

This letter is sent by email only

HornseaProjectFour@planninginspectorate.gov.uk

National Infrastructure Planning,
The Planning Inspectorate,
Temple Quay House,
2 The Square,
Bristol,
BS1 6PN.



25 April 2025

Dear Sir/Madam,

THE HORNSEA FOUR OFFSHORE WIND FARM ORDER 2023 ("the Order")

SUBMISSION OF GUILLEMOT COMPENSATION IMPLEMENTATION AND MONITORING PLAN ("GCIMP") UNDER PART 3 OF SCHEDULE 16 OF THE ORDER

Thank you for consulting the RSPB on Hornsea Four's draft Guillemot Compensation Implementation and Monitoring Plan (GCIMP). Our brief response is set out below.

We have recently commented on the consultation on the Non-Material Change in relation to the bycatch reduction element of Hornsea Four's original Guillemot compensation package (letter dated 20 March 2025). In that response we supported the proposed non-material change to remove the bycatch reduction component of the original compensation package.

As a consequence of that non-material change, Hornsea Four will now fulfil the compensation requirements for Guillemot solely via the predator eradication measures set out in the GCIMP.

As an advisory member of the Hornsea Four Offshore Ornithology Engagement Group (OOEG), the RSPB has been given the opportunity to comment on earlier, pre-submission drafts of the GCIMP document.

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The RSPB is part of BirdLife International, a network of passionate organisations, working together to save nature across the world.

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Among other things, we welcome the amendments made to earlier drafts that now appear in the formal consultation version of the GCIMP, with particular reference to the following:

- **Success criteria (paragraph 9.1.1.2).** We support both success criteria and, in particular, welcome the wording of Success Criterion 2. Specifically, the reference to increases in the Guillemot population that show sustained progress towards the occupancy of 4,760 rat-free Guillemot nesting spaces. This emphasises the need for ongoing progress over time towards achieving full occupancy of the available nest spaces;
- **Defining sustained progress (paragraph 9.1.1.3):** we welcome and support the key role of the OOEG in periodically reviewing what is meant by “sustained progress”, taking account of relevant monitoring information and other factor;
- **Experimental monitoring to Core monitoring (paragraph 10.3.1.3):** we welcome the commitment to consult with the OOEG on whether to change an Experimental Monitoring Objective to a Core Monitoring Objective where the Experimental Monitoring proves to be reliable etc. This is particularly important in the area of productivity monitoring as this will contribute to a fuller understanding of the compensation measure’s effectiveness.
- **Correction factor for breeding Guillemot survey (paragraph 10.3.1.10):** we welcome clarification on the approach to the correction factor for the breeding Guillemot survey.

As noted in our response to the recent non-material change consultation, the RSPB acknowledges that Hornsea Four’s predicted scale of rat-free nesting spaces to be provided by the proposed predator eradication component is significant (Success criterion 1). Success of the compensation measure will ultimately need to be gauged by the successful and sustained colonisation by breeding Guillemots in the required numbers and breeding success to meet the compensation objectives (Success criterion 2).

Yours faithfully,


Head of Casework