

Outer Dowsing Offshore Wind

The Applicant's Response to the Second Request for Information

Response to the Second Request for Information and All Parties Consultation

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Acronyms & Definitions

Abbreviations / Acronyms

Abbreviation / Acronym	Description
AEoI	Adverse Effects on Integrity
ANS	Artificial Nesting Structure
COWSC	Collaboration on Offshore Wind Strategic Compensation
CWT	Cornwall Wildlife Trust
DCO	Development Consent Order
Defra	Department for Environment, Food & Rural Affairs
dML	deemed Marine Licence
EA	Environment Agency
ExA	Examining Authority
FFC	Flamborough and Filey Coast
HPAI	Highly Pathogenic Avian Influenza
IDRBNR	Inner Dowsing, Race Bank and North Ridge
JNCC	Joint Nature Conservation Committee
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
MPA	Marine Protected Area
NE	Natural England
NSIP	Nationally Significant Infrastructure Project
NSN	UK National Site Network
NTJ	National Trust Jersey
ODOW	Outer Dowsing Offshore Wind
ORCP	Offshore Reactive Compensation Platforms
OWIC	Offshore Wind Industry Council
RFI	Request for Information
RIAA	Report to Inform Appropriate Assessment
SAC	Special Area of Conservation
SCG	Strategic Compensation Group
SNCB	Statutory Nature Conservation Body
SoS	Secretary of State
SPA	Special Protection Area
TCCT	Torbay Coast and Countryside Trust
UXO	Unexploded Ordinance
WCS	Worst Case Scenario

Reference Documentation

Outer Dowsing Document Number	Planning Inspectorate Document Reference	Title
28.5	n/a	The Applicant's Response to RfI 2 - Wake Effects
2.0	REP6-003	Schedule of Changes for Plans
2.5	REP6-004 REP6-005	Land Plans
3.1	C1-016	Draft Development Consent Order
4.1	REP6-013	Book of Reference
4.1.1.	REP6-015	Schedule of Changes to the Book of Reference
5.1	AS1-034	Consultation Report
6.1.3	REP5-009	Chapter 3 Project Description
6.1.11	C1-019	Chapter 11 Marine Mammals
6.3.11.2	REP5-070	Chapter 11 Appendix 2 Underwater Noise Assessment
6.1.12	C1-022	Chapter 12 Offshore and Intertidal Ornithology
6.3.12.7	REP4a-048	Appendix 12.7 Levels of precaution in the assessment and compensation calculations for offshore ornithology
7.5.1	APP-258	Plémont Sea Bird Reserve Feasibility Study Report
7.6.1.1	APP-245	Outline Sandbank Compensation Implementation and Monitoring
7.6.2.1	APP-247	Biogenic Reef Compensation Implementation and Monitoring Plan
7.7.1.1	APP-251	Outline Kittiwake Compensation Implementation and Monitoring Plan
7.7.2	n/a	Without Prejudice Guillemot Compensation Strategy
7.7.2.1	APP-253	Outline Guillemot Compensation Implementation and Monitoring Plan
7.7.3	n/a	Without Prejudice Razorbill Compensation Plan
7.7.3.1	APP-254	Outline Razorbill Compensation Implementation and Monitoring Plan
7.7.4	n/a	Offshore Artificial Nesting Structures Evidence Base and Roadmap
7.7.5	REP6-050	Without Prejudice Predator Control Evidence Base and Roadmap
7.7.6	n/a	Without Prejudice Additional Measures for Compensation of Guillemot and Razorbill
7.9	APP-264	Compensation Funding Statement
8.1	REP6-056	Outline Code of Construction Practice
8.3	C1-076	Offshore In-Principle Monitoring Plan
8.5	n/a	Cable Specification and Installation Plan
8.6.1	C1-075	Outline Marine Mammal Mitigation Protocol for Piling
8.6.2	C1-070	Outline Marine Mammal Mitigation Protocol for UXO

Outer Dowsing Document Number	Planning Inspectorate Document Reference	Title
8.7	C1-058	In Principle Southern North Sea Special Area of Conservation Site Integrity Plan
8.13	n/a	Schedule of Mitigation
8.21	REP6-076	Scour Protection and Cable Protection Management Plan
8.22	n/a	Outline Biogenic Reef Mitigation Plan
15.4	REP6-081	Compulsory Acquisition and Land Rights Tracker (clean)
15.4	REP6-082	Compulsory Acquisition and Land Rights Tracker (tracked)
14.3	AS-014	Biodiversity Net Gain Assessment Report
14.3.1 – 14.3.7	AS-011, AS-015 – AS-020	Biodiversity Net Gain Assessment Report Figures
19.11	REP4-104	Lead-in periods for kittiwake breeding on Artificial Nesting Structures
20.17	n/a	Guillemot and Razorbill Compensation Quanta
21.8	REP6-104	The Applicant's Comments on Natural England's Risk and Issues Log
21.16	C1-055	ORCP Design Principles Statement
24.2	REP6-110	The Applicant's Comments on Deadline 5 Submissions
27.2	C1-049	The Applicants Response to the Request for Information dated 12th August 2025
27.3	C1-047	Plémont Seabird Sanctuary Biodiversity Research 2017-2024
27.4	C1-048	Document Amendments Change Log
27.5	C1-043	2025 South West England Auk Monitoring
27.6	C1-050	Noise Abatement Systems Commitment Clarification Note
27.7	C1-046	ORCP Physical Processes Clarification Note
27.8	C1-045	Nearshore Cable Protection Clarification Note
n/a	PD-028	Rule 17 Letter - Request for further information – 21 March 2025
n/a	REP2-074	Natural England Responses to ExQ1
n/a	REP5-166	Comments on any other submissions received at Deadline 4a - Appendix F5 Advice on Offshore and Intertidal Ornithology
n/a	REP6-115	Applicant's Response to Rule 17 Request 17 March 2025
n/a	REP6-136	Environment Agency's Response to Rule 17 Request
n/a	REP6-148	Comments on any other submissions received at Deadline 5 - Appendix E4 Natural England's advice on Marine Mammals
n/a	REP6-149	Comments on any other submissions received at Deadline 5 - Appendix F6 Natural England's advice and end of Examination position on Offshore Ornithology
n/a	REP6-151	Comments on any other submissions received at Deadline 5 - G5 - Natural England's End of Examination Position on Offshore Ornithology Compensation Deadline 6 - late submission accepted at the discretion of the Examining Authority

Outer Dowsing Document Number	Planning Inspectorate Document Reference	Title
n/a	REP6-153	Comments on any other submissions received at Deadline 5 - Appendix J6 - Natural England's NE Risk and Issues Log Deadline 6
n/a	REP6-154	Natural England's Risk and Issue Log
n/a	REP6-155	Natural England's Response to Rule 17 Request
n/a	C1-007	Natural England's Response to the Request for Information
n/a	C3-002	Natural England's Responses to Secretary of State consultation 3 Part A

1 Applicant's Responses to the Second Request for Information

1. The Secretary of State for Energy Security and Net Zero issued a second Request for Information ("**RFI**") to GT R4 Limited (trading as Outer Dowsing Offshore Wind) (the Applicant) and other Interested Parties on the 10 October 2025.
2. In section 1.1 below the Applicant has provided its written response, or signposting to its written response, against each request asked of it in the Second RFI. In the interim, the Applicant has also continued to engage with relevant Interested Parties to resolve any outstanding issues where possible.

1.1 Applicant’s Responses to the Second Request for Information

3. The Applicant has provided a response to each relevant paragraph within the Second Request for Information, in Table 1.1 and Table 1.2 below.

Table 1-1 The Applicant’s Responses to the Second Request for Information dated 10 October 2025, Part A

Paragraph Number	Addressed to	Request	Applicant Response
4	Natural England	<p>The Secretary of State notes that in response to question 7 of the first information request, Natural England advise that "<i>these mitigation measures are used throughout the IDRBNR SAC we further highlight use of this mitigation would also address many of our concerns raised in relation to NERC, 2006 Priority Habitats 2 outside of designated sites</i>". Natural England is invited to clarify its position and explain whether it is advising that 1) the existing proposed mitigation measures address their concerns in relation to NERC Priority Habitats outside of designated sites; or 2) additional commitments to mitigation measures outside of designated sites should be made to resolve their concerns in relation to Priority Habitats.</p>	<p>The Applicant wishes to highlight that while <i>Sabellaria spinulosa</i> reef is recognised as a habitat of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, this designation does not afford the same level of statutory protection as Annex I habitats designated within Special Areas of Conservation (SACs) under the Conservation of Habitats and Species Regulations 2017.</p> <p>The NERC listing places a general biodiversity duty on public authorities to have regard to the conservation of such habitats in decision-making; however, it does not establish site-specific legal protection or require the application of the Habitats Regulations Assessment (HRA) process. Consequently, while <i>S. spinulosa</i> reef outside of designated SACs has been appropriately considered within the Application, in line with national policy obligations, it is not subject to the same statutory requirements or mitigation standards that apply to Annex I habitats within designated SACs.</p> <p>On 23 October 2025, the Applicant met with Natural England to discuss mitigation measures for NERC (2006) Priority Habitats located outside designated sites. Following this discussion, on the 24 October 2025 Natural England submitted their response to part A of the SoS Request for Information dated 10th October (C3-002) and provided clarification on the commitments that Natural England request for within the Inner Dowsing, Race Bank and North Ridge (IDRBNR) SAC and outside of the SAC.</p> <p>The Applicant has committed to all mitigation measures requested by Natural England and has updated the commitments within the following documents to make clear that each of Natural England’s requested mitigations have been committed to:</p> <ul style="list-style-type: none">▪ Outline Cable Specification and Installation Plan (document Reference 8.5, V9 submitted in response to RFI 2),▪ Outline Biogenic Reef Mitigation Plan (document Reference 8.22, V5 submitted in response to RFI 2)▪ Schedule of Mitigation (document reference 8.13, V9 submitted in response to RFI 2). <p>This issue is therefore resolved. Therefore, the Secretary of State has all the necessary information before him to be able to make a decision on this matter.</p>

Table 1-2 The Applicant's Responses to the Second Request for Information dated 10 October 2025, Part B

Paragraph Number	Addressed to	Request	Applicant Response
Benthic ecology, intertidal, subtidal and coastal effects			
5	n/a	The Secretary of State notes that the Applicant and Natural England agree on the extent of supporting habitat for Annex 1 Sabellaria spinulosa Reef ("supporting habitat") within the Export Cable Corridor that overlaps with the Inner Dowsing, Race Bank and North Ridge ("IDRBNR") Special Area of Conservation ("SAC"). He also notes continued disagreement on the likely extent of cable protection required by the Proposed Development and therefore the Worst Case Scenario ("WCS") impact to this supporting habitat from habitat loss due to the placement of that cable protection.	
5a	The Applicant	a) The Applicant is requested to provide further explanation of the approach used to determine their position of a 20% WCS for cable protection on this supporting habitat; including the method employed to calculate the expected cable protection requirement and the evidence used to reach this conclusion.	<p>The Applicant is confident in the engineering work which underpins the 20% value for cable protection. The Applicant has continued to engage with Natural England on these matters following the close of the examination and held a meeting with them on 11 June 2025 and on 23 October 2025, during which the Applicant demonstrated the engineering work underpinning the 20% value for cable protection.</p> <p>The approach for determining the 20% WCS for cable protection on <i>S. spinulosa</i> supporting habitat followed these sequential steps:</p> <ul style="list-style-type: none"> Ground model units were delineated along the entire proposed cable route within the IDRBNR SAC. Each unit was assigned a percentage likelihood of requiring remedial protection measures, based on geotechnical conditions. Cables were then routed along the optimal corridor, as determined at the time of assessment. Cable lengths were mapped at a metre-scale to the corresponding ground model units. For each unit, the assigned worst-case likelihood percentage was applied to the total length of cable within that unit. The resulting values were aggregated to produce the total estimated length of cable requiring intervention, which formed the basis of the submission for examination. <p>As additional information emerges during pre-construction surveys and when the technical specification of the offshore cables is finalised, the Applicant will continue to refine the cable installation methodology within the consented parameters and will leverage applied industry knowledge, lessons learned from existing projects, and operational experience from established wind farms to inform and optimise cable burial methodologies. This evidence-based approach will feed into the final Cable Specification and Installation Plan and will enhance the efficiency, resilience, and environmental integrity of offshore infrastructure delivery.</p> <p>Natural England has maintained that the proposed 20% threshold for cable protection would be insufficient across the <i>S. spinulosa</i> supporting habitat due to the difficulties experienced by neighbouring cable installations and advised that the Worst-Case Scenario (WCS) should reflect a higher percentage, which would in turn necessitate a larger compensation area. However, the Applicant has not received any specific information from Natural England regarding their position that the 20% WCS is unrealistic in their view—the Applicant notes that this has been requested by the Secretary of State.</p>

