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By email: EastAngliaOneNorth@planninginspectorate.gov.uk &
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To Whom It May Concern,

Red-throated Diver Implementation and Monitoring Plan

Thank you for consulting JNCC on the Report on the Red-throated Diver Implementation and Monitoring Plan (RTDIMP) for East Anglia One North and East Anglia Two Offshore Wind Farms.

The advice contained within this minute is provided by JNCC as part of our statutory advisory role to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit).

JNCC Specialist Comments

Ornithology

JNCC are of the opinion that the Red-throated Diver Implementation and Monitoring Plan (RTDIMP) fulfils the requirements under paragraph 3 of Schedule 18, Part 3 of the East Anglia ONE North Offshore Wind Farm Order 2022 and paragraph 3 of Schedule 18, Part 3 of the East Anglia TWO Offshore Wind Farm Order 2022.

We note that, although efforts have been made to re-route vessels around the Outer Thames Estuary Special Protection Area (SPA), there will still be occasions where disturbance due to vessel movements overlapping with the SPA, resulting in residual disturbance. However, this has been factored into compensation ratio calculations and a sufficient compensation ratio could be achieved.

While we do not object to the proposals within this plan, we feel it important to raise some points around the compensatory measure itself.

We note that it was deemed not feasible to monitor changes in red-throated diver abundance as a result of vessel re-routing to monitor effectiveness of the measure; instead, vessel compliance with the re-routing will be monitored. The compliance monitoring and compensation ratio may provide sufficient confidence that the measure will be effective. However, this does not provide a direct guarantee that the measure will be effective in providing the required compensation.

We disagree with the temporary nature of re-routing of vessels being used as like-for-like compensation for the perpetual presence of an offshore wind farm, as well as limited benefit due to residual disturbance from other vessels potentially negating the impact of East Anglia projects' vessel re-routing. We also disagree with the use of an "effective area of displacement" method to calculate the impact of displacement due to offshore wind farms (see rationale in Appendix A12 to the Natural England's Deadline 4 Submission [REP4-087](#)).

However, we recognise that the Secretary of State has adopted both of the above approaches in their Appropriate Assessment. We are content with the effective area of displacement and the effective area of compensation being used to calculate a compensation ratio, given that these are both quantified using the same metrics. Therefore, in this instance, we are content with these methods being used for this specific purpose.

Please contact me with any questions regarding the advice provided.

Yours sincerely,

[Redacted Signature]

Offshore Industries Adviser

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References

JNCC, Natural England, Natural Resources Wales, NatureScot. 2024. *Joint advice note from the Statutory Nature Conservation Bodies (SNCBs) regarding bird collision risk modelling for offshore wind developments*. JNCC, Peterborough. <https://hub.jncc.gov.uk/f7892820-0f84-4e96-9eff-168f93bd343d>