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Volume 8 Additional Information

Appendix 30: Refined Outline Implementation and Monitoring Plan

Caledonia Offshore Wind Farm Ltd

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Volume 8 Appendix 30: Refined Outline Implementation and Monitoring Plan

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Acronyms and Abbreviations

| | |
|---------------|--|
| AEoSI | Adverse Effect on Site Integrity |
| BPUE | Bycatch Per Unit Effort |
| IMP | Implementation and Monitoring Plan |
| MD-LOT | Marine Directorate – Licensing Operations Team |
| MoU | Memorandum of Understanding |
| OWF | Offshore Wind Farm |
| PVA | Population Viability Analysis |
| RIAA | Report to Inform Appropriate Assessment |
| NTS | National Trust for Scotland |
| RSPB | Royal Society for the Protection of Birds |
| SPA | Special Protection Area |

1 Introduction

1.1 Foreword to Updates

- 1.1.1.1 *In post-application consultation (04 June 2025), NatureScot requested that any updates to the compensation documents are provided as standalone documents clearly capturing additional information and key updates, rather than providing revised versions of the compensation documents submitted at application in November 2024. Whilst a standalone addendum has been provided for the Compensation Plan (Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans), a standalone update document was not appropriate for the Implementation and Monitoring Plan due to its iterative nature.*
- 1.1.1.2 *To maintain clarity, all updates and new information are instead presented in blue italic text, using Application Document 15, Appendix 15-4: Caledonia North Outline Implementation and Monitoring Plan as a basis for the updates (noting this appendix also incorporates Caledonia South).*
- 1.1.1.3 *For additional clarity, in instances where information in a section of this appendix addresses, or relates to, specific questions or advice raised by a consultee in their representations, this is described in the style displayed in the example below:*

Example

In their Representations, NatureScot advised [description of advice provided]

1.2 Overview

- 1.2.1.1 This appendix provides details regarding the (Outline) Implementation and Monitoring Plan (IMP) for the Proposed Development (Offshore), specifically to inform the Caledonia North *and Caledonia South* applications, located in the Moray Firth, Scotland. This appendix supports the Caledonia North Derogation Case (Application Document 15: Caledonia North Habitats Regulations Appraisal Derogation Case) *and Caledonia South Derogation Case (Application Document 16: Caledonia South Habitats Regulations Appraisal Derogation Case)*.
- 1.2.1.2 The Proposed Development (Offshore) will be developed in two phases (see Volume 1, Chapter 5: Proposed Development Phasing), referred to as Caledonia North and Caledonia South. The Array Areas of the two phases are referred to as the Caledonia North Site and the Caledonia South Site, with the combined Array Areas referred to as the Caledonia Offshore Wind Farm (OWF). It is assumed that construction of the two application areas

could be progressed in either order (e.g., Caledonia North constructed in the first phase, then Caledonia South in the second phase, or vice-versa) or at the same time. This has been assessed within a single Report to Inform Appropriate Assessment (RIAA) covering Caledonia North and Caledonia South in isolation, as well as the Proposed Development (Offshore) (i.e., Caledonia North and Caledonia South combined).

- 1.2.1.3 The Caledonia North RIAA (Application Document 13) *and Caledonia South RIAA (Application Document 14) and subsequently the Ornithology Additional Information Reports for Caledonia OWF, Caledonia North and Caledonia South (Volume 8, Appendices 4, 5 and 6)*, through apportioning, in-combination assessments and population viability analysis (PVA), concluded that the Proposed Development (Offshore) could have an Adverse Effect on Site Integrity (AEoSI) on a number of Special Protection Area (SPA) seabird populations when impacts from the Proposed Development (Offshore) are considered in-combination with other projects. For this reason, the application for Caledonia North *and Caledonia South* is supported by a derogation case, including the development of compensation measures for black-legged kittiwake (hereafter kittiwake) *Rissa tridactyla*, Northern gannet (hereafter gannet) *Morus bassanus*, common guillemot (hereafter guillemot) *Uria aalge*, *razorbill Alca torda* and Atlantic Puffin (hereafter puffin) *Fratercula arctica*. For guillemot, *razorbill* and puffin, this derogation case is without prejudice, based on the fact that the Applicant Approach concluded no AEoSI for those species.
- 1.2.1.4 This document provides an outline for the Implementation and Monitoring Plan for the chosen compensatory measures. This is a working document; *an Outline IMP was submitted at application (Caledonia North Outline Implementation and Monitoring Plan (Application Document 15, Appendix 15-4) and Caledonia South Outline Implementation and Monitoring Plan (Application Document 16 Appendix 16-4))*, which provides an overview of the information to be captured within the IMP, to be developed in close collaboration and consultation with a stakeholder steering group post-submission. *This refined version of the Outline IMP represents the first update to this iterative IMP document, providing additional information and updates on the implementation and monitoring plans.*

1.2.1.5

This Refined Outline IMP document should be read alongside:

- Caledonia North Compensation Long List and Short List (Application Document 15, Appendix 15-2) *and Caledonia South Compensation Long List and Short List (Application Document 16, Appendix 16-2)*, which contains:
 - For each at-risk species, an ecological description and information on pressures facing the species, the nature, extent and potential impacts of adverse effects
 - A long list and short list of compensation measures, with methodology provided and feasibility and sufficiency of compensation options discussed
- Caledonia North Compensation Plan and Site Selection (Application Document 15, Appendix 15-3) *and Caledonia South Compensation Plan and Site Selection (Application Document 16, Appendix 16-3)*, which contains:
 - Details on the predicted impacts (from Caledonia North RIAA (Application Document 13) *and Caledonia South RIAA (Application Document 14)*);
 - An overview of the proposed short list of compensation measures, including ecological effectiveness, wider ecological considerations, timing of delivery, monitoring requirements, adaptive management requirements and feasibility.
- Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans (hereafter referred to as "Compensation Plan Addendum"), which contains additional information and key updates on the predicated impacts and proposed compensation measures.

1.2.1.6

This Outline IMP details the consultation process and outlines stakeholders that could be involved in the IMP development and compensation delivery process. It then considers IMPs for all shortlisted compensatory measures. The shortlisted compensatory measures *proposed at application* are as follows:

- Reduction of disturbance and colonies (kittiwake, gannet, guillemot, puffin);
- Mammalian predator management and eradication (all species);
- Avian predator management (kittiwake, guillemot, puffin);
- Bycatch reduction (gannet, guillemot);
- Restoration or maintenance of breeding sites (puffin); and
- Conservation management funding (all species).

In their Representations, NatureScot advised they agree that avian predator management has potential to compensate for impacts from offshore wind, but do not support it as a measure at this stage.

In their Representations, RSPB noted difficulties of carrying out non-lethal avian predator control and flagged potential impacts upon species associated with other designated SPAs.

1.2.1.7 Following receipt of the NatureScot (dated 27 March 2025) and The Royal Society for the Protection of Birds (RSPB) Scotland Representations (dated 28 March 2025) the Applicant has decided to not progress avian predator management at this time, on the basis that NatureScot and RSPB do not support it as a compensation measure. The section on avian predator management provided in the Outline IMP at consent application has thus been removed from this Refined Outline IMP.

1.2.1.8 For each shortlisted compensatory measure, the document outlines contents of the IMP regarding the following:

- Scale and location;
- Design of measure;
- Management/maintenance (where applicable);
- Delivery mechanisms;
- Implementation timeline;
- Monitoring;
- Adaptive management; and
- Reporting.

2 Consultation

- 2.1.1.1 The Applicant will establish a steering group to assist on implementation, monitoring, reporting, adaptive management and other relevant matters. Specifically, the steering group will:
- Monitor the progress of the IMP to ensure objectives of the compensation measure(s) are defined and met;
 - Provide expert views (such as *advising on measure design, scale*, any technological or ecological issues, data analysis and presentation etc.);
 - Give advice on key decisions, requirements, targets and timelines for implementation and monitoring;
 - Consider and recommend corrective measures where and if these objectives are not being met;
 - Carry out reviews at set timepoints throughout implementation and delivery (to monitor progress and aid in the discharging of consent conditions);
 - Ensure that there is a transparent and open process for the implementation of the IMP with an evident audit trail; and
 - Provide regular updates on the implementation of the IMP to a 'wider audience'.
- 2.1.1.2 *By overseeing the monitoring, reporting and adaptive management provisions, the steering group ensures compliance with relevant consent conditions (and any other associated licence obligations).*
- 2.1.1.3 Steering group membership will be finalised post-submission. *Invitations to join the group as* members will be *extended to* representatives from the Applicant, NatureScot, Marine Directorate - Licensing Operations Team (MD-LOT), the Royal Society for the Protection of Birds (RSPB), local wildlife trusts, local authorities and other local stakeholders (for example relevant representatives of commercial fisheries for developing the bycatch compensation measure, *and National Trust for Scotland (NTS) for the predator control measure*).
- 2.1.1.4 This section of the IMP will provide an overview of all relevant consultation that has taken place through the steering group as part of the development of the IMP. Details of the steering group including membership, schedule of meetings, timetable for final IMP delivery and review periods will be documented here. This section will include a summary of agreements and key decisions, as well as any outstanding issues and next steps for resolving these. Plans for ongoing engagement with the steering group will also be outlined here.

