DBS Offshore Wind

RWE Renewables UK Dogger Bank South (West) Limited

RWE Renewables UK Dogger Bank South (East) Limited

Dogger Bank South Offshore Wind Farms

Guillemot and Razorbill Compensation Update

Document Date:	December 2025
Document Reference:	22.8
Revision Number:	01
Classification:	Unrestricted

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Company:	**RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited**	Asset:	**Development**
Project:	**Dogger Bank South Offshore Wind Farms**	Sub Project/Package	**Consents**
Document Title or Description:	Guillemot and Razorbill Compensation Update		
Document Number:	006463963-01	Contractor Reference Number:	PC2340-RHD-OF-ZZ-RP-Z-0234

Rev No.	Date	Status/Reason for Issue	Author	Checked by	Approved by
01	December 2025	Request for Information 1	Haskoning	RWE	RWE

Contents

Tables

Figures

Glossary

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

Acronyms

Acronym	Definition
ANS	Artificial Nesting Structure
BTO	British Trust for Ornithology
CIMP	Compensation Implementation and Monitoring Plan
DCO	Development Consent Order
Defra	Department for Environment Food and Rural Affairs
HAR	HiDef Aerial Research
JNCC	Joint Nature Conservation Committee
MRF	Marine Recovery Fund
RFI	Request For Information
SAC	Special Area of Conservation
SMP	Seabird Monitoring Programme
SNCB	Statutory Nature Conservation Body
SPA	Special Protection Area
UCI	Upper Confidence Interval

1 Introduction

1. In response to the Secretary of State's request for information (RFI) on the 6th November 2025, the Applicants intend to submit updated versions of the **Guillemot [and Razorbill] Compensation Plan (Revision 7)** [document reference 6.2.2] and the **Guillemot [and Razorbill] Outline Compensation Implementation and Monitoring Plan (CIMP) (Revision 3)** [document reference 6.2.2.1]. In advance of these submissions, the pertinent updates are provided to Natural England in this document to enable a more informed response to the RFI on their part.

2. The contents of this report were discussed with Natural England on 25th November 2025 and this report has been provided to the Secretary of State to allow Natural England to make reference to the points raised in it. **Appendix 2 Guillemot and Razorbill Compensation Plan (Revision 8)** [document reference 6.2.2] and the **Annex A - Outline Guillemot and Razorbill Compensation Implementation and Monitoring Plan (Revision 4)** [document reference 6.2.2.1], submitted at this deadline have been updated based on the discussions with Natural England on 25th November 2025.

3. The updates include:

   - Updates on the progress of the project-led compensation proposal (see below) (RFI Q8, response for RFI Q9 will be added prior to submission);
   - Updated timelines for the project-led proposal. The overall timelines have not changed but further detail has been added (RFI Q10);
   - Confirmation of the number of guillemot and razorbill specific nesting spaces that have been included in the design of the offshore artificial nesting structure (ANS) (RFI Q14); and
   - A summary of the overall package of compensation proposed for guillemot [and razorbill].

4. No update is provided by the Applicants regarding the strategic proposal for the Isles of Scilly. The progress of this project is beyond the control of the Applicants and there has been little change in the status of this project since the previous revision of the Guillemot [and Razorbill] Compensation Plan. The Secretary of State has requested Defra provide an update on the progress of the Isles of Scilly Task and Finish Group. The Applicants understand through engagement with Defra that their response will largely reflect upon the setting up and role of the Task and Finish Group and provide an indication that results on the quantification of nesting spaces available in the Isles of Scilly may be presented in late December.

2 Guillemot and Razorbill Update

2.1 Compensation Quantum

5. Based on Natural England's Appendix H8 - End of Examination Position on The Applicants' Proposed Offshore Ornithology Compensatory Measures [REP8-054], it is understood that their recommended compensation quantum for the Projects, as presented in **Table 2-1**, is:

- Success criteria – 70% disturbance/2% mortality, mean impact value, Hornsea 4 method, 1:1 ratio
- Scaling criteria - 70% disturbance/2% mortality, 95% Upper Confidence Interval (UCI) impact value, Hornsea 4 method, 2:1 ratio

Table 2-1 Compensation requirements according to Natural England's end of examination position [REP8-054]. Values in bold represent the success criteria (*) and the scaling criteria (^).

Species (location)	Impact value	Impact (IND)	1:1 (Breeding Pairs)	2:1 (Breeding Pairs)
Guillemot (FFC SPA)	Mean	455.9	**2,015***	4,029
	95% UCI	878.2	3,881	**7,762^**
Guillemot (Farne Islands SPA)	Mean	13	**57***	115
	95% UCI	18.3	91	**162^**
Razorbill (FFC SPA)	Mean	140.4	**545***	1,091
	95% UCI	429.6	1,669	**3,337^**

6. These values have not changed since the end of Examination and were confirmed with Natural England in a meeting on 12th November 2025.

7. During a meeting with Natural England on 25th November 2025 the need to consider philopatry in the calculation of compensation quantum was also discussed. Natural England suggested that their advice would likely be in line with advice provided in their Responses to Secretary of State Consultation 3 Part B for Outer Dowsing : *"In the light of this multi-stranded approach targeting different colonies and/or geographic areas, on balance Natural England considers it would be **disproportionate to seek an additional step factoring philopatry** into the Applicant's auk calculations."*

8. While the Applicants' position is still that the 50% disturbance and 1% mortality impact values are more appropriate, the ability of compensation proposals to meet the Projects' requirements has been based upon the values according to Natural England's position.

2.2 Compensation Package

9. In order to achieve the quantum of compensation detailed above the Applicants have proposed a number of measures, summarised in more detail in section 2.5. At this stage no scheme or measure has been ruled out, and the Applicants may choose to progress all or a subset of the following measures.