Paragraph Number	Addressed to	Request	Applicant Response
			<p>Natural England’s suggestion that cable protection may need to range between 20% and 100% is not supported by any evidence or historical examples. In fact, the assertion that up to 100% protection <i>could</i> be required appears speculative, given that no previous project has ever been required cable protection for 100% of the route. This lack of precedent underscores the Applicant’s position that the 20% figure is both reasonable and consistent with established practice.</p> <p>In the highly unlikely event that the actual requirement surpasses this figure, as noted by Natural England (pt2 of REP6-154), the Applicant would be required to submit a new Marine Licence Application for any further cable protection during the project lifetime. Any associated compensation required by an additional Marine License Application (between 0.095 km² and 0.3975 km² of <i>S. spinulosa</i> supporting habitat based on Natural England’s position of ‘between 20-100%’) would be accessed through the Marine Recovery Fund. As stated within the Ministerial Statement¹ <i>‘We are also aware that offshore wind projects might sometimes be required to compensate for essential maintenance activities carried out once the wind farm is operational and/or for unforeseen impacts. For this reason, we will aim to deliver additional environmental compensation so that projects eligible to request MPA designation to support project consent (those listed above in paragraph 7) as well as operational projects delivered in Leasing Round 2, can access this measure if available and deemed suitable.’</i></p> <p>Notwithstanding the outstanding request for evidence made of Natural England, the Applicant asserts that the site-specific evidence before the Secretary of State provided by the Applicant is sufficiently robust and the Secretary of State can have confidence that the 20% WCS figure is suitably conservative. Therefore the Secretary of State has all the necessary information before him to be able to make a decision on this matter.</p>
5b	Natural England	<p>b) Noting that in [REP6-147] and in response to the first information request Natural England raised its concern that <i>“given the inherent difficulty found by neighbouring cable installations with installing cables to a sufficient depth within the prevailing sediment type for this predominantly mixed sediment habitat, a 20% WCS is not realistic.”</i> And that it considers <i>“that the WCS of cable protection required across the supporting habitat for Annex I Sabellaria spinulosa reef, should be higher, somewhere between 20% (95,407m2 and 100% (477,036m2)”</i>. Natural England is requested to provide evidence to support this position that should include, but not necessarily be limited to, further detail of the neighbouring cable burial projects such as:</p> <ul style="list-style-type: none"> the expected WCS and realised cable protection requirements for those projects; 	<p>The Applicant held a meeting with Natural England on 11 June 2025 where they raised <i>“the inherent difficulty found by neighbouring cable installations”</i>. Following the meeting, the Applicant emailed Natural England to request further details to allow an analysis of the projects in question. Natural England responded that it was not possible to share any details.</p> <p>The Applicant has not been presented with any evidence which supports Natural England’s position that the 20% worst-case scenario presented by the Applicant in the EIA, is not realistic. The Applicant maintains, as described in response to 5a above, that the 20% worst case scenario derived from its own assessment is suitable for the requirements of the Project.</p> <p>Therefore, the Secretary of State has all the necessary information before him to be able to make a decision on this matter.</p>

¹ [Written statements - Written questions, answers and statements - UK Parliament](#)

Paragraph Number	Addressed to	Request	Applicant Response
		<ul style="list-style-type: none"> why sufficient burial was not achieved; and how this information is applicable to the Proposed Development. 	
6	The Applicant	<p>The Secretary of State notes the Applicant's commitment to the use of a precise disposal method for sediment return within the offshore Export Cable Corridor and within the IDRBNR SAC as presented in their Response to the Request for Information (Document Reference: 27.2). The Applicant is requested to update the wording in the Cable Specification and Installation Plan, the Outline Biogenic Reef Mitigation Plan and the Schedule of Mitigation, to specify this return will be "<i>upstream</i>" of the original dredge location, to align with the advice they present from Natural England.</p>	<p>As set out in Outline Cable Specification and Installation Plan (Document Reference 8.5, V9 submitted in response to RFI 2), secured by DCO Schedule 11, Part 2 - Condition 13 (1)(d)(ii), and reflected in the Schedule of Mitigation (Row 46, Document Reference 8.13, V9 submitted in response to RFI 2.), the Applicant has already committed to (our emphasis added):</p> <p><i>"In the event that disposal of dredged sediment (associated with seabed preparation works or cable installation) is required, material will be deposited, upstream, within an area of similar sediment characteristics, in close proximity to the dredge location, in order to retain sediment within the sediment transport system"</i></p> <p>This commitment applies to dredged sediment associated with seabed preparation works or cable installation inside and outside of the IDRBNR SAC. This commitment has been acknowledged by Natural England in Tab C, row 14 of the risk and issues log (REP6-153), which is marked as 'issue resolved'.</p> <p>As requested by the Secretary of State this commitment has now been added into the Outline Biogenic Reef Mitigation Plan (Document Reference 8.22 ,V5 submitted in response to RFI 2).</p> <p>Natural England provided the following commitment wording in their 24 October 2025 submission to part A of RFI 2 (C3-002):</p> <p><i>"If any dredging of sediment for sandwave clearance is required within the IDRBNR SAC, the material removed from the IDRBNR SAC will be placed within the offshore ECC, within the IDRBNR SAC via a sediment return methodology suitable to ensure that material is returned within the same sediment cell, upstream of the original dredge location, using a precise disposal method via discharge pipe(s), downpipe(s) or equivalent.</i></p> <p>Natural England's suggested commitment wording has been added to the Outline Cable Specification and Installation Plan (document Reference 8.5, V9 submitted in response to RFI 2), the Outline Biogenic Reef Mitigation Plan (document Reference 8.22, V5 submitted in response to RFI 2) and the Schedule of Mitigation (document reference 8.13, V9 submitted in response to RFI 2).</p>
7	The Applicant	<p>The Secretary of State also notes the Applicant's commitment that <i>"As part of the routeing design, a working separation distance (50 m buffer) will be maintained from Sabellaria spinulosa reef features to limit the potential for impacts to arise from sediment deposition"</i> in its response the first information request (document 27.2)</p> <p>The Applicant is requested to update the wording in the Cable Specification and Installation Plan, the Outline Biogenic Reef Mitigation Plan and the Schedule of Mitigation by removing the wording "<i>where possible</i>", to ensure these documents reflect that commitment.</p>	<p>The Applicant has removed 'where possible' from the Outline Cable Specification and Installation Plan (Document Reference 8.5, V9 submitted in response to RFI 2), the Outline Biogenic Reef Mitigation Plan (Document Reference 8.22, V5 submitted in response to RFI 2), and the Schedule of Mitigation (Document Reference 8.13, V9 submitted in response to RFI 2).</p>
8	Natural England	<p>The Secretary of State notes the updates made to Section 3.1 (Physical Processes) of the Applicant's proposed Offshore In-Principle Monitoring Plan</p>	

Paragraph Number	Addressed to	Request	Applicant Response
		<p>(Document 8.03). Natural England is invited to comment on these updates and confirm the following:</p> <p>a) Whether those updates, alongside the updates made to the maximum design scenario for nearshore cable protection in the Applicant's Outline Scour Protection and Cable Protection Management Plan (Document 8.21) and the Outline Cable Specification and Installation Plan (Document 8.5), provide sufficient commitment to rule out an Adverse Effect on the Integrity of the Wash and North Norfolk Coast SAC due to changes in physical process; as indicated in Annex 1 of Natural England's response to the first information request (Ref: 523323).</p> <p>b) Whether those updates, alongside the addition of the Offshore Reactive Compensation Platform ("ORCP") Restriction Area, as proposed in the Applicant's ORCP Physical Process Assessment Clarification Notes (Document Reference: 27.8), provide sufficient commitment to rule out an Adverse Effect on the Integrity of the IDRBNR SAC due to changes in physical process; as indicated in Point 9 and Annex 1 of Natural England's response to the first information request (Ref: 523323).</p>	
Offshore infrastructure – Wake effects			
9	The Applicant Ørsted IPs Equinor IPs	The Secretary of State notes that following the first information request, the Ørsted and Equinor IPs provided their preferred protective provisions as part of their response. The Ørsted and Equinor IPs and the Applicant are therefore invited to provide an update on whether any further engagement has been had on this matter and if any agreement has been reached on the most recent protective provisions.	The Applicant has provided its comments on the matter of wake effects in The Applicant's Response to the Second Request for Information on Wake Effects (document 28.5).
Offshore and Intertidal Ornithology			
10	Defra	The Applicant's response to question 19 of the first information request states that <i>"predator control in the Plémont area has been listed as likely to succeed in the draft Collaboration in Offshore wind Strategic Compensation (COWSC) Predator Reduction Implementation and Monitoring Plan. As such, the</i>	

Paragraph Number	Addressed to	Request	Applicant Response
		<i>COWSC group ... consider that predator control is likely to be effective at Plémont,”.</i> Defra is invited to confirm this	
11	n/a	The Secretary of State notes that the Applicant’s without prejudice compensation package for impacts to guillemot and razorbill includes 'additional compensation measures in the South-West' that may be carried out in collaboration with other wind farm developers, including Five Estuaries and North Falls. The Secretary of State also notes that Natural England recently provided advice (NE reference: 27347/519205) ² in response to Part 2 of the Secretary of State’s first request for information for the Five Estuaries Offshore Windfarm. That advice stated Five Estuaries was recommended to adopt the North Falls approach to calculating compensation quanta (i.e. considering philopatry) to ensure calculation consistency across projects which may share compensation.	<p>The Applicant confirms that the calculations provided use the Hornsea Four Approach and are consistent with the methods adopted by other projects (Five Estuaries and North Falls). Therefore, the overall compensation requirement remains unchanged.</p> <p>The additional analysis of natal dispersal used by those projects was intended to show the proportion of compensation benefits likely to disperse away from natal colonies versus the proportion expected to recruit back to them. However, this analysis did not alter the overall compensation requirement for those projects under this measure.</p> <p>When given the opportunity during the Examination, Natural England have not requested this additional information be presented in the same way as Five Estuaries or North Falls. The Applicant also notes that the Secretary of State did not apply philopatry in the guillemot compensation quanta calculation for Rampion extension project.³ The Rampion extension project is also a partner in the collaborative additional compensation measures proposed in the South-West.</p> <p>The Applicant met with Natural England on 23rd October 2025 and Natural England confirmed that given the suite of measures across a range of geographical locations being put forward by the Applicant, Natural England’s position is that for the Project, they have greater confidence that compensation can be delivered and therefore philopatry need not be applied in this specific case.</p>
12	Natural England	Given that the Applicant also proposes this shared measure in collaboration with those same projects, Natural England is invited to comment on whether it would be appropriate for the Applicant to provide the same calculations i.e. using the Hornsea 4 method but presented to show the proportion likely to disperse into the NSN, using a 0.17 natal dispersal rate for razorbill from Lavers et al. (2007) ⁵ and the 0.58 rate for guillemot from Horswill and Robinson (2015) ⁶ . Furthermore, if these calculations are advised, Natural England are requested to confirm if it is appropriate for the Applicant to apply the above method only to the measures in the southwest, or across their wider proposed compensation package.	<p>A full case for why considering natal dispersal is not ecologically relevant can be found in The Applicants Response to the Request for Information dated 12th August 2025 (document 27.2, C1-049), point 20, and has been summarised here:</p> <ul style="list-style-type: none"> ▪ Recruitment of guillemots to non-natal colonies, including NSN sites, is likely to be substantial, but specific recruitment rates cannot be quantified. Despite this uncertainty, compensation measures will still benefit the NSN by supporting healthy, well-dispersed regional populations, which enhances resilience against threats like Highly Pathogenic Avian Influenza (HPAI) and predation. Birds that do not recruit directly to NSN colonies will breed elsewhere, and their offspring may later recruit to NSN sites, creating a cumulative contribution over generations. ▪ Connectivity between proposed measures and NSN colonies is well established through dispersal ranges and ringing recoveries, as accepted by the Secretary of State in previous decisions⁴. While more precise recruitment data could theoretically be obtained through tagging, practical and ethical challenges make this unfeasible. Juvenile dispersal is variable and influenced by colony size and performance, with larger, successful colonies (often NSN sites) being more attractive to recruits. Therefore, a significant proportion of dispersing birds are expected to recruit to NSN colonies, ensuring the measures provide appropriate compensation.

