants are now progressing potential sites in Scotland, with ~~three sitestwo schemes, onetwo~~ in the Outer Hebrides and one in the Out Skerries, Shetland in Shetland, being progressed for further assessment.

~~157.170.~~ In line with the draft Defra guidance (2021; 2024), the location for compensation will prioritise the ability to deliver effective compensation rather than proximity to the predicted impact, while protecting the overall coherence of the NSN.

## 6.3.1.5.1 Connectivity to the NSN

158.171. A review of guillemot connectivity undertaken for Hornsea Project Four (GoBe Consultants Ltd, 2022) found that although guillemot demonstrate high breeding philopatry, returning to the same colony after a first successful breeding (Lyngs, 1993; Harris *et al.*, 1996; Halley *et al.*, 1995), around 50% of guillemots recruit at non-natal colonies (Harris *et al.*, 1996; Knox, 2012). A long-term ringing study of Baltic guillemot recorded individuals breeding at colonies significant distances from their natal sites (Lyngs, 1993). The average dispersal distance was approximately 260km, but several individuals travelled much further, up to 780km.

159.172. The Hornsea Project Four review also reported that, similar to guillemot, razorbill demonstrate high breeding philopatry but also higher rates of colony philopatry, with more than 80% of razorbill returning to breed from the colony where they hatched. However, those razorbills which do disperse from their natal colony have been recorded dispersing much greater distances. Lavers, *et al.* (2007) reported that emigration distances of razorbill within North America colonies ranged from 57-1,737km (average approximately 350km), and a single individual was reported to have recruited to a colony more than 3,200km from where it was hatched in Scotland.

160.173. Furness (2015) identified two BDMPS for guillemot and razorbill: the UK North Sea and Channel, and the UK Western Waters. Of the potential sites currently under consideration, only the Out Skerries is within the UK North Sea and Channel BDMPS. All of the remaining potential compensation sites are within the UK Western Water BDMPS. The FFC SPA is part of the UK North Sea and Channel BDMPS and approximate straight line distances to the potential compensation sites are:

- 625km to the Isles of Scilly;
- 700km to the Out Skerries;
- 620km to the Bearasaigh island group; and
- 620km to the Pabaigh islands.

161.174. Therefore, although a small number of birds may recruit from the proposed compensation sites to the FFC SPA, the direct benefit to the FFC SPA guillemot and razorbill population is likely to be limited.

- ~~162.~~175. In accordance with the Habitats Regulations, compensatory measures must ensure overall coherence of the NSN and, as highlighted in the Defra compensation hierarchy (Defra, 2024b), while the preference should be given to providing compensation as close as possible to the affected site, the priority should be ecological effectiveness of the measure for the feature(s) at risk.
- ~~163.~~176. The Isles of Scilly is a designated SPA for several breeding seabird species, as well as for the seabird assemblage. Both guillemot and razorbill breed at several locations in the Isles of Scilly, but in numbers below the threshold of national importance (Isles of Scilly Wildlife Trust, 2024). The Skomer, Skokholm and the Seas of Pembrokeshire SPA is approximately 145km to the Isles of Scilly SPA boundary and 200km to the nearest island. Therefore, the Isles of Scilly SPA is within the natal dispersal range of guillemot and razorbill from the Skomer, Skokholm and the Seas of Pembrokeshire SPA (Lyngs, 1993; Lavers *et al.*, 2007). Density heat maps (Appendix A of GoBe Consulting Ltd, 2022) illustrate that the density of both guillemot and razorbill increases around the Isles of Scilly during the winter months, indicating that birds from other areas are present during the winter months. Therefore, compensation by way of predator eradication at the Isles of Scilly SPA could contribute to the NSN in two ways; by increasing the auk populations to the level at which they meet the threshold to be added to the site designation as named features, and through enhanced recruitment potential for the Skomer, Skokholm and the Seas of Pembrokeshire SPA populations and thereby the wider SPA network.
- ~~164.~~177. Shetland contains several SPAs designated for guillemot. The closest of these is the Noss SPA approximately 26km south of the Out Skerries. The Foula SPA is the closest SPA with razorbill as a designated feature at approximately 70km west of the Out Skerries. Both of these are within the natal dispersal range for guillemot and razorbill (Lyngs, 1993; Lavers *et al.*, 2007) and as such it is possible for increases in the Out Skerries populations to contribute to the UK Site Network.
- ~~165.~~178. The Flannan Isles SPA, designated for several seabird species, including guillemot and razorbill, is approximately 35km from the Bearasaigh island group and the Pabaigh islands. As above, these are within the natal dispersal range for guillemot and razorbill and therefore increases in the populations at either the Bearasiagh island group, or the Pabaigh Islands have the potential to contribute to the UK Site Network.

~~166.179.~~ Connectivity with the wider SPA network was accepted by the SoS for Hornsea Project Four (DESNZ, 2023b) which concluded that there was a likelihood of connectivity between colonies in the Channel Islands and those in the UK SPA network due to them being within the published dispersal distances for guillemot and razorbill, and the movement of birds from the north of the UK to wintering grounds in the English Channel and along the French coast. Therefore, the ability of compensation sites in Scotland to contribute directly to the UK Site Network should provide the Secretary of State with comfort that the proposed compensation is in line with the Habitats Regulations.

#### 6.3.1.6 Timescales

~~167.180.~~ The timing of shortlist refinement, pre-eradication studies and predator eradication stages are shown in **Plate 6-1**, based on the progression of a project-led scheme from the secondary site shortlist. This indicates pre-eradication studies in 2025/2026, eradication planning in 2026/2027 and implementation in late 2027, pending landowner consent. As stated in section 6.3.1.3.1, the Applicants consider that a strategic approach will be available to them in ~~late 2025~~2026, either via the MRF or an interim fund established by OWIC. The timeline for development of the Isles of Scilly strategic eradication is shown in **Plate 6-2** based on information provided to the Applicants by OWIC.

~~168.181.~~ In accordance with EC guidance (EC, 2019) requiring compensation to be in place at the time when the effect occurs, the Applicants propose to begin a project-led predator eradication two breeding seasons prior to installation of the first wind turbine within the DBS West and / or DBS East Array Areas (depending on the Development Scenario taken forward). In the absence of unforeseen pressures on the guillemot [and razorbill] populations, the predicted benefits of predator eradication are anticipated to be evident in the breeding season following eradication.

~~169.~~182. According to the statement provided by Defra in March 2025, and as shown in **Plate 6-2** detailed plans for a strategic eradication are expected in spring 2027, with an eradication to follow within an unspecified timescale. This means that an eradication on the Isles of Scilly may not be implemented two breeding seasons in advance of turbine installation. However, in line with EC guidance (2019), an eradication on the Isles of Scilly would, in the Applicants' opinion, provide significant over compensation to account for any delay in implementation. Delay to the eradication programme and the knock on requirements for the Applicants to over compensate, would however reduce the ecological headroom available for other projects to utilise as compensation in the future. In addition, the Defra consultation on the operation of the MRF suggests that, if suitable compensation is available through the MRF, the Applicants' responsibilities with regards to compensation will be considered to be met upon payment of the agreed fee.

## 6.3.1.7 Monitoring and Adaptive Management

~~170.~~183. Following the implementation of the project-led predator eradication measure, the Applicants will undertake a programme of monitoring to confirm the progress of the eradication, establish the response in guillemot [and razorbill] productivity, and detect possible re-incursions. This monitoring will be detailed in the Guillemot [and Razorbill] CIMP, with further information given in section 205 of this document and in the **Volume 6, Annex A - Outline Guillemot [and Razorbill] Compensation Implementation and Monitoring Plan (Revision 43) (document ref: 6.2.2.1)**. Monitoring will run in parallel with the eradication activity and will continue for the operational phase of the Projects at a scale and frequency to be agreed with the GCSG.