- Project-led predator eradication through two potential schemes in Scotland (section 2.3);
- Contribution to a strategic predator eradication scheme on the Isles of Scilly; and
- Provision of guillemot and razorbill specific nesting spaces on the offshore ANS proposed for kittiwake (section 2.4).

2.3 Progress of the Project-led Compensation

10. Having undertaken further desk study and site surveys at the three locations identified in the **Guillemot and Razorbill Compensation Secondary Shortlist Site Refinement Report** [document reference 20.5], the Applicants have taken the decision to combine the two Outer Hebrides sites, Bearasaigh and Pabaigh[1], into one scheme (**Figure 2-1**). At the current time both the Out Skerries (**Figure 2-2**) and the Outer Hebrides sites are being progressed.

11. A significant amount of information on each of the locations has been gathered and is presented in **Table 2-2,** covering all of the points within Natural England's checklist for compensatory measures. The checklist is presented within the **Guillemot and Razorbill Compensation Plan (Revision 8)** [document reference 6.2.2] which has been updated to reflect this information and will be submitted with the RFI response. An updated timeline / roadmap for delivery of an eradication at either of the Scottish locations is presented in **Figure 2-3**.

[1] 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 Berasay may appear in other documents.

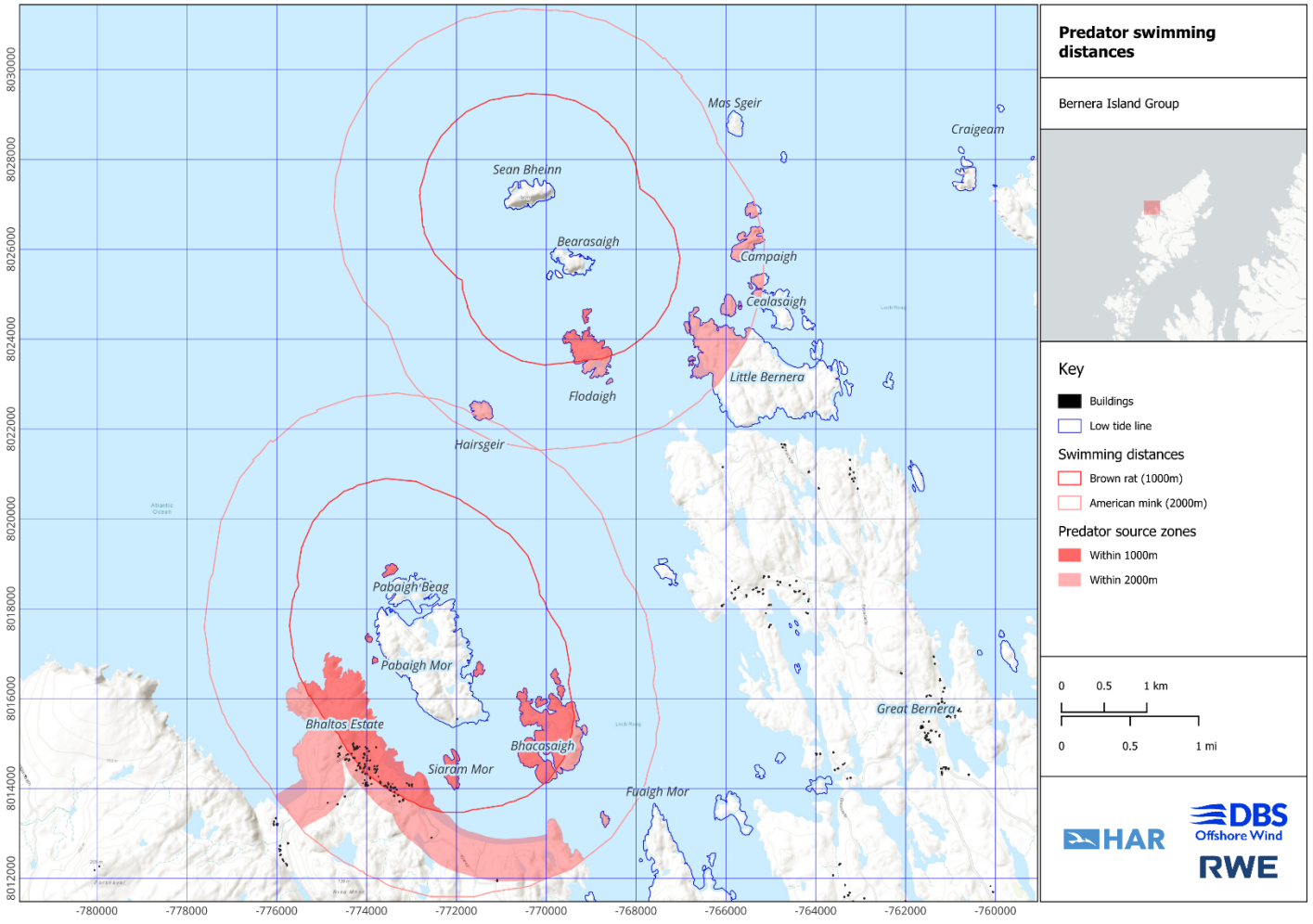

Figure 2-1 Outer Hebrides candidate site for potential compensation scheme

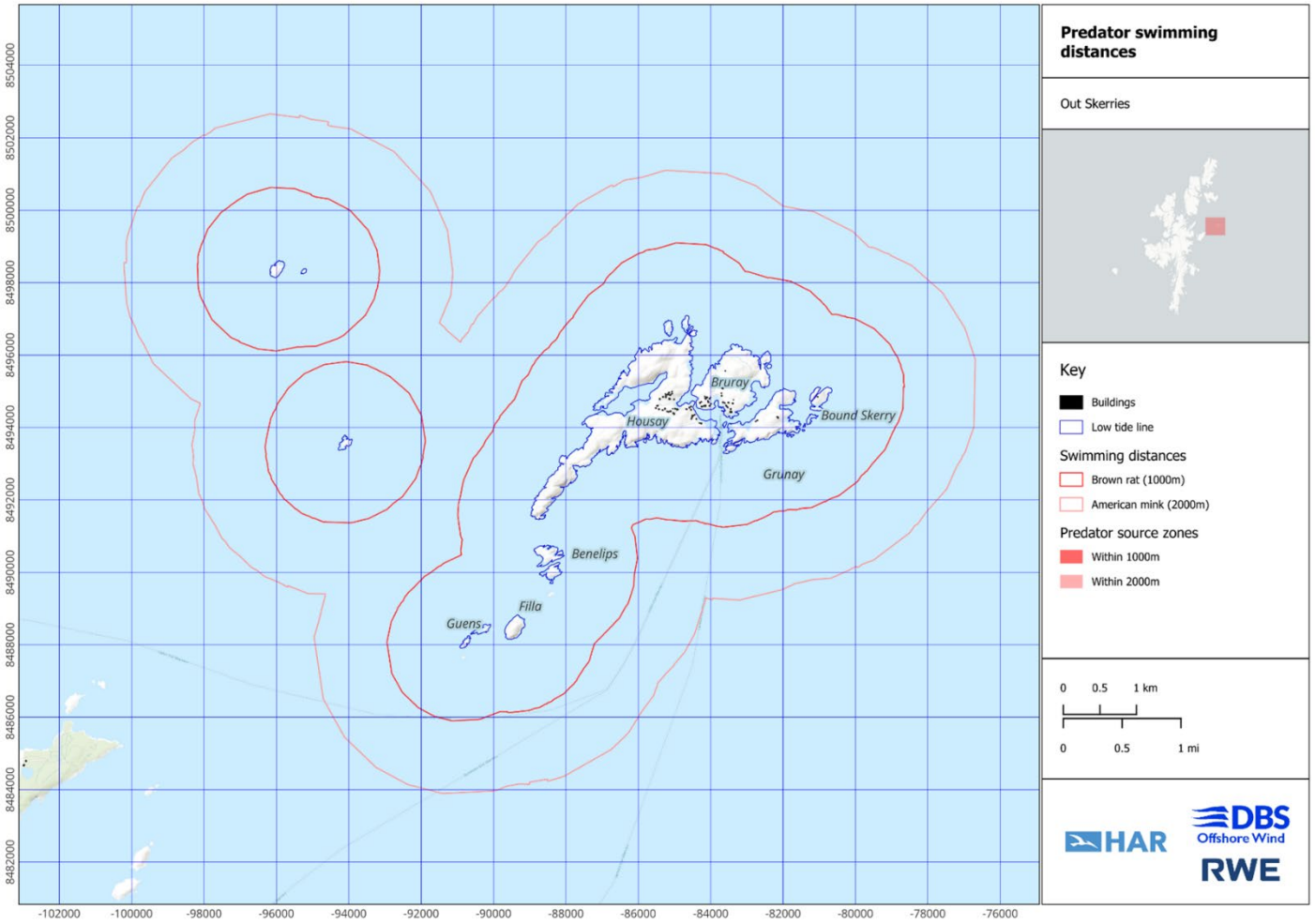

Figure 2-2 Out Skerries candidate site for potential compensation scheme

Table 2-2 Relevant information on the Scottish potential compensation sites

Criteria	Outer Hebrides	Out Skerries