² <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010115-001863-C1-020-response-from-Natural-England.pdf>

³ See page 50 of the Habitats Regulations Assessment for Rampion 2 Offshore Wind Farm, DESNZ (2025) and paragraph 4.1.4 and Table 4-1 of the Rampion 2 Guillemot and Razorbill Implementation and Monitoring Plan

⁴ **Planning Inspectorate (2025).** *Habitats Regulations Assessment for EN010117*. Document Reference: EN010117-002456. Available at: <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010117-002456-Habitats%20Regulations%20Assessment.pdf>

⁵ 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.

⁶ Horswill, C., and Robinson R. A. (2015), ‘Review of seabird demographic rates and density dependence’, JNCC Report No. 552.

Paragraph Number	Addressed to	Request	Applicant Response
			The Secretary of State has sufficient information to make an informed decision. The evidence presented on the compensation benefits for guillemot and razorbill within the current suite of documents demonstrates that the proposed measures are capable of delivering benefits that exceed the design requirements for both species (Guillemot Compensation Plan (7.7.2, V5 submitted in response to RFI 2) and Razorbill Compensation Plan (7.7.3, V5 submitted in response to RFI 2)).
13	Natural England	Natural England are invited to comment on the Applicant's submissions to the Secretary of State's first information request in relation to the Plémont Predator Eradication Measure, including the "Without Prejudice Predator Control Evidence Base and Roadmap" (Document Reference 7.7.5), "Guillemot and Razorbill: Compensation Quanta" (Document Reference 20.17) and the Applicant's Response to the Request for Information (Document Reference 27.2). Amongst other points, Natural England are invited to specifically comment on whether the Applicant's commitment of extending the extent of predator control measures to the 14ha of public land and National Trust Jersey land to the south and west of the fenced area is satisfactory to resolve their concerns surrounding the scale of the measure, and the ability for the measure to avoid predator reinvasion.	<p>The Applicant met with Natural England on Monday 13 October 2025. Natural England requested that the additional area of available land be presented on a figure, this was sent to Natural England on 22 October 2025. The Figure is presented in Appendix B of this document.</p> <p>Through further discussions with National Trust Jersey to establish the extent of the area where habitat management and biosecurity measures for purposes such as monitoring and management of predators could potentially be implemented outside of the fenced area, the Applicant has now determined that the area available is approximately 28ha, instead of the 14ha previously stated in response to question 21 of The Applicant's Response to the Request for Information dated 12 August 2025 (C1-049). Please note that this Figure has been produced by the Applicant and is indicative at this stage.</p> <p>When reviewing areas that have previously shown higher predator presence, it is notable that the additional locations now potentially available for biosecurity measures overlap well with areas of confirmed mammal presence (see Plémont Seabird Sanctuary Biodiversity Research 2017-2024 (document reference 27.3, C1-047)). This overlap strengthens confidence in the long-term viability of the biosecurity strategy, as it significantly reduces the likelihood of predator reinvasion into the site. By targeting known risk areas, the project will enhance its ability to maintain predator-free conditions.</p>
14	Natural England	Natural England are requested to provide any commentary on the "Plémont Seabird Sanctuary Biodiversity Research 2017-2024" (document reference 27.3), submitted by the Applicant. Natural England are requested to comment on whether the report assuages any of their concerns raised in [REP6-151].	
Other Offshore and Intertidal Ornithology			
15	The Applicant Natural England	Noting the advice provided in Natural England's response to the first information request which states that the method outlined in Rhoades et al., 2025 ⁷ is a more ecologically robust method of calculating ornithological compensation than previously used methods/formulae, the Secretary of State requests that the Applicant works with Natural England to apply the British Trust of Ornithology method outlined in Rhoades et al. to their calculations for kittiwake compensation.	<p>The Applicant discussed the application of the BTO method with Natural England on 23 October 2025, the following documents have been updated with the BTO method applied:</p> <ul style="list-style-type: none"> ▪ Kittiwake Compensation Plan (Document reference 7.7.1, V3 submitted in response to RFI 2.) ▪ Offshore Artificial Nesting Structure Evidence Base and Roadmap (Document reference 7.7.4, V5 submitted in response to RFI 2) <p>The Applicant's position is that the Hornsea 4 approach remains appropriate and deliverable. The Applicant notes that the BTO method has been discussed with Natural England (NE) on the 23 October 2025 and applied to updated documents (Kittiwake Compensation Plan (Document Reference 7.7.1, V3 submitted in response to</p>

⁷ Rhoades, J., Johnston, D.T., Humphreys, E.M. & Boersch-Supan, P.H. 2025. Review of methods used to calculate scale of artificial nesting structures proposed as a compensation measure for Kittiwake mortality at offshore wind farms. BTO Research Report 778, BTO, Thetford, UK.

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			<p>RFI 2); Offshore Artificial Nesting Structure Evidence Base and Roadmap (Document Reference 7.7.4, V5 submitted in response to RFI 2). The results are also summarised in the table below.</p> <p>Table 1: Compensation calculations for kittiwake using the BTO recommended methodology.</p> <table><tr><th>Predicted impact</th><th>Calculation method</th><th>Breeding pairs 1 : 1 ratio</th><th>Breeding pairs 1.5 : 1 ratio</th><th>Breeding pairs 2 : 1 ratio</th></tr><tr><td>Mean: 15.5</td><td>BTO success requirement</td><td>136</td><td>204</td><td>278</td></tr><tr><td>UCI: 41.0</td><td>BTO design requirement</td><td>360</td><td>540</td><td>720</td></tr></table> <p>NE’s position is that the BTO method should be adopted because it incorporates demographic parameters such as productivity and dispersal, which they consider reduce uncertainty and may justify a lower compensation ratio (C1-007).</p> <p>The Applicant considers the BTO method to be is overly-conservative for the following reasons:</p> <ul style="list-style-type: none">▪ The BTO method assumes Artificial Nesting Structures (ANS) operate as closed colonies, from which only surplus birds contribute to compensation, and that no immigration occurs. These assumptions are biologically unrealistic and overly precautionary, ignoring natural kittiwake dynamics such as immigration and recruitment from floating adults.▪ The method is highly sensitive to productivity rates. Offshore ANS are likely to achieve higher productivity than the regional average (0.819), with evidence of rates up to 1.07 from offshore platforms (Christensen-Dalsgaard et al., 2020). Using realistic productivity values using the BTO model significantly reduces the compensation requirement. <p>The Applicant maintains that a 3:1 ratio would be excessively precautionary, particularly given the inherent conservatism already embedded within the BTO method. The Applicant also notes Natural England’s own comments in their response to RFI 1 (C1-007), which acknowledge that a lower ratio may be justified given the comprehensiveness of the methodology.</p> <p>The Applicant met with Natural England on 23rd October 2025. During these discussions, it was agreed that if the Applicant were to commit to using the Upper Confidence Interval (UCI) rather than the central impact estimate to calculate the required compensation, Natural England would be comfortable with a maximum compensation ratio of 2:1. This equates to a maximum of 720 nesting spaces.</p> <p>Should the Secretary of State agree with Natural England and adopt the BTO method using the UCI and a ratio of 2:1 or lower, the resulting compensation quantum would fall within a range that the Applicant is able to deliver alongside other requirements for auks.</p> <p>The Secretary of State now has all the necessary information to make an informed decision, and no further information is required to support this assessment from the Applicant or Natural England.</p>	Predicted impact	Calculation method	Breeding pairs 1 : 1 ratio	Breeding pairs 1.5 : 1 ratio	Breeding pairs 2 : 1 ratio	Mean: 15.5	BTO success requirement	136	204	278	UCI: 41.0	BTO design requirement	360	540	720
Predicted impact	Calculation method	Breeding pairs 1 : 1 ratio	Breeding pairs 1.5 : 1 ratio	Breeding pairs 2 : 1 ratio														
Mean: 15.5	BTO success requirement	136	204	278														
UCI: 41.0	BTO design requirement	360	540	720														
16	The Applicant	The Secretary of States notes that the Applicant updated their compensation calculations for guillemot and razorbill following advice from Natural England, found in Appendix C of Document 27.2. For clarity, the	As requested, the Applicant has updated Tables 3-7 of the Guillemot and Razorbill: Compensation Quanta (Document Reference 20.17, V6 submitted in response to RFI 2).															