~~171.~~184. Should monitoring indicate that the compensation measure is not meeting its objectives, the cause will be investigated and appropriate adaptations identified and implemented. Example adaptive management measures are presented in **Table 6-8**. The requirement for adaptive management measures would be agreed with the SoS prior to implementation.

~~172.~~185. With regards to the collaborative / strategic delivery of an eradication on the Isles of Scilly, a monitoring plan will be developed by the Isles of Scilly Seabird Partnership, expected in 2027.

~~173.~~186. The Defra consultation on the MRF confirms that monitoring and adaptive management for strategic measures implemented through the MRF, will be the responsibility of the MRFO, not the Applicants.

~~174.187.~~ Section 6.4 discusses potential adaptive management measures beyond predator eradication.

Table 6-8 Example 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.
	2 years after all other management measures have been exhausted	Relocation to an alternative site or exploration of alternative compensation method.

### 6.3.1.8 Outline Implementation and Delivery Roadmap

~~175.188.~~ An indicative implementation and delivery roadmap is shown in **Plate 6-1** for a project-led eradication, with a roadmap for the strategic option at the Isles of Scilly shown in **Plate 6-2**, according to information that the Applicants have received from OWIC.



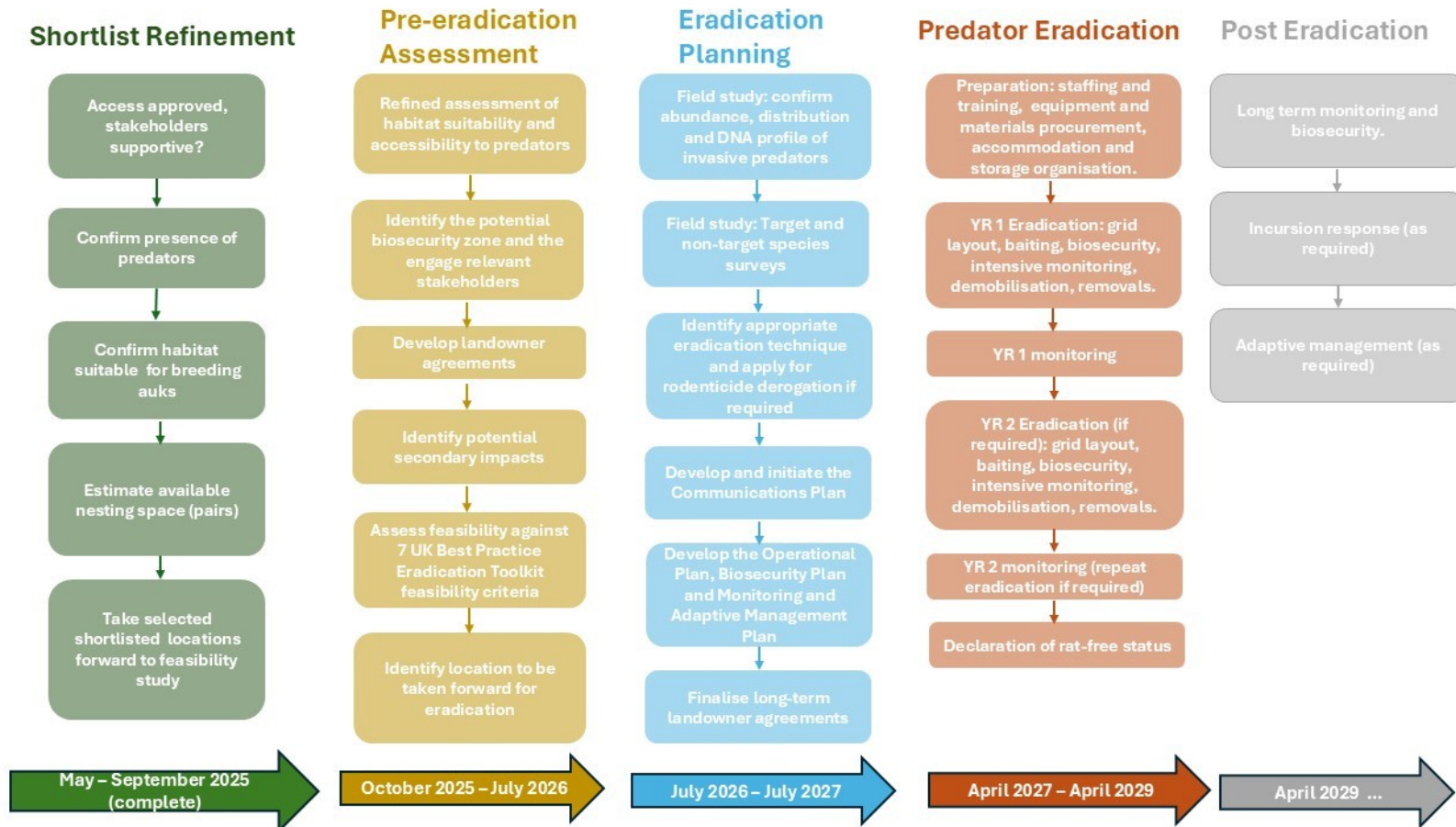


Plate 6-1 Outline implementation and delivery roadmap for project-led compensation



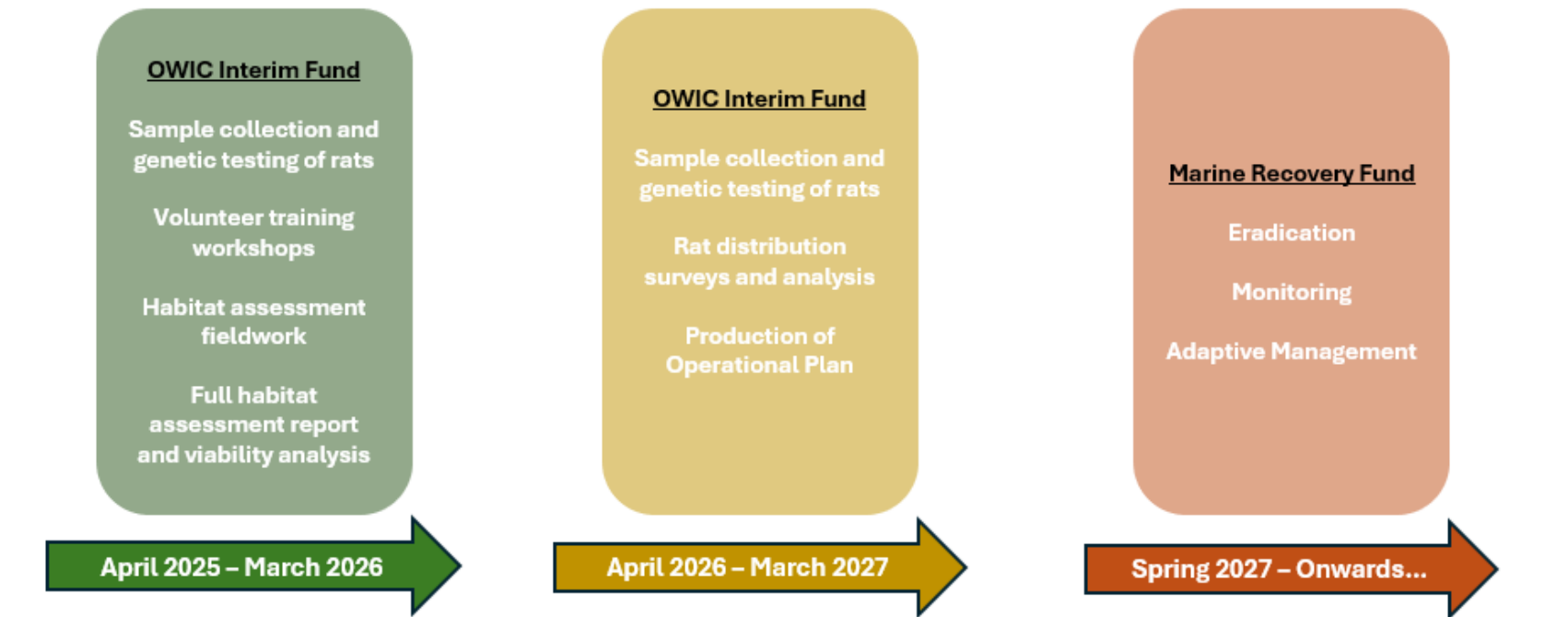


Plate 6-2 Outline implementation and delivery roadmap for strategic compensation at the Isles of Scilly