Location	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 (**Figure 2-1**). In addition, a portion of the Lewis mainland at Bhaltos would need to be included in the biosecurity zone. 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. 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.	Island group in the east of Shetland. The focal islands in the group are Housay, Grunay, Bruray and Bound Skerry. Additional islands include Benelips, Filla and Guens (**Figure 2-2**). 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. 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.
Ecological Evidence		
Evidence base	Surveys undertaken by HiDef Aerial Research (HAR) for the Applicants. Initial site visit in June 2025 and drone survey in October 2025 (limited by poor weather).	Surveys undertaken by HAR for DBS. Initial site visit in June 2025 and drone survey in October 2025 (limited by poor weather).

Criteria	Outer Hebrides	Out Skerries
	British Trust for Ornithology (BTO) / Joint Nature Conservation Committee (JNCC) Seabird Monitoring Programme (SMP) data. JNCC seabird censuses. Consultation with landowners and residents. Desk-based literature search, including grey literature.	BTO/JNCC SMP data. JNCC seabird censuses. Consultation with landowners and residents. Desk-based literature search, including grey literature.
Predator presence	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. Potential thermal image of rats on Flodaigh. Predator 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. Confirmation from members of the community that rats are present in Bhaltos (mainland closest to the islands, within the biosecurity zone).	Confirmed thermal imagery and trapping of rats on Housay, Bruray and Grunay. Landowner confirmation of rats on Housay and Bruray. Unconfirmed on the other adjacent islands. This information would be gathered as part of pre-eradication studies in 2026/2027 to inform biosecurity planning. Presence of Atlantic puffin on North Benelips during the July 2025 site visit suggest there may not be rats on that island.
Suitability of habitat	Initial assessment indicates suitable habitat on Pabaigh Mor, Pabaigh Beag, Sean Bheinn and Bearasaigh	Initial assessment indicates suitable habitat on all of the islands (**Guillemot and Razorbill Compensation**