Paragraph Number	Addressed to	Request	Applicant Response
		Secretary of State requests that the Applicant provides updated versions of Tables 3-7 of their “Guillemot and Razorbill: Compensation Quanta” document (document reference 20.17) which shows the compensation numbers for both species when calculated with both the mean and Upper Confidence Interval (UCI) values, and both a 70:2 and a 50:1 displacement: mortality ratio.	<p>The Applicant has updated the guillemot and razorbill compensation quanta in Table 3-7 of the Guillemot and Razorbill: Compensation Quanta document (reference 20.17) to clarify the displacement and mortality rates used in calculating the compensation requirements. The previously presented figures already included both the mean and UCI values, as well as calculations based on two displacement and mortality rates: 70:2 and 50:1, however, they were not labelled as such.</p> <p>For completeness, an additional table (Table 4) has been included to present the compensation requirements for both FFC SPA and Farne Islands SPA combined for the Applicant’s approach. Previously, this information was only provided for the Natural England approach.</p>
17	The Applicant	In line with the request found in Natural England’s response to the first information request, the Applicant is requested to amend Tables 8 and 9 of “Guillemot and Razorbill: Compensation Quanta” (document reference 20.17) to include the values for the predicted contribution of each site in the South West to the total of 1900 pairs for guillemot and 255 pairs for razorbill presented by the Applicant, and confirmation on which sites are still under consideration. Furthermore, the Applicant is requested to provide clarification of whether any revised calculations of potential for each site provided in response to the above request are based on data from both the 2024 and 2025 surveys or the 2024 surveys only.	<p>In line with Natural England’s request, the Guillemot and Razorbill: Compensation Quanta document (Document Reference 20.17, V6 submitted in response to RFI 2) has been updated to include the predicted contribution of each south west site to the total compensation requirement. Only Outer Dowsing shortlisted sites were included in the calculations (see Appendix C for a list of Outer Dowsing sites; Table 2-2). These updates follow a methodology agreed with Natural England on 23 October 2025, whereby it was agreed that the calculation methodologies used to estimate a realistic potential range of benefits from the proposed measures were the best available at this time. However, due to the low productivity observed in the 2024 and 2025 monitoring data, Natural England were hesitant to place significant weight on benefits derived from potential productivity increases.</p> <p>As a result, a range of potential compensation has been provided, from a lower estimate based solely on population growth benefits, to an upper estimate that includes both colony growth and productivity gains. These revised calculations incorporate data from both the 2024 and 2025 monitoring surveys.</p> <p>While there is some annual variation between colonies, the overall calculated benefit remains consistent across both years and species.</p> <p>Guillemot:</p> <ul style="list-style-type: none"> 2024 data: 1,305 - 2,982 additional fledglings per annum (equivalent to 1,942 - 4,438 additional breeding pairs) 2025 data: 1,330 - 2,950 additional fledglings per annum (equivalent to 1,979 - 4,389 additional breeding pairs) <p>Razorbill:</p> <ul style="list-style-type: none"> 2024 data: 120 - 395 additional breeding pairs 2025 data: 159 - 364 additional breeding pairs <p>See Appendix C for a full methodology and a breakdown of the site-specific benefit calculations.</p> <p>Further details on the colony-specific benefits and the calculation methodology have been included in the updated Additional Measures for Guillemot and Razorbill document (Document Reference 7.7.6, V7 submitted in response to RFI 2). The sites shortlisted in Appendix 3 are considered to provide an appropriate scale of compensation to address the Project’s potential requirements, based on best available information including 2 years’ worth of site-specific monitoring data. In the event that the potential benefit is not realised from the measures, then appropriate adaptive management will be implemented. For example, and as discussed with Natural England on 23 October, 2025, this could include extension of the measures to further/alternative sites within the southwest which have been identified with the Additional Measures for Guillemot and Razorbill (document reference: 7.7.6, V7 submitted in response to RFI 2).</p>

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			As shown in the updated Guillemot and Razorbill Compensation Quanta (Document reference 20.17, V6 submitted in response to RFI 2), the calculations using monitoring data from either year confirm that the potential measures are sufficient to offset the Project's potential impacts.
18	n/a	Noting the Applicant's response to question 29 of the first information request, the Secretary of State has again reviewed the figures for colony sizes of Kittiwake, Guillemot and Razorbill at Flamborough and Filey Coast ("FFC") Special Protection Area ("SPA") referenced within the Applicant's Offshore Artificial Nesting Structures Evidence Base and Roadmap (document reference: 7.7.4 versions 3 and 4) and compared this to the data presented in the Seabird Monitoring Programme Database ⁸ for the same site and the data contained in Clarkson et al. (2022) ⁹ which the Secretary of State believes to be the original report of the latest full colony counts of the SPA.	See response to 20.
19	The Applicant	To the Secretary of State, it appears that the 2022 colony figures presented in the Seabird Monitoring Programme Database for FFC SPA are not representative of the whole SPA – they appear to present only the Flamborough Head and Bempton Cliffs colony data and do not include the Filey Cliffs colony data. As such, it appears the colony counts presented in document 7.7.4 are not representative of the whole SPA as, being based on the Seabird Monitoring Programme Database data, they only present data from Flamborough Head and Bempton Cliffs. The Applicant's data sources for FFC SPA colony sizes appear to be inconsistent across documents as its Report to Inform Appropriate Assessment [REP6-028] appears to present colony counts that are representative of the whole SPA; citing "Butcher et al. (2023)" as the source. However [REP6-028] does not include a full reference for this citation. It may be that the Applicant is referring to FFC SPA Seabird Monitoring Programme 2023 Report ¹⁰ authored by Butcher et al.	See response to 20.
20	The Applicant	However, that report does not appear to contain the cited figures. Without this reference the Secretary of	The Applicant has reviewed and amended the Offshore Artificial Nesting Structures Evidence Base and Roadmap (document reference: 7.7.4, V5 submitted in response to RFI 2) to ensure that the colony size figures for

⁸ <https://app.bto.org/seabirds/public/data.jsp>

⁹ Flamborough & Filey Coast SPA: 2022 seabird colony count and population trends: <https://yorkshiremarinenaturepartnership.org.uk/wpcontent/uploads/2022/11/Flamborough-and-Filey-Coast-SPA-seabird-colony-count-2022.pdf>)

¹⁰ <https://yorkshiremarinenaturepartnership.org.uk/wpcontent/uploads/2023/10/FFC-SPA-Seabird-Monitoring-Programme-Report-2023.pdf>

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		<p>State is unclear on the source of the cited data. To ensure the Secretary of State has access to the clear and consistent information required to help determine the current application, the Applicant is therefore requested to:</p> <ul style="list-style-type: none"> review again the colony count figures for Kittiwake, Razorbill and Guillemot in document 7.7.4 and where appropriate update these figures to ensure they are representative of the whole FFC SPA (i.e. including both Flamborough Head and Bempton Cliff colony and the Filey Cliff colony); and check across all relevant documents to ensure the correct figures are used consistently for these species across those documents; and update any calculations that had previously used incomplete or inaccurate colony data. 	<p>kittiwake, guillemot, and razorbill at the Flamborough and Filey Coast (FFC) SPA are accurate and representative of the entire SPA, including both Flamborough Head and Bempton Cliffs and Filey Cliffs. The relevant calculations within that document have also been amended and it can be confirmed that they have no bearing on any other documents.</p> <p>Specifically, the Applicant has:</p> <ul style="list-style-type: none"> Updated the colony size figures to reflect the most recent and comprehensive data available from Clarkson et al. (2022), which provides the latest full colony counts for the SPA. Although the Report to Inform Appropriate Assessment (RIAA) did not explicitly cite a reference for the population sizes, the Applicant confirms that the figures used in that report are based on Clarkson et al. (2022) and are consistent with the updated values now presented across all relevant documents. <p>These updates provide a clear, consistent, and transparent evidence base for the Secretary of State's consideration and confirm that the Applicant's approach is based on the most robust and up-to-date information available.</p>
Marine Mammals			
21	The Applicant	<p>The Applicant is invited to clarify its commitment to the use of a soft-start procedure during the installation of part or fully driven pile foundations. This should include explanation of a) whether a soft-start procedure will be used at all times; or b) any relevant scenarios if this commitment is not possible. The position should be updated in the outline Marine Mammal Mitigation Plan and any other relevant control documents.</p>	<p>The soft-start procedure is an embedded mitigation measure for marine mammals within the Project design, see Table 11-8 of Chapter 11: Marine Mammals (C1-019) and will be implemented for all part or fully driven pile foundations including monopile and jacket foundations. The soft-start procedure is detailed within Table 3-2, Table 3-3 and Table 3-4 of Chapter 11 Appendix 2: Underwater Noise Assessment (REP5-070). The soft-start procedure is in line with JNCC (2010) guidance and stakeholder advice received throughout the examination process. Throughout the Examination and pre-application consultation, the Examining Authority, Natural England and the MMO have not raised any issues with the soft start procedure.</p> <p>As outlined in section 4.5 of the Outline Marine Mammal Mitigation Protocol for Piling Activities (MMMP) (document reference 8.6.1, C1-075), in the unlikely event that following a break in piling it is not possible to resume with a soft start, the contingency measures of ADD deployment and pre-piling search would be redone before continuing piling operations.</p> <p>The reason that the above contingency has been included in the MMMP is that there may be situations—such as after an unforeseen break in piling (e.g. due to unforeseen equipment breakdown or failure)—where using a soft-start procedure at the re-start of piling is not feasible. For example, during a break in piling, the sediment around the partially installed pile can settle and harden, increasing resistance. When piling resumes, a greater hammer energy may be needed to continue installation. In such cases, the lower hammer energy levels used during a soft-start may not be strong enough to move the pile, meaning the soft-start would lead to hammer blows without progressing installation. This could unnecessarily stress and weaken the pile and cause unnecessary, additional noise that could impact marine mammals.</p> <p>The main objective of a soft-start is to protect marine mammals by gradually increasing noise levels, giving them time to move away. However, when a soft-start isn't effective from an engineering perspective, similar protection can be achieved through other measures, such as extending the use of Acoustic Deterrent Devices (ADDs) (as set out in the Outline MMMP for Piling (document reference 8.6.1, C1-075). These can be more precisely timed to reduce the risk of injury while also limiting unnecessary disturbance.</p>

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			<p>The measures identified in the Outline MMMP are standard and have been included within the Outline MMMPs for other projects, including Rampion 2¹¹.</p> <p>The mitigation measures to be undertaken following a break in piling will be fully detailed within the Final MMMP for piling submitted at the post-consent stage, in collaboration with the piling contractor (once appointed) and consulted on with the Statutory Nature Conservation Bodies (SNCBs). The Applicant notes that this contingency scenario for unforeseen breaks in piling has been included in multiple recent final MMMPs approved by the MMO, in consultation with Natural England including Sofia Offshore Wind Farm and East Anglia Three Offshore Wind Farm¹², and as such, this is not a novel approach and nor would it be likely to be a focus of comments within the pre-construction consultation process on a final MMMP. Therefore, the Secretary of State can have confidence that the inclusion of this scenario in the Outline MMMP is a robust and ecologically sound measure whilst also supporting an efficient construction process and the Outline Marine Mammal Mitigation Protocol for Piling Activities (document reference 8.6.1, C1-075) does not require to be updated.</p>
Other HRA Matters			
22	The Applicant	In addition to specific requests earlier in this letter, the Applicant is requested to provide an update on any other progress that has been made with developing its proposed ornithology compensation measures since the close of examination.	<p>The following progress has been made across the Applicant’s proposed suite of compensation measures since the close of examination. The Applicant notes that information on these matters was also provided previously in response to questions 24 and 44 of The Applicant’s Response to the Request for Information dated 12th August 2025 (C1-049). Since then, the Applicant can provide the following further updates.</p> <p>Additional Measures for auks in the South West – Cornwall Wildlife Trust (CWT), Applicant & other offshore wind developers</p> <p>The Applicant met with Natural England and CWT on the 14th October 2025 through the Offshore Wind Industry Council (OWIC) Strategic Compensation Group (SCG) who are coordinating the interface between CWT, the Applicant and the other relevant offshore wind developers. A number of topics were discussed including but not limited to:</p> <ul style="list-style-type: none"> ▪ Agreement standardised methodologies for any future survey work and associated intervention measures ▪ Appointment of the CWT Project Manager (recruitment for this role has been completed) ▪ Future workshop to agree full scope of the measure and associated interventions ▪ How to deliver efficient engagement between NE and developers and how NE case teams will feed into the process. <p>The Applicant notes that it has continued dialogue with the relevant parties since the close of examination and positive progress is being made to develop these measures as planned. The disturbance reduction measures proposed by the Applicant for auks in the South West are progressing as planned and the Secretary of State can be confident that they will, if required, deliver the compensation required for the project.</p> <p>Additional Measures for auks in the South West – Torbay Coast and Countryside Trust (TCCT) & Applicant</p> <p>The Applicant has entered an exclusivity agreement (ODOW only) with the TCCT to implement disturbance measures at the Berry Head site should the measure be deemed necessary by the Secretary of State. The Applicant is providing early funding to TCCT for the purchase of buoyage to deploy a physical barrier in the water</p>

¹¹ Rampion Extension Development Limited (2024) *Draft Piling Marine Mammal Mitigation Protocol* Available at [EN010117-002056-7.14 Draft Piling Marine Mammal Mitigation Protocol \(tracked\).pdf](#) [Accessed October 2025]

¹² Sofia MMMP available at Case ref: DCO/2016/00019 and East Anglia 3 MMMP Available at Case ref: DCO/2018/00001 of <https://marinelicensing.marinemanagement.org.uk/mmofox5/fox/live/>

