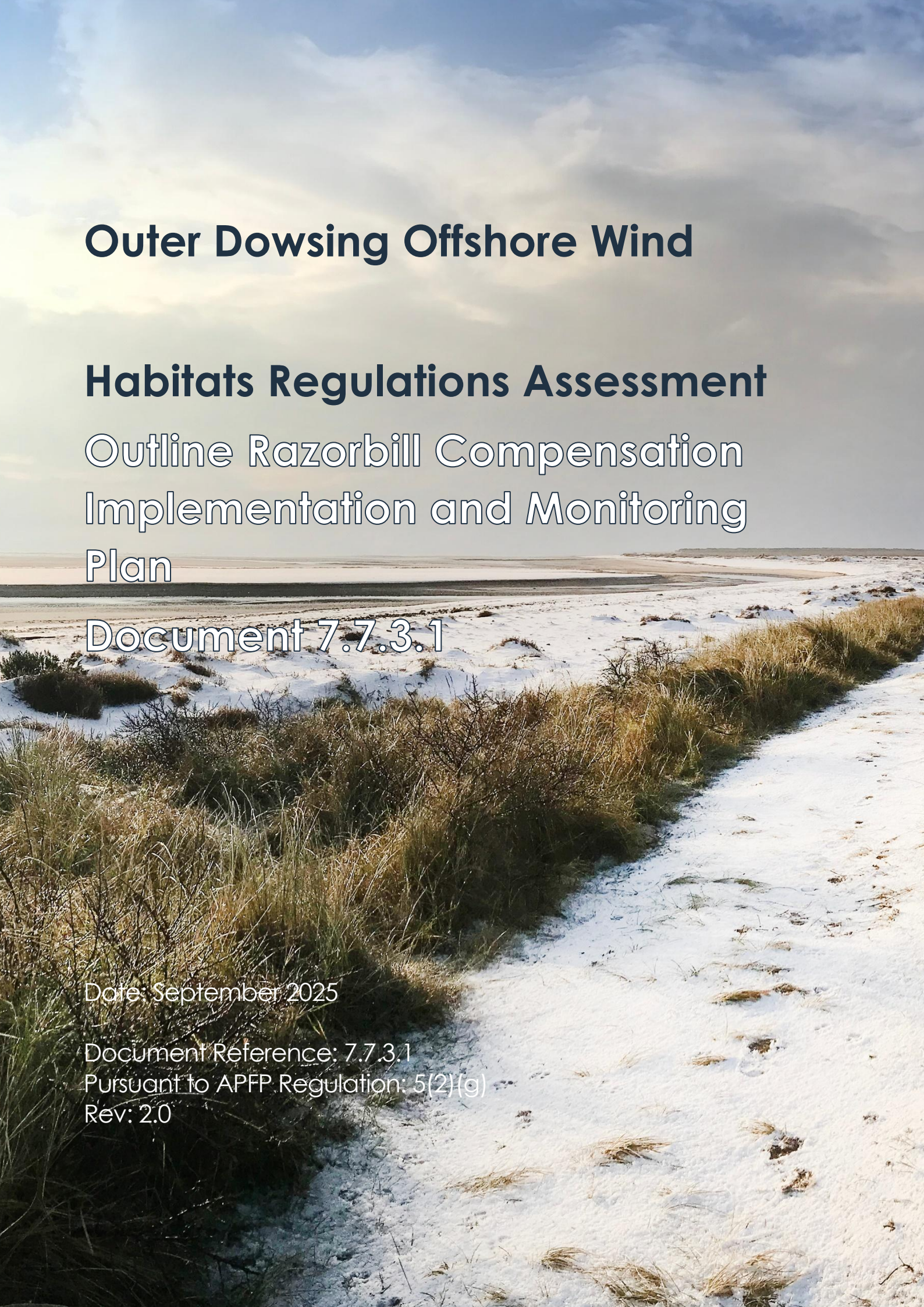


The background image is a photograph of a coastal landscape. In the foreground, there is a sandy path or dune area with patches of dry, yellowish-brown grass and some small, dark shrubs. The path leads towards the right side of the frame. In the middle ground, there is a flat, sandy area that appears to be a beach or a tidal flat, with some water visible in the distance. The sky is filled with large, white, fluffy clouds, and the overall lighting suggests a bright, sunny day.

