



Rampion 2 Wind Farm

Applicant's Response to Examining Authority's Request for Further Information

Date: August 2024

Revision A

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Rules 2010, Rule 8(1)(c)

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Executive Summary

On 17 July 2024, the Examining Authority published a request for further information **[PD-017]** following receipt of written submissions at Deadline 5. This request included further schedule of proposed amendments to the **Draft Development Consent Order [REP5-005]** and a number of final questions.

Rampion Extension Development Limited (the 'Applicant') has taken the opportunity to provide comments on the schedule of proposed amendments to the **Draft Development Consent Order [REP5-005]**, and review each of the questions received from the Examining Authority. This document provides the Applicant's responses and has been submitted for Examination Deadline 6.

1. Introduction

1.1 Project overview

- 1.1.1 Rampion Extension Development Limited (hereafter referred to as 'RED') (the 'Applicant') is developing the Rampion 2 Offshore Wind Farm Project ('Rampion 2' or the 'Proposed Development') located adjacent to the existing Rampion Offshore Wind Farm Project ('Rampion 1') in the English Channel.
- 1.1.2 Rampion 2 will be located between 13km and 26km from the Sussex Coast in the English Channel and the offshore array area will occupy an area of approximately 160km². A detailed description of the Proposed Development is set out in **Chapter 4: The Proposed Development, Volume 2** of the Environmental Statement (ES) [APP-045], submitted with the Development Consent Order (DCO) Application.

1.2 Purpose of this document

- 1.2.1 The Examining Authority published a request for further information [PD-017] following receipt of written submissions at Deadline 5 on 17 July 2024. This request included a further schedule of proposed amendments to the **Draft Development Consent Order [REP5-005]** and set of Final Written Questions.
- 1.2.2 The Applicant has taken the opportunity to provide comments on the schedule of proposed amendments to the **Draft Development Consent Order [REP5-005]**, and review each of the questions received from the Examining Authority. This document provides the Applicant's responses and has been submitted for Examination Deadline 6.

1.3 Structure of the Applicant's response

- 1.3.1 The Applicant has structured this document to follow the Planning Authority's further information request [PD-017], with **Table 2-1** providing the Applicant's response regarding the schedule of proposed amendments to the **Draft Development Consent Order [REP5-005]**, and **Table 2-2** providing the Applicant's response to the Examining Authority's Final Written Questions.
- 1.3.2 The Examining Authority's Final Written Questions are set out using an issue-based framework and outlined who the question was directed to (i.e. the Applicant or an Interested Party).
- 1.3.3 The Applicant has provided a response to all of the Examining Authority's Final Written Questions directed to the Applicant. In addition to this, the Applicant has also provided a response to some questions that were directed at Interested Parties where the Applicant considers additional information would be useful for the Examining Authority.

2. Applicant's response to the Examining Authority's Request for Further Information

Table 2-1 Applicant's response to Examining Authority's schedule of proposed amendments to the Draft Development Consent Order

No	DCO Req	Examining Authority's Recommended Additional / Amended Requirement	Examining Authority's Reasoning	Applicant's response
1.	8(1)	<p><u>Works comprising Work No. 16 and Work No.18 together with the associated parts of Work No 17, access from Kent Street to Work No. 9 and 19 and use of Work No. 10 at Oakendene (excluding any onshore site preparation works) must not commence until - (a) the following details of the substation (Work No. 16):</u></p> <p><u>(a) siting and layout;</u></p> <p><u>(b) scale and quantum of development and its uses;</u></p> <p><u>(c) existing and proposed finished ground levels;</u></p> <p><u>(d) landscaping;</u></p> <p><u>(e) access (Work No.18); and</u></p> <p><u>(f) external appearance, form and materials for any building structures and other infrastructure including boundary treatment;</u></p> <p><u>(b) a single comprehensive construction traffic management plan covering:</u></p> <p><u>(i) the timing and routing of construction traffic along the A272 and into and out of the Oakendene compound;</u></p> <p><u>Substation site and Kent Street;</u></p> <p><u>(ii) the safety of construction accesses off the A272 and Kent Street;</u></p> <p><u>(iii) the safety of non-construction traffic, pedestrians, cyclists and equestrians using Kent Street;</u></p> <p><u>(iv) the restriction of traffic from unsuitable routes off the A272; and</u></p> <p><u>(v) measures to minimize the volume of construction traffic passing through the Air Quality Management Area (AQMA) at Cowfold; and</u></p> <p><u>(c) details of vegetation removal, retention and replanting within Work Nos. 16 and 18 and along Kent Street at construction accesses A61 and A64, which shall be consistent with the Outline Vegetation Retention and Removal Plan secured under requirement 40 and the Outline Landscape and Ecology Management Plan secured under requirement 12;</u></p> <p>for the onshore substation have been submitted to and approved in writing by the relevant planning authority following consultation with the <u>local highway authority and</u> West Sussex Fire and Rescue Service and Works comprising Works No. 16 and 18 together with the associated parts of Work No 17, access from</p>	<p>The ExA notes the Applicant's response to its proposed amendments to Requirement 8 in [REP5-121]. However, having reviewed the submissions made at Deadline 5 by IPs, the ExA is still of the view that the issues still to be resolved in the vicinity of the Oakendene substation site including:</p> <ul style="list-style-type: none"> • the safety of non-construction traffic, pedestrians, cyclists and equestrians using Kent Street alongside construction traffic; • the safety of construction accesses off the A272 and Kent Street; • the restriction of construction traffic from unsuitable routes off the A272; and • The details of vegetation removal, retention and replanting on Kent Street; is best addressed by a site-specific plan. <p>The ExA considers the suggested change to Requirement 8, which now more explicitly covers all the elements in the vicinity of the substation that need to be addressed than previous drafts, would ensure such a comprehensive site specific plan.</p>	<p>The Applicant notes the Examining Authority's concern to secure a comprehensive plan to secure approval of details associated with the works in the vicinity of the Oakendene substation site. However, the Applicant notes that the purpose of Requirement 8 has been to secure approval for the detailed design for the Oakendene substation (Work No 16) to ensure that the matters listed in requirement 8(1) are approved before construction starts and the works are undertaken in accordance with the approved details and the parameters assessed in the Environmental Statement.</p> <p>As a consequence, the Applicant considers it appropriate to retain the existing wording for Requirement 8(1) to (6), such that the works to deliver the onshore cable route are not held up by the need to secure approval for the detailed design for the substation.</p> <p>The Applicant also considers that the points raised in the proposed amendments are already covered by existing requirements, including the approval for a programme of stages for the Proposed Development (Requirement 10) and for a construction traffic management plan (Requirement 24) which accords with the <u>Outline Construction Traffic Management Plan [REP5-068]</u> (updated at Deadline 6) which includes a management plan for Kent Street.</p> <p>However, should the Examining Authority still consider that an amendment to requirement 8 is necessary the Applicant proposes that the wording below is utilised. This provides that a single construction traffic management and access plan is submitted for approval before the first of the works covered by the requirement is commenced, and then for each subsequent part of the works covered the plan submitted is to take account of the measures previously approved pursuant to the requirement. In this way there will be a plan in place at all times which takes account of all works which are taking place in this locality at the relevant time</p>