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			<p>which will reduce disturbance to the colony. This could facilitate implementation of the measure (a physical barrier of buoys to prevent access close to the cliffs on which the colony is located which would be actively monitored and enforced) for the 2026 breeding season or part way through it. This could prove a useful test of the effectiveness of the measure even if not deployed at the start of the breeding season in terms of the potential to reduce disturbance, given that this is expected to be one of the success criteria on which the measure is judged.</p> <p>The Applicant notes that it has continued dialogue with the relevant parties since the close of examination and positive progress is being made to develop these measures as planned. The disturbance reduction measures proposed by the Applicant for auks in the South West are progressing as planned and the Secretary of State can be confident that they will, if required, deliver the compensation required for the project. Further detail on these measures has been provided in response to questions 24 and 44 of the Applicant’s Response to the Request for Information dated 12th August 2025 (C1-049).</p> <p>Plémont – National Trust Jersey & Applicant</p> <p>The Applicant has investigated options for the production of decoys and for the procurement of other equipment which could be used for social attraction and will commission a survey during vegetation clearance to assess the availability of additional potential nesting habitat in addition to decoy deployment and call playback during 2025/2026.</p> <p>The Applicant also notes the ability to implement habitat management and biosecurity measures, such as monitoring and management of predators outside of the fenced area (a combination of National Trust for Jersey land and publicly owned land, which is managed by the States of Jersey). On further discussion with National Trust for Jersey, it has become apparent that the area available for these additional habitat management and biosecurity measures is significantly larger than the 14ha previously anticipated (approximately a ha- also see response to Q13).</p> <p>ANS – Applicant</p> <p>The Applicant is progressing with its procurement process at pace to secure the relevant contracts to deliver the ANS in time to deliver the project by 2030.</p> <p>It is the Applicant’s position is that the Secretary of State now has all the necessary information to make a decision on these matters. The level of information regarding compensation measures that has been submitted to accompany the application for consent for the Project is squarely in line with (and in many respects exceeds) the level of detail submitted to accompany other offshore wind projects, and which has been found to be acceptable by the Secretary of State (see for example, Rampion 2, the Sheringham and Dudgeon Extension Projects and Hornsea 4).</p>
Onshore Ecology			
23	The Applicant	In line with Natural England’s discretionary advice found in Appendix E of the Applicant’s Response to the Request for Information (Document Reference 27.2), the Applicant is requested to amend their outline Soil Management Plan [REP6- 061] to state that mowing and stripping “will” be avoided during wet conditions, rather than “should”.	The Applicant has amended the Outline Soil Management Plan (document 8.1.3, version 8) to reference that mowing and stripping “will” be avoided during wet conditions.

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Compulsory Purchase and Temporary Acquisitions - Book of Reference			
24	n/a	The Secretary of State has reviewed the most updated version of the Applicant's Book of Reference submitted on 10 July 2025 with the Book of Reference submitted at Deadline 6 and found multiple inconsistencies, including changes to land plots and ownership.	The Book of Reference (document 4.1) submitted by the Applicant on 10 July 2025 was not an update to the version submitted at deadline 6, but the version that was intended for submission at Deadline 6. Following the close of the Examination, the Applicant became aware that an incomplete version of the Deadline 6 Book of Reference was provided into Examination (REP6-013). The submission on 10 July 2025 was therefore the complete version, which had been prepared in advance of Deadline 6 but due to an administrative error was not uploaded in full.
25	The Applicant	For verification purposes, several documents submitted at Deadline 6 of Examination, including the Schedule of Changes, Land Plans, Compulsory Acquisition and Land Rights Tracker must be cross-referenced with the updated Book of Reference (V9). The Secretary of State requires the Applicant to submit a document that clearly outlines any changes in the Book of Reference and Compulsory Acquisition and Lands Rights Tracker, also explaining how these relate to the other documents provided at Deadline 6 (close of Examination) - Schedule of Changes and Land Plans. The Applicant is required to provide evidence confirming consultation with landowners affected by these changes. The Applicant should also specify whether any of the changes to the Book of Reference have altered the Order Limits.	<p>The Schedule of Changes to the Book of Reference (document 4.1.1, REP6-015), Land Plans (document 2.5, REP6-004 and REP6-005), Compulsory Acquisition and Land Rights Tracker (document 15.4, REP6-081) submitted at Deadline 6 therefore already reflect the changes made to version 9 of the Book of Reference.</p> <p>All changes made between version 8 and version 9 of the Book of Reference are shown in track changes within the tracked version of the Book of Reference submitted on 10 July 2025, and a summary of the changes and the reasons for the changes are provided in the Schedule of Changes to the Book of Reference (REP6-015) – please see electronic page 85 (numbered page 83) to electronic page 108 (numbered page 106) for an explanation of all changes to plot interests and electronic page 119 (numbered page 117) to electronic page 122 (numbered page 120) for all changes to the extents of plots in version 9 of the Book of Reference.</p> <p>Changes to the Compulsory Acquisition and Lands Rights Tracker between version 5 submitted at Deadline 4 (REP4-092) and version 6 submitted at Deadline 6 (REP6-081) are shown on the tracked version of the Compulsory Acquisition and Land Rights Tracker submitted at Deadline 6 (REP6-082). All updates made were to report on progress made with voluntary agreement negotiations with affected persons that had occurred since the previous tracker was submitted. The newly identified persons in version 9 of the Book of Reference were added to the tracker and a status on negotiations provided.</p> <p>The Land Plans were updated at Deadline 6 (REP6-004 and REP6-005) to reflect changes to plots as a result of updated landowner and occupier data obtained through a HM Land Registry refresh of the Order Limits and information provided by affected persons, which resulted in the re-shaping of existing plots, the addition of new plots and the removal of certain plots. The reasons for the changes are provided in the Schedule of Changes for Plans (REP6-003), both in Section 1.1 (Deadline 6, Summary of Changes) and in Table 2.1 (Deadline 6, 2.5 Land Plans).</p> <p>None of the changes made to the Book of Reference or the Land Plans have altered the Order Limits. Where plots have been split and plots created or removed, these remain fully within the Order Limits and have only been so amended because of a change in ownership or occupation (for example a previously unregistered plot becoming registered to an adjoining title which has a plot assigned to it already, resulting in that plot being removed and the land joining the existing plot or, where updated information has confirmed that part of a plot does not fall within a registered title, that has resulted in a plot split and created a new unregistered plot separate to the plot to which the registered title relates) which has necessitated a corresponding update to Land Plans.</p> <p>The Applicant has complied with all statutory obligations to undertake consultation. Applicants have a duty to:</p> <ul style="list-style-type: none"> consult landowners and other prescribed parties prior to the submission of the application under Part 5, Chapter 2 (Pre-application procedure) of the Planning Act 2008. The Applicant's compliance with this duty is set out in the Consultation Report (AS1-034);

Paragraph Number	Addressed to	Request	Applicant Response
			<ul style="list-style-type: none"> ▪ notify landowners and other prescribed parties that an application has been accepted for examination under section 56 of the Planning Act 2008. The Applicant provided a certificate dated 27 June 2024 certifying compliance with the notification and publication requirements of section 56. <p>There is no statutory obligation, nor is there any policy requirement, that the Applicant must consult with parties added to the Book of Reference as a result of updates made to the same during the Examination or Determination periods.</p> <p>Notwithstanding that there is no statutory or policy obligation, with each update of the Book of Reference, all newly identified persons with an interest in land within the Order Limits were contacted by letter advising them of the examination of the application and of their right to request to become an interested party and have their say about the Project under section 102A of the Planning Act 2008. This approach was recommended in paragraph 19 of the Planning Act 2008: examination of applications for development consent (March 2015) guidance, which was withdrawn on 30 April 2024. The replacement guidance (Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (April 2024)) does not include the same recommendation to applicants, however, the Applicant considered it would be appropriate to advise those parties of their rights notwithstanding this.</p> <p>Four new interests were identified in version 9 of the Book of Reference (Jennifer Maureen Grant, Elisabeth Grant, Steven John Padley and David George Padley), and letters were issued to all four parties, and copies of those letters are appended to this response in Appendix - A Letters to newly identified parties with an interest in land within the Order Limits. In addition, the Applicant has engaged with these individuals via their appointed land agent or solicitor in respect of voluntary land agreements for the rights required to construct and operate the Project.</p> <p>As set out in the Compulsory Acquisition and Land Rights Tracker (REP6-081), an option agreement is in place with Jennifer Maureen Grant and Elisabeth Grant in respect of their interests.</p> <p>Steven John Padley and David George Padley were added to the Book of Reference in their capacity as Executors of the Estate of the Late Frank Derek Vere who was previously noted as the owner in the Book of Reference. As set out in the Compulsory Acquisition and Land Rights Tracker (REP6-081) the terms of an option agreement are to be re-issued to the said Executors. Probate has now been received, and engrossments of the option agreement are in the process of being reissued to the parties’ solicitor. Heads of Terms for the temporary works agreement have been reissued to the parties appointed agent. As such, these parties are fully aware of the Applicant’s proposals</p> <p>As noted above, the Applicant has complied with all statutory consultation obligations required of it, which does not include a statutory obligation, nor any policy requirement, to consult with parties added to the Book of Reference as a result of updates made to the same during the Examination or Determination periods. The Applicant’s approach of notifying these additional parties went further than is required in law. Notwithstanding this, all parties added to the Book of Reference during the Examination and Determination periods have been notified of the project, and nothing further is required under the consultation processes set out in the Planning Act 2008.</p>

2 Appendices

Appendix A. Letters to newly identified parties with an interest in land within the Order Limits

Party ID	Interest	Salutation	Address	Posted date	Royal Mail Tracking number	Confirmed delivery date
323147	Elisabeth Grant	Ms E Grant	J W Grant Co., Fold Hill, BOSTON, Lincolnshire, PE22 9PJ	24/03/2025	0215E841040838E0	25/03/2025
323148	Jennifer Maureen Grant	Ms J Grant	J W Grant Co., Fold Hill, BOSTON, Lincolnshire, PE22 9PJ	24/03/2025	0215E84104083945	25/03/2025
326047	Steven John Padley	Mr S Padley	Grange Farm, Church Lane, ANWICK, Lincolnshire, NG34 9ST	24/03/2025	0215E8410408390D	25/03/2025
326048	David George Padley	Mr D Padley	Empingham Lodge, Horn Lane, Tickencote, STAMFORD, PE9 4AL	24/03/2025	0215E84104083929	25/03/2025

24th March 2025

Ref: 22000094_323147

Ms E Grant
J W Grant Co
Fold Hill
BOSTON
Lincolnshire
PE22 9PJ

Dear Ms Grant,

Outer Dowsing Offshore Wind**Your Right to Request to Become an Interested Party to Development Consent Order Application Under Section 102A of the Planning Act 2008**

The Planning Inspectorate (on behalf of the Secretary of State for Energy Security and Net Zero) accepted an application made by GTR4 Limited (trading as Outer Dowsing Offshore Wind) c/o Johnston Carmichael LLP Birchin Court, 20 Birchin Lane, London, England, EC3V 9DU ("the Applicant") for a Development Consent Order under the Planning Act 2008 ("the Application"). The Application was submitted to the Secretary of State c/o the Planning Inspectorate on 19 March 2024 and accepted for examination on 16 April 2024 (Reference EN010130). The Planning Inspectorate appointed an Examining Authority to examine the Application on behalf of the Secretary of State on 26 April 2024, and the Examination commenced on 10 October 2024.

