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22 September 2025

Dear Jemima Wakelin,

PLANNING ACT 2008

HORNSEA FOUR OFFSHORE WIND FARM ORDER 2023 (AS AMENDED) (“the Order”)

APPROVAL OF GUILLEMOT COMPENSATION IMPLEMENTATION AND MONITORING PLAN UNDER PART 3 OF SCHEDULE 16 TO THE ORDER

1. The Hornsea Four Offshore Wind Farm Order 2023 as amended¹ (“the Order”) contains requirements and conditions that the undertaker must comply with before certain works within the authorised development as defined in the Order can commence.
2. Orsted Hornsea Project Four (UK) Limited (“the Applicant”) made a request (“the Approval Request”) to the Secretary of State for Energy Security and Net Zero (“the Secretary of State”) on 28 March 2025 for approval of the Guillemot Compensation Implementation and Monitoring Plan (“GCIMP”), in accordance with Part 3 of Schedule 16 (Compensation to protect the coherence of the National Site Network) to the Order.
3. On 25 June 2025, the Applicant submitted an amended GCIMP and a table of amendments, to take account for a delay in the delivery of the compensation measures. All documents are available on the Planning Inspectorates project website².
4. The Secretary of State wishes to inform the Applicant that consideration has now been given to the Approval Request.

¹ The Hornsea Four Offshore Wind Farm Order 2023 (SI 2023/800) was amended by The Hornsea Four Offshore Wind Farm (Correction) Order 2024 (SI 2024/117), The Hornsea Four Offshore Wind Farm (Amendment) Order 2024 (SI 2024/800) and The Hornsea Four Offshore Wind Farm (Amendment) Order 2025 (SI 2025/485).

² <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010098/documents>

Requirements under paragraph 10 of Part 3 and paragraph 15 of Part 3 of Schedule 16 of the Order

5. Paragraph 10 of Part 3 of Schedule 16 to the Order (as Amended) states that:

“10. Following consultation with the H4 OOEG, the GCIMP must be submitted to the Secretary of State for approval in consultation with Natural England, the local planning authority and Alderney Wildlife Trust. The GCIMP must be based on the strategy for guillemot compensation set out in the guillemot and razorbill compensation plan (as relevant to guillemot) and include-

(a) for the predator eradication measure—

(i) details of the location(s) where the compensation measure will be delivered;
(ii) details of the number of nest sites that need to be created within the Herm Island complex (Herm, Jethou, including Grand Fauconniere and the Humps) and locations around Alderney. This must take into account both the number of chicks that will need to be produced to ensure that the required number of adults survive to adulthood and the proportion of adult birds that are expected to be recruited into the UK NSN;

(iii) details of how any necessary land access rights, licences and approvals have or will be obtained and any biosecurity measures will be or have been secured;

(iv) an implementation timetable for delivery of the predator eradication measure, such timetable to ensure that the predator eradication method has commenced no later than two years prior to the commencement of Work No. 1(a) and 1(b), Work No. 2(a), 2(b) and 2(c) and Work No. 3(a);

(v) details for the proposed ongoing monitoring of the measure including—

(aa) survey methods for predators and seabirds;

(bb) success criteria;

(cc) survey and reporting programmes

(dd) seabird productivity rates;

(ee) seabird breeding population;

(ff) distribution of breeding seabirds; and

(gg) evidence of guillemot natal dispersal to the UK NSN;

(vi) recording of H4 OOEG consultations and project reviews;

(vii) details of any adaptive management measures, with details of the factors used to trigger any such measures. Such measures should consider offshore artificial nesting structures for guillemot;

(viii) provision for reporting to the Secretary of State, to include details of the use of the location(s) by breeding guillemot to identify barriers to success and target any adaptive management measures;”

Paragraph 11 of Part 3 of Schedule 16 to the Order (as Amended) states that (emphasis added):

*“The undertaker must carry out the predator eradication method as set out in the GCIMP approved by the Secretary of State in consultation with Natural England, the Alderney Wildlife Trust and the local planning authority. Work No. 1(a) and 1(b), Work No. 2(a), 2(b) and (c) and Work No. 3(a) **must not commence until the GCIMP has been approved by the Secretary of State in accordance with paragraph 10, and at least 2 years have elapsed since the start of the predator eradication works.**”*