In their Representations, NatureScot advised they appreciate the creation of a steering group, however during the planning stage are only able to provide high-level advice.

In their Representations, RSPB advised they welcome the proposed establishment of a steering group to oversee implementation of compensation measures. RSPB notes that whilst they welcome involvement, RSPB is unlikely to have the capacity to engage as they might ideally like.

- 2.1.1.5 *In the compensation documents submitted as part of the consent application, the Applicant outlined the aim to set up a steering group post-submission. However, given the fact that in their Representations both NatureScot and RSPB highlighted that they have limited scope to engage in discussions at this stage, the Applicant has decided to postpone formal steering group formation until after consent award. Stakeholder engagement around compensation is instead taking place separately (i.e., outside a steering group format) during the planning phase; further details on discussions with stakeholders since application are captured below.*
- 2.1.1.6 *Since consent application, consultation with NatureScot has taken place on 04 June 2025 and 09 September 2025, during which progress on compensation planning was presented and feedback on the proposed measures and approach received. In addition, collaborations have been built with NTS and Muir Mhòr Offshore Wind Farm for the predator control measure (for more information, see Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans). Furthermore, an initial meeting was held with Clean Catch UK and Defra to inform the bycatch reduction measure, particularly in relation to monitoring methodology. Bycatch data collection in the Moray Firth (commenced in 2024) was continued in 2025. In addition, site visits were undertaken to East Caithness Cliffs and Isle of May, and managers at both sites have been approached to commence discussions on the disturbance reduction measure (see Volume 8, Appendix 34: East Caithness Cliffs Site Assessment Report (Confidential)).*

3 Proposed Compensation Measures

3.1 Reduction of Disturbance at Colonies

3.1.1 Overview

3.1.1.1 An overview of the proposed compensation measure (including ecological effectiveness, wider ecological considerations, timing of delivery, monitoring requirements, adaptive management requirements and feasibility) can be found in Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection, *Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection and Volume 8 Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans*.

3.1.1.2 *The overarching aim of this compensation measure is to reduce anthropogenic disturbance on nesting seabirds and as such increase productivity and/or breeding population size.*

3.1.2 Scale and Location

3.1.2.1 This section will discuss the scale of compensation required as per the relevant assessments. The scale of compensation will be informed through compensation calculations as outlined in Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection *and Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection, with further information provided in Volume 8 Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans*, and subsequently confirmed through the consent decision.

3.1.2.2 This section will set out the location(s) at which the disturbance reduction measures will be undertaken. It will include evidence on the suitability of the site(s) to deliver compensation, based on the site selection detailed within Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection *and Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection*, as well as further refinement using stakeholder consultation, further research and any relevant on-site monitoring.

3.1.2.3 *Since consent application potential opportunities for deployment of this compensation measure have been identified at the Isle of May and East Caithness Cliffs. In June 2025, the Applicant undertook a site visit to both the Isle of May and East Caithness Cliffs to assess the feasibility of implementing seabird compensation measures, with evidence of visitor-related disturbance observed during the site visits. Further details on these*

site investigations have been provided in Volume 8, Appendix 34: East Caithness Cliffs Site Assessment Report (Confidential) and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans. The Applicant has not yet been able to secure a meeting with the site managers due to a lack of response and/or limited availability. The Applicant remains keen to engage and will continue to seek opportunities for discussion, and NatureScot is facilitating contact between the Isle of May site manager and the Applicant.

3.1.2.4 *The Applicant is looking to continue to progress site investigations and discussions with the relevant site managers and other key stakeholders during the remainder of 2025. The Applicant's aim is to carry out feasibility site visits and baseline monitoring during the first breeding season post-consent, with implementation locations (and measure design) finalised shortly after (in collaboration with site managers). Final details regarding site selection will thus be confirmed within the next iteration of this IMP.*

3.1.2.5 *Numerous other sites across Scotland were contacted to investigate the potential for delivering disturbance reduction measures, with limited response. In addition to progressing the measure at the Isle of May and East Caithness Cliffs, the Applicant also continues to be open to progressing this measure at other locations, where contact with site managers can be successfully made and opportunities are identified.*

3.1.2.6 Information on the securing of the relevant rights and permissions for the location(s) *taken forward for compensation delivery* will be detailed here.

In their Representations, NatureScot advised further detail is required regarding the planned frequency and duration of the measure.

3.1.2.7 *Disturbance reduction measures are planned to be implemented with the following frequency and duration:*

- For ongoing activities, such as educational campaigns, implemented as soon as feasible after consent and pre-implementation baseline collection, delivered annually for the operational lifetime of the offshore wind farm; and
- For infrastructural improvements, such as path improvements, to be installed as soon as feasible after consent and pre-implementation baseline collection, and to be maintained over the operational lifetime of the offshore wind farm.

3.1.3 Design of Disturbance Reduction Measures

3.1.3.1 This section will present the chosen approach and design for the delivery of the anthropogenic disturbance reduction programme (e.g., the introduction of wardens, signage, path diversions and path maintenance). Ecological considerations to maximise the potential for success will also be discussed.

In their Representations, RSPB advised that whilst the proposed disturbance reduction activities can have a practical effect, little detail is included [in the consent application] regarding how this would actually work.

3.1.3.2 *Preliminary site visits to the Isle of May and East Caithness Cliffs identified the potential for the following disturbance reduction activities (see Volume 8, Appendix 34: East Caithness Cliffs Site Assessment Report (Confidential)):*

- Boardwalk creation;
- Surfaced (e.g., rock/gravel) path creation;
- Path network review and route improvements (new routes and/or closures);
- Improved warden briefing (guide route use and spread footfall);
- Signage, flyers and/or conduct agreements; and
- Installation of viewing opportunities (hides, platforms or CCTV).

3.1.3.3 *The final design of the measure is to be decided upon in discussion with the site managers, with the most beneficial and feasible activities to be selected and delivered as a package of disturbance-reducing measures, which will together be monitored for effectiveness. This can include one of more of the options listed above, but may also include additional activities identified as part of discussions with the site managers. If additional activities are proposed, these would be consulted upon with the steering group and presented in detail in this section in the next iteration of this IMP.*

3.1.3.4 *The design of the disturbance reduction measure will be dependent on the identified location and current levels of visitor disturbance, which will be established during pre-implementation site visits to be undertaken during the first breeding season post-consent, during which baseline seabird breeding and productivity data will also be collected. As discussed in Section 6.3.4 of Volume 8, Appendix 29 (Addendum to the Caledonia North and Caledonia South Compensation Plans), measure design can be informed by a site-wide visitor tracking and/or footfall study to identify preferred visitor routes and areas of high usage. See Volume 8, Appendix*

29: Addendum to the Caledonia North and Caledonia South Compensation Plans for further details.

- 3.1.3.5 The programme design will be discussed with relevant stakeholders post-consent to be agreed within the final IMP.

3.1.4 Delivery Mechanisms

- 3.1.4.1 This section will confirm the delivery process to successfully implement disturbance reduction measures, as well as outlining stakeholders and/or partners involved and their responsibilities in the delivery. This section will also present the nature and status of all consents and any other relevant approvals that are needed to secure the implementation of disturbance reduction.

- 3.1.4.2 *Since application potential opportunities have been identified at the Isle of May and East Caithness Cliffs (see Section 3.1.3 for more detail). As stated above, The Applicant has not yet been able to have a meeting with the site managers due to the limited response and/or availability from site managers, but initial contact has been made, and NatureScot is facilitating contact between the Isle of May site manager and the Applicant. The Applicant is looking to continue to progress site investigations and discussions with the relevant site managers and other key stakeholders during the remainder of 2025. The Applicant's aim is to carry out feasibility site visits and baseline monitoring during the first breeding season post-consent, with implementation locations (and measure design) finalised shortly after (in collaboration with site managers). Feasibility studies and pre- and post-implementation monitoring are to be carried out by the Applicant, overseen by the steering group. The delivery mechanisms for the implementation of the measure will be largely determined by site manager and landowner consultation, and can thus not be confirmed at this time. It could include a funding arrangement with the site(s), or the implementation of the measure by the Applicant through the use of specialist subcontractors. A decision on delivery mechanism is anticipated shortly after the feasibility studies the first breeding season post-consent, and will thus be confirmed within a future iteration of this IMP.*

3.1.5 Implementation Timeline

- 3.1.5.1 This section will confirm the programme for the implementation of the disturbance reduction measures and the timescales for the anticipated delivery of compensation. Any lead-in times and predicted delivery of compensation quanta across the operational timeline of the Proposed Development (Offshore) will be set out here. For further discussion around timing of delivery of the proposed measures, see Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection *and*

Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection.

In their Representations, NatureScot advised key stages are identified at which points of agreement can be made.