The Application is for development consent for the construction, operation, maintenance, and decommissioning of the Outer Dowsing Offshore Wind Farm, an offshore wind generating station located approximately 54 km east of the Lincolnshire coastline in the southern North Sea, together with associated development to connect the generating station to the national grid (the "Project"). The onshore cable corridor is approximately 70km long from the landfall at Wolla Bank, south of Anderby Creek to a new substation at Surfleet Marsh and then to a new National Grid substation at Weston Marsh that will be consented built, owned, and operated by National Grid Electricity Transmission.

Following a review of HMLR data, the Applicant has identified that you may have an interest in land which falls within the Project's Order limits, or which may otherwise entitle you to make a relevant claim. This is in relation to 25-003, 25-005 and 25-006 as shown on the enclosed extract from the Land Plans.

As you have recently gained an interest in the plot referred to above, and have not been previously notified of the acceptance of the Application under section 56 of the Planning Act 2008, which gave interested parties notice that the Planning Inspectorate (on behalf of the Secretary of State for Energy Security and Net Zero) accepted the Application, you have the right to request to become an Interested Party to the Application and have your say about the Project under section 102A of the Planning Act 2008. You can do this by contacting the Planning Inspectorate's Outer Dowsing project team by email: OuterDowsingOffshoreWind@planninginspectorate.gov.uk. Following your request, the Examining Authority appointed to examine the Application on behalf of the Secretary of State will decide whether it considers that you fall within one or more of the categories set out in section 102B of the Planning Act 2008.

Copies of Outer Dowsing Offshore Wind's completed application form and accompanying plans, maps and other application documents may be inspected free of charge on the Outer Dowsing Offshore Wind Farm project page of the Planning Inspectorate's National Infrastructure Planning website under the documents tab:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010130/documents>

If you wish to discuss this letter or any other matters in connection with the Project, please contact the Applicant's project team by using one of the following contact methods:

Email: outerdowsing@dalcourmaclaren.com

Post: FREEPOST ODOW (no stamp or further address details needed on the envelope)

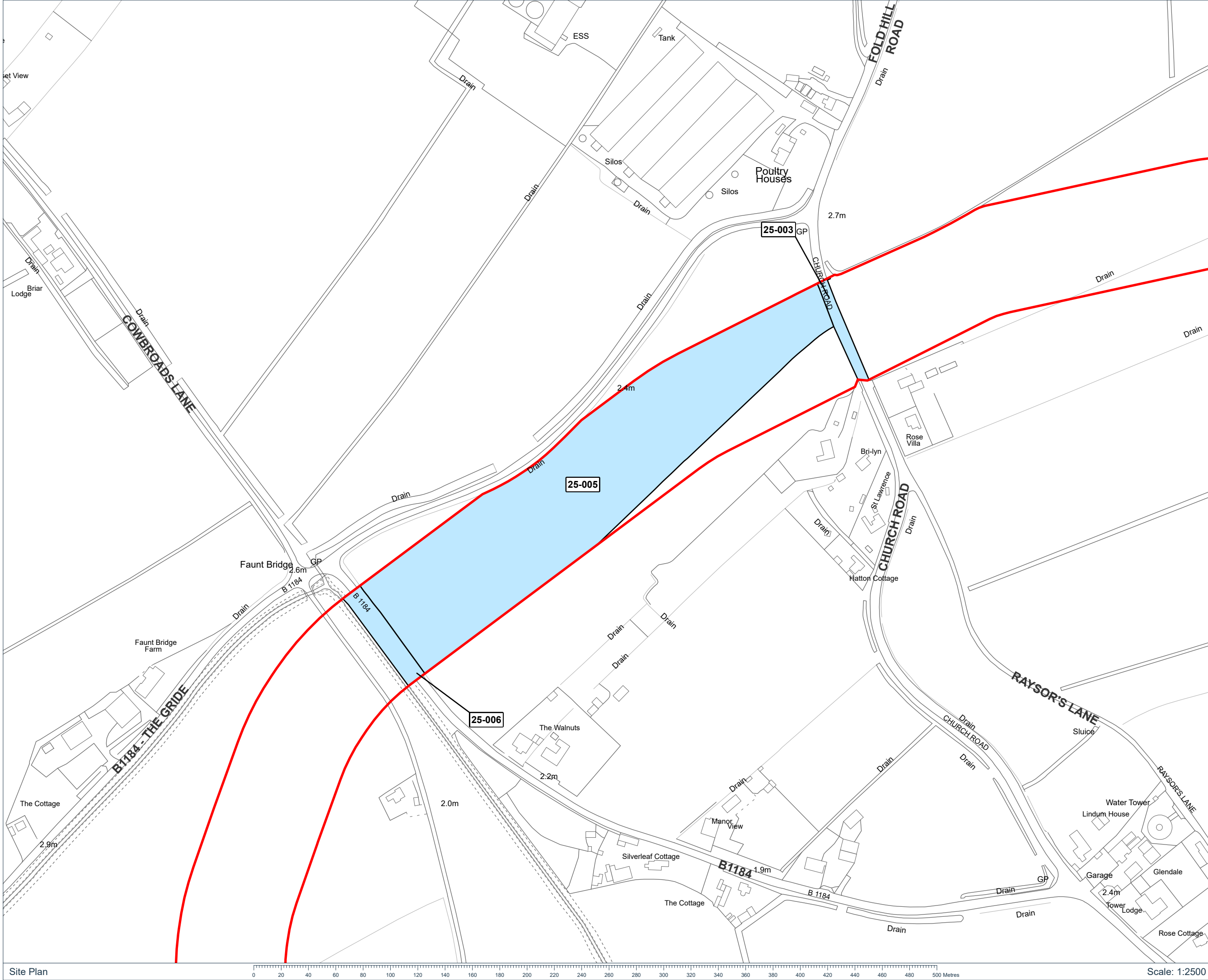
Telephone: 0333 188 5374

www.outerdowsing.com

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chris Jenner', with a stylized flourish at the end.

Chris Jenner
Development Manager
Outer Dowsing Offshore Wind



Key:

Order Limits - Onshore Only

Permanent Rights

Notes:

Plots: 25-003, 25-005, 25-006

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest:
Elisabeth Grant

Location:
Faunt Bridge Farm, Old Leake CP, Leake
Common Side, Boston

Coords: 539871, 351084

Scheme Name:
Outer Dowsing

Drawing Name:
Information Plan

Drawing No: 22000087_PLN_INFO_13295.1

Rev	Date	Description
-	19.03.2025	First Issue

Drawn:	WS	
Approved:	ED	
Sheet No:	1 of 1	
Sheet Size:	A3	



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Drawing Location: C:\Users\William.Stott\Documents\Outer Dowsing General\22000087 - Geomatics\01 DM Plans\22000087_PLN_INFO_13295.1\22000087_PLN_INFO_13295.aprx

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| Your item was delivered on 25-03-2025.

Tracking number:

0215E841040838E0

Service used:

Royal Mail Tracked 24™



Proof of delivery

24th March 2025

Ref: 22000094_323148

Ms J Grant
J W Grant Co
Fold Hill
BOSTON
Lincolnshire
PE22 9PJ

Dear Ms Grant,

Outer Dowsing Offshore Wind**Your Right to Request to Become an Interested Party to Development Consent Order Application Under Section 102A of the Planning Act 2008**

The Planning Inspectorate (on behalf of the Secretary of State for Energy Security and Net Zero) accepted an application made by GTR4 Limited (trading as Outer Dowsing Offshore Wind) c/o Johnston Carmichael LLP Birchin Court, 20 Birchin Lane, London, England, EC3V 9DU ("the Applicant") for a Development Consent Order under the Planning Act 2008 ("the Application"). The Application was submitted to the Secretary of State c/o the Planning Inspectorate on 19 March 2024 and accepted for examination on 16 April 2024 (Reference EN010130). The Planning Inspectorate appointed an Examining Authority to examine the Application on behalf of the Secretary of State on 26 April 2024, and the Examination commenced on 10 October 2024.

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Following a review of HMLR data, the Applicant has identified that you may have an interest in land which falls within the Project's Order limits, or which may otherwise entitle you to make a relevant claim. This is in relation to 25-003, 25-005 and 25-006 as shown on the enclosed extract from the Land Plans.

As you have recently gained an interest in the plot referred to above, and have not been previously notified of the acceptance of the Application under section 56 of the Planning Act 2008, which gave interested parties notice that the Planning Inspectorate (on behalf of the Secretary of State for Energy Security and Net Zero) accepted the Application, you have the right to request to become an Interested Party to the Application and have your say about the Project under section 102A of the Planning Act 2008. You can do this by contacting the Planning Inspectorate's Outer Dowsing project team by email: OuterDowsingOffshoreWind@planninginspectorate.gov.uk. Following your request, the Examining Authority appointed to examine the Application on behalf of the Secretary of State will decide whether it considers that you fall within one or more of the categories set out in section 102B of the Planning Act 2008.

Copies of Outer Dowsing Offshore Wind's completed application form and accompanying plans, maps and other application documents may be inspected free of charge on the Outer Dowsing Offshore Wind Farm project page of the Planning Inspectorate's National Infrastructure Planning website under the documents tab:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010130/documents>

If you wish to discuss this letter or any other matters in connection with the Project, please contact the Applicant's project team by using one of the following contact methods:

Email: outerdowsing@dalcourmaclaren.com

Post: FREEPOST ODOW (no stamp or further address details needed on the envelope)

Telephone: 0333 188 5374

www.outerdowsing.com

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chris Jenner', with a stylized flourish at the end.

Chris Jenner
Development Manager
Outer Dowsing Offshore Wind

Drawing Location: C:\Users\William.Stott\Documents\Outer Dowsing General\22000087 - Geomatics\01 DM Plans\22000087_PLN_INFO_13295.aprx



- Key:
- Order Limits - Onshore Only
 - Permanent Rights

Notes:

Plots: 25-003, 25-005, 25-006

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest:

Jennifer Maureen Grant

Location:

Faunt Bridge Farm, Old Leake CP, Leake Common Side, Boston

Coords: 539871, 351084

Scheme Name:

Outer Dowsing

Drawing Name:

Information Plan

Drawing No: 22000087_PLN_INFO_13296.1

Rev	Date	Description
-	19.03.2025	First Issue

Drawn:	WS	
Approved:	ED	
Sheet No:	1 of 1	
Sheet Size:	A3	



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Tracking number:

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Service used:

Royal Mail Tracked 24™



Proof of delivery

24th March 2025

Ref: 22000094_326047

Mr S Padley
Grange Farm
Church Lane
ANWICK
Lincolnshire
NG34 9ST

Dear Mr Padley,

Outer Dowsing Offshore Wind**Your Right to Request to Become an Interested Party to Development Consent Order Application Under Section 102A of the Planning Act 2008**

The Planning Inspectorate (on behalf of the Secretary of State for Energy Security and Net Zero) accepted an application made by GTR4 Limited (trading as Outer Dowsing Offshore Wind) c/o Johnston Carmichael LLP Birchin Court, 20 Birchin Lane, London, England, EC3V 9DU ("the Applicant") for a Development Consent Order under the Planning Act 2008 ("the Application"). The Application was submitted to the Secretary of State c/o the Planning Inspectorate on 19 March 2024 and accepted for examination on 16 April 2024 (Reference EN010130). The Planning Inspectorate appointed an Examining Authority to examine the Application on behalf of the Secretary of State on 26 April 2024, and the Examination commenced on 10 October 2024.

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Following notification via landowner solicitor that Frank Derek Vere has passed away, the Applicant has identified that you may have an interest in land which falls within the Project's Order limits, or which may otherwise entitle you to make a relevant claim. This is in relation to 27-001, 27-002, 27-003, 27-004, 27-004a, 27-005, 27-005a, 27-005b, 27-006, 27-007, 27-008, 27-009, 27-015, 27-016, 27-017, 27-018 & 27-019 as shown on the enclosed extract from the Land Plans.