Criteria	Outer Hebrides	Out Skerries
	(**Guillemot and Razorbill Compensation Site Secondary Shortlist Refinement Report** [document reference 20.5]). Refined habitat assessment underway for Pabaigh Mor and Pabaigh Beag where high resolution drone footage was gathered. This should be available prior to responding to the RFI (this is presented in **Appendix A** and the updated **Guillemot and Razorbill Compensation Plan (Revision 8)** [document reference 6.2.2]) 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.	**Site Secondary Shortlist Refinement Report** [document reference 20.5]). Refined assessment of the habitat is underway for Housay, Bruray and Bound Skerry where high resolution drone footage was gathered. This should be available prior to responding to the RFI (this is presented in **Appendix A** and the updated **Guillemot and Razorbill Compensation Plan (Revision 8)** [document reference 6.2.2]). It was not possible to gather high resolution drone footage of the other locations during the survey window. We are confident that the surveyed locations contain sufficient habitat to meet the compensation needs of the Projects however, high-resolution drone footage of the additional islands can be gathered at a later date if necessary.
Accessibility of habitat to predators	Refined habitat assessment underway for Pabaigh Mor and Pabbaigh Beag where high resolution drone footage was gathered. This should be available prior to responding to the RFI. 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. However, site visit photographs indicate that much of the habitat it is accessible (**Photographs 1 - 4**).	Refined assessment of the habitat is underway for Housay, Bruray and Bound Skerry where high resolution drone footage was gathered. This should be available prior to responding to the RFI. 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.

Criteria	Outer Hebrides	Out Skerries
		However, site visit photographs indicate that much of the habitat is accessible (**Photographs 5 - 8**).
Auk populations	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. 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. 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.	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. 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. 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.
Other species	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,	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

Criteria	Outer Hebrides	Out Skerries
	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. 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.	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.
Aim	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.	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.
Feasibility of a successful eradication		

Criteria	Outer Hebrides	Out Skerries
Biosecurity requirements	Locations that are within a 1km biosecurity zone are Flodaigh, Bhacasaigh, Siaram Mor, Mas Sgeir and a section of the mainland at Bhaltos. 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. 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.	Locations within 1km of the focal islands are Benelips, Filla and Guens. 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. 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.
Accessibility to personnel	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. Further assessment will be undertaken once high-resolution drone footage has been gathered.	Access to the main islands of Housay and Grunay is by ferry. Grunay and Bound Skerry are easily accessed by boat. Accessibility of the other islands is assumed but requires further investigation.
Eradication method	Eradication is anticipated to make use of rodenticide baited traps, although consideration will be given to the use of non-toxic lethal traps. Investigation of the most appropriate trap/rodenticide will form part of eradication planning and pre-eradication	Eradication is anticipated to make use of rodenticide baited traps, although consideration will be given to the use of non-toxic lethal traps. Investigation of the most appropriate trap / rodenticide will form part of eradication planning and

Criteria	Outer Hebrides	Out Skerries
	studies in 2026/2027 to determine if rodenticide resistance is present in the population. No predator-proof fencing is required as part of the Scheme. 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.	pre-eradication studies in 2026/2027 to determine if rodenticide resistance is present in the population. No predator-proof fencing is required as part of the Scheme. 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.
Timescales	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 6th December 2025. If further information is required, this would be gathered in early 2026. 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. Eradication activity will begin in September / October 2027, at least two breeding seasons ahead of turbine installation. The timescales for the proposed compensation is provided in **Figure 2-3**.	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 6th December 2025. If further information is required, this would be gathered in early 2026. 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. Eradication activity will begin in September / October 2027, at least two breeding seasons ahead of turbine installation. The timescales for the proposed compensation is provided in **Figure 2-3**.

Criteria	Outer Hebrides	Out Skerries
Securing the scheme		
Stakeholders	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 comfort for submission to the Secretary of State have been requested and are provided in the updated **Guillemot [and Razorbill] Compensation Plan (Revision 8)** [document reference 6.2.2]. 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. 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.	The Out Skerries are owned by a single landowner. Contact has been established with the landowner and Heads of Terms have been issued. A letters of comfort for submission to the Secretary of State have been requested. Tenants are present on Housay and Bruray. Initial discussions undertaken during the site visit indicate that an eradication would be positively received. 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. 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.

Criteria	Outer Hebrides	Out Skerries
Development Consent Order (DCO) Conditions	Suspensive condition contained within the Draft DCO	Suspensive condition contained within the Draft DCO
Financial	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.	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.
Other considerations		
Secondary ecological impacts	The islands are not within any designated sites. 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. 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-toxic would not be attractive or accessible to these species. The risk of	The Out Skerries are not within any designated sites. 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. 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 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

Criteria	Outer Hebrides	Out Skerries
	secondary poisoning of these species would be a consideration in the choice of rodenticide and the use of non-toxic lethal traps. 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.	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. Seals are likely to be present around the islands however no designated haul out or known pupping sites are present.
Community impacts	Discussions during the site visit in June 2025 indicated that the community of Bhaltos 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. There is potential that a small local employment boost could occur during the eradication phase and for biosecurity.	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. 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.
Monitoring and adaptive management	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-	The detailed monitoring and adaptive management plan will be developed during the eradication planning phase in 2026/2027. However, there will be a

Criteria	Outer Hebrides	Out Skerries
	term monitoring of predator presence and guillemot and razorbill populations. 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. 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.	commitment to long-term monitoring of predator presence and guillemot and razorbill populations. 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. 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.
Governance	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. 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.	Post-consent an auk compensation steering group will be formed comprising the SNCBs, Natural England and NatureScot, and other relevant stakeholders. 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.

Criteria	Outer Hebrides	Out Skerries
	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. Dogger Bank South will remain responsible for the scheme for the lifetime of the windfarm, or for the period agreed through the CIMP.	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. Dogger Bank South will remain responsible for the scheme for the lifetime of the windfarm, or for the period agreed through the CIMP.