~~176.189.~~ Throughout the DCO determination, the Applicants will continue to progress ~~the~~ pre-eradication ~~assessment studies~~ to confirm the most appropriate approach for a predator eradication at the ~~potential identified~~ project-led locations. ~~However, the roadmap provides a clear plan for how the compensation will be progressed.~~

~~177.190.~~ A detailed CIMP will be developed following confirmation of the site(s) for predator eradication, ~~during the eradication planning stage. In accordance with the~~ **Draft Development Consent Order** [document reference 3.1] this CIMP must be approved by the Secretary of State. The outline CIMP is provided in **Volume 6, Annex A - Outline Guillemot [and Razorbill] Compensation Implementation and Monitoring Plan (Revision 43)** (document ref: 6.2.2.1).

~~178.191.~~ Implementation of strategic compensation at the Isles of Scilly is beyond the control of the Applicants, however engagement with the relevant organisations will continue to ensure that the scheme progresses as quickly and effectively as possible.

~~179.192.~~ The following sections (6.3.1.8.1-6.3.1.8.4) are presented in relation to project-led compensation, as the Applicants have no control over the strategic compensation. However, it is expected that the strategic compensation will follow a similar process, based on best practice.

#### 6.3.1.8.1 *Pre-eradication Assessment Study*

~~193.~~ The Applicants ~~propose to are in the process of~~ undertaking a pre-eradication assessment at ~~all~~ project-led options ~~subject to landowner consent. The study will which~~ follows the protocol as set out in the UK Rodent Eradication Best Practice Toolkit (Thomas *et al.*, 2017).

~~194.~~ A site visit has been undertaken by experienced personnel to gather evidence on the presence of predators and a detailed assessment of the habitat in terms of suitability for the target seabird species and accessibility to predators. Some locations could not be surveyed due to weather conditions within the survey window, however the Applicants consider sufficient information is available to enable the assessment.

- ~~180.~~—An assessment has been undertaken to determine the potential biosecurity zone for the locations, based on the published swimming capabilities of rats (Stanbury *et al.*, 2017; Russell *et al.*, 2008) and using expert professional judgement with regards to conditions at the locations. This will allow for identification of all of the relevant landowners and for further conversations with the landowners and local communities, ensuring that an eradication would be supported and that agreements could be put in place to enable to the eradication to be undertaken effectively. Heads of Terms have already been issued to the landowners of the focal islands for each scheme and a letter of support has been received from the Pabaigh Mor landowner (**Annex A – Letter of Support**). The applicants are expecting further letters of support and these will be shared with the SoS once received.
- ~~181.~~—A site visit, undertaken by suitably experienced personnel will gather evidence of the abundance, distribution and DNA profile of invasive predators in addition to investigating evidence of predation on breeding seabirds, and obtaining up to date seabird counts.
- ~~182.195.~~ Stakeholder and community consultation will also be undertaken. The form of consultation will be tailored to the location and community of the site but will potentially include local public meetings coupled with one to one meetings with key stakeholders. At this stage the Applicants can provide stakeholders and the community with realistic expectations of a potential predator eradication project and stakeholders and members of the community will be able to express their support or concerns.
- ~~183.196.~~ This information gathered by the site visit and consultation, which is presented in Table 6-5, has will been used to conduct a detailed assessment against the following seven criteria (detailed in 6.3.1.2 ~~section 0~~), thereby confirming to further support the suitability of compensation sites and informing the most appropriate approach to ensure a successful eradication.
- Technical feasibility;
  - Sustainability;
  - Social acceptability;
  - Political and legal acceptability;
  - Environmental acceptability;
  - Capacity; and
  - Affordability.

~~184.~~197. On completion of the pre-eradication study the site, or combination of sites, will be confirmed where the required compensation is considered achievable via predator eradication.

## 6.3.1.8.2 Eradication Planning

198. 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 any necessary applications submitted, which may include a derogation for rodenticide use (discussed in the **Outline Guillemot and Razorbill Compensation Implementation and Monitoring Plan (revision 4)** [document reference 6.2.2.1]) and any necessary wildlife licences for potential disturbance. A number of detailed plans will be developed during this preparatory stage, including:

- Eradication operational plan;
- Biosecurity and incursion response plan in line with the UK Rodent Eradication Best Practice Toolkit (Thomas *et al.*, 2017);
- Species monitoring and management plan;
- Health and safety plan;
- Waste management plan; and
- Stakeholder management plan.

199. A site visit, undertaken by suitably experienced personnel will gather evidence of the abundance, distribution and DNA profile of invasive predators to inform the detailed operational planning such as the number, layout and type of traps and the amount of personnel resource required. ~~In addition, to investigating evidence of predation on breeding seabirds, and obtaining up to date seabird counts will be obtained to provide a baseline for post-eradication monitoring.~~

200. Further stakeholder and community consultation will also be undertaken. The form of consultation will be tailored to the location and community of the site but will potentially include local public meetings coupled with one-to-one meetings with key stakeholders. At this stage the Applicants can provide stakeholders and the community with realistic expectations of a potential predator eradication project and stakeholders and members of the community will be able to express their support or concerns.

201. During the eradication planning stage, all landowner agreements will be finalised and the detailed CIMP will be developed based on the outline plan provided in **Volume 6, Annex A -Outline Guillemot [and Razorbill] Compensation Implementation and Monitoring Plan (Revision 4) (document ref: 6.2.2.1)** and submitted to the Secretary of State for approval.

## 6.3.1.8.26.3.1.8.3 Predator Eradication

~~185. On securing a suitable project led site or combination of sites for implementation of the predator eradication measures, a detailed CIMP will be developed based on the outline plan provided in **Volume 6, Annex A -Outline Guillemot [and Razorbill] Compensation Implementation and Monitoring Plan (Revision 3) (document ref: 6.2.2.1).**~~

~~186. The predator eradication will be undertaken by a suitably experienced Contractor(s) and will align with best practice (Thomas et al., 2017). There are several elements to a successful predator eradication.~~

~~187. 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 a derogation for rodenticide use and wildlife licences for any potential disturbance. A number of detailed plans will be developed during this preparatory stage, including:~~

~~188. Eradication operational plan;~~

~~189. Biosecurity and incursion response plan;~~

~~190. Species monitoring and management plan;~~

~~191. Health and safety plan;~~

~~192. Waste management plan; and~~

~~193.202. Stakeholder management plan.~~

194.203. The operational stage of the predator eradication will require a variety of onsite preparations including confirmation of office and storage facilities, procurement of equipment and establishment of safety systems. It is at this stage where the Applicants will initiate the operational stakeholder and community engagement, with the launch of a project website, installation of information boards at key locations, and appointment of a Community Liaison Officer. The biosecurity network will also be established at this stage, in advance of the eradication. The biosecurity network will be tailored to the specific risks of the site and will be detailed in the Biosecurity and Incursion Response Plan.

~~195.204.~~ Predator eradication methods will be dependent on the target predator species however it is assumed at this stage that the target predator will be black or brown rat. Measures will include the placement of lethal bait stations in a grid formation with spacing ranging from 25m x 25m to 50m x 50m depending on habitat suitability and target species. It will be necessary to check bait stations regularly, both for animal welfare purposes and to monitor bait uptake. Additional bait stations can be placed in specific areas of known predator presence. Predator carcasses will be removed in line with the Waste Management Plan.

