

Date: 02 May 2025
Our ref: 510825
Your ref: EN010098



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

Dear Sir/Madam,

PLANNING ACT 2008

The Hornsea Four Offshore Windfarm Order 2023 (“the Order”): Part 3 of Schedule 16: Guillemot Compensation Implementation and Monitoring Plan (GCIMP)

Thank you for your consultation dated 02 April 2025, inviting comments on the Hornsea Four Offshore Wind Farm Order 2023 submission of their Guillemot Compensation Implementation and Monitoring Plan (GCIMP). Natural England provide these comments in accordance with paragraph 10, Part 3 of Schedule 16 to the Order.

Natural England’s remit is to ensure sustainable stewardship of the land and sea so that people and nature can thrive. We are working to achieve a healthy and biodiverse marine environment which can enable a truly sustainable UK offshore wind sector, to support the achievement of ‘net zero’ and address the climate change emergency. This is underpinned by our vision for thriving marine and coastal nature alongside low impact offshore wind energy, tackling both climate and biodiversity emergencies as set out in our [Approach to Offshore Wind \(2021\)](#). Aligned to the four aims of our Approach, we use our expertise to help facilitate offshore windfarms that are sensitively located and constructed, whilst protecting marine ecosystems from proposals with significant environmental impacts through our statutory advice. This, coupled with mechanisms for nature enhancement, will allow marine nature recovery and help mitigate the negative impacts of climate change.

In providing this advice we have reviewed the following document:

- Guillemot Compensation Implementation and Monitoring Plan (Version 3; dated 28th March 2025)

Summary

Natural England has engaged in the Hornsea Four (HOW04) Offshore Ornithology Engagement Group (OOEG) and contributed to the development of the Guillemot Implementation and Monitoring Plan (GCIMP). Following review of the submitted GCIMP, we are in broad agreement with its content and welcome that the Project have invested significant effort and resources into underpinning the

GCIMP with the best available knowledge. We have, however, outlined below certain key points for further consideration by the Secretary of State (SoS).

Recruitment into UK National Site Network

Natural England highlight that there remains uncertainty over the proportion of guillemots that will be recruited into the Flamborough and Filey Coast Special Protection Area (FFC SPA), and/or contribute to the coherence of the wider UK National Site Network (NSN) for this species.

Section 6.2.1.2 states that establishing the nesting requirement involves calculating "*the proportion of adults birds that are expected to be recruited into the UK NSN*". We welcome that the more conservative rate of 58% natal philopatry has been considered in this calculation. However, it cannot be confidently assumed that the remaining 42% will be recruited into the FFC SPA or the UK NSN, as opposed to the wider general population. Predicting connectivity likelihood is complex and variable, and in this context is compounded by a lack of evidence provided on guillemot dispersal distances to aid further understanding. Based on our current understanding, connectivity is likely to be limited. We therefore caution against over-confidence regarding the level of direct benefits to FFC SPA and the UK NSN.

Nonetheless, Natural England recognise that the Secretary of State has mandated this measure and accept the absence of other suitable compensatory measures that would directly target the FFC SPA guillemot colony. If implemented successfully, we agree that this measure has the potential to deliver meaningful benefits to the wider biogeographic guillemot population, and that this may provide a degree of resilience to the UK NSN. We welcome that the Project have included adequate monitoring measures to provide insight into these outcomes and support adaptive management measurements if required.

We highlight that in a review of potential island eradications to benefit seabird populations, the Herm archipelago was one of 25 priority sites in the UK and crown dependencies identified for non-native predator eradication (Stanbury et al, 2017)¹, reflecting the considerable conservation value of the proposals, which will likely benefit a wide range of other seabird species.

Scale of benefits in relation to rat presence

Natural England note that the index trapping results have not been provided on a location-by-location basis, with rat presence amongst the Herm island complex instead captured only by a high-level summary (Table 6-1). We acknowledge that, as long as rat presence is confirmed within the complex, it is possible that predation is currently a factor suppressing guillemot nesting availability across all of the islands within accessible distance. It is, therefore, ecologically sound to assume that all islands within the complex could theoretically benefit from the eradication measure and provide additional suitable nesting spaces.

However, we believe that a better understanding of current rat presence/absence at each location would add important context and confidence in predicting the scale of benefits likely to arise. For example, the island of Longue Pierre was found to host 167 guillemots in 2024 and has been estimated to potentially support upwards of 1,500 'good' quality additional nesting sites. If there is confirmed rat presence specifically on Longue Pierre, or confirmation that the current colony is in an area inaccessible to rats, then we would have increased confidence that eradication measures could indeed deliver the predicted level of benefits. Conversely, where islands have no record of either guillemots or rats, there would be lower confidence in the potential benefits at this location, as the evidence to suggest that predation is a significant constraint to guillemot colonisation is weaker in this instance.

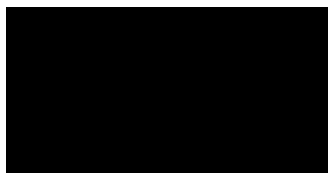
Whilst we remain supportive of the extensive research and survey effort that has been undertaken in

¹ Stanbury, A., Thomas, S., Aegerter, J. *et al.* Prioritising islands in the United Kingdom and crown dependencies for the eradication of invasive alien vertebrates and rodent biosecurity. *Eur J Wildl Res* 63, 31 (2017).

predicting the number of nest spaces that will be freed up, it is difficult to confidently comment further on the scale of benefits that may be realistically achieved, without further insight into location-specific predator survey results. However, this is not to say that the measure cannot deliver a significant increase in the guillemot population and as noted above, we are content that there are suitable monitoring and adaptive management plans in place, in the event of the measure under-performing.

For any queries relating to the content of this letter please contact me using the details provided below.

Yours faithfully,



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