Photograph 1 Sean Bheinn

Photograph 2 Bearasaigh

Photograph 3 Pabaigh Mor

Photograph 4 Pabaigh Beag

Photograph 5 Housay

Photograph 6 Bruray

Photograph 7 Grunay

Photograph 8 Bound Skerry

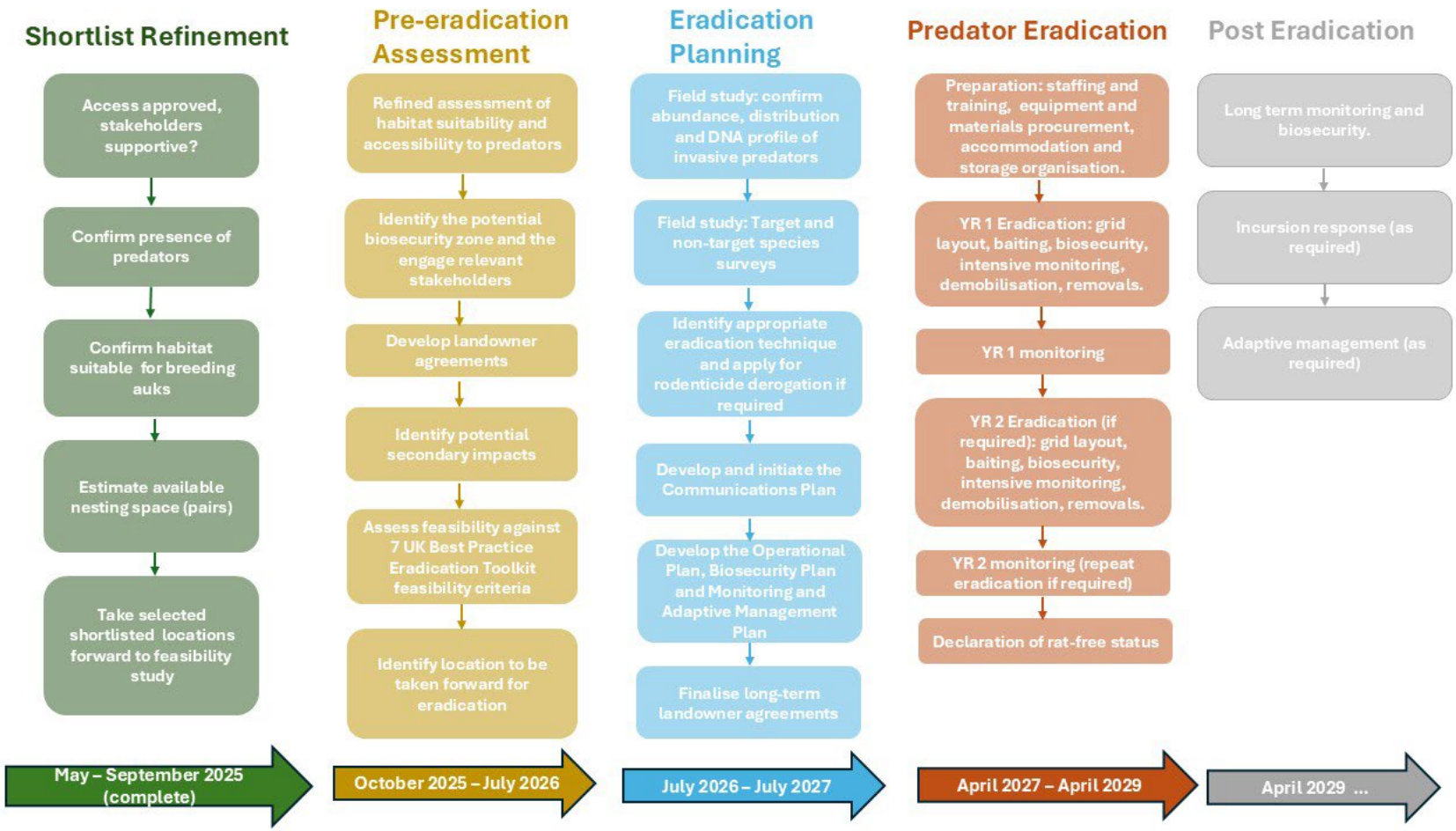

Figure 2-3 Timeline / roadmap for a project-led predator eradication

2.4 Adaptive Management – ANS

12. The Guillemot [and Razorbill] Compensation Plan lists the potential to utilise the offshore ANS as adaptive management, should. To this end, the most recent iteration of the ANS design has included specific nesting spaces to accommodate 415 guillemot and 62 razorbill without compromising the number of kittiwake nesting spaces. Should these spaces be utilised successfully by nesting guillemot and razorbill and adaptive management is required for these species, there is potential to retrofit a further 1,247 guillemot and 187 razorbill nesting spaces to the structure.

2.5 Overall Guillemot and Razorbill Compensation Position

13. 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.

14. **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.

15. **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.

16. **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.

17. **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.

18. **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.

19. Based on the package of measures provided and the habitat refinement work for the project-led measures (Appendix A) the Applicants are confident the following they can meet both the success measure (mean impacts at 1:1) and scaling (95% UCI impact at 2:1) required in Natural England's close of examination position (**Figure 2-1**).

Appendix A – Habitat Refinement

1. This appendix provides an update on the habitat refinement work that has been undertaken to date for the Scottish compensation sites. The information in relation to methods and the results for Pabaigh Mor and Pabaigh Beag were presented to Natural England in a meeting on the 25th November 2025 but were not contained in the original version of this document which was sent to them (on 21st November 2025) or in the extract sent to NatureScot (on 24th November 2025).