Outer Dowsing Offshore Wind

Habitats Regulations Assessment

Outline Razorbill Compensation Implementation and Monitoring Plan

Document 7.7.3.1

Date: September 2025

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Acronyms & Definitions

Abbreviations / Acronyms

Abbreviation / Acronym	Description
AEoI	Adverse effect on integrity
ANS	Artificial Nesting Structure
Defra	Department for Environment, Food and Rural Affairs
ECC	Export Cable Corridor
ES	Environmental Statement
FFC	Flamborough and Filey Coast
MRF	Marine Recovery Fund
ORCP	Offshore Reactive Compensation Platform
RCP	Razorbill Compensation Plan
RCSG	Razorbill Compensation Steering Group
RIAA	Report to Inform Appropriate Assessment
RCIMP	Razorbill Compensation Implementation and Monitoring Plan
SoS	Secretary of State
SPA	Special Protection Area

Terminology

Term	Definition
The Applicant	GT R4 Ltd. The Applicant making the application for a DCO. The Applicant is GT R4 Limited (a joint venture between Corio Generation (and its affiliates), TotalEnergies and Gulf Energy Development (GULF)), trading as Outer Dowsing Offshore Wind. The project is being developed by Corio Generation, TotalEnergies and GULF.
Array area	The area offshore within which the generating station (including wind turbine generators (WTG) and inter array cables), offshore accommodation platforms, offshore transformer substations and associated cabling will be positioned.
Baseline	The status of the environment at the time of assessment without the development in place.
Compensatory Measures	Stage 3 of the Habitats Regulations Assessments (see Derogation) involves the development of compensation measures for any features which the report to inform appropriate assessment was unable to conclude no adverse effect on integrity on.
deemed Marine Licence (dML)	A marine licence set out in a Schedule to the Development Consent Order and deemed to have been granted under Part 4 (marine licensing) of the Marine and Coastal Access Act 2009.
Derogation	Stage 3 of the Habitats Regulations Assessments which is triggered once it is determined that you cannot avoid adversely affecting the integrity of a designated site. Involves assessing if alternative solutions are available to achieve the same goals as the project, if there are imperative reasons of overriding public interest, and if compensatory measures will be required.

Term	Definition
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP) from the Secretary of State (SoS) for Department for Energy Security and Net Zero (DESNZ).
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of an impact with the sensitivity of a receptor, in accordance with defined significance criteria.
Evidence Plan	A voluntary process of stakeholder consultation with appropriate Expert Topic Groups (ETGs) that discusses and, where possible, agrees the detailed approach to the Environmental Impact Assessment (EIA) and information to support Habitats Regulations Assessment (HRA) for those relevant topics included in the process, undertaken during the pre-application period.
Habitats Regulations Assessment (HRA)	A process which helps determine likely significant effects and (where appropriate) assesses adverse impacts on the integrity of European conservation sites and Ramsar sites. The process consists of up to four stages of assessment: screening, appropriate assessment, assessment of alternative solutions and assessment of imperative reasons of over-riding public interest (IROPI) and compensatory measures.
Mitigation	Mitigation measures, or commitments, are commitments made by the Project to reduce and/or eliminate the potential for significant effects to arise as a result of the Project. Mitigation measures can be embedded (part of the project design) or secondarily added to reduce impacts in the case of potentially significant effects.
Offshore Reactive Compensation Station (ORCP)	A structure attached to the seabed by means of a foundation, with one or more decks (including bird deterrents) housing electrical reactors and switchgear for the purpose of the efficient transfer of power in the course of HVAC transmission by providing reactive compensation
Offshore Substation (OSS)	A structure attached to the seabed by means of a foundation, with one or more decks and a helicopter platform (including bird deterrents), containing— (a) electrical equipment required to switch, transform, convert electricity generated at the wind turbine generators to a higher voltage and provide reactive power compensation; and (b) housing accommodation, storage, workshop auxiliary equipment, radar and facilities for operating, maintaining and controlling the substation or wind turbine generators
Outer Dowsing Offshore Wind (ODOW)	The Project.
Order Limits	The area subject to the application for development consent, the limits shown on the works plans within which the Project may be carried out.
Preliminary Environmental Information Report (PEIR)	The PEIR was written in the style of a draft Environmental Statement (ES) and provided information to support and inform the statutory consultation process during the pre-application phase.
The Project	Outer Dowsing Offshore Wind including proposed onshore and offshore infrastructure.

