

Outer Dowsing Offshore Wind

Habitats Regulations Assessment

Without Prejudice Predator Control Evidence Base and Roadmap

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Table of Contents

Acronyms & Definitions	3
Abbreviations / Acronym	3
Terminology	3
Reference Documentation	6
1 Introduction	7
2 Site Selection	9
3 Plémont Seabird Reserve.....	10
3.1 Background.....	10
3.2 Overview of the Selected Area.....	10
3.3 Predators within the Plémont Seabird Reserve	11
3.3.1 Summary of Non-Native Predators Present	11
3.4 Control measures	11
3.4.1 Rats.....	12
3.4.2 Hedgehogs	12
3.4.3 Ferrets	12
3.4.4 Cats.....	12
3.5 Potential for Population Growth.....	12
3.5.1 Scale of Compensation	13
3.6 Connectivity with the National Site Network	14
4 Monitoring and Adaptive Management	16
4.1 Guillemot and Razorbill Implementation Plans	16
4.2 Post-Implementation Monitoring	16
5 Implementation	17
5.1 Exclusivity Agreement	17
5.2 Reserve Establishment and Management	17
6 Funding	20
7 References	21

Acronyms & Definitions

Abbreviations / Acronym

Abbreviation / Acronym	Description
AEoI	Adverse Effect on Integrity
ANS	Artificial Nesting Structure
COWSC	Collaboration on Offshore Wind Strategic Compensation
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero, formerly Department of Business, Energy and Industrial Strategy (BEIS), which was previously Department of Energy & Climate Change (DECC)
EPP	Evidence Plan Process
ETG	Expert Technical Group
FFC	Flamborough and Filey Coast
GT R4 Ltd	The Applicant. The special project vehicle created in partnership between Corio Generation (a wholly owned Green Investment Group portfolio company), Gulf Energy Development and TotalEnergies
GCP	Guillemot Compensation Plan
HPAI	Highly Pathogenic Avian Influenza
HRA	Habitats Regulations Assessment
MPA	Marine Protected Area
MRF	Marine Recovery Fund
OWF	Offshore Wind Farm
OWIC	Offshore Wind Industry Council
RCP	Razorbill Compensation Plan
RIAA	Report to Inform Appropriate Assessment
SAC	Special Areas of Conservation
SNCB	Statutory Nature Conservation Body
SPA	Special Protection Area
TCE	The Crown Estate

Terminology

Term	Definition
The Applicant	GT R4 Ltd. The Applicant making the application for a DCO. The Applicant is GT R4 Limited (a joint venture between Corio Generation, TotalEnergies and Gulf Energy Development (GULF)), trading as Outer Dowsing Offshore Wind. The project is being developed by Corio Generation (a wholly owned Green Investment Group portfolio company), TotalEnergies and GULF.
Array area	The area offshore within which the generating station (including wind turbine generators (WTG) and inter array cables), offshore accommodation

Term	Definition
	platforms, offshore transformer substations and associated cabling will be positioned.
Baseline	The status of the environment at the time of assessment without the development in place.
Compensatory Measures	Stage 3 of the Habitats Regulations Assessments (see Derogation) involves the development of compensation measures for any features which the report to inform appropriate assessment was unable to conclude no adverse effect on integrity on.
deemed Marine Licence (dML)	A marine licence set out in a Schedule to the Development Consent Order and deemed to have been granted under Part 4 (marine licensing) of the Marine and Coastal Access Act 2009.
Derogation	Stage 3 of the Habitats Regulations Assessments which is triggered once it is determined that you cannot avoid adversely affecting the integrity of a designated site. Involves assessing if alternative solutions are available to achieve the same goals as the project, if there are imperative reasons of overriding public interest, and if compensatory measures will be required.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP) from the Secretary of State (SoS) for Department for Energy Security and Net Zero (DESNZ).
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of an impact with the sensitivity of a receptor, in accordance with defined significance criteria.
Evidence Plan	A voluntary process of stakeholder consultation with appropriate Expert Topic Groups (ETGs) that discusses and, where possible, agrees the detailed approach to the Environmental Impact Assessment (EIA) and information to support Habitats Regulations Assessment (HRA) for those relevant topics included in the process, undertaken during the pre-application period.
Habitats Regulations Assessment (HRA)	A process which helps determine likely significant effects and (where appropriate) assesses adverse impacts on the integrity of European conservation sites and Ramsar sites. The process consists of up to four stages of assessment: screening, appropriate assessment, assessment of alternative solutions and assessment of imperative reasons of over-riding public interest (IROPI) and compensatory measures.
Mitigation	Mitigation measures, or commitments, are commitments made by the Project to reduce and/or eliminate the potential for significant effects to arise as a result of the Project. Mitigation measures can be embedded (part of the project design) or secondarily added to reduce impacts in the case of potentially significant effects.
Outer Dowsing Offshore Wind (ODOW)	The Project.
Order Limits	The area subject to the application for development consent, the limits shown on the works plans within which the Project may be carried out.
Preliminary Environmental	The PEIR was written in the style of a draft Environmental Statement (ES) and provided information to support and inform the statutory