- 3.1.5.2** *An overview of the proposed implementation timescale is provided in Table 3-1. This programme is subject to change, depending on the timing on consent award and successful engagement and consultation with site managers.*
- 3.1.5.3** *Site selection is currently ongoing, and it is aimed to be finalised and secured by Year 1 post-consent (see Section 3.1.2 above), with a partnership agreement with site managers and any other key partners obtained, e.g. in the form of a Memorandum of Understanding (MoU) and/or letter of support, as well as any relevant contracts. Once a site has been secured and confirmed with the steering group, the chosen methodology for the disturbance reduction measure will be confirmed (e.g. the use of wardens, signage, pathways etc).*
- 3.1.5.4** *Key stages at which points of agreement can be made with the steering group during Year 1 post-consent include:*
- Feasibility study and baseline data collection: To agree on the methodology for refining implementation locations and design options, methodology for calculating the predicted potential benefits at each site, and methodology for collecting pre-implementation baselines on footfall, seabird disturbance and seabird breeding parameters;
 - Site selection: To agree on the relevant site(s) to take forward;
 - Design: To agree on the final list of disturbance reduction activities to take forward; and
 - Monitoring and adaptive management: To agree the monitoring methodology and approach to adaptive management.

Table 3-1: Proposed programme for the delivery of the disturbance reduction measure. Programme based on the assumption that consent will be awarded during Q1 of 2026, and feasibility site visits and baseline data collection can thus be commenced in the 2026 breeding season.

| | 2025 | 2026 | 2027 | 2028 | 2029 | 2030+ |
|--|------|------|------|------|------|-------|
| <i>Site visits, site selection and baseline data collection</i> | | | | | | |
| <i>Engagement with site managers and landowners</i> | | | | | | |
| <i>Confirm partnership agreements and contracts</i> | | | | | | |
| <i>Select design options for the disturbance reduction measure</i> | | | | | | |
| <i>Finalise design of disturbance reduction measure</i> | | | | | | |
| <i>Implementation of measures</i> | | | | | | |
| <i>Monitoring and maintenance</i> | | | | | | |

3.1.6 Monitoring

- 3.1.6.1 This section will set out the specific monitoring objectives, plans, and schedules, as well as a description of how the proposed monitoring approach links to the objectives of the compensation measure.

In their Representations, NatureScot advised they require further detail on how the success of the measure will be monitored. NatureScot advised baseline data collection is built into the monitoring plans to inform reports and measure effectiveness.

- 3.1.6.2 *Additional information on baseline data collection and the monitoring of the success of the measure is provided in blue italic text in this Refined Outline IMP, as per NatureScot's request in their Representations. These monitoring plans are to be refined and agreed upon in collaboration with the steering group post-consent.*
- 3.1.6.3 The approach to monitoring development will be informed by "Scottish guidance on the principles underpinning the assessment of compensatory measures in relation to ecology, monitoring and socio-economics" (Butler *et al.*, 2024¹).
- 3.1.6.4 This section will include information on the frequency and duration of monitoring, including written protocols and indicators provided by surveys/monitoring. Also included will be detail on the types and quantity of data that will be collected, and a description of the proposed approach for processing and analysing the data. Power calculations may be considered where appropriate to demonstrate that the proposed data collection approach is sufficient to achieve monitoring objectives.
- 3.1.6.5 Indicators will be designed as to monitor, where feasible:
- Implementation of the measure;
 - Success in achieving the objectives of the measure;
 - Changes which indicate failure (or anticipated failure) of the measure; and
 - The likely source of failure of the measure.
- 3.1.6.6 Indicators will adhere to 'SMART' (specific, measurable, achievable, relevant, timely) principles as much as feasibly achievable considering the ecological context of the monitoring.

- 3.1.6.7 As per the guidance set out in Butler *et al.* (2024¹), indicators will as much as feasible:
- “Link directly to conservation objectives which are undermined by the Proposed Development (Offshore);
 - Respond rapidly to changes in the effectiveness of the compensatory measure;
 - Change only if the effectiveness of the compensatory measure changes.
 - Be feasible to measure using established methods and protocols; and
 - Provide information on the likely cause of any failures in the effectiveness in the measure”.
- 3.1.6.8 This section will include detail on the team(s)/surveyors involved and a justification of their expertise.
- 3.1.6.9 Any potential caveats and/or assumptions that underpin the monitoring approach will be described and quantitative or qualitatively uncertainties in the robustness of the monitoring outcomes will be presented.

Baseline Data Collection

- 3.1.6.10 *In order to be able to monitor the success of the measure, the Applicant proposes the following baseline data collection prior to the implementation of the disturbance reduction measures:*
- Disturbance monitoring, consisting of:
 - Monitoring and mapping of footfall and visitor aggregations; and
 - Seabird behavioural study, recording any seabird responses to disturbance events, recording the distance and cause of disturbance (e.g. human presence (including number of people), loud noises, dog presence etc.).
 - Seabird breeding baseline at both disturbed and undisturbed sub-colonies:
 - Sub-colony (i.e. spatially separated cliffs or parts of a site/island) level counts of breeding pairs/occupied nests (i.e. sub-colony size); and
 - Sub-colony level productivity monitoring.
- 3.1.6.11** It is envisaged that seabird monitoring will be largely based on the methods detailed in Walsh *et al.* (1995)², *with any novel data collection methods considered where deemed appropriate and beneficial.*
- 3.1.6.12 *In addition, a review of the path network will be conducted in order to identify new routes, route re-directions and path closures to reduce disturbance.*

- 3.1.6.13 *The baseline data collection is designed to allow the monitoring of changes in disturbance, breeding numbers and productivity pre- and post-implementation of the disturbance reduction measure. The methodology used prior to implementation will be the same as post-implementation, to ensure that colony and productivity counts are comparable. Looking at colony size and productivity at the level of sub-colonies allows comparison between spatially proximate disturbed and undisturbed nest sites, and depending on implementation location, may provide a monitored reference area where disturbance is not reduced in order to better quantify the improvements made. Where a reference sub-colony is not available, comparisons to other nearby colonies, or changes relative to regional or national productivity averages can instead be employed to quantify the benefits realised.*

Monitoring Measure Success

- 3.1.6.14 *The success in achieving the objectives of the disturbance reduction compensation measure will rely on a combination of the successful implementation of the disturbance reduction measures, effects on footfall and visitor patterns, and subsequent impact to the target seabird species behaviour and breeding performance.*
- 3.1.6.15 *As set out above, success of the implementation of the disturbance reduction measure will be monitored through before and after monitoring of visitor disturbance and seabird breeding. Where disturbance-reduction activities centre around educational activities, visitor interviews to assess their knowledge around seabird behaviour and appropriate visitor conduct may also be considered.*

Indicators of Measure Failure

- 3.1.6.16 *Frequent monitoring of visitor behaviour and footfall patterns, as well as disturbance events and seabird response will provide the first indicators as to whether the implementation of disturbance-reducing measures has been successful.*
- 3.1.6.17 *Comparing changes in colony size and seabird productivity may also provide insights as to whether any observed changes in productivity rate and/or colony size are linked to the implementation of the compensation measure, or likely caused by other ecological processes (e.g. food availability, weather conditions).*
- 3.1.6.18 *Where no differences in visitor behaviours, footfall patterns and/or seabird disturbance events are observed between the sub-colonies at which the measure was implemented and other sites, it can be assumed that the measure has not successfully addressed disturbance.*
- 3.1.6.19 *The likely cause of failure of the measure will be investigated, and the adaptive management process commenced.*

3.1.7 Adaptive Management

- 3.1.7.1 This section will present the process which will identify whether adaptive management will be required, including success criteria and the intervals or timepoints at which evaluation will take place. The proposed process for adaptive management will have been discussed and confirmed with the relevant stakeholders.
- 3.1.7.2 As per the Marine Directorate's guidance on ornithological compensatory measure development for offshore wind (DTA, 2021³), this section will describe both the data analysis approach that will be used, and the way that the results of this analysis will be used in determining whether the compensatory measure is effective, including the "limits of acceptable change".
- 3.1.7.3 This section will also detail a set of potential adaptive management options (corrective measures) which might be relied upon in the event that monitoring shows that the compensatory measures have not reached their objectives. Conditions under which corrective/adaptive measures will be triggered will also be discussed.

Corrective Measures

- 3.1.7.4 *Corrective measures, should they be required, will be discussed and agreed with the steering group. Examples of potential corrective measures are presented in Table 3-2. In addition to implementing corrective measures, adaptive management can also consist of expanding the delivery of other compensation measures targeting the same species.*

Table 3-2: Examples of potential corrective measures for disturbance reduction to different monitoring outcomes.

| <i>Monitoring Outcome</i> | <i>Potential Corrective Measure</i> |
|--|---|
| <i>No change in visitor footfall patterns or seabird disturbance responses</i> | <i>Further amendments to paths (e.g. installing barriers), changes to educational campaign or warden briefings, additional warden employment.</i> |
| <i>Damage to signage</i> | <i>Repairs/replacements and design amendments to improve longevity.</i> |
| <i>New paths or route diversions not utilised by visitors</i> | <i>Further review of path network, considering additional route closures to re-direct footfall.</i> |

3.1.8 Reporting

- 3.1.8.1 This section will outline the reporting requirements regarding the implementation, monitoring and success of the compensation measure, as discussed and agreed with the steering group. Objectives and timescales for reporting will be confirmed, alongside an overview of the proposed content for the required reports.