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		Kent Street to Works No. 9 and 19 and use of Work No. 10 at Oakendene, must be carried out in accordance with the approved details		<p>(1) No stage which includes works comprising any part of Work No. 16 and Work No.18, together with the parts of Work No 17 associated with those works, accesses A61 and A64 as shown on sheet 33 of the access rights of way and streets plans at Kent Street, or establishment and use of either of the compounds comprising Work No.10 shown on sheet 33 of the onshore works plans (excluding any onshore site preparation works) must may commence until, only insofar as such works are included within or relate to works within that stage-</p> <p>(a) the following details of the substation (Work No. 16):</p> <ul style="list-style-type: none"> (i) siting and layout; (ii) scale and quantum of development and its uses; (iii) existing and proposed finished ground levels; (iv) landscaping; (v) access (Work No.18); and (vi) external appearance, form and materials for any building structures and other infrastructure including boundary treatment; <p>(b) a single comprehensive construction traffic management and access plan covering:</p> <ul style="list-style-type: none"> (i) the programming and routing of construction traffic along the A272 and into and out of the compounds comprising Work No. 10 shown on sheet 33 of the onshore works plans and Kent Street; (ii) the safety of construction accesses off the A272 and Kent Street; (iii) the safety of non-construction traffic, pedestrians, cyclists and equestrians using Kent Street; (iv) the restriction of HGV traffic from unsuitable routes off the A272; (v) measures to minimize the volume of construction traffic passing through the Air Quality Management Area (AQMA) at Cowfold; (vi) traffic management measures in respect of any previous stage approved under this requirement and <p>(c) details of vegetation removal, retention and replanting within Work Nos. 16 and 18 and along Kent Street at construction accesses A61 and A64 as shown on sheet 33 of the access rights of way and streets plans, which shall be consistent with the Outline Vegetation Retention and Removal Plan and the Outline Landscape and Ecology Management Plan have been submitted to and approved in</p>

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				<p>writing by the relevant planning authority following consultation with the local highway authority and West Sussex Fire and Rescue Service and the works covered by the details submitted under this sub-paragraph (1) must be carried out in accordance with the approved details</p> <p>(2) Where details are approved pursuant to requirement 8(1) then details for</p> <p>(a) construction traffic management</p> <p>(b) accesses A61 and A64 as shown on sheet 33 of the access rights of way and streets plans</p> <p>(c) vegetation removal, retention and replanting for the part of a stage for which approval has been secured under requirement 8(1) shall not be required to be approved under requirements 24, 15, 12 or 13 as applicable.</p> <p>(3) Any details provided by the undertaker pursuant to sub-paragraph (1)(a) must accord with the principles set out in the relevant part of the design and access statement including taking account of climate change allowances, relationship to and effect on heritage assets, must accord with the drainage arrangements approved pursuant to requirement 17, include details of any water harvesting and recycling measures and be within the Order limits.</p> <p>(4) The details submitted pursuant to sub-paragraph (3) must demonstrate how the works for operation of Work No. 16 will secure water neutrality.</p> <p>(5) To the extent comprised in Work No. 16—</p> <p>(a) there must be no more than 12 buildings;</p> <p>(b) the height of the main operational building and other infrastructure must be no more than 28.75 metres above ordnance datum;</p> <p>(c) the maximum main building length must be no more than 70 metres;</p> <p>(d) the maximum main building width must be no more than 20 metres;</p> <p>(e) lightning protection masts must be no more than a height of 34.25 metres above ordnance datum; and</p> <p>(f) the maximum height of any fire walls must be no more than 26.25 metres above ordnance datum.</p>

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				<p>(6) For the purposes of paragraph (4) the term 'water neutrality' means that the use of water in the supply area before the development of Work No. 16 is the same or lower after the development is in place in order to meet the requirements of regulation 63 of the Conservation of Habitats and Species Regulations 2017.</p> <p>(7) For the purposes of paragraph (5) the term 'building' excludes electrical infrastructure installations.</p>
2	23(2)(b)	<p>(b) comply with commitments C-112, C-114 and C-216 of the Commitments Register with regards to the restriction of access within ecologically sensitive sites. restrict access within ecologically sensitive sites including Glimping Beach Site of Special Scientific Interest, Littlehampton Golf Course and Atherington Beach Local Wildlife Site, Sullington Hill Local Wildlife Site, and Michelgrove Park.</p>	<p>The ExA understand the reasons given for the removal of wording in this Requirement as set out at deadline 5 [REP5- 009]. In so doing, the ExA considers Requirement 23(2)(b) as currently worded is an unnecessary repetition of Commitments C-112, C-114 and C-216 of the Commitments Register. It would be better if Requirement 23(2)(b) was reworded to adhere to the said Commitments as suggested. The ExA further considers this amendment would address the concerns raised by Horsham DC at Deadline 5 [REP5-149].</p>	<p>The Applicant considers that it is not appropriate for this amendment to the requirement to be made. The commitments are not referred to elsewhere on the face of the Draft Development Consent Order [REP5-005] and instead the control documents referred to in the requirements detail the commitments they secure and provide detail as to how the mitigation measures will be secured.</p> <p>It is considered appropriate to identify the specific sensitive sites in the requirement to confirm that protection, as detailed in the Outline Construction Method Statement, [REP5-089] will be secured in respect of those sites, and to address concerns which have been raised by interested parties including those raised by Horsham DC at Deadline 5 [REP5-149].</p> <p>Furthermore, reference to the commitments in this requirement would require a reader to locate and review the commitments register to identify which ecologically sensitive sites are afforded protection.</p>
3.	39	<p><i>(1) Prior to commencement of the authorised development seaward of MHWS the undertaker must provide details of the number, specification (including lightning protection) and dimensions of each wind turbine generator and its location to the Airport Operator and provide confirmation of the same to the Secretary of State. (2) Within 21 days of providing the information specified in sub-paragraph (1) above (or such other period as may be agreed in writing between the undertaker and the Secretary of State) the Undertaker, with any written confirmation of the Airport Operator, must confirm to the Secretary of state that— (a) none of the turbines to be installed in accordance with the information submitted pursuant to sub-paragraph (1) above would have an impact on the instrument flight procedures of Shoreham Airport; or (b) a turbine or turbines to be installed in accordance with the details submitted pursuant to sub-</i></p>	<p>The ExA considers that there should not be a requirement put on a third party (in this case Shoreham Airport). Any requirements should be on the undertaker of the development only. The ExA also considers that it should be the relevant Secretary of State who decides whether all stages and aspects of the Requirement are agreed.</p>	<p>The Applicant has incorporated the Examining Authority's proposed change into Requirement 39 of the Draft Development Consent Order [REP5-005] which has been updated at Deadline 6.</p>