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

Reference Documentation

Document Number	Title
6.1.3	Project Description
7.1	Report to Inform Appropriate Assessment
7.1.1	Offshore and Intertidal Ornithology Apportioning
7.5	Derogation Case
7.7	Ornithology Compensation Strategy
7.7.2	Guillemot Compensation Plan
7.7.3	Razorbill Compensation Plan
7.7.4	Artificial Nesting Structures Evidence Base and Roadmap
7.7.5.1	Plémont Seabird Reserve Feasibility Study Report
7.7.6	Additional Measures for Guillemot and Razorbill Evidence Base and Roadmap

1 Introduction

1. The Report to Inform Appropriate Assessment (RIAA; Document 7.1) has concluded that there would be no Adverse Effect on Integrity (AEI) to the common guillemot, *Uria aalge* (hereafter 'guillemot'), and razorbill, *Alca torda* (hereafter 'razorbill') features of the Flamborough and Filey Coast (FFC) Special Protection Area (SPA) due to displacement, both when considering the project alone and in combination with other plans or projects.
2. Following consultation with Natural England and other relevant consultees through the Evidence Plan Process, the Project has however provided a 'without prejudice' derogation case for both guillemot and razorbill in relation to the FFC SPA; alongside this, a number of options for relevant compensation measures have been developed as far as possible at the point of application. In the event that the Secretary of State determines potential for Adverse Effect on Integrity (AEI) and considers that compensation is required, the Project has provided sufficient confidence that compensation measures are available, securable and deliverable.
3. This document provides the evidence base and roadmap for the delivery of predator control, focussing on the proposed Plémont Seabird Reserve in Jersey.
4. Section 2 sets out the process followed in the selection of suitable sites for this measure, specifically where there is clear evidence that predator control is feasible and would lead to an increase in the annual productivity and recruitment of guillemot and razorbill into the regional population of the southern North Sea.
5. Section 3 provides further information on the proposed Plémont Seabird Reserve, including the potential for predator control and the resultant seabird population growth / scale of compensation that this measure could provide. Connectivity of the Plémont site with the FFC SPA and wider National Site Network is also discussed in Section 3.
6. Implementation of the measure, including monitoring and adaptive management, as well as the funding required, are provided in Sections 4 to 6. Discussions regarding the development of this measure were framed around an earlier version of the Defra compensation guidance (published in 2021). However, although still under consultation, updated draft guidance has been published recently (Defra 2024). The new proposals prioritise Ecological Effectiveness when considering compensation, i.e. the ecological outcome and the confidence that the measures will be effective.
7. This document is supported by The Plémont Seabird Reserve Feasibility Study Report undertaken in 2021 by Birds on the Edge for the National Trust Jersey (NTJ), provided as document 7.7.5.1.
8. This report should also be read alongside the Project's Guillemot Compensation Plan (7.7.2) and the Razorbill Compensation Plan (7.7.3).