3.2 Mammalian Predator Management and Eradication

3.2.1 Overview

- 3.2.1.1 An overview of the proposed compensation measure (including ecological effectiveness, wider ecological considerations, timing of delivery, monitoring requirements, adaptive management requirements and feasibility) can be found in Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection, *Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans*.
- 3.2.1.2 *The overarching aim of predator control measures is to reduce direct mortality effects of mammalian predation on nesting seabirds (i.e., predation on eggs, chicks or adults) through the implementation of predator control and biosecurity measures, and as such increase productivity and the breeding population size.*

3.2.2 Scale and Location

- 3.2.2.1 This section will discuss the scale of compensation required as per the relevant assessments. The scale of compensation will be informed through compensation calculations as outlined in in Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection, *Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans*, and subsequently confirmed through the consent decision.
- 3.2.2.2 This section will set out the location(s) at which mammalian predator management or eradication will be undertaken. It will include evidence on the suitability of the site(s) to deliver compensation, based on the site selection detailed within Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection *and Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and*

Site Selection, as well as further refinement using stakeholder consultation, further research and any relevant on-site monitoring.

- 3.2.2.3 Information on the securing of the relevant rights and permissions for the location will be detailed here.

In their Representations, RSPB noted that the Applicant suggested that the development of an existing predator control programme is more beneficial than individual project-based proposals, but that no detailed proposals were put forward.

In their Representations, NatureScot advised further detail is required regarding the planned frequency and duration of the measure.

- 3.2.2.4 *Since the consent applications were submitted, the Applicant has partnered with National Trust for Scotland (NTS) and Muir Mhòr OWF to develop a programme of predator control and biosecurity on NTS islands. NTS owns and manages seven of the 25 islands which are deemed a priority for predator control.⁴ NTS is looking to expand its biosecurity and predator control efforts across multiple seabird islands, and a collaborative programme with Caledonia and Muir Mhòr can provide the resources to realise this, whilst at the same time functioning as a pilot programme which could be scaled up to deliver strategic compensation measures involving a larger group of developers. By delivering this measure through a collaborative programme, rather than undertaken by the Applicant independently, benefits can be maximised and scalability ensured. Caledonia and Muir Mhòr are looking to commit to operating the project for a duration of, at a minimum, 35 years.*

- 3.2.2.5 *A letter of intent from NTS has been received by the Applicant (Volume 8, Appendix 32), and an MoU has been signed between Caledonia and Muir Mhòr. Both developers are currently working with NTS to refine the programme plans. The sites for implementation of this measure are currently under consideration by NTS, and will be decided upon with both Caledonia and Muir Mhòr over the coming months. A joint Implementation Plan is being drafted during the remainder of 2025 (to be refined post-consent), within which further information on the scale of the measure and priority islands for implementation will be set out.*

- 3.2.2.6 *Discussions are also underway for Caledonia and Muir Mhòr to provide the funding for a full-time coordinator for the predator control programme, to ensure the planning and implementation of the measure is carried out as efficiently and swiftly as possible. The Implementation Plan will include details on the programme coordinator role and governance of the role.*

3.2.2.7 *To evidence the extent to which the measure is contributing to meeting Caledonia and Muir Mhòr OWFs individual compensation requirements, it is essential that a methodology is developed to split and attribute the delivered compensation to Caledonia and Muir Mhòr OWFs separately and proportionately. Discussions on this methodology are underway, and the joint Implementation Plan will therefore also include information and agreements on how the compensation delivered through the joint NTS measure will be divided and attributed to Caledonia and Muir Mhòr's compensation quanta.*

3.2.2.8 *As set out in the NTS letter of intent (Volume 8 Appendix 32), in addition to delivering predator control and biosecurity, the partnership between NTS, Caledonia and Muir Mhòr provides a substantial opportunity for a wider (scalable) programme of seabird conservation. Opportunities for additional beneficial activities will thus be discussed within the partnership, and where identified will be presented in the joint Implementation Plan and consulted upon in due course.*

3.2.3 Design of the Mammalian Predator Management Programme

3.2.3.1 This section will present the chosen approach, eradication process and wider delivery of the mammalian predator management and/or eradication programme. Ecological considerations to maximise the potential for success will also be discussed. This section will also outline any relevant biosecurity measures required to prevent incursion and ensure that compensation is delivered for the lifetime of the Proposed Development (Offshore).

3.2.3.2 The programme design will be discussed with relevant stakeholders post-consent to be agreed within the final IMP.

3.2.3.3 *As set out above, the Applicant has partnered with National Trust for Scotland (NTS) and Muir Mhòr OWF to develop a programme of predator control and biosecurity on NTS islands. For further information on the proposed measure, see Section 3.2.2 above and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans.*

3.2.4 Delivery Mechanisms

3.2.4.1 This section will confirm the delivery process to successfully implement mammalian predator management, as well as outlining the stakeholders and/or partners involved and their responsibilities in the delivery. This section will also present the nature and status of all consents and any other relevant approvals that are needed to secure the implementation of mammalian predator management.

3.2.4.2 *As set out above, the Applicant has partnered with National Trust for Scotland (NTS) and Muir Mhòr OWF to develop a programme of predator control and biosecurity on NTS islands. For further information on the proposed measure, see Section 3.2.2 and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans. A letter of intent from NTS has been received (Volume 8 Appendix 32), and an MoU has been signed between Caledonia and Muir Mhòr. Discussions are underway to provide the funding for a full-time coordinator for the programme and both developers are working with NTS to refine the programme plans. For further information on the proposed measure, see Section 3.2.2 and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans.*

3.2.5 Implementation Timeline

3.2.5.1 This section will confirm the programme for the implementation of the disturbance reduction measures and the timescales for the anticipated delivery of compensation. Any lead-in times and predicted delivery of compensation quanta across the operational timeline of the Proposed Development (Offshore) will be set out here. For further discussion around timing of delivery of the proposed measures, see Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection *and Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection.*

In their Representations, NatureScot advised key stages are identified at which points of agreement can be made.

3.2.5.2 *An overview of the proposed implementation timescale is provided in Table 3-3. This programme is subject to change, and to be refined in collaboration with NTS. An agreed programme will be set out in the joint Implementation Plan currently under development by NTS, Caledonia and Muir Mhòr.*

3.2.5.3 *Key stages are identified at which points of agreement can be made with the steering group include:*

- Site selection: To agree with NTS and Muir Mhòr on the relevant site(s) to take forward (Year 1 post-consent);
- Draft joint Implementation Plan: To agree the draft measure design and monitoring approach with the steering group (Year 1 post-consent); and
- Final design of predator control and biosecurity measures: to be reviewed and agreed with the steering prior to implementation.

Table 3-3: Indicative proposed programme for the delivery of the joint NTS, Caledonia and Muir Mhòr predator management measure. This programme is indicative only, and subject to amendments following refinement of the programme in collaboration with NTS and Muir Mhòr. Programme based on the assumption that consent will be awarded during Q1 of 2026.

| | 2025 | 2026 | 2027 | 2028 | 2029 | 2030+ |
|--|------|------|------|------|------|-------|
| <i>Site Selection</i> | | | | | | |
| <i>Joint Implementation Plan drafting</i> | | | | | | |
| <i>Partnership agreements and contracts finalised</i> | | | | | | |
| <i>Programme co-ordinator commencing role</i> | | | | | | |
| <i>Monitoring plans finalised</i> | | | | | | |
| <i>Baseline data collection</i> | | | | | | |
| <i>Finalisation of predator management and biosecurity methodology</i> | | | | | | |
| <i>Implementation and monitoring</i> | | | | | | |

3.2.6 Monitoring

- 3.2.6.1 This section will set out the specific monitoring objectives, plans, and schedules, as well as a description of how the proposed monitoring approach links to the objectives of the compensation measure.

In their Representations, NatureScot advised they require further detail on how the success of the measure will be monitored. NatureScot advised baseline data collection is built into the monitoring plans to inform reports and measure effectiveness.

- 3.2.6.2 *Additional information on the monitoring of the measure is provided in blue italic text in this Refined Outline IMP, as per NatureScot's request in their Representations.*

- 3.2.6.3 The approach to monitoring development will be informed by "Scottish guidance on the principles underpinning the assessment of compensatory measures in relation to ecology, monitoring and socio-economics" (Butler *et al.*, 2024¹).

- 3.2.6.4 This section will include information on the frequency and duration of monitoring, including written protocols and indicators provided by surveys/monitoring. Also included will be detail on the types and quantity of data that will be collected, and a description of the proposed approach for processing and analysing the data. Power *analysis* calculations may be considered where appropriate *in order to ensure that the planned data collection approach (e.g. sample size) is sufficient to achieve monitoring objectives.*

- 3.2.6.5 Indicators will be designed as to monitor, where feasible:
- Implementation of the measure;
 - Success in achieving the objectives of the measure;
 - Changes which indicate failure (or anticipated failure) of the measure; and
 - The likely source(s) of failure of the measure.

- 3.2.6.6 Indicators will adhere to 'SMART' (specific, measurable, achievable, relevant, timely) principles as much as feasibly achievable considering the ecological context of the monitoring.