Term	Definition
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects (NSIPs).
Wind turbine generator (WTG)	A structure comprising a tower, rotor with three blades connected at the hub, nacelle and ancillary electrical and other equipment which may include J-tube(s), transition piece, access and rest platforms, access ladders, boat access systems, corrosion protection systems, fenders and maintenance equipment, helicopter landing facilities and other associated equipment, fixed to a foundation

1 Introduction

1.1 Project Background

1. GT R4 Limited (trading as Outer Dowsing Offshore Wind) hereafter referred to as the 'Applicant', is proposing to develop Outer Dowsing Offshore Wind ('the Project'). The Project will be located approximately 54km from the Lincolnshire coastline in the southern North Sea. The Project will include both offshore and onshore infrastructure including an offshore generating station (windfarm), export cables to landfall, Offshore Reactive Compensation Platforms (ORCPs), onshore cables, connection to the electricity transmission network, ancillary and associated development and areas for the delivery of up to two Artificial Nesting Structures (ANS) and the creation of a biogenic reef (if these compensation measures are deemed to be required by the Secretary of State (SoS) (see Volume 1, Chapter 3: Project Description (Document Reference 6.1.3) for full details).
2. The Report to Inform Appropriate Assessment (RIAA) undertaken for the Project concluded that an Adverse Effect on Integrity (AEoI) could be ruled out alone and in-combination for the razorbill feature at Flamborough and Filey Coast (FFC) Special Protection Area (SPA) (including as part of the seabird assemblage). However, cognisant of consultation with Natural England, the Applicant has developed potential compensation measures for the SPA in the event that the Project is required to provide compensation for impacts to the razorbill feature of the SPA (including as part of the seabird assemblage) by the SoS.

1.2 Document Overview and Purpose

3. This document sets out the outline for the Razorbill Compensation Implementation and Monitoring Plan (RCIMP) that will be developed by the Applicant, in consultation with the proposed Razorbill Compensation Steering Group (RCSG), should consent for the Project be granted and compensation for guillemot be required. The final RCIMP will be developed in accordance with the Razorbill Compensation Plan (RCP) (document 7.7.3) which provides the detailed delivery strategy supporting the potential compensation measures for razorbill.
4. The RCIMP will include details, where relevant for each measure to be taken forward, of the:
 - Scale and location;
 - Design;
 - Delivery process;
 - Delivery timeframe;
 - Monitoring and adaptive management; and
 - Reporting.

2 Background

5. This section will provide context to the RCIMP, confirming the reason for its need, its aims and objectives, and the latest project status.

3 Consultation

6. This section will summarise all relevant consultation that has taken place through the RCSG in the development of the RCIMP. It will capture any key decisions, agreements, and where relevant any outstanding issues under discussion (with clarity as to the steps necessary to resolve any such matters). Ongoing engagement, for example to provide updates on monitoring, (post-discharge of the RCIMP) will be outlined here.

4 Predator Control

4.1 Scale and Location of Compensation

7. This section will identify the scale of compensation proposed to be provided and how this relates to the consent decision made by the SoS. This section will also detail the specific location(s) at which the compensation will be delivered, the suitability of the sites to deliver the compensation measures, and how the necessary rights in those locations have been secured. The evidence base included in support of the measures set out in Predator Control Evidence Base and Roadmap (document reference 7.7.5) will help inform these aspects.

4.2 Design

8. This section will identify the design of the selected measure, including the high-level structural design and the ecological design considerations, including initial eradication measures and ongoing control measures to ensure the maximum chance of success of the compensation measure. The evidence base included in support of the measures set out in Predator Control Evidence Base and Roadmap (document reference 7.7.5) will help inform these aspects.

4.3 Delivery Process

9. This section will identify the delivery process, including nature and status of all consents, commercial agreements and other relevant approvals that may be necessary for the compensation measure and a programme for any outstanding consents. The Razorbill Compensation Plan (RCP) (document reference 7.7.3) will help inform these aspects.

4.4 Delivery Timeframe

10. This section will identify the proposed timeframe for implementation and long-term delivery of the compensation measure.

4.5 Monitoring and Adaptive Management

11. This section will identify the monitoring and adaptive management principles and processes that have been agreed with the RCSG, including the scenarios under which adaptive management measures are required. It will be developed taking into account the evidence base that has been provided in support of the RCP (Predator Control Evidence Base and Roadmap (document reference 7.7.5)). Following discharge of the RCIMP, the RCSG will be engaged in relation to implementing adaptive management if required as outlined in the Consultation section above.

4.6 Reporting

12. This section will set out the reporting requirements associated with the monitoring and adaptive management. In doing so, it will confirm the necessary objectives and timescales for the reporting.