9. This measure forms the primary ‘without prejudice’ compensation measure for guillemot and razorbill supported, if necessary, by the suite of ‘additional measures’ in south-west England (see Additional Measures for Compensation of Guillemot and Razorbill document reference 7.7.6). Additional supporting compensation could be provided by ANS should that be deemed necessary (see ANS Evidence and Roadmap, document reference 7.7.4) .
10. The compensation requirements for guillemot and razorbill, calculated using the Applicant’s approach and Natural England’s anticipated approach, are presented in each of the species specific Compensation Plans: the Guillemot Compensation Plan (document reference 7.7.2) and the Razorbill Compensation Plan (document reference 7.7.3).

2 Site Selection

11. A desk-based site review, focussed on locations which could support populations of breeding guillemot and/or razorbill, and where predator control measures would be feasible, was undertaken. Islands were preferred to mainland sites due to the greater potential for full predator eradication or control/exclusion. The site selection process was informed by Stanbury *et al.* (2017), taking into account factors such as the connectivity to other sites with predators, human population size and island area size.
12. Several sites from the following areas were identified:
 - Channel Islands;
 - Isles of Scilly; and
 - Scottish Islands.
13. A shortlist of suitable sites was created, with input from consultation with relevant site managers as well as predator control experts. Information considered included, but was not limited to:
 - The feasibility of undertaking predator control on the relevant site, including whether a full eradication, or a control/exclusion is possible;
 - The extent of the predation issue, and the predator species present;
 - Any site-specific requirements (including over the lifetime of the measure);
 - The expected quantifiable benefits to guillemot and razorbill as a result of eradication on the site;
 - The ability of the site to host measures in addition to existing site management; and
 - The connectivity of birds at the proposed site with relevant SPAs (e.g. FFC SPA) and the UK national site network.
14. These considerations guided the site selection process towards a location where predator control could be carried out, to the benefit of seabird populations and at a location where any population increases would benefit the FFC SPA colonies and the UK national site network.
15. Very few sites in England have evidence of ongoing predation related suppression of seabird populations, with several having already undergone successful predator control programmes. This reduced options considerably, but remaining areas identified as potentially feasible for an eradication/control programme are the Isles of Scilly and the Channel Islands.
16. The area between the Plémont and La Rocquerelle Headlands, on the north coast of Jersey, was identified as a suitable location; studies into local predator populations have already been carried out and the potential to restore populations to historic levels at the site had been assessed.

3 Plémont Seabird Reserve

3.1 Background

17. A full feasibility assessment of the potential for predator control at the proposed Plémont Seabird Reserve was carried out by Birds on the Edge for the National Trust Jersey (NTJ) in 2021. The feasibility study (document 7.7.5.1) provides the detailed evidence base for this measure, outlining the current state of the bird populations at the site, the historical context, information on the presence of mammalian predators and the measures required to remove predators from the reserve, as well as ongoing management measures that will be required over the lifetime of the reserve.
18. The Project has secured an exclusivity agreement with NTJ with respect to the funding of the establishment of the reserve. As part of the exclusivity agreement, the Project has also funded the Project Officer role for the reserve for 1-year in the first instance to ensure continued progress.
19. It should be noted that, at the time of the Project's initial involvement, there was insufficient commitment to funding to develop the Reserve. However, the Project has committed to provide the additional funding required to implement and maintain the scheme during the lifetime of the project.
20. The following sections provide further information on the evidence base and roadmap for delivery of this measure, should it be required, including:
 - Overview of the selected area, suggested predator control measures and the potential for population growth/scale of compensation delivered (Section 3);
 - monitoring and adaptive management for this measure (Section 4);
 - implementation of the measure (Section 5); and
 - funding of the measure (Section 6).

3.2 Overview of the Selected Area

21. The two mile stretch of coast between the Plémont and La Rocquerelle Headlands in northern Jersey, comprises cliffs, promontories, bays and rocky shores. The coastline is backed by steep bracken and gorse covered slopes, bordering onto agricultural land with some small settlements. A public footpath runs through the area and parts of the described area are accessed for swimming, angling, clay-pigeon shooting and other forms of outdoor recreation. The site also hosts a variety of historic sites, including three Neolithic sites, as well as fortifications dating from the Iron age to the Second World War.
22. The entire site falls within the boundaries of the Jersey Coastal Park, which is mostly owned by the Government of Jersey, and managed by the Natural Environment Department. Management for biodiversity mainly consists of the removal of bracken and gorse to encourage growth of native coastal flowers and grasses.