- 3.2.6.7 As per the guidance set out in Butler *et al.* (2024¹), indicators will as much as feasible:
- “Link directly to conservation objectives which are undermined by the Proposed Development (Offshore);
 - Respond rapidly to changes in the effectiveness of the compensatory measure;
 - Change only if the effectiveness of the compensatory measure changes.
 - Be feasible to measure using established methods and protocols; and
 - Provide information on the likely cause of any failures in the effectiveness in the measure.”
- 3.2.6.8 This section will include detail on the team(s)/surveyors involved and a justification of their expertise.
- 3.2.6.9 Any potential caveats and/or assumptions that underpin the monitoring approach will be described and quantitative or qualitatively uncertainties in the robustness of the monitoring outcomes will be presented.

Baseline Data Collection

- 3.2.6.10 *In order to be able to monitor the success of the measure, the Applicant proposes to carry out detailed baseline data collection prior to the implementation of the predator control and biosecurity measure. The approach is to be aligned with best practice and NTS experience, whilst also considering any novel monitoring opportunities to optimise data collection, such as through the use of drone surveys.*
- 3.2.6.11 *Baseline data collection is anticipated to consist of pre-implementation monitoring of seabird colony size and productivity trends as well as data collection on predator presence and distribution, as well as evidence for predation occurring, when such data is not already available (e.g. through existing NTS monitoring) or is outdated. When existing data is available, this will be incorporated into the baseline.*
- 3.2.6.12 *The baseline data collection is designed to allow the monitoring of changes in predator presence, seabird breeding numbers and seabird productivity pre- and post-implementation of the measure. The methodology used pre- and post-implementation will be the same, to ensure data comparability and the provision of robust analyses. Comparisons with changes in colony size and productivity at other nearby colonies, or changes relative to regional or national productivity averages can also be employed to attempt to quantify the benefits realised.*

Monitoring Measure Success

3.2.6.13 *The success in achieving the objectives of the compensation measure will rely on a combination of the successful implementation of the control and biosecurity measures, the effect on predator presence, numbers and distribution, and subsequent impact on the target seabird species. The exact methodology for monitoring measure success is to be decided upon with NTS and Muir Mhòr, but is anticipated to include at a minimum:*

- Number of invasive predators removed;
- Geographic coverage of control measures (e.g. number of islands, size of islands); and
- Seabird colony size and productivity trends (pre- and post-implementation).

3.2.6.14 *It should be noted that whilst the success of the measure will be quantified as much as is considered to be feasible, there are likely to be situations where an adaptive and/or qualitative approach to measuring the delivered benefits may be required. For instance, on islands where eradication was carried out previously, pre-eradication baseline data may be incomplete, missing or outdated. In such scenarios, alternative sources of information (e.g. data from nearby sites, historical data, and estimates of likely re-incursion rates in the absence of biosecurity) may need to be used to estimate measure success.*

Indicators of Measure Failure

3.2.6.15 *Monitoring will be undertaken throughout the lifetime of the Proposed Development (Offshore) to ensure that the target sites remains predator-free. The monitoring approach will follow NTS best practice, and will be set out within the joint Implementation Plan. This monitoring is likely to consist of a combination of wildlife camera monitoring, permanent biosecurity surveillance stations (e.g. wax stations to record bite marks) and field surveillance to detect predation signs (e.g. droppings, predated eggs). If signs of predator presence are identified, then the incursion response would begin (see information on adaptive management detailed in Section 3.2.7).*

3.2.6.16 *Monitoring of productivity rate and/or colony size pre- and post-implementation and throughout the duration of the measure will be undertaken to determine the effect of the measures on seabird populations. Comparisons to other (reference) sites and comparisons to historic, regional or national averages in productivity and colony size can be used to investigate whether a lack of improvement in productivity rate and/or colony size is due to a failure in the compensation measure, or linked to wider ecological pressures on the target species (e.g. food availability, weather conditions).*

3.2.7 Adaptive Management

- 3.2.7.1 This section will present the process which will identify whether adaptive management will be required, including success criteria and the intervals or timepoints at which evaluation will take place. The proposed process for adaptive management will have been discussed and confirmed with the relevant stakeholders.
- 3.2.7.2 As per the Marine Directorate's guidance on ornithological compensatory measure development for offshore wind (DTA, 2021³), this section will describe both the data analysis approach that will be used, and the way that the results of this analysis will be used in determining whether the compensatory measure is effective, including the "limits of acceptable change".
- 3.2.7.3 This section will also detail a set of potential adaptive management options (corrective measures) which might be relied upon in the event that monitoring shows that the compensatory measures have not reached their objectives. Conditions under which corrective/adaptive measures will be triggered will also be discussed.

Corrective Measures

- 3.2.7.4 *Corrective measures, should they be required, will be discussed and agreed with the steering group. Examples of potential corrective measures are presented in Table 3-4. In addition to implementing corrective measures, adaptive management can also consist of expanding the delivery of other compensation measures targeting the same species. As set out in the Letter of Intent from NTS (Volume 8, Appendix 32), the partnership provides the opportunity to deliver a programme of seabird conservation also targeting beneficial activities other than predator management. Therefore, corrective actions can include the delivery of alternative seabird conservation actions in collaboration with NTS.*

Table 3-4: Examples of potential corrective measures for predator management.

| Monitoring Outcome | Potential Corrective Measure |
|---|--|
| Re-incursion of predator species | A rapid incursion response is triggered, with swift removal of predators commenced as soon as possible following the detection of re-incursion. Review of biosecurity protocols. |
| Damage to predator control measures i.e. break in fencing | Repairs carried out. |
| Failed eradication (incomplete eradication) | Assess cause for failed eradication (e.g. insufficient coverage, rodenticide resistance), repeat eradication with updated approach. |

3.2.8 Reporting

- 3.2.8.1 This section will outline the reporting requirements regarding the implementation, monitoring and success of the compensation measure, as discussed and agreed with the steering group. Objectives and timescales for reporting will be confirmed, alongside an overview of the proposed content for the required reports.

3.3 Bycatch Reduction

3.3.1 Overview

- 3.3.1.1 An overview of the proposed compensation measure (including ecological effectiveness, wider ecological considerations, timing of delivery, monitoring requirements, adaptive management requirements and feasibility) can be found in Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection, *Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans*.

- 3.3.1.2 *The overarching aim of this compensation measure is to reduce the number of individuals (both adults and immatures) bycaught in fishing gear.*

3.3.2 Scale and Location

- 3.3.2.1 This section will discuss the scale of compensation required as per the relevant assessments. The scale of compensation will be informed through compensation calculations as outlined in Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection, *Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans*, and subsequently confirmed through the consent decision.
- 3.3.2.2 This section will set out the location(s) at which bycatch reduction techniques will be delivered. It will include evidence on the suitability of the site(s) and fisheries to deliver compensation, based on the site selection detailed within Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection *and Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection*, as well as further refinement using stakeholder consultation, fisheries engagement, further research and any relevant pre-implementation monitoring of bycatch reduction technique(s).

3.3.2.3 Information on the securing of the relevant rights and permissions will be detailed here.

3.3.2.4 *The Applicant has carried out a self-reporting seabird bycatch study involving ten fishing vessels (static gear, trawlers and dredgers) in the Moray Firth region in 2024 and 2025, and video data collection of gear setting and retrieval on a subset of vessels has been undertaken during 2025. The video recordings are being systematically reviewed for evidence of seabird interactions with fishing gear.*

3.3.2.5 *Data from the self-reporting and video studies are being processed and will be used to inform subsequent data collection and refinement of the planned location(s), methodology and implementation of the bycatch measure. As such, appropriate mitigation methods and implementation locations are still under development. The Applicant is looking to deliver benefits through mitigation trials and bycatch monitoring using electronic monitoring (supported by on-board observers where vessel size and fishing practices allow this). Longline and static gear vessels are likely to be prioritised, as bycatch in trawls for the target species (gannet and auks) is thought to be low, with trawls thus lower priority for bycatch reduction (see Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans).*

3.3.2.6 *Should the findings of the current self-reporting and video studies conclude opportunities in the Moray Firth are limited, the Applicant will consult with fisheries consultants, Clean Catch and other relevant parties to identify alternative or additional delivery locations.*

3.3.3 Design of Bycatch Reduction Techniques

3.3.3.1 This section will present the chosen design and delivery of the bycatch reduction technique(s) (e.g., line weighting, bird scaring or tori lines, Bird Exclusion Devices) and any associated by-catch monitoring programme. Ecological considerations to maximise the potential for success will also be discussed.

3.3.3.2 The programme design will be discussed with relevant stakeholders post-consent to be agreed within the final IMP.

3.3.4 Delivery Mechanism

3.3.4.1 This section will confirm the delivery process to successfully implement and monitor bycatch reduction technique(s) as well as outlining the fishers/fisheries, stakeholders and partners involved and their responsibilities in the delivery. This section will also present the nature and status any agreements and approvals that are needed to secure the implementation of bycatch reduction.