~~196.205.~~ After several weeks of baiting, an intensive phase of monitoring is undertaken, described in section 6.3.1.8.4. If signs of predator activity are detected at the end of March (prior to the onset of the seabird breeding season), eradication activity will cease but an additional season of eradication will be required.

#### ~~6.3.1.8.3~~ 6.3.1.8.4 *Monitoring and Adaptive Management*

~~197.206.~~ There are two elements in predator eradication monitoring:

- Monitoring predator activity to track progress of the eradication and enable a declaration of predator-free status, and post-eradication monitoring to determine if a re-incursion has occurred; and
- Monitoring the wider ecosystem, including seabirds, during the eradication to detect effects on non-target species, and post-eradication to track the ecosystem recovery.

~~198.207.~~ Intensive monitoring for rats will be undertaken after several weeks of baiting, when bait uptake has ceased. An intensive monitoring grid of rat-attractive items (flavoured wax, soap, chocolate, candles, chew cards, and apple etc.) and passive monitoring tools (tracking tunnels and automated trail cameras and inspection for footprints on beach sand) will be established. The coverage of the monitoring grid extends beyond that of the bait stations; one monitoring point at each bait station and one in-between two stations. All intensive monitoring points will be recorded on Global Positioning System (GPS), entered on the Geographic Information System (GIS)-linked database, and mapped to ensure coverage of the island. Each monitoring site will be checked every two days to detect rat signs (usually teeth marks or footprints or footage on camera). If any rat sign is detected, an intensive targeting programme (e.g. alternative bait, reduced spacing in the bait station grid, trapping etc.) is started until rat signs in the area cease. The intensive monitoring phase would begin in December (assuming baiting starts in October) and continue through to March.



- ~~199.~~208. If rats are detected at the end of winter, second baiting the following winter, and continued monitoring, would have to be completed at active areas to finish the eradication. However, for most projects, this is not required.
- ~~200.~~209. Long-term monitoring for rats will commence at the end of the eradication and, following best practice, continue for two years, to account for the life expectancy of a wild adult rat which is around 18 months.
- ~~201.~~210. The two-year long-term monitoring programme will have a four-weekly check regime to confirm the success of the eradication phase (i.e., to detect any surviving (or possible invasion) of rats). Permanent monitoring (biosecurity) stations will be placed around the island (i.e., within known seabird areas, optimum rat habitat and in high-risk areas) to aid with detecting any surviving rats or intercepting invading rats.
- ~~202.~~211. All long-term monitoring points will be recorded on GPS, entered into the GIS-linked database, and mapped to ensure coverage of the site. Any sign or indication of rodents should be photographed and if possible, collected or sampled for expert opinions on identification.
- ~~203.~~212. This long-term monitoring for the presence of rodents after the eradication operation will be done as part of the biosecurity programme using a range of detection devices (such as flavoured and plain wax, chew cards, traps, rodent motels, trail cameras and indicator dogs) and have a regular search effort.
- ~~204.~~213. Once the two-year monitoring phase has been completed and no rats have been detected, one further intensive site-wide monitoring check will be completed. This involves putting a range of monitoring devices over the entire site and checking every two days for six weeks. Once this check is completed and no rats have been detected the site can be declared rat-free.
- ~~205.~~214. To quantify the impacts of rats on the native biodiversity, the ecology of the site will be monitored. Seabird, land bird, invertebrate, vegetation, and non-target mammal species surveys will be completed using standardised, repeatable methods. Biodiversity monitoring methodology will include point counts, bird and non-target mammal abundance surveys and counts, vegetation plots and photo points, and invertebrate counts. It is important to expand the monitoring to detect changes of these species and ecosystems in the absences of rats. Monitoring ecological changes on the island can support and inform future eradication proposals and will help to inform the benefits (and identifying any unforeseen negative impacts) of eradicating rats from the site.



~~206.~~215. It will be important to determine population recovery for all seabirds, particularly guillemots [and razorbills], to determine if the predator eradication has achieved the necessary compensation requirements. The method of monitoring will be somewhat location specific due to the challenges of monitoring guillemot and razorbill colonies. This will be detailed in the CIMP and is proposed to include monitoring of colony counts and productivity where possible.

~~207.~~216. Monitoring of the wider ecosystem, specifically seabirds, will continue for the operational phase of the project at a scale and frequency to be agreed with the ETG and detailed in the CIMP.

#### 6.3.1.9 Consideration of Potential Impacts from Implementation of the Compensatory Measure

~~208.~~217. Potential unintended consequences of predator eradication include:

- Poisoning of non-target species either directly through consumption of bait, or indirectly through predation or scavenging of poisoned individuals; and
- Wider trophic effects such as hyperpredation (increase predator pressure on a secondary prey due to increased predator abundance or removal of primary prey), mesopredator release (increased abundance of a medium-sized carnivore as a result of removal of a larger carnivore), competitor release and herbivore release.

~~209.~~218. The potential for such unintended consequences can often be predicted and controlled but requires knowledge of site specific communities and interactions. These will be fully explored in the pre-eradication studies.

## 6.4 Potential Adaptive Management Measures

### 6.4.1 Artificial Nesting Structure

~~210.~~219. The creation of artificial colonies or ANS is being taken forward as a measure to provide compensation for kittiwake as detailed in **Volume 6, Appendix 1 - Project Level Kittiwake Compensation Plan (application ref: 6.2.1)**, however there is a lack of current evidence supporting the utilisation of offshore ANS by guillemot [and razorbill]. For this reason, the Auk Compensation ETG concluded that this measure should not be taken forward as primary compensation for guillemot and/or razorbill at this time.

~~211.~~220. The ETG did, however, note that ANS for auks are worthy of further investigation. In 2023 Ørsted constructed three nearshore ANS as compensation for effects on kittiwake as a result of the Hornsea Project Three Offshore Wind Farm. Additionally, Outer Dowsing Offshore Windfarm are proposing ANS as compensation for auks. As monitoring data becomes available from these structures the suitability of ANS as compensation for auks can be evaluated.

221. Sufficient data will not be available in the timeframe required to consider ANS as a compensatory measure for guillemot [and razorbill]. However, the Applicants ~~will look to have~~ incorporated d provision for suitable nesting locations for guillemot [and razorbill] on the ANS(s) being provided for kittiwake. Such provisions ~~s will~~ takes s cognizance of the nesting preferences of guillemot [and razorbill], predominantly narrow ledges, rock platforms and boulder fields (Plumb, 1965; Hipfner and Dussereault, 2001, Harris et al., 1997). Guillemot tend to nest in dense congregations on open ledges, whereas razorbill have shown a preference for more enclosed nest sites (Olsthoorn & Nelson, 1990) often scattered throughout or on the periphery of colonies (Hipfner and Dussereault, 2001; JNCC, 2021). As such a combination of open, narrow ledges for guillemot and more enclosed nesting compartments ~~may behave been~~ incorporated into the design of the kittiwake structure.

~~212.~~—The current design incorporates nesting compartments to accommodate 415 guillemot pairs and 62 razorbill pairs.

~~213.~~222. Should the primary compensation (predator eradication) prove to be less effective than anticipated and the ANS have been colonised by guillemot [and razorbill], the Applicants may consider this as appropriate adaptive management and could increase the capacity by a further 1,247 nesting spaces for guillemot and 187 for razorbill.

## 6.4.2 Bycatch Reduction

### 6.4.2.1 Introduction

~~214.~~223. At the Auk Compensation ETG meeting on 10 April 2024, Natural England advised that bycatch reduction be included within this document as an adaptive management compensation measure (**Table 3-1**). Therefore, in the unlikely event that predator eradication was demonstrated as being unsuccessful at delivering on the Projects' compensation requirements, and that robust evidence demonstrating the effectiveness of techniques to reduce the bycatch of auks became available, then it could, if required, be implemented as a compensatory measure for the Projects in place of or in addition to predator eradication. This could be as part of a project-led, collaborative or strategic delivery mechanism.