No	DCO Req	Examining Authority's Recommended Additional / Amended Requirement	Examining Authority's Reasoning	Applicant's response
		<p><i>paragraph (1) above or their turbine blades would have an impact on the instrument flight procedures of Shoreham Airport and that an IFP Scheme is required. (3) There shall be no commencement of the authorised development seaward of MHWS unless and until such time as—</i></p> <p><u>(a) the Secretary of State has confirmed and agreed in writing under paragraph 2(a);</u> or (b) in the event that written notification under paragraph 2(b) is received, the Secretary of State has confirmed in writing that they are satisfied that the undertaker has put in place a binding undertaking to pay the Airport Operator such sums as are demonstrably and reasonably required by the Airport Operator for producing and securing the implementation of the IFP Scheme. (4) If an IFP Scheme is required, no wind turbine generator or turbine blade that has been identified as having an impact on instrument flight procedures may be erected or fitted unless and until such time as the Secretary of State <u>receives written confirmation and evidence from the Undertaker that—</u></p> <p><i>(a) an IFP Scheme has been approved by the Airport Operator; and</i></p> <p><i>(b) the Civil Aviation Authority has evidenced its approval to the Airport Operator of the IFP Scheme (if such approval is required).</i></p> <p><i>(5) For the purposes of this requirement— “Airport Operator” means the operator of Shoreham Airport being Brighton City Airport Limited of The Terminal Building, Cecil Pashley Way, Shoreham-by-sea, West Sussex, BN43 5FF or any successor as holder of a licence under the Commission Regulation (EU) No. 139/2014 (or any successor regulation) from the Civil Aviation Authority to operate Shoreham Airport; and “IFP Scheme” means a scheme to address the identified potential impact of certain wind turbine generators or turbine blades to be constructed on the instrument flight procedures of Shoreham Airport.</i></p>		
DML Conditions				
4	NEW	<p><i>Notwithstanding the mitigation measures proposed within the submitted information and the Commitment Register, there shall be no piling associated with this development between the dates of 01 March to 31 July inclusive, unless otherwise agreed in writing before the commencement of any piling by the Marine Management Organisation</i></p>	<p>Natural England have requested this restriction based on the potential impact of underwater noise from piling on Black Seabream during their breeding/nesting season within the Kingmere MCZ.</p> <p>The Applicant is requested to comment on this potential additional condition and its wording, should the Secretary of State decide that it is required within the Deemed Marine Licences.</p>	<p>It is the Applicant's position that such a ban would be disproportionate in the context of the information presented to the Examination as to the mitigation measures that would be adopted by the Applicant in the event that piling is proposed during this period; these measures are detailed in the In Principle Sensitive Features Mitigation Plan [REP5-082].</p> <p>The implementation of a full piling ban would have a direct effect on the construction schedule of the project by prohibiting construction in the months of the year with the most accommodating weather conditions. Until the final</p>

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				<p>design of the turbines and foundations, and until comprehensive geotechnical surveys are completed, it is difficult to determine with a high level of confidence, what the magnitude of the impacts on the construction schedule would be. However, preliminary construction modelling has strongly indicated that a full piling ban would be extremely challenging, leading to an additional year or more of offshore installation activity being required.</p> <p>The Applicant refers to its response to reference FS2.1 in the Applicant's Responses to Examining Authority's Second Written Questions [REP5-0119], in respect of ensuring the economic viability of proposed developments. An extensive piling ban with the associated increase in the cost of the construction schedule, in addition to other mitigation measures such as double bubble curtains, considerably limits the project's prospects of securing funding and getting built. As noted in the response to FS2.1, work has already commenced to model the construction programme, given the proposed constraints. This work may conclude that the costs associated with repeated installation spread mobilisations to avoid the breeding season, in combination with the equipment required to meet the proposed stringent noise restriction, prevent the Applicant submitting a competitive bid at the relevant Auction Round.</p> <p>The Applicant has determined that the financial and logistical implications of a full piling ban would Result, as a minimum, in a reduction of the total capacity of generation that could be installed or could make the project unviable. This would be in conflict with the urgent need for renewable energy set out in NPS EN-1 (2011), the Critical National Priority status for offshore wind set out in NPS EN-3 (2023), and the 50 GW by 2030 target for offshore wind set out in the British Energy Security Strategy (2022). As a result of this direct conflict with the urgent need set out in the 2011 and 2023 NPS, the Applicant considers that conditioning a full piling ban within the dML is not appropriate and disproportionate to the assessed potential for effects on the Conservation Objectives of the Kingmere MCZ as set out within the Environmental Statement.</p>