- 3.3.4.2 *As set out in Section 3.3.2 above, The Applicant is currently analysing the data from the self-reporting and video studies on bycatch in the Moray Firth conducted during 2024 and 2025. Once findings have been assessed, appropriate mitigation methods and implementation locations can be considered, and information on this will thus be included in the next iteration of this IMP. As part of the self-reporting and video studies, strong relationships with the fishing industry in the Moray Firth region has been developed, building on those established by Ocean Winds during the development of the existing Moray East and Moray West OWFs. This existing relationship will be further developed during the identification of appropriate and accepted mitigation and monitoring techniques.*

3.3.5 Partnership Agreements

- 3.3.5.1 This section will provide detail of any agreements to secure the implementation of the measure (e.g., memorandum of understandings, written contracts, etc.) with the relevant commercial fisheries partners. Any other relevant agreements and/or funding arrangements that are required for securing of the measure will be included in this section.
- 3.3.5.2 *The Applicant is looking to build upon their existing relationships with the fishing industry in the Moray Firth to roll out a bycatch monitoring and mitigation trial over a larger number of vessels, and if required (see Section 3.3.2), across a wider spatial area.*

3.3.6 Implementation Timeline

- 3.3.6.1 This section will confirm the programme for the implementation of the disturbance reduction measures and the timescales for the anticipated delivery of compensation. Any lead-in times and predicted delivery of compensation quanta across the operational timeline of the Proposed Development (Offshore) will be set out here. It is estimated that a minimum of one to two years is needed to engage with the fishing industry and plan monitoring and trial implementation. For further discussion around timing of delivery of the proposed measures, see Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection *and Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection.*

In their Representations, NatureScot advised key stages are identified at which points of agreement can be made.

3.3.6.2

An overview of the proposed implementation timescale is provided in Table 3-5. Key stages at which points of agreement can be made with the steering group during Year 1 post-consent include:

- Site selection: to agree on the area(s) in which to implement bycatch monitoring and mitigation trials (following analysis of the self-reporting study (2024 and 2025) and video monitoring study (2025));
- Monitoring approach: to get agreement on the proposed methodology for monitoring bycatch; and
- Mitigation measure selection: to obtain feedback on a shortlist of potential bycatch mitigation measures to refine for implementation.

Table 3-5: Proposed indicative programme for the delivery of the bycatch mitigation measure.

| | 2025 | 2026 | 2027 | 2028 | 2029 | 2030+ |
|---|------|------|------|------|------|-------|
| <i>Analysis of self-reporting and video monitoring data, additional data collection</i> | | | | | | |
| <i>Site selection</i> | | | | | | |
| <i>Mitigation measure selection and design, monitoring approach development</i> | | | | | | |
| <i>Fishing industry engagement and participant recruitment</i> | | | | | | |
| <i>Finalisation of monitoring plans, observer hiring, equipment purchase</i> | | | | | | |
| <i>Trials and monitoring commenced</i> | | | | | | |

3.3.7 Monitoring

3.3.7.1 This section will set out the specific monitoring objectives, plans, and schedules, as well as a description of how the proposed monitoring approach links to the objectives of the compensation measure.

In their Representations, NatureScot advised they require further detail on how the success of the measure will be monitored. NatureScot advised baseline data collection is built into the monitoring plans to inform reports and measure effectiveness.

3.3.7.2 *Additional information on the monitoring of the measure is provided in blue italic text in this Refined Outline IMP, as per NatureScot's request in their Representations.*

3.3.7.3 The approach to monitoring development will be informed by "Scottish guidance on the principles underpinning the assessment of compensatory measures in relation to ecology, monitoring and socio-economics" (Butler *et al.*, 2024¹).

3.3.7.4 This section will include information on the frequency and duration of monitoring, including written protocols and indicators provided by surveys/monitoring. Also included will be detail on the types and quantity of data that will be collected, and a description of the proposed approach for processing and analysing the data. Power calculations may be considered where appropriate to demonstrate that the proposed data collection approach is sufficient to achieve monitoring objectives.

3.3.7.5 Indicators will be designed as to monitor, where feasible:

- Implementation of the measure;
- Success in achieving the objectives of the measure;
- Changes which indicate failure (or anticipated failure) of the measure; and
- The likely source of failure of the measure.

3.3.7.6 Indicators will adhere to 'SMART' (specific, measurable, achievable, relevant, timely) principles as much as feasibly achievable considering the ecological context of the monitoring.

- 3.3.7.7 As per the guidance set out in Butler *et al.* (2024¹), indicators will as much as feasible:
- “Link directly to conservation objectives which are undermined by the Proposed Development (Offshore);
 - Respond rapidly to changes in the effectiveness of the compensatory measure;
 - Change only if the effectiveness of the compensatory measure changes.
 - Be feasible to measure using established methods and protocols; and
 - Provide information on the likely cause of any failures in the effectiveness in the measure.”
- 3.3.7.8 This section will include detail on the team(s)/surveyors involved and a justification of their expertise.
- 3.3.7.9 Any potential caveats and/or assumptions that underpin the monitoring approach will be described and quantitative or qualitatively uncertainties in the robustness of the monitoring outcomes will be presented.

Baseline Data Collection

- 3.3.7.10 *Monitoring of seabird bycatch numbers and rates (bycatch per unit effort, BPUE) will be carried out across all participating vessels using electronic monitoring. Electronic monitoring will be supported by the use of trained on-board observers where possible, although limitations in space and operational procedures on the vessel may mean this is not possible on all participating vessels.*
- 3.3.7.11 *The Applicant intends to align their data collection methodology with Clean Catch UK and the UK Bycatch Monitoring Programme to ensure the methods meet best practice standards. This will also allow the collected data to be readily comparable to, and usable by, wider UK-wide bycatch research initiatives, thereby maximising the knowledge gains from this work.*

Monitoring Measure Success

- 3.3.7.12 *In order to measure the effectiveness of trialled mitigation methods, and experimental approach with control groups will be employed. The methodology is to be refined in consultation with the steering group following the selection of the mitigation methods, but is anticipated to include the use of paired gear (i.e. control gear and mitigation gear used on one vessel, potentially alternating between gear between trips of hauls) and/or paired vessels, where one vessel has mitigation gear, and a paired vessel has not. Control and mitigation groups will be matched by vessel and gear type, as well as spatially and temporarily to ensure exposure to comparable environmental and operational conditions.*

Indicators of Measure Failure

- 3.3.7.13 *Preliminary findings from ongoing monitoring and discussions with the participating vessels will provide information on observed seabird interactions with vessels, bycatch rates and any operational difficulties with mitigation technologies. Where issues arise, adaptive management will be commenced, and where the failure is due to mitigation technology design or installation, design amendments will be identified and implemented.*

3.3.8 Adaptive Management

- 3.3.8.1 This section will present the process which will identify whether adaptive management will be required, including success criteria and the intervals or timepoints at which evaluation will take place. The proposed process for adaptive management will have been discussed and confirmed with the relevant stakeholders.
- 3.3.8.2 As per the Marine Directorate's guidance on ornithological compensatory measure development for offshore wind (DTA, 2021³), this section will describe both the data analysis approach that will be used, and the way that the results of this analysis will be used in determining whether the compensatory measure is effective, including the "limits of acceptable change".
- 3.3.8.3 This section will also detail a set of potential adaptive management options (corrective measures) which might be relied upon in the event that monitoring shows that the compensatory measures have not reached their objectives. Conditions under which corrective/adaptive measures will be triggered will also be discussed.

Corrective Measures

- 3.3.8.4 *Corrective measures, should they be required, will be discussed and agreed with the steering group. Potential corrective measures are presented in Table 3-6. In addition to implementing corrective measures, adaptive management can also consist of expanding the delivery of other compensation measures targeting the same species.*

Table 3-6: Examples of potential corrective measures for bycatch reduction.

| Monitoring Outcome | Potential Corrective Measure |
|--|---|
| No/little bycatch recorded during all hauls, including control groups | Expand the measure to include additional vessels and/or areas of additional bycatch risk. |
| Technical or operational issues with implemented bycatch reduction technique | Investigate and implement changes to the design of the mitigation technique. Trial alternative bycatch reduction techniques, either in a subset of the participating vessels, or with new participants. |

3.3.9 Reporting

- 3.3.9.1 This section will outline the reporting requirements regarding the implementation, monitoring and success of the compensation measure, as discussed and agreed with the steering group. Objectives and timescales for reporting will be confirmed, alongside an overview of the proposed content for the required reports.