~~215.~~224. The requirement for adaptive management will be built into the annual programme of review through the GCSG.

~~216.~~225. A summary of the issue of auk bycatch and how its reduction represents a potentially suitable adaptive management compensation measure for the Projects is provided in the following sections.

### 6.4.2.2 Overview

~~217.~~226. Auks in UK waters are not thought to be caught in longline fisheries but are at risk of bycatch in trawl and in set-net (gillnet) fisheries. Northridge *et al.* (2020) noted bycatch of 27 guillemots and three razorbills in 2,239 midwater trawls sampled between 1996-2018 and bycatch of 267 guillemots and 12 razorbills in 18,916 hauls of gillnets sampled over the same period. Their sampling extended slightly beyond the UK territorial limit (see Figure 1 in Northridge *et al.*, 2020) but was predominantly within UK waters. The evidence therefore indicates bycatch of these species in UK waters to be most severe in set-net fisheries.

~~218.~~227. Using the bycatch data in Northridge *et al.* (2020), scaled up to the entire fishery, Miles *et al.* (2020) estimated that bycatch of guillemots in UK set-net fisheries in the UK European Economic Zone (EEZ) (a median estimate of 1,984 birds per year) may represent 1.7% of annual mortality of breeding adult guillemots (assuming that bycatch was equally distributed across all age classes in the population and only affected birds from the UK population rather than birds visiting UK waters from other countries). Similarly, bycatch of razorbills in UK gillnet fisheries in the UK EEZ (a median estimate of 130 birds per year) may represent 0.4% of annual mortality of breeding adult razorbills.

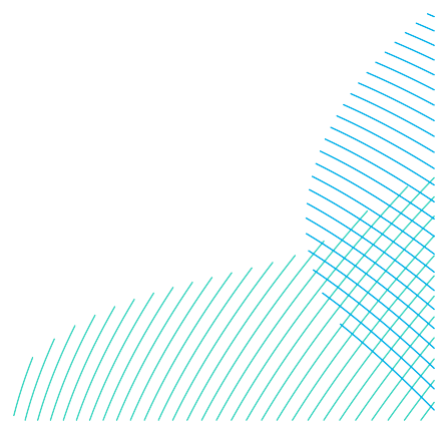
~~219.228.~~ Miles *et al.* (2020) suggest that because Northridge *et al.* (2020) did not include sampling from non-UK vessels fishing in UK waters, the results they presented “*are likely to underestimate the potential population increases that could be achieved by bycatch mitigation*”.

~~220.229.~~ However, it should be noted that the sampling period (1996-2018) included many years before bycatch mitigation was put into effect at Filey Bay which has considerably reduced bycatch of guillemots and razorbills in the gillnet fishery there; before mitigation the bycatch was estimated as 200 guillemots and 323 razorbills in 2008, and 186 guillemots and 277 razorbills in 2009 (Quayle, 2015). After mitigation was introduced in 2010 the bycatch was reduced to an average of 11 guillemots and 43 razorbills per year in 2010-2014 (Quayle, 2015).

~~221.230.~~ In a review of bycatch data, Northridge *et al.* (2023) reported that guillemot bycatch rate is affected by season and water depth, with the highest bycatch occurring in set-net fisheries operating during the winter months and in shallow waters. The same review reported the highest occurrences of winter set-net fishing, in 2017, along the south coast of England, with hotspots of guillemot bycatch per unit effort in the northeast and the Cornish coast (Northridge *et al.*, 2023).

~~222.231.~~ Set-net fishing effort has reduced in recent years because of declines in salmon stocks to critically low levels. However, set-nets are still being used to catch sea trout, and those nets are likely to be responsible for a major part of the bycatch of guillemots and razorbills (Environment Agency, 2020).

~~223.232.~~ The UK set-net fishery is concentrated in the south and southwest coasts of England which is where bycatch reduction efforts would be focussed if it was required to be taken forward as an adaptive management compensatory measure for the Projects.



## 6.4.2.3 Techniques to Reduce Bycatch

224.233. There are multiple techniques that can be used to reduce the interaction between diving seabirds and fishing equipment. Evidence of the effectiveness of the various methods is relatively limited but is collated and presented in Anderson *et al.* (2022). One of the available techniques is the use of above water deterrents (AWD) attached to fishing nets at regular intervals. AWDs are usually fixed to buoys or markers attached to set fishing gear, which work to scare birds away from fishing nets. Looming eyes buoys (LEBs) are one of the most highly developed forms of AWD and have shown some success in the reduction of seabird bycatch, including guillemot however further trials are needed to confirm effectiveness (Ørsted, 2022; Rouxel *et al.*, 2021).

225.234. The Applicants recognise that both Natural England and the RSPB have raised a number of concerns regarding the approach taken and the evidence provided to date by Hornsea Project Four, and SEP and DEP, and have indicated that they do not consider bycatch reduction through implementation of LEBs to be a viable compensation measure based on current knowledge (Natural England 2022a; 2022b 2023b; RSPB 2022; 2023). Whilst investigation of the efficacy of LEBs has been the focus of recent studies to reduce seabird bycatch (Rouxel *et al.*, 2021; 2023), other technologies are currently undergoing research and there is potential for novel approaches to be shown to be effective in future. For example, bird scarer kites (alongside LEBs) are currently being trialled as part of a Defra Fisheries Industry Science Partnership (FISP) bycatch reduction project<sup>10</sup> in the southwest of England which could be shown to be effective at reducing bycatch of auks. Fishtek Marine Ltd, the RSPB, University of Exeter, Cornwall Inshore Fisheries and Conservation Authority and SeaScope Fisheries Research Ltd are involved in this study, which, unlike Rouxel *et al.* (2023), does not rely on self-reporting of bycatch events by fishers which is prone to underreporting. Instead, remote electronic monitoring equipment is installed on vessels with data being independently verified to record bycatch events. Therefore, it can be expected that the methodological and data analysis concerns encountered on the Hornsea Project Four trials will not be experienced at the FISP project. The controlled study is analysing both LEBs and bird scarer kites and will result in a peer-reviewed scientific paper.

---

<sup>10</sup> Above-water deterrents: mitigating seabird bycatch in set-net fisheries:

<https://www.gov.uk/government/publications/fisp-projects/fisp-projects-contracts-awarded-in-round-4-of-the-scheme#fishtek-marine>

~~226.235.~~ Therefore, that project can be expected to provide fully quantified and independently ratified success rates, and a quantified assessment of actual bycatch rates at the target fishery with consideration given to variation across vessels and other co-variables. However, this study is currently only planned to gather one year of data and so further studies to demonstrate effectiveness are likely to be required before SNCBs can support bycatch reduction as a compensation measure for auks.

~~227.236.~~ The Applicants are aware that OWIC are anticipating imminent publication of results of a bycatch study co-funded with Orsted assessing the scale of the problem, and are proposing to undertake further studies into potential bycatch mitigation measures. Although not currently available, these studies would be expected to provide evidence in advance of any requirement by the Applicants to implement adaptive management.

#### 6.4.2.4 Outline Delivery Mechanism for Bycatch Reduction

~~228.237.~~ If bycatch reduction was required to be implemented as an adaptive management compensatory measure for the Projects, the Applicants would seek to sign up fishers to implement AWDs and remote electronic monitoring systems building on the bycatch mitigation trials undertaken by Ørsted for Hornsea Project Four and the Defra funded FISP project. The following steps to secure vessel involvement as described in Fishtek Marine Limited (2023) for SEP and DEP would be followed:

- 1) Liaise with relevant IFCA and identify skippers who will engage positively and for a long period, will be diligent with data collection, trustworthy with respect to data confidentiality and reliable with regard to data collection and reporting;
- 2) Make an approach to the skippers by phone outlining the key requirements and expectations of them in their involvement and outline the proposed remuneration for participation in the scheme;
- 3) On verbal agreement, contact the Maritime and Coastguard Agency to ensure all vessel safety certification is complete and up to date;
- 4) Meet fishers face-to-face with 'Participant Consent Form' for signature; and
- 5) Install equipment.