Methods

Imagery Collection

2. Data was collected in September 2025 using a DJI Mavic 3 Pro with true colour image camera. Photos were taken of the areas of potential habitat at three angles: 90, 60 and 30 degrees at 80m above sea level. The photos were taken with an approximately 50% overlap and processed into a photogrammetry 3D model using 3DF Zephyr software.

3. Vector polygons of habitat were drawn on the surface of the 3D model, from which the surface area was calculated (**Photograph 9**). These areas were assessed using a combination of auk habitat preferences in the literature, reference images of similar-but-occupied habitat, and HAR's expert judgment.

Photograph 9 Example of habitat polygon on Pabaigh Mor

Auk Habitat Preferences

Guillemot

4. The following habitat preferences have been considered for guillemot:

- Preferred nesting habitat comprises ledges on sea cliffs, also occurring on boulder scree and a variety of rocky habitats on rocky islands.
- Guillemots nest from the top of cliffs down to two meters above wave height at high tide and appear to show a preference for sites further away from cliff tops, sites that slope inwards, and sites that have walls (Harris *et al.*, 1997).
- They can nest on horizontal and inclined rocky ledges and platforms (greater than or equal to an estimated 0.3m ledge depth) that are substantially sloped, with slopes recorded to vary "from +50° (sloping down, outwards) to -30° (sloping inwards)", but generally place their eggs on spots that are almost completely level (+5° to -5°) (Harris *et al.*, 1997).
- Birds show a preference for breeding next to other species, and new breeders join existing colonies (Birkhead, 1977; Harris *et al.*, 1997).
- On seabird islands, guillemots are also found to nest at lower densities than ledge colonies under boulders and on ledges in cavities, which could be related to high predation pressure and/or the absence of preferred ledges.

Razorbill

5. The following habitat preferences have been considered for razorbill:

- Nest on boulder beaches and on ledges and crevices on coastal cliffs, often associated with guillemots.
- Due to the cryptic nature of breeding habitats, nests are often hidden in crevices between boulders, making them a difficult species to census.
- May cohabit with guillemot but generally prefer enclosed spaces to open-topped ledges (Birkhead 1978; Harris *et al.*, 1989).
- Razorbills typically nest at lower densities than guillemots. The highest nesting densities for Razorbill recorded by Elisseou (2020) and Legard *et al.* (2025) were 0.65 birds/m² and 0.86 birds/m², respectively.

Adjustment for aspect and terrain

6. The habitat within each polygon was graded for its aspect and uneven terrain.

- Modelling of guillemot site preference in relation to exposure to the prevailing wind found a preference for the leeside (Lempidakis *et al.*, 2021). However, guillemots will choose exposed sites regardless of if the quality of terrain is good. For the Out Skerries, habitat on fully exposed coasts was excluded from assessment whereas partially exposed sites were subject to a correction factor of 0.5. Due to the shelter provided to the Pabaigh Islands from mainland Lewis

to prevailing wind and associated swell, a 0.5 correction factor was applied to exposed habitat. No correction was applied to sheltered habitat.

- Accounting for uneven terrain included a visual assessment of the amount of flat surface area within each polygon suitable for egg laying (i.e. excluding areas of vertical or extremely sloped surface). This was quantified as adjustment multipliers to refine the amount of available habitat: 0.25, 0.50 and 0.75 for amount of uneven terrain.

Results

Outer Hebrides

7. The results of the refined habitat assessment for Pabaigh Beag and Pabaigh Mor are presented in **Table A-1** and **Figure A-1**. The habitat on Pabaigh Beag and Pabaigh Mor comprises granite cliffs, sea caves and exposed platforms. All of the habitat identified as suitable on Pabaigh Beag and Pabaigh Mor was assessed as accessible to rats. Areas of inaccessible habitat were not included in the assessment.

8. The habitat refinement for the Bearasaigh Islands (Sean Bheinn and Bearasaigh) has yet to be undertaken. The ability to capture the necessary high-resolution drone imagery was limited by poor weather at the time of survey.

9. While the refined habitat assessment for the Bearasaigh Islands has yet to be undertaken (due to bad weather), however, based on Pabaigh islands alone the results demonstrate that, even at the low density of 2.5 pairs/m^2, there is sufficient suitable habitat on both islands combined to support 13,550 guillemot pairs and 2,710 razorbill pairs at a density of 0.5 pairs/m^2. Each of the two islands individually contain sufficient habitat to support enough breeding pairs to meet the success criteria for both guillemot and razorbill. With regards to scaling, the two islands combined provide enough suitable habitat (at the above nesting densities) to compensate for the 95% UCI impact value at a ratio of 3.4:1 for guillemot and 1.6:1 for razorbill.

10. As stated above the available habitat on the Pabaigh Islands represents only a proportion of the habitat that would be made available through the Outer Hebrides scheme, which also includes the Bearasaigh Islands. For these islands the indicative assessment provided in the **Guillemot and Razorbill Compensation Site Secondary Shortlist Refinement Report** [document reference 20.5] suggests they are likely to contain a similar amount of suitable habitat as the Pabaigh Islands, with the unrefined habitat estimate of 6,560m^2 which could potentially support 16,400 guillemot pairs at 2.5 pairs/m^2 and 3,280 razorbill pairs at 0.5 pairs/m^2.