3.4 Restoration or Maintenance of Breeding Sites

3.4.1 Overview

- 3.4.1.1 An overview of the proposed compensation measure (including ecological effectiveness, wider ecological considerations, timing of delivery, monitoring requirements, adaptive management requirements and feasibility) can be found in Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection, *Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans.*

3.4.2 Scale and Location

- 3.4.2.1 This section will discuss the scale of compensation required as per the relevant assessments. The scale of compensation will be informed through compensation calculations as outlined in Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection, and subsequently confirmed through the consent decision, *Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans.*
- 3.4.2.2 This section will set out the location(s) at which the restoration or maintenance of breeding sites will be undertaken. It will include evidence on the suitability of the site(s) to deliver compensation, based on the site selection detailed within Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection *and Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection*, as well as further refinement using stakeholder consultation, further research and any relevant on-site monitoring.
- 3.4.2.3 *Since consent application potential opportunities have been identified at the Isle of May and East Caithness Cliffs. In June 2025, the Applicant undertook site visits to both the Isle of May and East Caithness Cliffs to assess the feasibility of implementing habitat restoration and/or maintenance measures, with evidence of habitat erosion and potential puffin burrow collapse observed. Further details on these site investigations*

have been provided in Volume 8, Appendix 34: East Caithness Cliffs Site Assessment Report (Confidential) and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans. The Applicant has not yet been able to have a meeting with the site managers due to the timeframes of this application and site manager availability, but initial contact has been made, and NatureScot is facilitating contact between the Isle of May site manager and the Applicant. The Applicant is looking to continue to progress site investigations and discussions with the relevant site managers and other key stakeholders during the remainder of 2025. The Applicant's aim is to carry out feasibility site visits and baseline monitoring during the first breeding season post-consent, with implementation locations (and measure design) finalised shortly after (in collaboration with site managers). Final details regarding site selection will thus be confirmed within the next iteration of this IMP.

3.4.2.4 *Numerous other sites across Scotland were contacted to investigate the potential for delivering habitat restoration and/or maintenance measures, with limited response. In addition to progressing the measure at the Isle of May and East Caithness Cliffs, the Applicant also continues to be open to progressing this measure at other locations, where contact with site managers can be successfully made and opportunities are identified.*

3.4.2.5 Information on the securing of the relevant rights and permissions for the location(s) *taken forward for compensation delivery* will be detailed here.

In their Representations, NatureScot advised further detail is required regarding the planned frequency and duration of the measure.

In their Representations, RSPB considered habitat restoration and vegetation removal to restore puffin breeding sites a technically feasible measure.

3.4.2.6 *The Applicant is currently in the process of refining site selection through engagement with site managers and the completion of initial site visits. While a confirmed site has not yet been identified, potential opportunities have been recognised at the Isle of May and the East Caithness Cliffs, particularly around improving breeding habitat by reducing habitat erosion (see Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans).*

3.4.2.7 *Proposed activities include:*

- Boardwalk creation over soft ground;
- Path creation using rock, gravel and/or ground stabilization;
- Puffin nest box installation;
- Drainage management; and
- Native ground cover restoration and targeted watering.

3.4.2.8 *Infrastructural improvements, such as path surfacing, are to be installed as soon as feasible after consent and pre-implementation baseline collection, and to be maintained over the operational lifetime of the offshore wind farm. Drainage management and native ground cover restoration and targeted watering would likely be a multi-year activity to be carried out over several seasons and then maintained over the operational lifetime of the offshore wind farm.*

3.4.2.9 *The Applicant will continue to progress site investigations related to these sites and continue discussions with the relevant landowners and stakeholders. Final details regarding site selection will be confirmed within the forthcoming IMP.*

3.4.3 Design of Restoration or Maintenance Measures

3.4.3.1 This section will present the chosen approach, techniques and delivery of restoration or maintenance measures. Ecological considerations to maximise the potential for success will also be discussed.

3.4.3.2 The measure design will be discussed with relevant stakeholders post-consent to be agreed within the final IMP.

3.4.3.3 *As set out in Section 3.4.2, proposed activities include boardwalk creation over soft ground, path creation using rock, gravel and/or ground stabilization, puffin nest box installation, drainage management and native ground cover restoration and targeted watering.*

3.4.3.4 *The final design of the measure is to be decided upon in discussion with the site managers, with the most beneficial and feasible activities to be selected and delivered as a package of habitat improvement measures, which will together be monitored for effectiveness. This can include one of more of the options listed above, but may also include additional activities identified as part of discussions with the site managers. If additional activities are proposed, these would be consulted upon with the steering group and presented in detail in this section in the next iteration of this IMP.*

3.4.4 Delivery Mechanism

3.4.4.1 This section will confirm the delivery process to successfully implement restoration or maintenance measures, as well as outlining the stakeholders and/or partners involved and their responsibilities in the delivery. This section will also present the nature and status of all consents and any other relevant approvals that are needed to secure the implementation of restoration or maintenance measures.

3.4.4.2 *Since application potential opportunities have been identified at the Isle of May and East Caithness Cliffs (see Section 3.4.2 for more detail). As stated above, The Applicant has not yet been able to have a meeting with the site managers due to the timeframes of this application and site manager availability, but initial contact has been made, and NatureScot is facilitating contact between the Isle of May site manager and the Applicant. The Applicant is looking to continue to progress site investigations and discussions with the relevant site managers and other key stakeholders during the remainder of 2025. The Applicant's aim is to carry out feasibility site visits and baseline monitoring during the first breeding season post-consent, with implementation locations (and measure design) finalised shortly after (in collaboration with site managers). Feasibility studies and pre- and post-implementation monitoring are to be carried out by the Applicant, overseen by the steering group.*

3.4.4.3 *The delivery mechanisms for the implementation of the measure will be largely determined by site manager and landowner consultation, and can thus not be confirmed at this time. It could include a funding arrangement with the site(s), or the implementation of the measure by the Applicant through the use of specialist subcontractors. A decision on delivery mechanism is anticipated shortly after the feasibility studies the first breeding season post-consent, and will thus be confirmed within a future iteration of this IMP.*

3.4.5 Implementation Timeline

3.4.5.1 This section will confirm the programme for the implementation of the disturbance reduction measures and the timescales for the anticipated delivery of compensation. Any lead-in times and predicted delivery of compensation quanta across the operational timeline of the Proposed Development (Offshore) will be set out here. For further discussion around timing of delivery of the proposed measures, see Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection *and Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection.*

In their Representations, NatureScot advised key stages are identified at which points of agreement can be made.

3.4.5.2 *As this measure is currently being developed alongside, and at the same locations as, the disturbance reduction measure, the implementation timeline and key points of agreement align with those presented for the disturbance reduction measure in Section 3.1.5.*

3.4.6 Monitoring

3.4.6.1 This section will set out the specific monitoring objectives, plans, and schedules, as well as a description of how the proposed monitoring approach links to the objectives of the compensation measure.

In their Representations, NatureScot advised they require further detail on how the success of the measure will be monitored. NatureScot advised baseline data collection is built into the monitoring plans to inform reports and measure effectiveness.

3.4.6.2 *Additional information on the monitoring of the measure is provided in blue italic text in this Refined Outline IMP, as per NatureScot's request in their Representations. These monitoring plans are to be refined and agreed upon in collaboration with the steering group post-consent.*

3.4.6.3 The approach to monitoring development will be informed by "Scottish guidance on the principles underpinning the assessment of compensatory measures in relation to ecology, monitoring and socio-economics" (Butler *et al.*, 2024¹).

3.4.6.4 This section will include information on the frequency and duration of monitoring, including written protocols and indicators provided by surveys/monitoring. Also included will be detail on the types and quantity of data that will be collected, and a description of the proposed approach for processing and analysing the data. Power calculations may be considered where appropriate to demonstrate that the proposed data collection approach is sufficient to achieve monitoring objectives.

3.4.6.5 Indicators will be designed as to monitor, where feasible:

- Implementation of the measure;
- Success in achieving the objectives of the measure;
- Changes which indicate failure (or anticipated failure) of the measure; and
- The likely source of failure of the measure.

- 3.4.6.6 Indicators will adhere to 'SMART' (specific, measurable, achievable, relevant, timely) principles as much as feasibly achievable considering the ecological context of the monitoring.
- 3.4.6.7 As per the guidance set out in Butler *et al.* (2024¹), indicators will as much as feasible:
- "Link directly to conservation objectives which are undermined by the Proposed Development (Offshore);
 - Respond rapidly to changes in the effectiveness of the compensatory measure;
 - Change only if the effectiveness of the compensatory measure changes.
 - Be feasible to measure using established methods and protocols; and
 - Provide information on the likely cause of any failures in the effectiveness in the measure."
- 3.4.6.8 This section will include detail on the team(s)/surveyors involved and a justification of their expertise.
- 3.4.6.9 Any potential caveats and/or assumptions that underpin the monitoring approach will be described and quantitative or qualitatively uncertainties in the robustness of the monitoring outcomes will be presented.