23. Small scale commercial fisheries operate offshore, however resulting impacts on seabirds are low as operations are minimised during the breeding season through a voluntary code of conduct, discouraging access to those areas closest inshore, known as the 'Seabird Protection Zone'.

3.3 Predators within the Plémont Seabird Reserve

3.3.1 Summary of Non-Native Predators Present

24. Studies into non-native invasive predators in the Plémont area were carried out by the 'Birds on the Edge' partnership (<http://www.birdsontheedge.org/>).
25. Four species of non-native invasive predators have been identified within the proposed reserve (Brown rat, *Rattus norvegicus*, European hedgehog *Erinaceus europaeus*, feral ferret *Mustela furo* and feral cat *Felis catus*), with studies using traps, direct observations from project officers, thermal imaging, motion-triggered cameras, flavoured wax blocks, and footprint tunnels. Further monitoring of some species has been carried out in order to inform population estimates for the site, or behavioural aspects such as home ranges.
26. Trapping, images from monitoring and trail cameras, and direct observations were the most effective means of identifying predators within the study area, contributing to a total of 408 detections where species could be ascertained.
27. In total, 53 occurrences of brown rat have been recorded (comprising a minimum of 13 individuals), with 219 hedgehogs (32 individuals), 57 ferret (17 individuals) and 7 cats (4 individuals) recorded. Numbers of individuals are likely to be underestimates, especially where individuals of the animals look alike, as trapped animals were not marked during the beginning of the monitoring program. Greatest numbers of each species were encountered around human habitation to the south of the Plémont headland, and towards the eastern end of the proposed reserve.
28. For detailed information on the site baseline please see the supplementary Plémont Seabird Reserve Feasibility Study Report (document 7.7.5.1).

3.4 Control measures

29. In order to control non-native predators, a predator-proof fence encircling the area to be protected would be constructed, and lethal and non-lethal traps designed to capture the species defined in section 3.3 would be deployed. Concurrent monitoring of predator numbers using the methods described below will allow the success of the scheme to be assessed, and will inform the need for, and nature of, any adaptive management measures to be implemented. The predator proof fence will be built to the following specifications:

- A minimum of 1.9m high with additional hood or cap to deter predators from climbing over
- A mesh size no larger than 7mm, with the mesh extending 50cm from the base to prevent burrowing under
- Sited to follow the contours of the land with a buffer zone containing no vegetation or trees within 4m.

30. Fences built to these specifications have been used successfully in predator control measures in New Zealand e.g. the Wharariki Sanctuary (Nature Trust, 2024), Hawaii (Young *et al.*, 2012), Australia (Smith *et al.*, 2020) and the Azores (Benedicto *et al.*, 2019).

31. For the control of non-native predators, the following suite of measures will be deployed:

3.4.1 Rats

- Rat specific kill traps on a grid of 25 – 50m squares,
- Additional rat specific kill traps at locations where rats have been detected,
- Bait stations at the same spatial scale,
- Feeding stations with live traps where rats have been detected, and
- Baited camera traps, rodent detector cards, dusk surveys and surveys for tracks and signs to monitor for presence (and as such, inform the location of the control measures).

3.4.2 Hedgehogs

- Deployment of feeding stations with humane traps in areas occupied by hedgehogs, and other areas of suitable habitat.
- Monitoring through the use of baited traps, dusk surveys and surveys for tracks and signs

3.4.3 Ferrets

- Deployment of feeding stations with humane traps in areas occupied by ferrets, and other areas of suitable habitat.
- Monitoring through the use of baited traps, dusk surveys and surveys for tracks and signs.

3.4.4 Cats

- Deployment of feeding stations with humane traps in areas occupied by cats, and other areas of suitable habitat.
- Monitoring through the use of baited traps, dusk surveys and surveys for tracks and signs.