Table 2-2 Applicant's response to Examining Authority's Final Written Questions

Ref number	Question to:	Question	Applicant's Response
BP 3.1	<p><i>Outline Cable Burial Risk Assessment and an Outline Cable Specification and Installation Plan</i></p> <p>Natural England Marine Management Organisation</p>	At Deadline 5 the Applicant submitted an Outline Cable Burial Risk Assessment [REP5-123] and an Outline Cable Specification and Installation Plan [REP5-126]. Provide comments on these documents and confirm which previous concerns expressed have been addressed by the submission of these documents.	No response required from the Applicant.
BP 3.2	<p><i>Chalk Impacts</i></p> <p>The Applicant</p>	Natural England [REP5-141] continues to advise that a full appraisal of all possible options for nearshore cable installation is necessary, with a commitment to using the methodology that minimises the environmental impacts, including the loss of irreplaceable marine chalk. Provide a response to these comments.	The Applicant has responded to this point in row 20 of Applicant's Response to Action Points Arising from ISH2 and CAH1 for Deadline 5 [REP5-129] .
CR 3.1	<p><i>Commitments Register</i></p> <p>All Relevant Interested Parties</p>	The Applicant considers [REP5-121] that the updated Commitments Register submitted at Deadline 5 [REP5-086] now address all remaining concerns. Briefly confirm this, without rehearsing previous comments.	No response required from the Applicant.
DCO 3.1	<p><i>Schedule 1, Requirements 22, 24, 33 and 40 Schedules 11 and 12, Conditions 9(8) and 16(2) Schedules 13 and 14</i></p> <p>The Applicant</p>	Provide a response and update the draft DCO [REP5-005] in respect to the suggested amendments advanced by Horsham DC [REP5-150], the Marine and Coastguard Agency [REP5-045] and West Sussex CC [REP5-134].	The Applicant has responded to the comments made by Horsham District Council, the Marine and Coastguard Agency and West Sussex County Council in Applicant's Comments to Deadline 5 Submissions (Document Reference: 8.98) submitted at Deadline 6. The Draft Development Consent Order [REP5-005] has been amended at Deadline 6 in response to those comments where considered appropriate as recorded in those responses.
FS 3.1	<p><i>Worst Case Scenario – Piling Noise for Fish and Shellfish</i></p> <p>The Applicant Natural England</p>	<p>The ExA notes that Natural England has remaining concerns/questions with regards to the modelling of underwater noise and the worst-case scenarios for different situations [REP5-139, Page 2]. It states:</p> <p><i>“We advise that a clear explanation of whether sequential or simultaneous piling has been modelled as the worst case in each situation still needs to be provided and each figure needs to be clearly labelled with which scenario it is demonstrating. Additionally, as raised in our Relevant Representations (Appendix E, Point 27), where piling is conducted simultaneously at two locations we question what the closest distance between locations is likely to be, and how this is considered in terms of impacts on the MCZ’s.”</i></p>	<p>All underwater noise modelling results are clearly labelled within Appendix 11.3: Underwater noise assessment technical report, Volume 4 [REP5-046]. All results tables in sections 4.1 (marine mammals) and 4.2 (fish) relate to a single modelling location, not simultaneous piling. Section 4.3 (Multiple Location Piling) considers the potential for piling at two locations simultaneously.</p> <p>The monopile scenarios consider both one pile driven in 24 hours (e.g. Table 4-3), and two piles driven <i>sequentially</i> (e.g. Table 4-4), and this is labelled in the table titles and captions. The multileg scenario modelling considered one pile driven in 24 hours (e.g. Table 4-9) and also a worst case of four piles driven in 24 hours (e.g. Table 4-10). These are for a single location installation.</p>

Ref number	Question to:	Question	Applicant's Response
FS 3.2	<p><i>Double Bubble Curtains/ Noise Abatement</i></p> <p>The Applicant</p>	<p>Natural England [REP5-139] have stated the following:</p> <p><i>"..provided that the Applicant were able to field-test and evidence that a reduction in the region of 15dB is deliverable during the 'worst-case' environmental conditions at the site, we would be in a position to conclude that the conservation objectives of the four seahorse MCZs will not be hindered due to TTS and behavioural impacts from underwater noise generated from piling." (Page 3)</i></p> <p>Provide the ExA with a statement with details of field testing as described above at the Rampion 2 site, including in depths of over 40m, or explain in detail why this cannot be done. It is also advised by MMO [REP5-146, Paragraph 2.14.21] that no testing of the noise abatement measures should occur during the sensitive seasons for herring (1st</p>	<p>For section 4-3, this considers two installations, with single monopiles and pin piles, and then a worst case of including two monopiles or four pin piles installed sequentially and simultaneously at each location. This is described in the table headings and captions.</p> <p>The East and West locations were modelled to provide the maximum geographical spread of locations and therefore intended to offer the maximum total combined area of impact. Recent modelling for the MCZs relate primarily to disturbance, which is a 'single pulse' instantaneous threshold and so in case this is the source of confusion; simultaneous or sequential piling is not relevant to this impact. Consequently, in terms of behavioural effects the distance between the locations does not affect conclusions.</p> <p>In respect of the Kingmere MCZ, the Applicant has stated that the north-west location as modelled is much closer to the boundary of the MCZ than will be used during the MCZ's sensitive period. It is therefore in excess of the worst case. Considering any piling in the absence of any mitigation, also represents an unrealistic worst case.</p> <p>There is no South-west modelling location, and so the Applicant presumes that NE is referring to the West location in light of Selsey Bill and the Hounds MCZ. The Applicant has undertaken additional modelling, supplied in Appendix A within Applicant's Comments to Deadline 5 Submissions (Document Reference: 8.98) (and shared with Natural England ahead of Deadline 6 on 26 July 2024) at a closer location to the MCZ, located in shallower water depths. The modelling confirms that the West location as used to inform the assessment in Volume 2 Chapter 8 Fish and shellfish ecology [APP-049] does indeed represent the worst case for Selsey Bill and the Hounds MCZ, due to the deeper water between the modelling location and the MCZ.</p> <p>The MMO and Natural England have suggested trialling of the piling noise mitigation measures ahead of the construction phase of the Proposed Development, however the Applicant considers a pre-construction field test is not feasible. Any such field test requires a substantial lead-in period in order to collect geotechnical site investigation data for the trial location, as well as for the procurement, detailed design and manufacture of a specific foundation pile. Substantial time, and significant additional expenditure, is also required to complete the design of the layout of the Proposed Development WTG array to ensure the trial location is correctly sited within an overarching optimised project design, and the procurement of the installation vessel(s), pile driving hammer and full mitigation equipment on a short-term basis. The planning, procurement and preparation for the trial is estimated to require a period of 2-3 years, with additional time incurred following the execution of the trial to provide for inclusion of the trial results into the subsequent installation strategy. All of these factors are prohibitive</p>