Table A-1 Results of refined habitat assessment for the Pabaigh Islands

Island	Area of potentially suitable habitat (m^2)	Estimated areas of suitable habitat (m^2)*	Estimated number of pairs			
			Guillemot			Razorbill
			2.5 pairs/m^2	5.5 pairs/m^2	10 pairs/m^2	0.5 pairs/m^2
Pabaigh Beag	6,961	3,153	7,883	17,343	31,530	1,577
Pabaigh Mor	5,321	2,267	5,667	12,467	22,670	1,133
Total	12,282	5,420	13,550	29,810	54,200	2,710

* Adjusted for aspect and terrain

11. It is acknowledged that the estimated numbers are significant in the context of the Western Isles populations of guillemot (72,913 individuals) and razorbill (30,708 individuals) from the most recent seabird census (JNCC, 2024). However, previous populations were much higher (120,714 guillemot and 37,434 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 and the low populations are likely to be reflective of that. With the removal of mammalian predators from these islands, and other included in the Outer Hebrides scheme, there is reason to believe that the necessary compensation can be achieved.

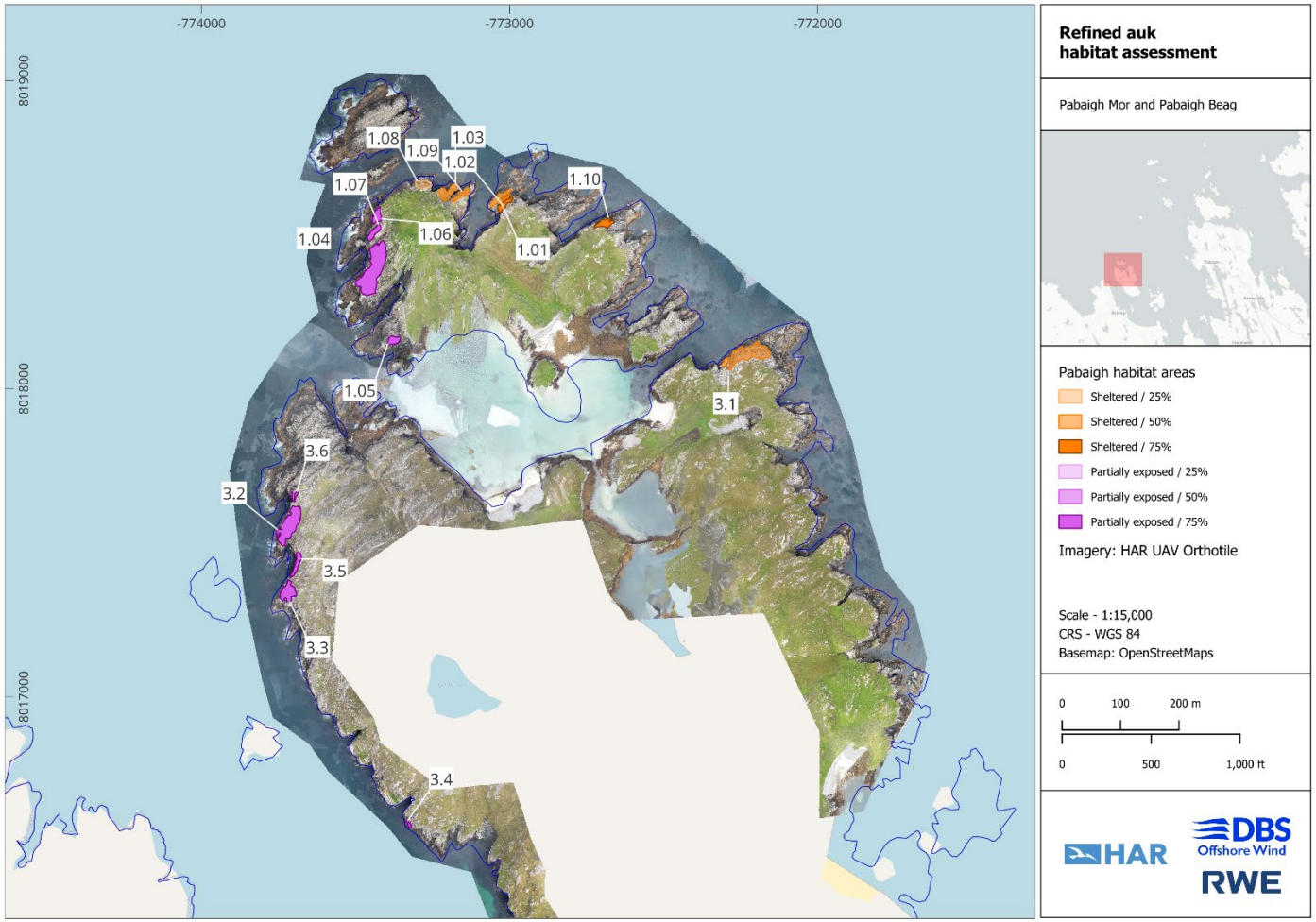

Figure A-1 Map of suitable habitats identified by the refined assessment of Pabaigh Beag (north) and Pabaigh Mor (south). Positron basemap attribution: © OpenStreetMap contributors, © CARTO.

Out Skerries

12. The results of the refined habitat assessment for Bruray, Grunay and Bound Skerry are presented in **Table A-2** and **Figure A-2**. The results of the habitat refinement for North Benelips have not been included in Table A-2 as the presence of puffins suggests that rats may not be present. The habitat refinement for Housay, Filla and Guens have not yet been undertaken due to poor weather at the time of survey. The habitat on Bruray, Bound Skerry and North Benelip comprises granite cliffs, sea caves and exposed platforms, while Grunay has additional sea caves. All of the habitat identified as suitable on these islands was assessed as accessible to rats. Areas of inaccessible habitat were not included in the assessment.