Consultation

6. On 02 April 2025, the Secretary of State invited comments from Natural England (“NE”), The States of Guernsey, Alderney Wildlife Trust and the Royal Society for the Protection of Birds (“RSPB”) on the Approval Request in accordance with paragraph 10 of Part 3 of Schedule 16 to the Order.
7. NE responded that it is in broad agreement with the content of the GCIMP and welcomes that the Applicant has invested significant effort and resource in underpinning the GCIMP with the best available knowledge. NE states that there remains uncertainty over the proportion of guillemot that will be recruited into the Flamborough and Filey Coast Special Protection Area (“FFC SPA”), and although it welcomes the use of 58% natal philopatry, it cannot be confidently assumed that the remaining 42% of adult guillemot will be recruited into the FFC SPA or UK National Site Network (“NSN”). Further, the lack of location-specific results of presence/absence surveys means it is difficult to predict the scale of benefits likely to arise from the measure. Nevertheless, NE acknowledge that no other suitable compensatory measures are available that would directly target the FFC SPA guillemot colony, and it is content that suitable monitoring and adaptive management plans are in place, in the event of the measure under-performing.
8. In response to the amended GCIMP, NE confirmed it remains satisfied that the anticipated changes to the delivery timeframe will not impact the Proposed Development’s ability to fulfil its guillemot compensation requirements, noting that there is potential for the effectiveness of the measure to increase should the eradication programme commence more than two years in advance of construction. NE notes however that a monitoring commitment appeared to have been weakened. Post-eradication monitoring to determine rat-free status (paragraph 10.2.1.2 of the GCIMP) was amended from checks to detect the presence every four weeks, to “regular on site/remote checks”. NE understood that updates to this section have been made to reflect the current status of agreements with leaseholders; however, NE 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 Offshore Ornithology Engagement Group (“OOEG”) for further discussion.
9. The RSPB responded on 25 April 2025, stating that it welcomed amendments made to earlier drafts that now appear in the final version of the GCIMP, particularly in defining the success criteria and “sustained progress”, commitments to consulting with the OOEG on monitoring arrangements, and clarification on the correction factor for the breeding guillemot survey. The RSPB did not respond to the consultation on the

amended GCIMP, but the Secretary of State notes that the provisions referenced by the RSPB remained unchanged.

10. The States of Guernsey and Alderney Wildlife Trust provided a joint response on 29 April 2025. The States of Guernsey has entered into a Cooperation Agreement with the Applicant with a view to facilitating collaboration to deliver the GCIMP measures. The States of Alderney is in the process of agreeing a Memorandum of Understanding with the Applicant to similarly facilitate the potential GCIMP measures in their jurisdictions. Both the States of Guernsey and the States of Alderney are supportive of the delivery of the GCIMP, as relevant to their jurisdictions. In response to the amended GCIMP, the States of Guernsey and States of Alderney remain supportive of the delivery of the GCIMP as presented.

The Secretary of State's consideration of the approval request

11. The Secretary of State has considered the amended GCIMP and responses of consultees.
12. Regarding the selected locations and scale of benefit, evidence of rat presence across the Herm Island complex and L'Etac is provided or described. The locations in Table 6.1 of the GCIMP have been consulted on with the OOEG and are agreed as suitable for inclusion in the GCIMP. An appropriate methodology is used to predict that 1,999 rat-free nesting spaces will be required to support the number of breeding pairs to compensate for 452.3 breeding adult guillemot. Allowing for philopatry, approximately 4760 rat free nesting spaces are required to be provided. The Secretary of State notes the uncertainty and difficulty in predicting the recruitment of guillemot to the UK NSN, but considers a reasonable methodology incorporating philopatry has been applied. The Secretary of State acknowledges that it is not currently possible to quantitatively measure natal dispersal with current technologies and restrictions within the Herm Island complex, but he welcomes that future developments and their potential for additional study opportunities will be discussed with the OOEG post-implementation of the measure. The potential for significant overcompensation (between 164% – 279%) provides confidence that the UK NSN will benefit from the predator eradication programme.
13. The Secretary of State notes the agreements from the States of Guernsey and States of Alderney which he considers demonstrates that the GCIMP is feasible and deliverable. The Applicant has constructively engaged with the OOEG in the development of the GCIMP, and the ongoing role of the OOEG in the long-term implementation and monitoring of the predator eradication programme is adequately secured.
14. Regarding the frequency of post-eradication validation monitoring, the Secretary of State agrees with NE 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 but notes that the frequency and nature of checks is dependent on landowner agreements. The Secretary of State considers that the Applicant should discuss and agree on finalised monitoring frequency during the initial 2 year post-eradication phase with the OOEG as landowner agreements are finalised.
15. In the event that monitoring suggests the predator eradication is failing to meet the defined success criteria, a range of appropriate adaptive management options are identified. The Secretary of State notes that the Applicant will discuss the initial trigger

points and the continual review process for triggering adaptive management with the OOEg as the measure progresses throughout the lifetime of the offshore wind farm.

16. The Secretary of State is satisfied that the GCIMP complies with the requirements under paragraph 10 of Part 3 of Schedule 16 of the Order and hereby gives his approval to the GCIMP.

Yours sincerely,

A solid black rectangular box used to redact a signature.

Energy Infrastructure Planning Delivery
Department for Energy Security & Net Zero