As you have recently gained an interest in the plot referred to above, and have not been previously notified of the acceptance of the Application under section 56 of the Planning Act 2008, which gave interested parties notice that the Planning Inspectorate (on behalf of the Secretary of State for Energy Security and Net Zero) accepted the Application, you have the right to request to become an Interested Party to the Application and have your say about the Project under section 102A of the Planning Act 2008. You can do this by contacting the Planning Inspectorate's Outer Dowsing project team by email: OuterDowsingOffshoreWind@planninginspectorate.gov.uk. Following your request, the Examining Authority appointed to examine the Application on behalf of the Secretary of State will decide whether it considers that you fall within one or more of the categories set out in section 102B of the Planning Act 2008.

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<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010130/documents>

If you wish to discuss this letter or any other matters in connection with the Project, please contact the Applicant's project team by using one of the following contact methods:

Email: outerdowsing@dalcourmaclaren.com

Post: FREEPOST ODOW (no stamp or further address details needed on the envelope)

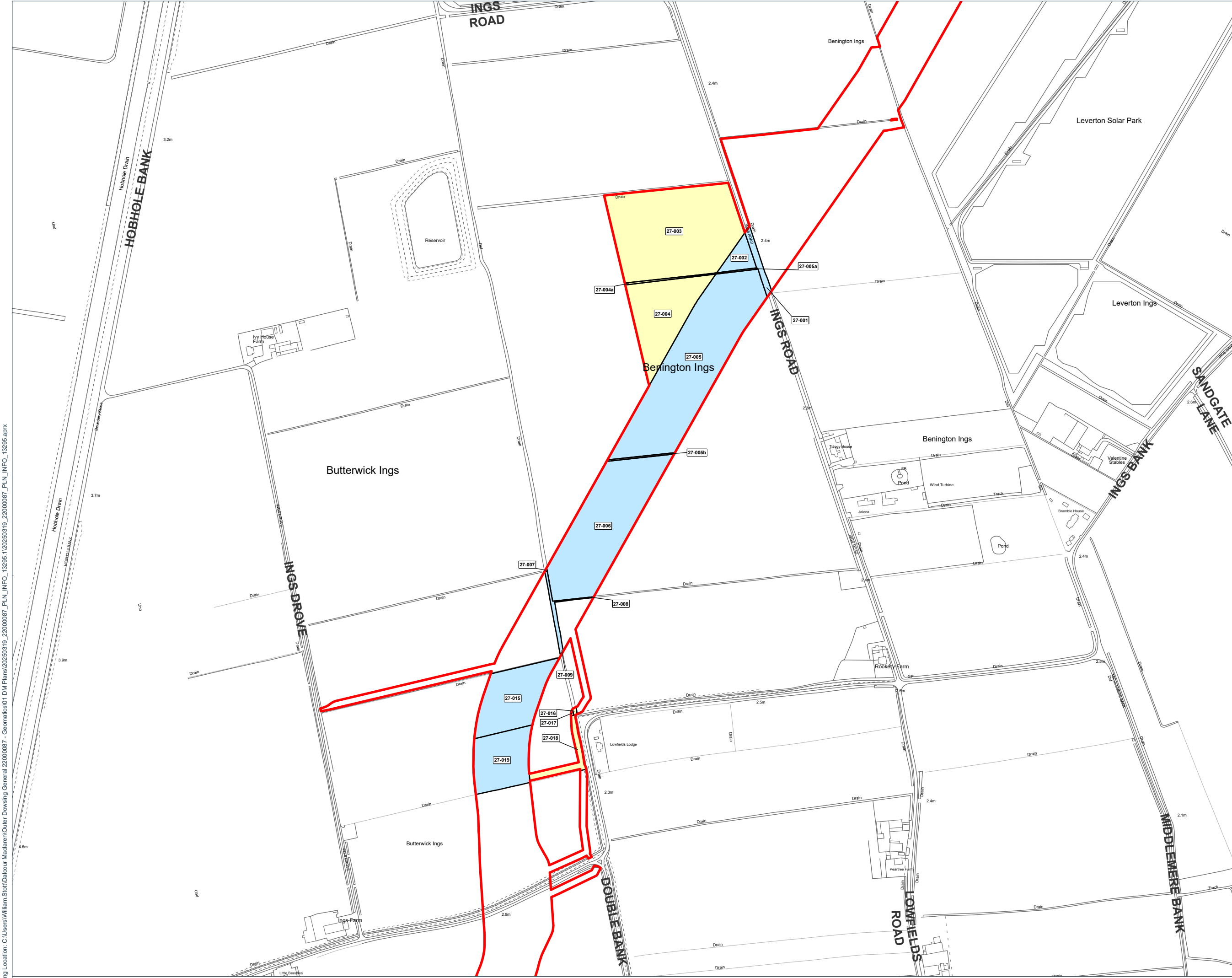
Telephone: 0333 188 5374

www.outerdowsing.com

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chris Jenner', with a stylized flourish at the end.

Chris Jenner
Development Manager
Outer Dowsing Offshore Wind



- Key:
- Order Limits - Onshore Only
 - Permanent Rights
 - Temporary Rights

Notes:

Plots: 27-001, 27-002, 27-003, 27-004, 27-004a, 27-005, 27-005a, 27-005b, 27-006, 27-007, 27-008, 27-009, 27-015, 27-016, 27-017, 27-018, 27-019

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest:
Steven John Padley

Location:
Ings Road, Southway, Benington CP, Boston

Coords: 537755, 348436

Scheme Name:
Outer Dowsing

Drawing Name:
Information Plan

Drawing No: 22000087_PLN_INFO_13297.1

Rev	Date	Description
-	19.03.2025	First Issue

Drawn:	WS	
Approved:	ED	
Sheet No:	1 of 1	
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We've left a card at your address with the details.

Tracking number:

0215E8410408390D

Service used:

Royal Mail Tracked 24™



24th March 2025

Ref: 22000094_326048

Mr D Padley
Empingham Lodge
Horn Lane
Tickencote
STAMFORD
PE9 4AL

Dear Mr Padley,

Outer Dowsing Offshore Wind**Your Right to Request to Become an Interested Party to Development Consent Order Application Under Section 102A of the Planning Act 2008**

The Planning Inspectorate (on behalf of the Secretary of State for Energy Security and Net Zero) accepted an application made by GTR4 Limited (trading as Outer Dowsing Offshore Wind) c/o Johnston Carmichael LLP Birchin Court, 20 Birchin Lane, London, England, EC3V 9DU ("the Applicant") for a Development Consent Order under the Planning Act 2008 ("the Application"). The Application was submitted to the Secretary of State c/o the Planning Inspectorate on 19 March 2024 and accepted for examination on 16 April 2024 (Reference EN010130). The Planning Inspectorate appointed an Examining Authority to examine the Application on behalf of the Secretary of State on 26 April 2024, and the Examination commenced on 10 October 2024.

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<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010130/documents>

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Email: outerdowsing@dalcourmaclaren.com

Post: FREEPOST ODOW (no stamp or further address details needed on the envelope)

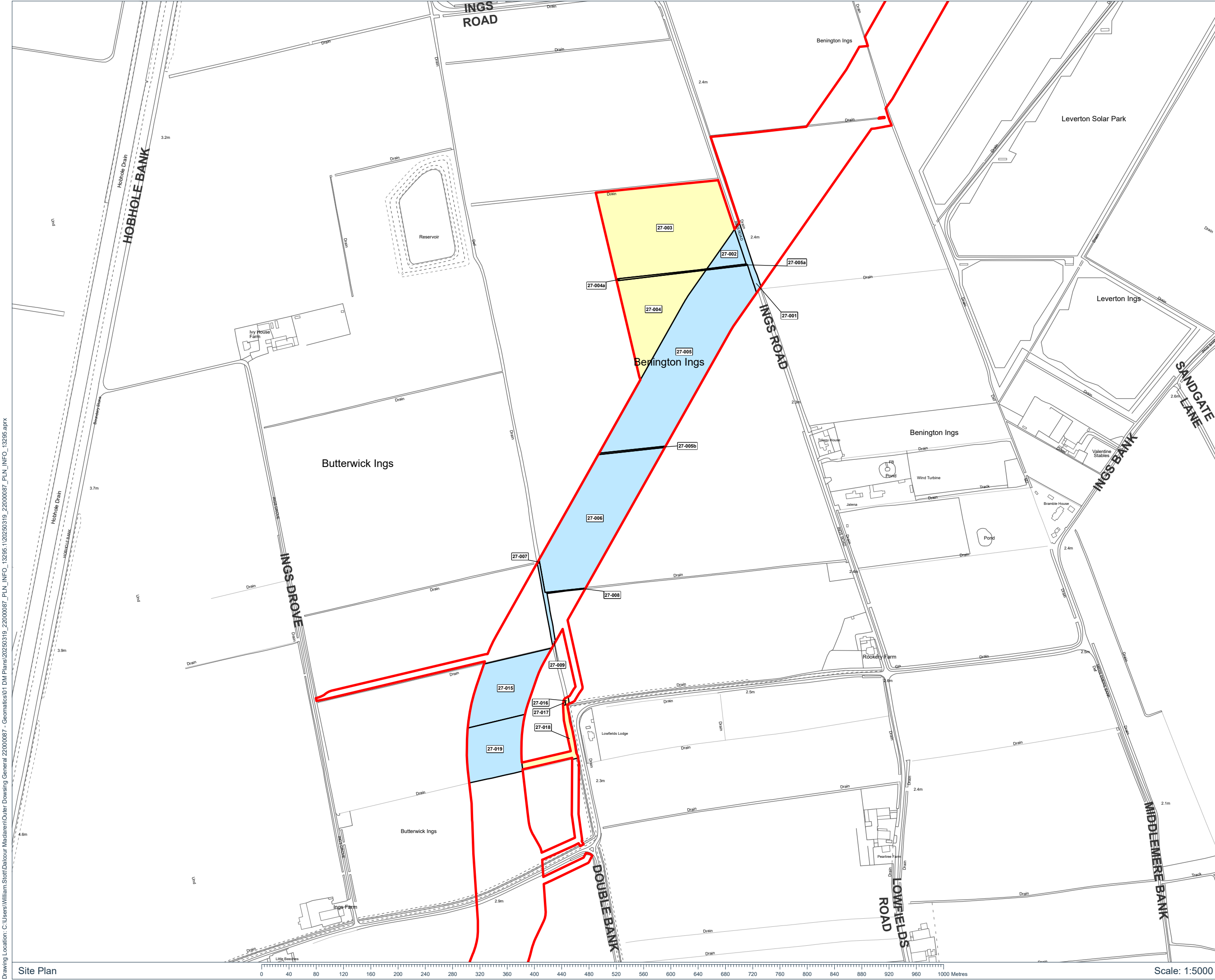
Telephone: 0333 188 5374


www.outerdowsing.com

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chris Jenner', with a stylized flourish at the end.

Chris Jenner
Development Manager
Outer Dowsing Offshore Wind





DM DALCOUR
MACLAREN

Key:

Order Limits - Onshore Only

Permanent Rights

Temporary Rights

Notes:

Plots: 27-001, 27-002, 27-003, 27-004, 27-004a, 27-005, 27-005a, 27-005b, 27-006, 27-007, 27-008, 27-009, 27-015, 27-016, 27-017, 27-018, 27-019

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest:
David George Padley

Location:
Ings Road, Southway, Benington CP,
Boston

Coords: 537755, 348436

Scheme Name:
Outer Dowsing

Drawing Name:
Information Plan

Drawing No: 22000087_PLN_INFO_13298.1

Rev	Date	Description
-	19.03.2025	First Issue

Drawn:

WS

Approved:


ED


Sheet No:

1 of 1

Sheet Size:

A3





**OUTER
DOWSING**
OFFSHORE WIND

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Site Plan

0 40 80 120 160 200 240 280 320 360 400 440 480 520 560 600 640 680 720 760 800 840 880 920 960 1000 Metres

Scale: 1:5000

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| Your item was delivered on **25-03-2025**.