## 7 Funding

~~229.238.~~ Funding information for the compensatory measures outlined in this plan can be found in the **Volume 4, Funding Statement (application ref: 4.4)**. The Applicants have estimated the costs associated with developing, constructing and operating the compensatory measures outlined in this Compensation Plan, the **Volume 6, Appendix 1 - Project Level Kittiwake Compensation Plan (application ref: 6.2.1)** and the **Volume 6, Appendix 3 - Project level Dogger Bank Compensation Plan (application ref: 6.2.3)**. This estimate includes project lead, strategic & collaborative compensation measures and is for the lifetime of the Projects.

~~230.239.~~ Based on the information presented in the **Volume 4, Funding Statement (application ref: 4.4)**, SoS can be satisfied that the financial viability of the Projects will not be compromised by the delivery of all or some of the compensatory measures proposed by the Applicants and set out in the compensation plans, and furthermore that these compensatory measures can be financed through the existing financial arrangements in place to develop, construct and operate the Projects.

## 8 Summary

231:240. A number of measures have been explored to provide compensation for adverse effects on guillemot as a result of the Projects in combination with other offshore wind farms. Compensation is also discussed for razorbill 'without prejudice' in the event that the SoS determines it is required.

232:241. Predator eradication / control has been identified as the most suitable measure to achieve the compensation requirements of DBS for guillemot [and razorbill]. Other measures considered: strategic fisheries management (prey enhancement), ANS and bycatch reduction, are either unavailable at the project-level or still in trial phases with limited evidence of success. However, the Applicants will monitor the progress of ANS and bycatch reduction trials to evaluate them as future adaptive management measures should they be required.

233:242. Assessment of the proposed predator eradication measure against Natural England's compensation checklist is provided in **Table 8-1**.

*Table 8-1 Assessment of the proposed compensation against Natural England's checklist*

Criteria	Predator Eradication / Control Measure Assessment Against Criteria
What, where and when	<p>Predator eradication measure as presented in this compensation document and to be further detailed in future iterations of this document and the CIMP.</p> <p>Site selection information presented in section 6.3.1.2 of this document with roadmap for identification of a final site(s) in section 6.3.1.8.</p> <p>Outline implementation roadmaps provided in <b>Plate 6-1</b> and <b>Plate 6-2</b> of this document.</p>
Why and how	Summarised in this document and will be detailed further in future iterations of this document and the CIMP.
Deliverability is secured	Roadmap for delivery is provided in section 6.3.1.8 of this document. Deliverability will be informed by pre-eradication studies and secured following selection of a suitable site(s).

Criteria	Predator Eradication / Control Measure Assessment Against Criteria
Policy / legislative mechanism for delivering the compensation	<p>Delivery of project-led compensation will be through agreement with individual landowners. In-principle agreements are being sought during the determination process.</p> <p>Delivery of strategic compensation will be through the MRF or an interim fund.</p>
Agreed DCO/DML conditions	The <b>Volume 3, Draft DCO (application ref: 3.1)</b> includes condition wording similar to other consented OWFs at Schedule 18.
Clear aims and objectives & links to the conservation objectives of the site or feature and addresses the specific damage caused by the project and will not negatively impact other sites.	Clear aim to improve productivity of auks through successful predator eradication / control to replace auks lost as a result of the Projects. Potential negative impacts of the compensation are explored in this document (section 6.3.1.9) but will be assessed in full by the feasibility study.
Mechanism for further commitments if the original compensation objectives are not met – monitoring, adaptive management & ongoing sign-off procedure	<p>Monitoring and adaptive management included in sections 6.3.1.7 and 6.3.1.8.4 of this document and to be detailed in the CIMP. Future potential adaptive management measures included in section 6.4 as agreed with the ETG.</p> <p>For strategic compensation, this would be the responsibility of the MRFO.</p>
Clear governance proposal for the post-consent phase (e.g. ToR agreed)	<p>A GCSG will be formed post-consent. Governance will be defined in the CIMP.</p> <p>For strategic compensation, this would be the responsibility of the MRFO.</p>
Ensure development of compensatory measures is open and transparent	<p>Continued stakeholder engagement throughout the lifetime of the project.</p> <p>For strategic compensation, this would be the responsibility of the MRFO.</p>

Criteria	Predator Eradication / Control Measure Assessment Against Criteria
Timescales for implementation & how quickly the measures will contribute to the network	<p>Indicative timeline for implementation of project-led compensation included in <b>Plate 6-1</b> of this document.</p> <p>Timescales for strategic compensation is discussed in section 6.3.1.6 and shown in <b>Plate 6-2</b>.</p> <p>Increased productivity should become evident quickly after implementation.</p>
Commitment to continued annual management of the compensation area throughout the lifetime of the project	<p>Monitoring commitments summarised in sections 6.3.1.7 and 6.3.1.8.4 of this document with details to be provided in the CIMP.</p> <p>Annual management of strategic compensation would be the responsibility of the MRFO and a financial contribution to the MRF by the Applicants would be reflective of the need for management for the lifetime of the Projects.</p>

243. The information provided demonstrates how the proposed measures can be implemented to provide the required compensation. The Applicants' guillemot [and razorbill] compensation proposal contains several options. At this stage no scheme or measure is ruled out and depending on the outcome of ongoing work the Applicants may choose to progress all or a subset of the following measures. The breadth of measures should provide Natural England and the Secretary of State with the confidence that the necessary compensation can be secured and delivered post consent following further engagement with NatureScot, Natural England and the wider Auk steering group.

- Project-led predator eradication – Two potential schemes (Outer Hebrides and Out Skerries) are currently being progressed. The Applicants are confident that each of these options individually can provide the required compensation at both Natural England's success and scaling criteria.
- Strategic predator eradication – The Applicants continue to engage with the Isles of Scilly Task and Finish Group and eagerly await further information on the progress of the scheme. This scheme is outside the control of the Applicants, but when available could replace or supplement the Applicants' project-led scheme.

- Marine Recovery Fund (MRF) – It is anticipated that the MRF will be operational in 2026. Should compensation for guillemot [and razorbill] be available through the MRF, alongside or instead of the Isles of Scilly predator eradication, the Applicants may make a contribution to the MRF to discharge all, or a proportion of the necessary compensation.
- Adaptive management – The Applicants have included guillemot and razorbill specific nesting spaces within the offshore ANS design. Should this prove successful and adaptive management be required, additional nesting spaces can be retrofitted to the structure, without compromising the kittiwake nesting spaces, to provide a total of 1,662 guillemot nesting spaces and 240 razorbill spaces. In addition, the Applicants' will continue to monitor progress of bycatch reduction measures for guillemot and razorbill.
- Wider compensation measures – The Government Response to the Environmental Offshore Wind Environmental Compensatory Measures Reform consultation, undertaken by Defra earlier this year, was published on 3rd December 2025. Defra propose a more flexible and pragmatic approach to compensation, including broadening access to the range of measures that can be used as compensation. Predator eradication had been proven to benefit a number of seabird species beyond guillemot and razorbill and therefore should these reforms come into effect the Applicants would propose that wider benefits resulting from the predator eradication, either at the Scottish sites or the Isles of Scilly, could contribute to achieving the required compensation.

At the time of writing, it is anticipated that the measures will be delivered by the Applicants at the project-led level, or potentially through a strategic measure or a combination of the two. Options for collaboration with other OWF developers are being explored, as are opportunities for contribution to strategic compensation through the MRF.