3.5 Potential for Population Growth

32. Predator eradication programs have had positive impacts in other colonies (for example Canna, Lundy and the Shiant), but predicting the impact of a successful predator eradication program inevitably carries some uncertainty. This said, the following factors provide confidence that there is potential for population growth as a result of the proposed control measures:

- There is suitable habitat within the proposed Reserve to hold many more breeding auks and other cliff-nesting seabirds than the current numbers.
- Other parts of the Channel Islands hold larger colonies of guillemot and razorbill: there are guillemot colonies of 90 birds on Alderney, 135 on Herm and 235 on Sark; there is a razorbill colony of 58 birds on Alderney (SMP database). This suggests that there is suitable foraging for both species within the species' foraging ranges from the proposed Plémont Seabird Reserve site.

- Numbers of native predators (e.g., gulls) are low in the area, which may also be a factor supporting population growth, although any increase in auk numbers may result in a subsequent increase in native predators.
 - Historically, the site has held maximum populations of 300 guillemot and 300 razorbill. With options for habitat management capable of increasing this capacity by creating more accessible ledges for breeding birds, the reserve has the potential to restore guillemot and razorbill populations beyond these historic levels.
33. There is currently no guillemot breeding population at the Reserve, although annually individual birds are noted in the area, potentially searching for suitable breeding habitat and birds are seen annually below the cliffs at Grosnez point, just west of the site, in the breeding season, with birds noted flying up to the cliffs on occasion. With this behaviour noted, and the regularity of occurrence here and off the reserve in the breeding season, it is possible that breeding is occurring undetected (see Plémont Seabird Reserve Feasibility Study Report (document 7.7.5.1)).
34. The population of birds breeding in the vicinity of the Reserve appears relatively stable (42 in 2007, 44 in 2011, 30 in 2014) and these colonies could provide breeding birds for Plémont once the predator eradication is complete. The presence of individuals around the colony in the breeding season suggests that potential breeders do investigate the area.
35. The current razorbill population is 27 individuals on the cliffs at the reserve (data provided by Birds on the Edge post publication of the feasibility report). With slightly different breeding habitat requirements to guillemot, once the eradication of rats and other non-native predators is complete, this small population should be able to expand, and without creating competition for guillemots.
36. Colonisation of new (or recolonisation of historic) natural breeding sites in auks has been well documented.
37. Colonies can grow and expand rapidly where conditions are right (Swann, 1983) and after successful eradication programs, expanding populations of both species will readily occupy new and historically occupied sites (Booker *et al.*, 2018). Large colonies of Brunnich's guillemot and razorbill that were wiped out by hunting pressures have re-established even when source colonies are very distant. Boertmann (2023) describes recolonisation by Brunnich's guillemot where source colonies are at least 270km away, with razorbill recolonising due to an expanding local population. This colony was initially recolonised by kittiwakes, suggesting heterospecific habitat copying may have been a factor in the recolonisation of auks. If this is the case, predator control and subsequent increases in razorbill may also encourage guillemot to recolonise the Plémont site.

3.5.1 Scale of Compensation

38. The scale of compensation that will be delivered by the predator control measure is defined by the current population of guillemot and razorbill in the context of historical peaks. If this measure returns guillemot and razorbill populations to previous maxima, the populations could grow to historical highs of 300 individual guillemot and 250 individual razorbill on the cliffs. Applying a standard correction factor (multiply number of individuals by 0.67) to express this as a population of breeding pairs, compensation quanta could be at least 200 pairs of guillemot and 167 pairs of razorbill from the Plémont Seabird Reserve. Using the Applicant’s impacts and approach to compensation calculation (as described in the Guillemot Compensation Plan (7.7.2) and the Razorbill Compensation Plan (7.7.3)), the predator control measure could account for all of the compensation requirement for guillemot and razorbill, with 110.6 and 103.4 breeding pairs required, respectively (Table 3.1).