Ref number	Question to:	Question	Applicant's Response									
		November – 31st January, inclusive) and black sea bream (1st March – 31st July, inclusive).	<p>in terms of project timeline, availability of equipment and vessels for short-term procurement, and costs, which the Applicant has calculated as being in excess of £30 Million (direct costs of the fabrication of a single monopile, reservation of an installation vessel, mobilization of the vessel, vessel day rate, equipment hire (installation hammer, noise mitigation system and support vessels)). Even leaving aside the site investigation works, the procurement of equipment and vessels would be estimated to require at least two years to complete, even if equipment could be made available for short-term charter, which is very unlikely given the scarcity of such in the market currently. The subsequent delay to the project, which notably affects its ability to enter into the financial investment decision and Contracts for Difference (CfD) Allocation Round auction process, notwithstanding any additional consents required to undertake the installation of a trial foundation pile if it is separate to the construction phase consented under the DCO for Rampion 2, makes the trialling of the installation mitigation unfeasible. The effectiveness of the noise mitigation techniques will be confirmed through comparison with the unmitigated modelling results. Measurements of underwater noise during the construction phase will be compared with the computer modelling of unmitigated piling noise, in which there is confidence as modelling is based primarily on empirical data from unmitigated piling measurements.</p>									
HRA 3.1	<p><i>Outline Guillemot and Razorbill Implementation and Monitoring Plan</i></p> <p>Natural England</p>	<p>Confirm whether the Outline Guillemot and Razorbill Implementation and Monitoring Plan submitted by the Applicant at Deadline 5 [REP5-117] adequately secures the likely feasible delivery mechanisms for and quanta of compensation from the evidence presented in the Outline Guillemot and Razorbill roadmap submitted by the Applicant at Deadline 3 [REP3-060], upon which Natural England provided comments at D4 [REP4-091] to confirm they are broadly supportive.</p>	<p>No response required from the Applicant.</p>									
LR 3.1	<p><i>Land Rights Flow Chart</i></p> <p>The Applicant</p>	<p>Confirm that the flow chart in Annex C (based on the Applicant's response to Compulsory Acquisition Hearing 1 (CAH 1) Action 1 [REP4-074]) is correct.</p>	<p>The Applicant's comments on the flow chart are as follows:</p> <table border="1" data-bbox="1789 1409 2792 1932"> <thead> <tr> <th data-bbox="1789 1409 2012 1442">Section</th> <th data-bbox="2012 1409 2220 1442">Item</th> <th data-bbox="2220 1409 2792 1442">Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="1789 1482 2012 1556">Pre-Application</td> <td data-bbox="2012 1482 2220 1556">New item</td> <td data-bbox="2220 1482 2792 1759"> <p>Insert:</p> <p><i>"The Applicant has informed landowners of indicative cable routes, anticipated land requirements, likely working corridor width, trenchless crossing locations, likely compound sizes."</i></p> </td> </tr> <tr> <td data-bbox="1789 1759 2012 1833">Application / Examination</td> <td data-bbox="2012 1759 2220 1833">New item</td> <td data-bbox="2220 1759 2792 1932"> <p>Insert:</p> <p><i>"The Applicant has continued to engage with affected parties to further refine the Works and Land Rights required as</i></p> </td> </tr> </tbody> </table>	Section	Item	Comments	Pre-Application	New item	<p>Insert:</p> <p><i>"The Applicant has informed landowners of indicative cable routes, anticipated land requirements, likely working corridor width, trenchless crossing locations, likely compound sizes."</i></p>	Application / Examination	New item	<p>Insert:</p> <p><i>"The Applicant has continued to engage with affected parties to further refine the Works and Land Rights required as</i></p>
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			<p><i>appropriate, including through the making of the Change Request [AS-046]</i></p>
			<p>New item</p> <p>Insert:</p> <p><i>“Temporary possession powers for construction purposes are contained in Article 33 to the dDCO. Land over which only temporary possession powers are sought is listed in Schedule 9 to the dDCO, and shown shaded green on the Onshore Land Plans”</i></p>
			<p>Expand / update the last item</p> <p>Insert:</p> <p><i>“construction” into the reference to the final location of the cable corridor</i></p> <p>Add:</p> <p><i>“In preparing that CMS, including arriving at cable construction corridor, the Applicant will liaise with Affected Parties in compliance with the Agricultural Liaison section of the CoCP (para 2.6 of the Outline Code of Construction Practice, and in summary will:</i></p> <ul style="list-style-type: none"> <i>- carry out landowner discussions and make arrangements prior to intrusive site investigations, and share key outcomes thereafter; and</i> <i>- appoint an Agricultural & Land Liaison Officer(s) (ALLO) to assist in the to assist in the day-to-day liaison with landowners and land managers;</i> <p><i>Prior to construction the ALLO will:</i></p> <ul style="list-style-type: none"> <i>- engage with landowners and oversee the works being delivered in compliance with legal agreements, consents, and approved construction</i>

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			<p><i>methodologies so as to mitigate disruption;</i></p> <ul style="list-style-type: none"> - <i>input into preparation of stage-specific CoCPs and Construction Method Statements (CMSs)</i> - <i>engage with landowners regarding final designs to inform them of the approximate areas of their land over which rights will be required including likely working corridor width and location, trenchless crossing locations and limits of deviation, likely compound sizes and a draft indication of which areas are likely to be fenced</i> - <i>prepare plans showing working corridor alignment, trenchless crossing locations, and areas where rights are required over an area wider than 40m, and present these to the landowner and take account of any responses.</i> <p><i>Prior to Construction: a Construction Notice will be served to set out the land requirements."</i></p>
		Construction	<p>Amend as shown in red:</p> <p><i>"Applicant takes temporary possession of land and carries out works using Article 33(1)(a)(i) or 33(1)(a)(ii) (dDCO) as appropriate"</i></p>
			<p>Amend as shown in red:</p> <p><i>"The Applicant may (prior to acquiring permanent</i> take possession of the green temporary possession only land which is specified in columns (1)</p>