Tracking number:

0215E84104083929

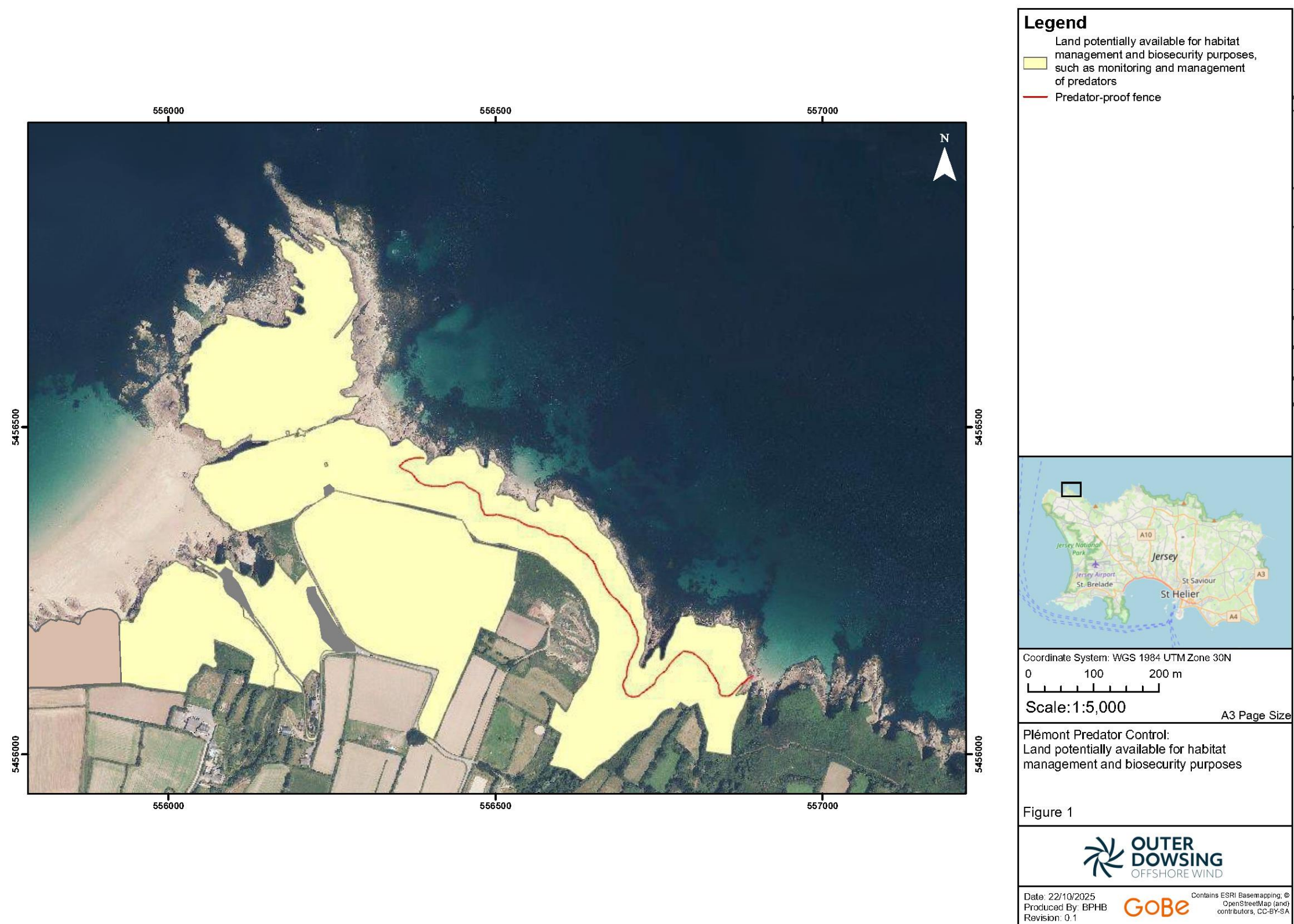
Service used:

Royal Mail Tracked 24™



Proof of delivery

Appendix B. Land potentially available for habitat management and biosecurity purposes



Appendix C. Summary of Updates Submitted with RfI Responses (28 October 2025)

1. Following RfI number 2 from the Secretary of State, updates were made to the relevant auk compensation documents. The primary requests from the SoS were to (1) confirm the contribution of each site in the South West to the total compensation delivery and, (2) clarify whether the estimates were determined based on only the 2024 monitoring results or the 2024 and 2025 monitoring results.
2. In response to this request, the Applicant has recalculated each site's estimated contribution to the overall total, using a methodology agreed with Natural England on 23 October 2025. The calculation methodologies used estimate a realistic potential range of benefits from the proposed measures. These updates show the potential for a substantial increase in the total contribution of the measure, expressed as additional breeding pairs. Furthermore, the Applicant has carried out an additional analysis of the 2025 monitoring data and recalculated the benefits based on those results. The following section summarises those results. The changes have also been applied to the following (full details can be found in Document 7.7.6):
 - Guillemot Compensation Plan (Document 7.7.2)
 - Razorbill Compensation Plan (Document 7.7.3)
 - Without Prejudice Additional Measures for Compensation of Guillemot and Razorbill (Document 7.7.6)
 - Guillemot and Razorbill Compensation Quanta (Document 20.17)

Methodology

3. The methodology for the calculation of compensation potential at the shortlisted sites has been refined based on discussions with Natural England on 23 October, 2025 (See Annex 2 in Document 7.7.6: Additional Measures for Compensation of Guillemot and Razorbill). To estimate compensation, data from each colony is required for:
 - A population. Historical and current site populations were taken from the SMP database. Site-specific survey data were also used to determine the population of sites where whole colonies were visible.
 - Productivity for the colony generated from recent monitoring data. The region-specific productivity rate as presented in Horswill and Robinson (2015) was used as a realistic target productivity rate. For the SW sites this will be 0.82 for guillemot and 0.64 for razorbill. Both of these rates are higher than the national average productivity, but as they are region specific and productivity is expected to be higher in an environment with reduced pressures, the Applicant considers that they are appropriate. Monitoring during the 2024 and 2025 breeding season has provided current site-specific productivity data for the eight shortlisted sites. Where no site-specific productivity rate was available in 2025, the site-specific rate from 2024 was used.

4. Across all sites, the calculation of compensation potential considered two key factors: population growth and increased productivity.
5. For new breeding pairs, expected productivity was estimated using the regional average rate. For existing breeding pairs, the approach involved calculating the difference between the colony-specific productivity rate and the regional rate. This difference was used to estimate the number of additional fledglings that could be produced.
6. By applying these methods, the compensation potential at each site was assessed in terms of both the likely increase in breeding population and the expected improvement in fledgling output. These revisions reduce the number of scenarios presented and provide clarity on the most likely compensation potential. Given the data available, this method was agreed as appropriate by Natural England in a meeting on 23rd October, 2025.
 - **Population Growth Benefit:** The potential benefit from population growth was estimated by calculating the difference between the historical peak population and the current population at each site. This potential increase in breeding pairs is then multiplied by the expected regional productivity rate to estimate the number of additional fledglings that could be produced.
 - **Productivity Increase Benefit:** The benefit from increased productivity is based on the current population achieving a higher productivity rate. This is calculated by subtracting the current colony-specific productivity rate from the regional (or expected) productivity rate. The resulting difference is applied to the current population to estimate the number of additional fledglings.
 - **Combined Scenario:** A third scenario considers the realistic scenario where both population growth and increased productivity occur simultaneously at a colony. In this case, the benefits from each factor are combined to estimate the total number of additional fledglings that could be generated.
7. As requested in the RfI (paragraph 17), the documents have been updated to present the compensation potential for each site across both years, as well as total potential for each year. This was undertaken separately to 2024 and the results from each year were compared and discussed. The overall compensation potential will be presented as the average between the 2024 and 2025 results.

Results

8. The following tables present a summary of the results for the potential benefit of the disturbance reduction measures across the Applicants shortlisted sites across the southwest. For a full breakdown, see the Additional Measures for Compensation of Guillemot and Razorbill (Document reference 7.7.6). breakdown the benefits by colony.
9. A range of potential compensation has been provided, from a lower estimate based on benefits from population growth alone to an upper estimate that combines the benefits of both colony growth and productivity gains.

Table 2-1 Potential compensation across the total short-listed sites for guillemot.

All short-listed sites combined	2024			2025		
	Combined benefit	Benefits from potential population growth	Benefits from increased productivity	Combined benefit	Benefits from potential population growth	Benefits from increased productivity
Total additional fledglings	2,982.8	1,304.8	1,677.9	2,950.0	1,329.5	1,620.5
Total additional adults (IND)	1,005.2	439.7	565.5	994.1	448.1	546.1
Total additional pairs	4,438.7	1,941.7	2,496.9	4,389.9	1,978.5	2,411.4

Table 2-2 Potential compensation across the total short-listed sites for razorbill.

All short-listed sites combined	2024			2025		
	Combined benefit	Benefits from potential population growth	Benefits from increased productivity	Combined benefit	Benefits from potential population growth	Benefits from increased productivity
Total additional fledglings	225.2	68.5	156.7	207.9	90.8	117.1
Total additional adults (IND)	101.8	31.0	70.8	94.0	41.0	52.9
Total additional pairs	395.0	120.2	274.8	364.7	159.3	205.5

10. Using the process detailed in Annex 2, Table 8.3 and Table 8.4 show the total potential compensation at each site using two years of survey data.

Table 2-3 Potential compensation across each short-listed site for guillemot, shown in the potential number of fledglings for all sites.

Site	2024			2025		
	Combined benefit	Benefits from potential population growth	Benefits from increased productivity	Combined benefit	Benefits from potential population growth	Benefits from increased productivity
The Moulds	402	30	372	402	30	372
Ore Stone	180	137	43	180	137	43
North Cornwall 3	55	10	45	40	5	35
North Cornwall 2	71	27	44	80	0	80
North Cliffs 3	88	0	88	88	0	88
Gulland Rock	603	327	276	603	327	276
Cow and Calf	662	301	361	662	301	361
Berry Head	922	473	449	896	530	366

Table 2-4 Potential compensation across each short-listed site for razorbill, shown in the potential number of fledglings for all sites.

All short-listed sites combined	2024			2025		
	Combined benefit	Benefits from potential population growth	Benefits from increased productivity	Combined benefit	Benefits from potential population growth	Benefits from increased productivity
The Moulds	29	22	7	29	22	7
Ore Stone	10	0	10	10	0	10
North Cornwall 3	37	0	37	31	11	20
North Cornwall 2	21	0	21	10	0	9
North Cliffs 3	5	0	5	5	0	5
Gulland Rock	34	13	22	34	13	22
Cow and Calf	78	33	44	78	33	44
Berry Head	11	0	11	11	11	0

Discussion

11. The population estimates presented above are grounded in realistic and conservative assumptions. Specifically, they cap future population growth at historical peak levels, despite the realistic possibility that some colonies may exceed these peaks if pressures are alleviated through targeted measures. Furthermore, the estimates adopt regional mean productivity rates as reported by Horswill and Robinson (2025). However, it is entirely feasible that actual productivity could surpass these averages under improved environmental conditions. Taken together, these assumptions suggest that the estimates may underrepresent the potential positive outcomes, reinforcing their credibility and robustness as a baseline for planning and decision-making.
12. Though there is inter-annual variation in the output between colonies the overall output from the suite of sites is very similar between the two years. This adds confidence that the measure will deliver a consistent annual return.
13. As demonstrated within the updated Guillemot and Razorbill Compensation Quanta (Document reference 20.17) the calculations demonstrate that the potential across both years can account for impacts from the Project.