Baseline Data Collection

- 3.4.6.10 *In order to be able to monitor the success of the measure, the Applicant proposes the following baseline data collection prior to the implementation of the habitat restoration measures:*
- Mapping of habitat condition, including (the extent of) drainage issues, erosion and burrow collapse (based either on historic data or data collected pre-implementation). The methodology for mapping is to be confirmed in consultation with site managers, but is likely to be a combination of on-the-ground mapping during site visits by ecologists, and the use of imaging technologies, including drone surveys and/or aerial imagery. The work is also anticipated to include site visits by specialist ornithologists to map suitable seabird habitat, map and count puffin burrows and to assess burrow stability;
 - Seabird breeding baseline, consisting of colony counts and productivity monitoring. It is envisaged that seabird monitoring will be largely based on the methods detailed in Walsh et al. (1995)², *with any novel data collection methods considered where deemed appropriate and beneficial*. A review of historic population sizes and (changes in) puffin habitat may also be required to establish the extent of burrow loss.
- 3.4.6.11 *In addition, a review of the path network will be conducted in order to identify new routes, route re-directions and path closures to reduce disturbance.*

- 3.4.6.12 *The baseline data collection is designed to allow the monitoring of changes in both habitat condition following the implementation of the measures, as well as changes in breeding habitat availability, seabird breeding numbers and productivity. The monitoring methodology used prior to implementation will be the same as post-implementation in order to ensure the collected datasets are comparable.*

Monitoring Measure Success

- 3.4.6.13 *The success in achieving the objectives of this habitat improvement measure will rely on a combination of the successful implementation of the measures, effects on breeding habitat availability, and subsequent impact to the target seabird species breeding performance.*
- 3.4.6.14 *As set out above, success will be monitored through before and after monitoring of habitats and seabird breeding. Should artificial puffin burrows be taken up as one of the activities as part of this package of measures, the rate of burrow uptake will also be monitored as a measure of success.*

Indicators of Measure Failure

- 3.4.6.15 *Frequent monitoring of habitat condition will provide be a first indicators as to whether the breeding habitat has been successfully improved following the implementation of the habitat improvement measures.*
- 3.4.6.16 *Assessing changes in habitat occupancy across the site pre- and post-implementation will indicate whether the measure has improved habitat condition and increased breeding habitat availability. In addition, comparing changes in colony size and productivity to nearby colonies and regional and national averages, can provide insights as to whether any observed changes in productivity rate and/or colony size are due to the implementation of the compensation measure, or linked to on wider ecological processes (e.g. food availability, weather conditions). If no increase in breeding habitat use is observed (after appropriate lead-in time), or when no differences in interannual change in colony size or productivity are observed between the colonies at which the measure was implemented and other sites, it can be assumed that the measure has not successfully improved breeding performance during the monitored period.*
- 3.4.6.17 *The likely cause of failure of the measure will be investigated, and the adaptive management process commenced.*

3.4.7 Adaptive Management

- 3.4.7.1 This section will present the process which will identify whether adaptive management will be required, including success criteria and the intervals or timepoints at which evaluation will take place. The proposed process for adaptive management will have been discussed and confirmed with the relevant stakeholders.

- 3.4.7.2 As per the Marine Directorate’s guidance on ornithological compensatory measure development for offshore wind (DTA, 2021³), this section will describe both the data analysis approach that will be used, and the way that the results of this analysis will be used in determining whether the compensatory measure is effective, including the “limits of acceptable change”.
- 3.4.7.3 This section will also detail a set of potential adaptive management options (corrective measures) which might be relied upon in the event that monitoring shows that the compensatory measures have not reached their objectives. Conditions under which corrective/adaptive measures will be triggered will also be discussed.

Corrective Measures

- 3.4.7.4 *Corrective measures, should they be required, will be discussed and agreed with the steering group. Examples of potential corrective measures are presented in Table 3-7. In addition to implementing corrective measures, adaptive management can also consist of expanding the delivery of other compensation measures targeting the same species.*

Table 3-7: Examples of potential corrective measures for habitat restoration to different monitoring outcomes.

| Monitoring Outcome | Potential Corrective Measure |
|---|--|
| No reduction in erosion following implementation of surfaced paths or boardwalks. | Establish cause of continued erosion. If anthropogenic, additional measures to direct footfall may be required, such as the use of barriers or ropes alongside the surfaced paths. If ecological (i.e. lack of vegetation recovery), implement additional vegetation recovery, such as further soil stabilisation and strategic vegetation planting. |
| Lack of uptake of artificial puffin nest boxes | Use additional or alternative methods of attracting puffin, e.g. decoys or playbacks. Locating additional nest boxes in alternative locations with optimal conditions (considering vegetation, geography and disturbance). |

3.4.8 Reporting

- 3.4.8.1 This section will outline the reporting requirements regarding the implementation, monitoring and success of the compensation measure, as discussed and agreed with the steering group. Objectives and timescales for reporting will be confirmed, alongside an overview of the proposed content for the required reports.

3.5 Conservation Management Funding

3.5.1 Overview

- 3.5.1.1 An overview of the proposed compensation measure (including ecological effectiveness, wider ecological considerations, timing of delivery, monitoring requirements, adaptive management requirements and feasibility) can be found in Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection , *Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans.*
- 3.5.1.2 *As set out under the predator management, disturbance reduction and habitat restoration measures above, the Applicant has identified a number of opportunities where conservation action can be implemented to benefit seabirds (e.g., at East Caithness Cliffs, on Isle of May and at multiple NTS-owned sites). These will be progressed as part of the measures set out above and may be delivered through the funding of conservation action (rather than being delivered by the Applicant directly). The governance and funding structure of the measures is to be determined with stakeholders and developed as part of the IMP development.*
- 3.5.1.3 *Other conservation management funding options are not currently being actively sought out by the Applicant, with the focus of compensation planning currently on the measures and collaborations set out in the section above. However, should other opportunities for compensation delivery through conservation management funding arise and be progressed by the Applicant, predicted benefits in relation to predicted losses would be set out in this section as part of the IMP refinement process.*

3.5.2 Scale and Location

- 3.5.2.1 This section will discuss the scale of compensation required as per the relevant assessments. The scale of compensation will be informed through compensation calculations as outlined in Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection, *Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans*, and subsequently confirmed through the consent decision.
- 3.5.2.2 This section will set out the location(s) at which the conservation management funding will be implemented. It will include evidence on the suitability of the site(s) to deliver compensation, based on the site selection detailed within Application Document 15, Appendix 15-3:

Caledonia North Compensation Plan and Site Selection *and Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection*, as well as further refinement using stakeholder consultation, further research and any relevant on-site monitoring.

- 3.5.2.3 Information on the securing of the relevant rights and permissions for the location will be detailed here.

3.5.3 Delivery Mechanisms

- 3.5.3.1 This section will confirm the delivery process to successfully implement restoration or maintenance measures, as well as outlining the stakeholders and/or partners involved and their responsibilities in the delivery. This section will also present the nature and status of any relevant approvals that are needed to secure the implementation of restoration or maintenance measures.

3.5.4 Partnership Agreements

- 3.5.4.1 This section will provide detail of any agreements to secure the implementation of the measure (e.g., memorandum of understandings, written contracts, etc.) with the relevant delivery partner of the programme that is being funded as the compensation delivery. Any other relevant agreements and/or funding arrangements that are required for securing of the measure will be included in this section.

3.5.5 Implementation Timeline

- 3.5.5.1 This section will confirm the programme for the funding and the timescales for the anticipated delivery of compensation.

3.5.6 Monitoring and Adaptive Management

- 3.5.6.1 It is not anticipated that monitoring and adaptive management will be needed (or feasible) for a compensation measure which involves the funding of existing conservation management plans/programmes. This will however be discussed with the steering group during IMP development, and any details recorded in this section.

3.5.7 Reporting

- 3.5.7.1 This section will outline the reporting requirements regarding the implementation, monitoring and success of the compensation measure, as discussed and agreed with the steering group. Objectives and timescales for reporting will be confirmed, alongside an overview of the proposed content for the required reports.

3.6 Strategic Compensation

- 3.6.1.1 *The Applicant's preference is to deliver and discharge compensation requirements through contributing to a strategic compensation delivery programme. The Applicant considers that strategic compensation will deliver a greater level of positive environmental benefit per pound spent and thus deliver the most beneficial outcome for seabirds.*
- 3.6.1.2 *The Applicant continues to explore strategic and innovative compensation proposals which could be adopted by a strategic compensation fund (e.g. Scottish Marine Recovery Fund once established).*
- 3.6.1.3 Should the Applicant opt to contribute to a strategic compensation fund as and when a viable pathway comes available, this section will contain details of the proposed compensation package and delivery mechanism. Such strategic measures may be used in addition to, instead of, or to provide adaptive management for the proposed developer-led compensation measures. For further discussion around strategic and collaborative delivery of compensation, see Application Document 15, Appendix 15-3: Caledonia North Compensation Plan and Site Selection, *Application Document 16, Appendix 16-3: Caledonia South Compensation Plan and Site Selection and Volume 8, Appendix 29: Addendum to the Caledonia North and Caledonia South Compensation Plans.*

References

- ¹ Butler, A., Searle, K., Hague, A., Jones, E. and Daunt, F. (2024) 'Scottish guidance on the principles underpinning the assessment of compensatory measures in relation to ecology, monitoring and socio-economics'
- ² Walsh, P.M., Halley, D.J., Harris, M.P., del Nevo, A., Sim, I.M.W. and Tasker, M.L. (1995) 'Seabird monitoring handbook for Britain and Ireland'. JNCC / RSPB / ITE / Seabird Group, Peterborough. ISBN 1 873701 73 X.
- ³ DTA (2021) 'Framework to Evaluate Ornithological Compensatory Measures for Offshore Wind'. Process Guidance Note for Developers
- ⁴ Stanbury, A., Thomas, S., Aegerter, J., Brown, A., Bullock, D., Eaton, M., Lock, L., Luxmoore, R., Roy, S., Whitaker, S. and Oppel, S. (2017) 'Prioritising islands in the United Kingdom and crown dependencies for the eradication of invasive alien vertebrates and rodent biosecurity', European Journal of Wildlife Research 63(1): 1-13.

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