Table 3.1. Capacity of the predator control measure to deliver the required compensation (Applicant’s approach)

	Requirement (breeding pairs)	Capacity (breeding pairs)	% of requirement delivered by measure
Guillemot	110.6	200	180.8
Razorbill	103.4	167	161.5

3.6 Connectivity with the National Site Network

39. Both guillemot and razorbill show a high degree of breeding philopatry (>90%), meaning that they return to the same colonies year on year. However, they do show a lower degree of colony philopatry (guillemot = ~50%; razorbill = ~80%). This means that roughly 50% of guillemots disperse away from the colony where they hatched and recruit to non-natal colonies (Swann and Ramsay, 1983; Lyngs, 1993; Harris et al., 1996; Lavers et al., 2007). This is evidenced by some colonies showing very high rates of growth, indicating that immigration into the colony is occurring (Hudson, 1982).

40. Hornsea Four provided considerable evidence of connectivity of guillemot and razorbill in the Channel Islands with North Sea populations and beyond from ringing studies (Ørsted, 2022) which was accepted by the Secretary of State such that predator eradication in the Channel Islands has been relied upon as a compensatory measures for guillemot for that project. Ringing recoveries show how some birds raised at FFC SPA (and other North Sea colonies) spend at least some of the non-breeding season in the area around the Channel Islands.

41. In summary, levels of colony philopatry among immature guillemots were approximately 50%, with some birds ultimately recruiting to colonies 780km from the natal colony. Dispersal during the non-breeding season between UK North Sea breeding sites and the English Channel is shown to be regular through both kernel density analyses of tagged birds, and ring recoveries. Birds ringed at east coast UK colonies have been recovered in the Channel Islands, suggesting that a proportion of east coast UK breeders end up in Channel Islands waters in the non-breeding season.

42. Razorbill philopatry is higher, but those that do disperse may do so over bigger ranges than guillemot. Of 314 ringed birds in eastern Canada, 41 dispersed to an island cluster averaging 541 km away, and four dispersed to islands approximately 783 kms away. The largest distance recorded during this study was 1,737 kms, and one razorbill recruited to a colony in eastern Canada from Handa in western Scotland, a distance of 3,200 kms.
43. The provision of suitable breeding habitat in an area used by North Sea breeding birds during the non-breeding season is likely to encourage colonisation of these birds at Plémont. The re-established colonies at Plémont should have high enough productivity to contribute breeding birds to sites within the wider National Site Network. Birds raised at the Plémont Seabird Reserve will have the potential to recruit to the FFC SPA.

4 Monitoring and Adaptive Management

4.1 Guillemot and Razorbill Implementation Plans

44. An outline monitoring and adaptive management plan has been provided for both guillemot (the Guillemot Compensation Implementation and Monitoring Plan (GCIMP)) and razorbill (the Razorbill Compensation Implementation and Monitoring Plan (RCIMP)) and these plans will be developed further post consent, in consultation with the species specific Compensation Steering Group (CSG) members, as required.
45. Once the measure is in place, if monitoring suggests that the control programme is less successful than planned, an assessment will be undertaken to establish the reasons for the lack of success and to identify methods of improving the control programme.
46. If the long-term biosecurity risk (i.e. predator re-invasion) at the initial site proves too high, then another location may be chosen, or alternatively a contribution to the Marine Recovery Fund (MRF) (or equivalent) may be considered, in consultation with the CSGs and Department for the Environment, Food and Rural Affairs (Defra).
47. Support to the Plémont Reserve as a compensation measure may be implemented by the Project alone, however the concept of predator control more generally is currently within the library of compensatory measures to be delivered through the Collaboration on Offshore Wind Strategic Compensation (COWSC) group, that will be available through the MRF and as such may be delivered at a strategic, cross-project level. The draft Development Consent Order (DCO) provides a mechanism for the Project to deliver compensation through the MRF.

4.2 Post-Implementation Monitoring

48. Monitoring of both targeted predators and relevant seabirds will be undertaken following implementation of any predator control programme to establish the success of this measure. This will include monitoring for signs of re-invasion and the identification of any increases in predator numbers above target levels.
49. To assess the response of guillemot and razorbill and other seabird species to the predator removal programme, breeding populations and productivity will also be monitored. Data will be compared to pre-eradication levels to assess any changes as a result of the measure. Productivity and any population changes will also be evaluated in a local, regional, and national context, comparing any changes to other guillemot and razorbill colonies to assess the success of the project. This process may involve undertaking seabird censuses and productivity monitoring at other local or regional guillemot and razorbill colonies.
50. Monitoring of the efficacy of the existing voluntary agreement with sea users to restrict close approach to breeding cliffs will allow the assessment of levels of disturbance through seaward disturbance and the potential for strengthening the nature of the agreement, or the visibility of the measure as adaptive management.
51. Annual monitoring of seabird numbers will continue for the operational phase of the Project.