## 9 References

Anderson, O.R.J., Thompson, D., & Parsons, M. (2022). Seabird bycatch mitigation: evidence base for possible UK application and research. JNCC Report No. 717, JNCC, Peterborough. ISSN 0963-8091.

APEM (2022). Hornsea Project Four: Deadline 1: Auk Displacement and Mortality Evidence Review (No. G1.47).

Bayes, J. and Kharadi, N. (2022). Marine natural capital accounting: impacts of the sandeel fishery in the North Sea. UKNEE. Available from: [REDACTED]

[Accessed April 2024].

Booker, H., Price, D., Slader, P., Frayling, T., Williams, T. and Bolton, M. (2019). Seabird recovery on Lundy population change in Manx shearwaters and other seabirds in response to the eradication of rats. *British Birds* 112: 217-230.

British Trust for Ornithology, JNCC and RSPB (2025). Seabird Monitoring Programme database. Available at: <https://app.bto.org/seabirds/public/data.jsp>

Burnell, D., Perkins, A.J., Newton, S.F., Bolton, M., Tierney, T.D. & Dunn, T.E. (2023). Seabirds Count: a census of breeding seabirds in Britain and Ireland (2015–2021). Lynx Nature Books, Barcelona.

Clarkson, K. (2023). Chick provisioning of Guillemot *Uria aalge* and Razorbill *Alca torda*, in the Flamborough and Filey Coast SPA seabird colony, England, in 2023. RSPB.

Clarkson, K., Aitken, D., Cope, R., & O'Hara, D. (2022). Flamborough and Filey Coast SPA seabird colony count 2022. RSPB, The Lodge, Sandy, Bedfordshire SG19 2DL

Defra (2021). Best practice guidance for developing compensatory measures in relation to Marine Protected Areas 22 July 2021 Version: For consultation.

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

Defra (2024b). Consultation on policies to inform updated guidance for Marine Protected Area (MPA) assessments. 09 February 2024 Version: For consultation.

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).

Department for Energy Security and Net Zero (2023a). National Policy Statement for Renewable Energy Infrastructure (EN-3).

Department for Energy Security and Net Zero (2023b). Habitats Regulations Assessment For An Application Under The Planning Act 2008 Hornsea Project Four Offshore Wind-farm [https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010098/EN010098-002331-DESNZ%20HRA%20-%20Hornsea%20Four\\_Final.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010098/EN010098-002331-DESNZ%20HRA%20-%20Hornsea%20Four_Final.pdf).



Department for Energy Security and Net Zero (2025). Strategic compensation measures for offshore wind activities: Marine Recovery Fund interim guidance.

EC (2019). Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. Brussels, 21.11.2018 C(2018) 7621 final.

Environment Agency (2020). Consultation Report: Options for extending the sea trout beach net fishery in Yorkshire and North East England. Environment Agency, Bristol.

Fishtek Marine Limited (2023). Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects. Annex 4 Auk Bycatch Reduction Feasibility Statement. Revision A. Deadline 3. Document Reference 5.5.4.3.

Furness, R.W. (2015). Nonbreeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Population Scales (BDMPS). Natural England Commissioned Report Number 164.

Furness, R.W., MacArthur, D., Trinder, M. and MacArthur, K. (2013). Evidence review to support the identification of measures that could be used to mitigate or compensate offshore wind farm aspects on selected species of seabirds (No. MEG 04/03/02).

GoBe Consultants Ltd. (2022). Hornsea Project Four. Compensation measures for FFC SPA: Ecological Connectivity of Compensation Measures Annex 1. Report for Deadline 3.

Halley, D., Harris, M. and Wanless, S. (1995). Colony Attendance Patterns and Recruitment in Immature Common Murres (*Uria aalge*). The Auk 112/4: 947-957.

Harris, M., Halley, D. and Wanless, S. (1996). Philopatry in the Common Guillemot *Uria aalge*. Bird Study 43: 134-137.

Harris, M. P., Wanless, S., Barton, T. R. and Elston, D. A. (1997). Nest site characteristics, duration of use and breeding success in the Guillemot *Uria aalae*. IBIS, 139: 468-476.

Hipfner, T. M. and Dussureault, J. (2001). The Occurrence, Size, and Composition of Razorbill Nest Structures. The Wilson Bulletin, 113/4:445-448.

HM Government (2022). British Energy Security Strategy. 38 pp.

Horswill, C. and Robinson, R.A. (2015). Review of seabird demographic rates and density dependence. JNCC Report No. 552.

Isles of Scilly Wildlife Trust (2024). The status of seabirds breeding in the Isles of Scilly 2023.

[REDACTED]

Joint Nature Conservation Committee (2018). Rathlin Island SPA Standard Data Form. <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9020011.pdf>

Joint Nature Conservation Committee (2021). Razorbill (*Alca torda*). Available at: <https://jncc.gov.uk/our-work/razorbill-alca-torda/>.

Joint Nature Conservation Committee (2023). Seabird Monitoring Programme Database. Available at: [REDACTED]

Joint Nature Conservation Committee (2024). Seabird 2000 and Seabirds Count comparative dataset. Available at: <https://jncc.gov.uk/resources/63f0ea40-485d-46dd-b967-150df90a7b2b#comparative-seabirds-count-dataset-revised-20240708.xlsx>

Knox, A. (2012). The subspecies of Guillemot on the British List. *Scottish Birds* 32/3: 204-210.

Lavers, L. J., Jones I. L. and Diamond A. W. (2007). Natal and breeding dispersal of Razorbills (*Alca torda*) in eastern North America. *Waterbirds* 30: 588-594.

Lyngs, P. (1993). Colony interchange in Baltic guillemots *Uria aalge*. *Dansk Ornitologisk Forenings Tidsskrift* 87: 247-250.

Luxmoore, R., Swann, R. and Bell, E. (2019). Canna seabird recovery project: 10 years on. In: C.R. Veitch, M.N. Clout, A.R. Martin, J.C. Russell and C.J. West, eds. *Island Invasives: Scaling up to meet the challenge*, 576-579. IUCN, Gland, Switzerland. Gland, Switzerland: IUCN.

Macarthur Green (2019). Norfolk Vanguard Offshore Wind Farm Offshore Ornithology Auk Displacement Assessment Update for Deadline 8 (No. ExA; AS; 10.D8.10)

Miles, J., Parsons, M. and O'Brien, S. (2020). Preliminary assessment of seabird population response to potential bycatch mitigation in the UK-registered fishing fleet. Report prepared for Defra Project Code ME6024. JNCC. Defra, UK – Science Search.

MMO (2022). The Dogger Bank Special Area of Conservation (Specified Area) Bottom Towed Fishing Gear Byelaw 2022.

Moors, P.J. and Atkinson, I.A.E. (1984). Predation on seabirds by introduced animals, and factors affecting its severity. In Croxall, J.P., Evans, P.G.H. and Schreiber, R.W. (eds.), *Status and Conservation of the World's Seabirds*. ICBP Technical Publication 2:667-690.

Natural England (2017). Farne Islands SPA Citation.

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

Natural England (2022a). Natural England's End of Examination Position on the Applicant's Proposed Compensatory Measures. For: The construction and operation of Hornsea Project Four Offshore Wind Farm. Available at:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010098/EN010098-001970-Natural%20England%20-%20Comments%20on%20any%20submissions%20received%20at%20Deadline%206%2001.pdf>. Accessed April 2024.

Natural England (2022b). Sheringham Shoal Extension and Dudgeon Extension Offshore Wind Farms Relevant Representations of Natural England. Planning Inspectorate Reference: EN010109. Available at:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010109/EN010109-000540-Natural%20England%20-%20Relevant%20Representation.pdf>. [Accessed April 2024].

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

<https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK9006101&SiteName=flamb&SiteNameDisplay=Flamborough+and+Filey+Coast+SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAAarea=&NumMarineSeasonality=4> (accessed March 2024).