Ref number	Question to:	Question	Applicant's Response
		<p>rights or imposing such restrictive covenants) take possession of any of the Blue Land and Pink Land on the Land Plans Onshore and "construct any works on that land as are mentioned in Part 1 of Schedule 1 (authorised development) and Part 2 of Schedule 1 (ancillary works) on that land"</p>	<p><i>and (2) of Schedule 9 for the purpose specified in relation to that land in column (3) of that Schedule, and may (prior to) provided that the Applicant has not yet served notice to acquire ing permanent rights or imposing such restrictive covenants in respect of that land) take possession of any of the Blue Land and Pink Land on the Land Plans Onshore and:</i></p> <p><i>"remove any buildings, agricultural plant and apparatus, drain, structure, apparatus, fences, debris and vegetation from that land;</i></p> <p><i>construct temporary works (including the provision of means of access), haul roads, security fencing, bridges, structures and buildings on that land;</i></p> <p><i>use the land for the purposes of a working site or construction compound (including for the purposes of duct and cable preparation and stringing out) with and for the passage of persons of vehicles (with or without materials, plant and machinery) in connection with the use of the working site or construction compound in connection with the authorised project;</i></p> <p><i>construct any new road surface or other improvements to any street specified in Schedule 2 (streets subject to street works);</i></p> <p><i>construct any ground strengthening works to facilitate construction of the authorised development;</i></p> <p><i>construct any works on that land as are mentioned in Part 1 of Schedule 1 (authorised development) and Part 2 of Schedule 1 (ancillary works) on that land; and</i></p>

Ref number	Question to:	Question	Applicant's Response
			<p><i>carry out mitigation works required pursuant to the requirements in Part 3 of Schedule 1 (requirements) or any other mitigation works on that land."</i></p>
			<p>New item</p> <p>Insert:</p> <p><i>"During the construction phase the ALLO will engage with landowners and occupiers:</i></p> <ul style="list-style-type: none"> - <i>to agree temporary, and permanent accommodation works to include fencing requirements, gates, crossing points, crossing surfacing, water supplies, stock relocation and access to severed land parcels and report and oversee necessary repairs;</i> - <i>to convey project plans, timelines, and potential impacts on property related issues and agricultural activities to identify and develop mitigation measures through mutually beneficial solutions to minimise disruption;</i> - <i>on construction traffic routeing and general construction matters;</i> - <i>to ensure that the project carries out works in accordance with the DCO requirements and management plans as they relate to agricultural matters.</i> - <i>to ensure compliance with the stage specific soil management plan</i> - <i>and the stage specific construction method statements;</i>

Ref number	Question to:	Question	Applicant's Response	
				<p>- to monitor the project's pre-construction, drainage and soil surveys and carry out pre and post construction condition schedules liaising with stakeholders with respect to field entrances and access and egress to construction strips.</p> <p>The ALLO will attend relevant project progress meetings and will work with stakeholders to enable the construction project to be conducted in a manner that respects and accommodates the needs of the agricultural and landowner community while meeting project objectives and DCO requirements.</p> <p>Contact details for the ALLO will be made available to landowners and occupiers.</p> <p>The ALLO will be contactable throughout the Contractor(s) working hours. and out-of-hours/emergency contact details will also be provided.</p> <p>The Outline Soil Management Plan [APP-226] (updated at Deadline 3) also sets out the responsibilities of the ALLO with respect to soils management.</p> <p>The final placing of the cables will be communicated to the landowner by the ALLO."</p>
			Permanent Acquisition of Rights	<p>New item at end of section</p> <p>Insert: "ALLO will continue to engage with Affected Parties communicating the final permanent land requirements prior to acquisition."</p>

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			<table border="1"> <tr> <td data-bbox="1780 315 2003 598"></td> <td data-bbox="2003 315 2211 598">New item at end of section</td> <td data-bbox="2211 315 2789 598">Insert: <i>“The final acquisition plans, will also identify any land outside of the permanent cable corridor over which rights are required, such as for operational access.”</i></td> </tr> <tr> <td data-bbox="1780 598 2003 808">Return & Reinstatement</td> <td data-bbox="2003 598 2211 808">New item at end of section</td> <td data-bbox="2211 598 2789 808">Insert: <i>“ALLO will continue to engage with Affected Parties during this period.”</i></td> </tr> <tr> <td data-bbox="1780 808 2003 1081"></td> <td data-bbox="2003 808 2211 1081">New item at end of section</td> <td data-bbox="2211 808 2789 1081">Insert: <i>“Further to the completion of construction, the land will be restored in accordance with the stage specific SMP, LEMP and CMS.”</i></td> </tr> <tr> <td data-bbox="1780 1081 2003 1459"></td> <td data-bbox="2003 1081 2211 1459">Further new item at end of section</td> <td data-bbox="2211 1081 2789 1459">Insert: <i>“Applicant to comply with commitments in the CMS to acquire no greater land/new rights or impose restrictive covenants over no greater land, than reasonably required following the detailed design, and commitments in respect of the disposal of surplus land, and release or variation of surplus restrictive covenants.”</i></td> </tr> </table>		New item at end of section	Insert: <i>“The final acquisition plans, will also identify any land outside of the permanent cable corridor over which rights are required, such as for operational access.”</i>	Return & Reinstatement	New item at end of section	Insert: <i>“ALLO will continue to engage with Affected Parties during this period.”</i>		New item at end of section	Insert: <i>“Further to the completion of construction, the land will be restored in accordance with the stage specific SMP, LEMP and CMS.”</i>		Further new item at end of section	Insert: <i>“Applicant to comply with commitments in the CMS to acquire no greater land/new rights or impose restrictive covenants over no greater land, than reasonably required following the detailed design, and commitments in respect of the disposal of surplus land, and release or variation of surplus restrictive covenants.”</i>
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<p>MM 3.1</p>	<p><i>Worst case piling scenario</i> The Applicant</p>	<p>Natural England has requested clarification in Appendix C5 of their Deadline 5 submission [REP5-138] of whether the worst-case number of piles and pile locations per day in the updated marine mammal ES chapter, updated at D4 [REP4-020], is reflected in the underlying modelling and assessment.</p> <p>a) Provide confirmation of whether or not the underlying modelling and assessment, particularly in Appendix 11.2: Marine mammal quantitative underwater noise impact assessment [APP-148] and Appendix 11.3 Underwater noise assessment technical report [APP-149] is reflective of the worst-case piling scenario presented in the updated Marine Mammal ES Chapter 11 [REP4-020].</p>	<p>The Applicant has confirmed the worst case modelling parameters of 4 monopiles (2 monopiles in 2 locations) and 8 pin piles (4 pin piles in 2 locations) installed in a 24-hour period have been used in the modelling presented in Appendix 11.2: Marine mammal quantitative underwater noise impact assessment, Volume 4 of the Environmental Statement [APP-148] and Appendix 11.3: Underwater noise assessment technical report, Volume 4 of the Environmental Statement [REP5-046] and which informed the Chapter 11: Marine Mammals, Volume 2 of the Environmental Statement [REP5-031]. The update to Chapter 11: Marine Mammals, Volume 2 of the Environmental Statement [RE5-031] was a correction of a mistake in the MDS table. The modelling, and subsequent assessment used the worst case scenario. Consequently, no further modelling was required.</p>												