5 Implementation

5.1 Exclusivity Agreement

52. As outlined above, the Applicant has entered into an exclusivity agreement with the NTJ with regard to the funding of the proposed Plémont Seabird Reserve project and with the intention to enable full establishment of the Reserve, should compensation for guillemot and/or razorbill be required. The Applicant is currently funding a full time Project Officer role at NTJ who is progressing the planning of the project.

5.2 Reserve Establishment and Management

53. It is anticipated, that if granted consent, the Project will be operational by 2030, with offshore construction potentially commencing in 2027 and preparatory works undertaken from 2026 at the earliest. An indicative construction programme is provided in document 6.1.3 of the Environmental Statement which has been used to inform the detailed assessments as required (including in-combination and cumulative assessments). The delivery of compensation measures and associated activities could commence prior to the start of the construction phase of other offshore elements of the Project. Note that these dates are indicative at this stage.
54. NTJ has installed a trial fence in support of the future Planning Application within the area where the reserve would be established. The full planning application for the establishment of the full fence and the Reserve is expected to be submitted in early Q2 2024.
55. Public opinion on the establishment of the Reserve has been assessed through a public survey, informed by an awareness campaign including a web page, information boards and leaflets, social media and public events. The results of this survey will be presented to the Planning Department as part of the Planning Application.
56. The Planning Application is expected to be determined by Q3-Q4 2024, at which time, all planning consents for the establishment of the fence will be in place. As such, following a successful planning application, it is expected that all necessary consents for this measure will be secured prior to the determination of the Project's DCO.
57. Once leases with land-owners are secured, construction would be carried out in line with a construction plan, drawn up in consultation with relevant stakeholders.
58. On the completion of the predator-proof fence, the predator eradication plan, drawn up in consultation with stakeholders, would be implemented. This work would run concurrently with a biosecurity strategy (defining schedules for activities such as routine fence maintenance and vegetation management) and a monitoring strategy, aimed at reducing the likelihood of re-invasion, and should this occur, enabling detection and further eradication. Monitoring would also enable the progress of the predator eradication to be charted and may inform when predator eradication can be declared complete.
59. Operational plans would be drawn up, with implementation likely starting in Q3/Q4 2025.

60. Following determination of the Project DCO, and if the SoS considers that compensation is required for guillemot and/or razorbill, the Project is confident that the establishment of the proposed Plémont Seabird Reserve can be secured and deliverable prior to the operation of the Project. An indicative programme for the establishment of the Reserve is set out in Table 5.1.

Table 5.1 Indicative timescales for establishment of Plemont Seabird Reserve

Phase	Indicative time based on current project timeline	Task	2024	2025	2026	2027	2028	2029	2030
Project milestones									
Consent	Q3/Q4 2025	Anticipated consent award							
Construction	2027	Start of offshore construction							
Reserve Establishment									
Consent	Q3 2024	Anticipated grant of planning permission for full fence							
Establishment	Q4 2025	Construction of fence							
	Q4 2025 onwards	Eradication programme							
Management	Q1 2026	Reserve established and ongoing management implemented							

6 Funding

61. The anticipated costs of the development, implementation and ongoing maintenance and monitoring of the proposed Plémont Seabird Reserve are outlined in Table 6.1 below. These costs are also included within the Compensation Funding Statement (document reference 7.9) which outlines how the Applicant and its ultimate parent companies would fund compensation measures should they be required.

Table 6.1: Estimated costs for establishment and management of Plémont Seabird Reserve

Phase	Cost
DEVEX	£458,384
CAPEX	£1,567,303
OPEX	£3,241,997
Total	£5,267,684

7 References

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