Natural England (2023b). Natural England's End of Examination Position on the Applicant's Proposed Compensatory Measures For: The construction and operation of the Sheringham Shoal Extension and Dudgeon Extension Offshore Wind Farms. Planning Inspectorate Reference: EN010109. Available at:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010109/EN010109-002130-Natural%20England%20-%20Other-%20EN010109%20441148%20SEP%20DEP%20Appendix%20C4%20-%20Natural%20England%E2%80%99s%20End%20of%20Examination%20Position%20on%20the%20Applicant%E2%80%99s%20Proposed%20Compensatory%20Measures%20Deadline%208.pdf>. [Accessed April 2024].

NIRAS (2022). Offshore Wind Leasing Round 4 Plan Level HRA. Report to Inform Appropriate Assessment.

NIRAS (2024). Offshore Wind Leasing Round 4. Kittiwake Strategic Compensation Plan.

Northridge, S., Kingston, A. and Coram, A. (2020). Preliminary estimates of seabird bycatch by UK vessels in UK and adjacent waters. Report to JNCC. Defra report ME6024 October 2020.

Northridge, S., Kingston, A. and Coram, A. (2023). Regional seabird bycatch hotspot analysis. JNCC Report No. 726. JNCC, Peterborough, ISSN 0963-8091.

Olsthoorn, J.C.M. and Nelson, J.B. (1990). The availability of breeding sites for some British seabirds. *Bird Study*, 37:3, 145-164, DOI: 10.1080/00063659009477052.

Ørsted (2022). Hornsea Project Four Bycatch reduction technology selection phase summary. Document Reference G5.13. Deadline 5 submission.

Parker, J., Fawcett, A., Banks, A., Rowson, T., Allen, S., Rowell, H., Harwood, A., Ludgate, C., Humphrey, O., Axelsson, M., Baker, A. & Copley, V. (2022). Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards. Phase III: Expectations for data analysis and presentation at examination for offshore wind applications. Natural England. Version 1.2. 140 pp.

Plumb, W.J. (1965). Observations on the breeding biology of the Razorbill, British Birds.

Quayle, H. (2015). Filey Bay: Safe Seas for Seabirds. RSPB report.

Rouxel, Y., Arnardóttir, H. and Oppel S. (2023). Looming-eyes buoys fail to reduce seabird bycatch in the Icelandic lumpfish fishery: depth-based fishing restrictions are an alternative. Royal Society Open Science. 10(10). Available at: [REDACTED] [Accessed April 2024].

Rouxel, Y., Crawford, R., Cleasby, I.R., Kibel, P., Owen, E., Volke, V., Schnell, A.K. and Oppel, S. (2021). Buoys with looming eyes deter seaducks and could potentially reduce seabird bycatch in gillnets. *Royal Society open science*, 8(5): 210225.

Russell, J.C., Towns, D.R. and Clout, M.N. (2008). Review of rat invasion biology. Implications for island biosecurity. *Science for Conservation* 286.

RSPB (2019). Protecting and restoring the Shiant Isles SPA through rat removal, and safeguarding other seabird island SPAs in the UK. Final Report LIFE13 NAT/UK/000209.

RSPB (2022). Written Representation for the RSPB Annex B Compensation proposals Comments on selected Deadline 5 and Deadline 5a submissions Submitted for Deadline 6 27 July 2022 In the matter of: Application by Hornsea Project Four Limited for an Order Granting Development Consent for the Hornsea Project Four Offshore Wind Farm. Planning Inspectorate Ref: EN010098. Available at <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010098/EN010098-001917-Royal%20Society%20for%20the%20Protection%20of%20Birds%20-%20Comments%20on%20any%20other%20submissions%20received%20at%20Deadline%205a%202.pdf>. [Accessed April 2024].

RSPB (2023). Written Representation for the RSPB Submitted for Deadline 1 20 February 2023 In the matter of: Application by Equinor for an Order Granting Development Consent for the Sheringham and Dudgeon Extension Projects. Planning Inspectorate Ref: EN010109. Available at: [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010109/EN010109-000916-RSPB%20-%20Written%20Representations%20\(WR\),%20including%20summaries%20of%20all%20WRs%20exceeding%201500%20words.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010109/EN010109-000916-RSPB%20-%20Written%20Representations%20(WR),%20including%20summaries%20of%20all%20WRs%20exceeding%201500%20words.pdf). [Accessed April 2024].

Stanbury, A., Thomas, S., Aegerter, J., Brown, A., Bullock, D., Eaton, M., Lock, L., Luxmoore, R., Roy, S., Whitaker, S and Oppel, S. (2017). Prioritising islands in the United Kingdom and crown dependencies for the eradication of invasive alien vertebrates and rodent biosecurity. *European Journal of Wildlife Research* DOI 10.1007/s10344-017-1084-7.

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.

Towns, D., Atkinson, I. and Daugherty, C. (2006). Have the Harmful Effects of Introduced Rats on Islands been Exaggerated? *Biological Invasions*. 8. 863-891. 10.1007/s10530-005-0421-z.

Woodward, I., Thaxter, C.B., Owen, E. and Cook, A.S.C.P. (2019). Desk-based revision of seabird foraging ranges used for HRA screening. BTO research report, (724).

## **Annex A – Letter of Support**



November 22

2025

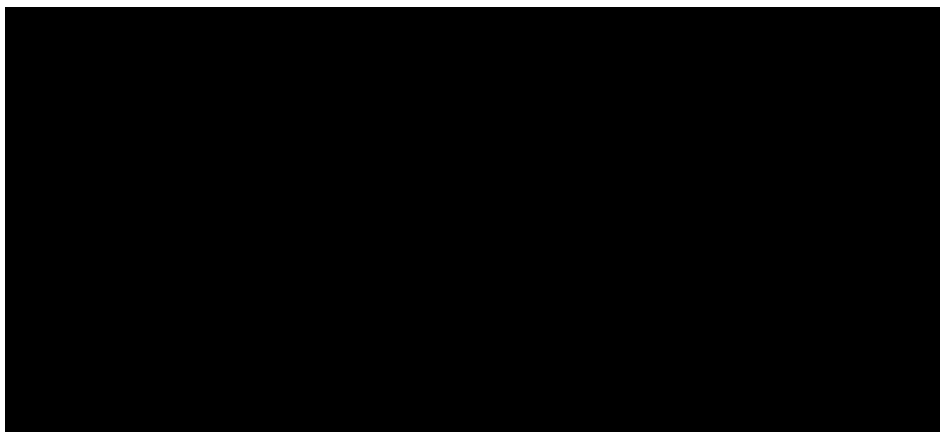
To whom it may concern.

In the early 1980s, my stepfather, a passionate amateur ornithologist, acquired Pabay Mohr to reconnect with nature, strengthen bonds with family, and support the local community in one of the most pristine environments on earth. I spent two months every summer there from the age of four, and those formative experiences—living from land and sea, and observing the island’s extraordinary birdlife—remain invaluable to me.

Over the years we have witnessed a dramatic and deeply saddening decline in both the number and diversity of species on Pabay. While the causes are multiple, the increasing infestation of rats has clearly played a devastating role. Beyond their impact on seabirds, they have become a broader environmental nuisance, affecting the island and local crofters alike. Although we have taken measured steps to control them, it has been an uphill struggle.

For this reason, when Will from Habitat Restoration, acting on behalf of RWE Dogger Bank South Wind Farms, approached us regarding inclusion in the rat eradication programme, we were immediately interested. The process to date has been thorough, respectful, and professional. We firmly believe that Pabay has the potential to become a benchmark project in the wider effort to eliminate invasive rat populations and restore native seabird colonies across the region.

To be absolutely clear: we offer our full and unequivocal support for this project. Together with the local community, we look forward to assisting in any way we can and to seeing this long-term initiative brought to a successful conclusion. Should you need any further details, I would be pleased to assist.





**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**