Ref number	Question to:	Question	Applicant's Response
OR 3.1	<p><i>Great Black-backed Gull</i></p> <p>The Applicant</p>	<p>b) Provide a comprehensive response to all points C24, C33, C40 and C41 in Appendix C5 to the Natural England Deadline 5 Submission [REP5-138].</p> <p>As indicated by Natural England in its Deadline 5 response [REP5-141], there remains concern over the cumulative impact on the great black-backed gull. The ExA notes that the Applicant remains in disagreement with Natural England regarding this point [REP5-141] and that both parties agree that no effective mitigation is possible in this circumstance. Also of note is that no compensation measures have been offered by the Applicant for this impact. If the Secretary of State is minded to accept the advice of Natural England regarding the cumulative effects on the great black-backed gull and subsequently wishes compensation measures to be implemented, advise the Secretary of State what could be achieved and how this might be secured in the draft DCO.</p>	<p>The Applicant has responded fully to points C24, C33, C40 and C41 in Appendix C5 to the Natural England Deadline 5 Submission [REP5-138] in Applicant's Comments on Deadline 4 Submissions [REP5-122], noting that with respect to C40, the Applicant has provided an updated Offshore In Principle Monitoring Plan [REP5-084] at Deadline 6, which sets out further details on monitoring of the effectiveness of noise mitigation measures, a summary of which is set out in the Applicant's response to reference UWN3.1 below.</p> <p>The Applicant has noted the following concerns raised regarding great black-backed gull cumulative assessment by Natural England within their Deadline 3 Response [REP3-080]:</p> <ul style="list-style-type: none"> • <i>“Natural England advises that the impacts from the Project alone and cumulatively with other projects should be assessed using the South-west UK and Channel non-breeding BDMPS population of 17,742 individuals as the reference population.”</i> • <i>“We also reiterate that the cumulative assessment presented contained numerous data gaps and therefore cannot be considered to be comprehensive.”</i> <p>Accordingly, the Applicant has provided an updated cumulative assessments within Appendix 12.6: Great black-backed gull cumulative assessment and PVA, Volume 4 of the Environmental Statement (ES) (Document reference 6.4.12.6) submitted at Deadline 6. The updated assessments accounted for Natural England's request to assess against the South-west UK and Channel non-breeding Biologically Defined Minimum Population Scale (BDMPS) of 17,742 individuals. The assessments also include consideration of the cumulative Gap analysis work recently completed by White Cross Offshore Wind Farm (OWF) (APEM, 2024) in order to account for the data gaps noted by Natural England. The Applicant's conclusions with regard to the updated assessments was that the level of impact predicted would not lead to a significant adverse effect for great black-backed gull cumulatively. The Applicant's justification for such is as follows:</p> <ul style="list-style-type: none"> • The results of the Great black-backed gull sensitivity assessment [REP1-038] demonstrated the level of precaution within recommended assessment approach with a single value reducing potential impacts by ~85% per annum. • The UK great black-backed gull population has seen decline in recent years, this is predominately skewed by the significant decline noted within the Scottish population (63% in the last 15- 20 years; Burnell <i>et al.</i>, 2023) which makes up the majority of the UK population. Although significant steps have already been made by to curb this decline, through removal of great black-backed gull from

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			<p>general licencing and updated guidance for gull licencing in Scotland, which aims to reduce the number of licences that are issued to control gulls in towns and cities each breeding season (NatureScot, 2024). Additionally, the recent ban on sandeel trawling within the UK has the potential to increase prey species for great black-backed gull such as puffin (Lopez <i>et al.</i>, 2023a), further adding to potential curbing of population decline.</p> <ul style="list-style-type: none"> • The Southwest UK and Channel regional population for which Rampion 2 has connectivity, can be considered in stable to increasing based on the latest seabird census (Burnell <i>et al.</i>, 2023), in contrast to the UK population trend. This is despite a total of 11 offshore wind farm developments being operational for between nine and 21 years within the BDMPS region. • There is also uncertainty as to whether great black-back gulls are actually in decline, as opposed to their population simply stabilising back to baseline population levels following changes to landfill waste and commercial fishery discard practices in the 21st century (Burnell <i>et al.</i>, 2023; Lopez <i>et al.</i>, 2023b). This is alongside increase in top down suppression on great black-backed gull abundance by other predators such as white-tailed eagles increasing in population in recent years (Burnell <i>et al.</i>, 2023). <p>As the Applicant has previously noted from discussions with Natural England, the only mitigation measure Natural England have confidence in with respect to reducing potential collision impacts for great black-backed gull would be to raise the minimum air gap of the wind turbine generators, which is not feasible for Rampion 2 and this has been acknowledged and agreed with Natural England.</p> <p>Feasible effective compensation measures for which the Project could implement targeted at increasing great black-backed gull numbers is considered significantly limited. As noted above, key drivers of population decline in great black-backed gulls relates to prey availability, culling and predator suppression. These key factors are considered predominately outside of the control of a private developer to intervene. Another key consideration with respect to great black-backed gull compensation, would be the negative effect on other bird species increasing the numbers of great black-backed gulls would have due to increased predation pressure. For example, as evidence on the Ilse of May seabird colony current levels of puffin predation mortality (1,120 puffins per year) from great black-backed gulls is sustainable, however if the population of great black-backed gulls significantly increased at the colony this could tip the puffin population at the Ilse of May into decline (Lopez <i>et al.</i>, 2023a). Increasing great black-backed gull numbers in urban environments has the potential to lead to conflicts with humans, which can lead to additional lethal and non-lethal</p>

