

Date: 28 July 2025
Our ref: 518757
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 26 June 2025, inviting comments on the Hornsea Four Offshore Wind Farm Order 2023 submission of their **Amended** 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 documents:

- GCIMP Amendments (09368361_A)
- Tracked Amended Hornsea Four Guillemot Compensation Implementation and Monitoring Plan (09368616_A)
- Clean Amended Hornsea Four Guillemot Compensation Implementation and Monitoring Plan with Appendix (09368616_A)

Summary

The amended GCIMP has been submitted to reflect the changes in its expected delivery timeframe, following Ørsted's decision to no longer deliver Hornsea Four in its current form and under the Contract for Difference awarded in September 2024. Natural England understand the eradication programme is now indicatively planned to commence in 2026, although flexibility has been retained throughout the amended GCIMP.

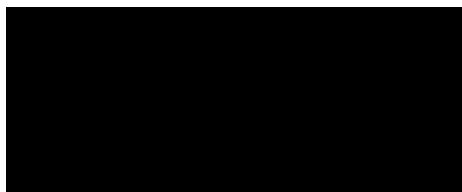
We are satisfied that the anticipated changes to the delivery timeframe will not impact the Project's ability to fulfil their guillemot compensation requirements set out in Part 3 of Schedule 16 of the Order. We note that there is potential for the effectiveness of the measure to be increased, should the rat eradication works now commence more than two years in advance of any construction. The increased length in time between compensation implementation and construction would improve the likelihood of the measure being functional prior to impacts occurring, potentially offering greater resilience to the National Site Network by the time construction impacts are realised.

Natural England note, however, that commitment to some of the core monitoring approaches appear to be potentially weakened in the amended GCIMP (section 10.2). This includes changing the interval of post-eradication monitoring to declare rat-free status from "*checks every four weeks*" to "*regular on site/remote checks*". We understand that updates to this section have been made to reflect the current status of agreements with leaseholders; however we consider that further information on proposed changes to the methodology for monitoring and/or incursion response times as a result of leaseholder agreements, including implications for effectiveness, should be presented to the OOEG for further discussion. We maintain that an incursion response following rat detection is likely to be more successful if on-site checks are undertaken on a consistent and frequent basis (e.g. every four weeks, as originally detailed).

Finally, we highlight that our comments on the original GCIMP submission (sent 02 May 2025), regarding uncertainty around recruitment rates into the UK National Site Network, and the scale of benefits in relation to confirmed rat presence, also remain relevant to the amended GCIMP.

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

Yours faithfully,



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Yorkshire and North Lincolnshire Team
E-mail: [redacted] [naturalengland.org.uk](mailto:[redacted]@naturalengland.org.uk)