4.7 Data sharing

13. All data collected during monitoring programmes associated with the delivery of measures (including pre-implementation) will be regularly submitted to the Marine Data Exchange and relevant Local Environmental Records Centre.

5 Disturbance Reduction and Habitat Improvement

5.1 Scale and Location of Compensation

14. This section will identify the scale of compensation proposed to be provided, and how this relates to the consent decision made by the Secretary of State. This section will then also detail the specific location(s) at which the compensation will be delivered and the suitability of identified sites to deliver the compensation measure.

5.2 Design

15. This section will identify the design for the disturbance reduction and habitat improvement measure on a site-by-site basis (dependent on the scale of compensation and therefore sites required). The evidence base provided in support of the RCP (Additional Measures for Guillemot and Razorbill (document reference 7.7.6)) and engagement with the RCSG will be important in informing the specific design aspects of this measure.

5.3 Delivery Process

16. This section will identify the delivery process, including nature and status of all consents, commercial agreements and other relevant approvals that may be necessary for the compensation measure and a programme for any outstanding consents. The RCP (document reference 7.7.3) will help inform these aspects.

5.4 Delivery Timeframe

17. This section will identify the proposed timeframe for implementation and long-term delivery of the compensation measure.

5.5 Monitoring and Adaptive Management

18. This section will identify the monitoring and adaptive management principles and processes that have been agreed with the RCSG, including the scenarios under which adaptive management measures are required. It will be developed taking into account the evidence base that has been provided in support of the RCP (Additional Measures for Guillemot and Razorbill (document reference 7.7.6)). Following discharge of the RCIMP, the RCSG will be engaged in relation to implementing adaptive management if required as outlined in the Consultation section above.

5.6 Reporting

19. This section will set out the reporting requirements associated with the monitoring and adaptive management. In doing so, it will confirm the necessary objectives and timescales for the reporting.

5.7 Data sharing

20. The Applicant will additionally regularly submit all relevant pre-implementation and operational survey and monitoring data to the Marine Data Exchange (The Crown Estate) and relevant Local Environmental Records Centres.

6 Artificial Nesting Structures

6.1 Scale and Location of Compensation

21. This section will identify the scale of compensation proposed to be provided, and how this relates to the consent decision made by the Secretary of State. This section will then also detail the specific location(s) at which the compensation will be delivered and the suitability of identified sites to deliver the compensation measure.
22. If the Applicant has elected to pay a contribution to the Marine Recovery Fund (“MRF”) or equivalent fund then this section shall include the sum of the contribution as agreed between the Applicant and Defra in consultation with the RCSG.
23. If the Applicant has elected to pay a contribution to an alternative strategic system for the delivery of this measure, then this section shall include the sum of the contribution as agreed between the Applicant and the relevant stakeholder in consultation with the RCSG.

6.2 Design of Artificial Nesting Structure

24. This section will identify the design for each structure provided within the compensation package, including the high-level structural design and the razorbill ecological design considerations which have been integrated to ensure the compensation measure has the maximum potential for success. The evidence base provided in support of the RCP (Artificial Nesting Structures Evidence Base and Roadmap (document reference 7.7.4)) and engagement with the RCSG will be important in informing the specific design aspects of the structure.

6.3 Delivery Process

25. This section will identify the delivery process, including nature and status of all consents, commercial agreements and other relevant approvals that may be necessary for the compensation measure and a programme for any outstanding consents. The RCP (document reference 7.7.3) will help inform these aspects.

6.4 Delivery Timeframe

26. This section will identify the proposed timeframe for implementation and long-term delivery of the compensation measure.

6.5 Monitoring and Adaptive Management

27. This section will identify the monitoring and adaptive management principles and processes that have been agreed with the RCSG, including the scenarios under which adaptive management measures are required. It will be developed taking into account the evidence base that has been provided in support of the RCP (Artificial Nesting Structures Evidence Base and Roadmap (document reference 7.7.4)). Following discharge of the RCIMP, the RCSG will be engaged in relation to implementing adaptive management if required as outlined in the Consultation section above.

6.6 Reporting

28. This section will set out the reporting requirements associated with the monitoring and adaptive management. In doing so, it will confirm the necessary objectives and timescales for the reporting.

6.7 Data sharing

29. All data collected during monitoring programmes associated with the delivery of measures (including pre-implementation) will be regularly submitted to the Marine Data Exchange and relevant Local Environmental Records Centre.