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TA 3.1	Traffic Survey Data Applicant	<p>The ExA notes from the latest version of the Outline Construction Traffic Management Plan (OCTMP) [REP5-068] that new traffic survey data has been obtained by the Applicant for baseline traffic flows on Michelgrove Lane and Kent Street. However, the ExA also notes that while the latest ES Traffic Generation Technical Note assessment [REP5-060] includes updated baseline traffic flows for each of these highway links their source has not been correctly referenced.</p> <p>(a) All documents relating to traffic and access should be re-submitted as a consistent set at Deadline 6, with analysis and conclusions based on the latest traffic survey data and all sources correctly referenced. And (b) What are the implications of the significantly increased baseline traffic flows on Michelgrove Lane and Kent Street highlighted by the new traffic survey data on the viability of the construction traffic management strategies for these highway links contained in the OCTMP [REP5-068]?</p>	<p>control of great black-backed gulls being required negating any compensation benefit to the species (Belant, 1997; Spelt et al., 2019).</p> <p>a) The Applicant has reviewed and updated the Outline Construction Traffic Management Plan [REP5-068], Traffic Generation Technical Note [REP5-061], and Chapter 32: ES Addendum, Volume 2 of the Environmental Statement (ES) [REP5-038] to ensure correct references and consistency between all transport documents in relation to baseline traffic flows presented for Michelgrove Lane and Kent Street. These documents have been provided at Deadline 6.</p> <p>b) The increased baseline traffic flow along Kent Street is not anticipated to have a material impact on the proposed traffic management strategy for Kent Street detailed within Appendix D of the Outline Construction Traffic Management Plan [REP5-068] on the basis that equates to one vehicle traveling along Kent Street every 2-3 minutes (or one vehicle per direction every 4-5 minutes). Whilst this means that some vehicles will be held by banksmen whilst heavy goods vehicles (HGVs) enter or exit accesses A-61 or A-64 the controls proposed and considered adequate to ensure this can be completed without compromising highway safety.</p> <p>This increased baseline traffic has also been accounted for within the detailed environmental assessment of Kent Street contained within Table 2-28 of Chapter 32: ES Addendum, Volume 2 of the Environmental Statement [REP5-038], whereby estimates driver delay has increased from negligible to minor adverse (Not Significant).</p>
UWN 3.1	Enhanced Monitoring The Applicant	<p>The Marine Management Organisation (MMO), in [REP5-146], Paragraph 2.10.5, state that due to persisting uncertainties relating to underwater noise and noise abatement efficacy, they require an enhanced monitoring programme. They explain this as follows:</p> <p><i>“This monitoring programme should include obtaining measurements of the first eight piles (or eight of the first 12 piles), of each foundation type, to be installed. We advise that this should include a commitment to provide initial outputs from the monitoring within 2 weeks of it concluding, highlighting any obvious deviations from what was assessed and whether the levels of noise abatement proposed have been achieved. We advise that the final reporting should be submitted to the MMO within 4 weeks.”</i></p> <p>Submit a revised enhanced monitoring programme in line with the MMO request, or explain in detail why this cannot be done.</p>	<p>The Applicant has provided an updated Offshore In Principle Monitoring Plan [REP5-084] at Deadline 6. This includes the commitment for monitoring to be undertaken for four piling locations for each foundation type used (i.e. monopiles and multi-leg foundations) in both the black seabream spawning period in the event that piling is permitted during this period (or part thereof), and in the period encompassing the rest of the calendar year (1st August to 28th (or 29th) February). These locations will be selected from the first 12 foundations to be installed in each period in order to provide for sites with differing seabed conditions and water depths. This monitoring strategy will deliver data representative of the varying conditions within the development site, whilst ensuring data are collected for the earliest pile installations for each of the two potential noise mitigation measure scenarios (i.e. single and, on the basis that piling within the 1st March to 31st July period is permitted, combined noise abatement systems) at sites with a range of water depths, to include sites of >40 m depth for verification of predicted (modelled) noise levels.</p>

Annex C – Land Rights Flow Chart

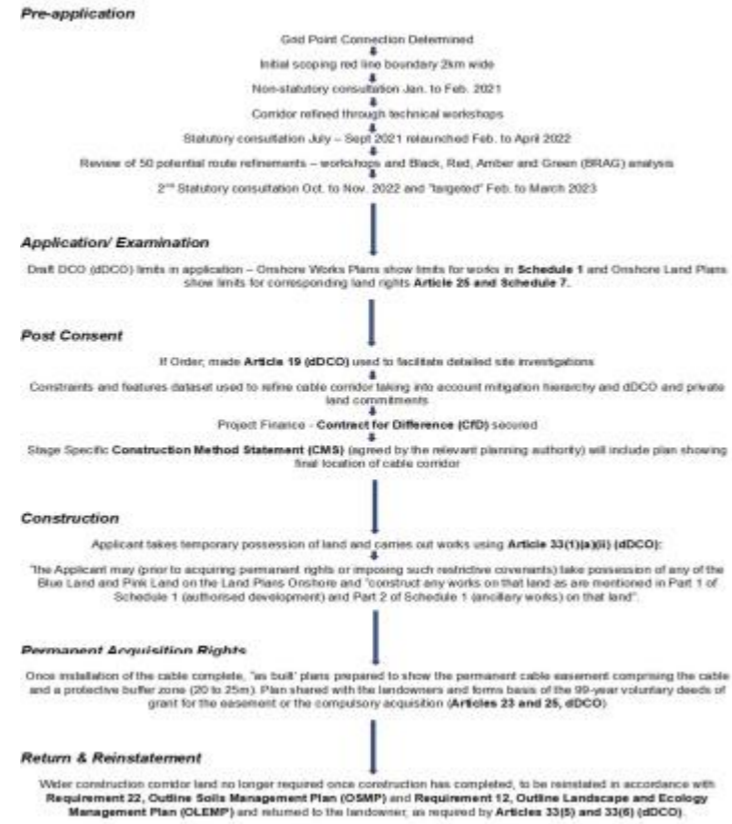
Ref number

Question to:

Question

Applicant's Response

Rampion 2 – Land Rights Flow Chart



3. References

APEM (2024). *White Cross Offshore Windfarm: Cumulative gap analysis*.

Belant, J.L., (1997). Gulls in urban environments: landscape-level management to reduce conflict. *Landscape and urban planning*, 38(3-4), pp.245-258.

Lopez, S.L., Daunt, F., Wilson, J., O'Hanlon, N.J., Searle, K.R., Bennett, S., Newell, M.A., Harris, M.P. and Masden, E., (2023a) *Quantifying the impacts of predation by Great Black-backed Gulls *Larus marinus* on an Atlantic Puffin *Fratercula arctica* population: Implications for conservation management and impact assessments*. *Marine Environmental Research*, 188, p.105994.

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