13. The results demonstrate that, even at the low density of 2.5 pairs/m², there is sufficient suitable habitat on the islands combined to support 13,434 guillemot pairs and 2,687 razorbill pairs at a density of 0.5 pairs/m². Each of Grunay and Bound Skerry individually contain sufficient habitat to support enough breeding pairs to meet the success criteria for both guillemot and razorbill. With regards to scaling, the three islands combined provide enough suitable habitat (at the above nesting densities) to compensate for the 95% UCI impact value at a ratio of 3.4:1 for guillemot and 1.6:1 for razorbill.

14. The available habitat on the islands in **Table A-2** represents only a proportion of the habitat that would be made available through the Out Skerries scheme, which also includes the Housay, Filla and Guens. However, the refined habitat assessment for these three islands has yet to be undertaken.

Table A-2 Result of habitat refinement for Out Skerries

Island	Area of potentially suitable habitat (m²)	Estimated areas of suitable habitat (m²)*	Estimated number of pairs			
			Guillemot			Razorbill
			2.5 pairs/m²	5.5 pairs/m²	10 pairs/m²	0.5 pairs/m²
Bruray	1,293	571	1,428	3,142	5,713	286
Grunay	2,016	1,512	3,780	8,316	15,120	756
Bound Skerry	4,617	3,290	8,226	18,096	32,903	1,645
Total	9,838	6,445	13,434	29,554	53,735	2,687

15. The estimated numbers are significant in the context of the Shetland populations of guillemot (78,477 individuals) and razorbill (4,180 individuals) from the most recent seabird census (JNCC, 2024). 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. With the removal of mammalian predators from these islands, and the recent ban on sandeel fishing which should help to boost prey resources for guillemot and razorbill, there is reason to believe that the necessary compensation can be achieved.

Summary

16. Based on the refined habitat assessment presented in the sections above, either of the Outer Hebrides or Out Skerries schemes could provide the compensation required by the Projects.

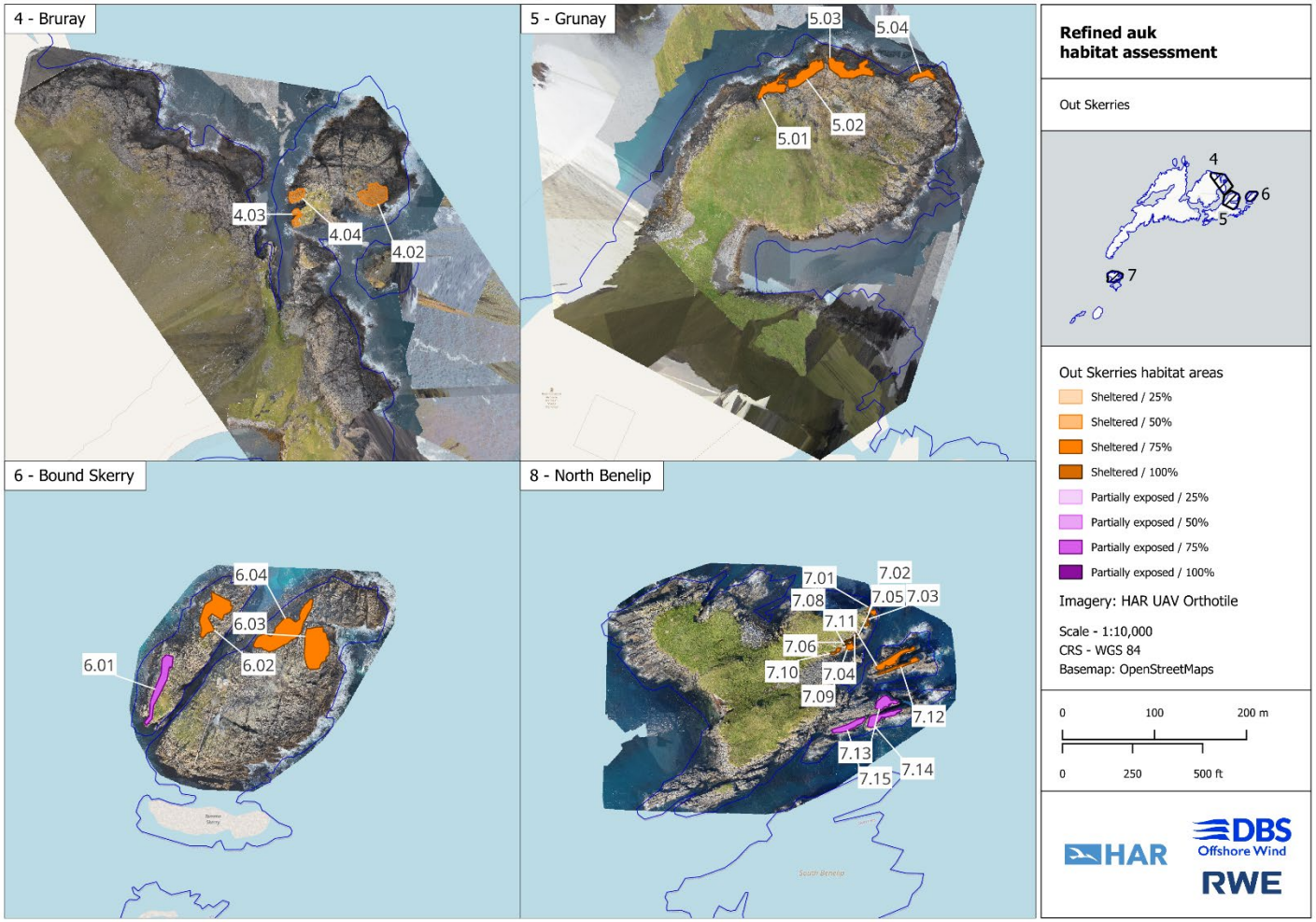

Figure A-2 Guillemot and razorbill habitat identified on Out Skerries. Positron basemap attribution: © OpenStreetMap contributors, © CARTO.

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