

Date: 01 June 2026  
Our ref: 548565  
Your ref: EN010098



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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 05 May 2026, 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:

- Amended Hornsea Four Guillemot Compensation Implementation and Monitoring Plan (09368616\_A; 17th April 2026)
- Hornsea Four Guillemot Compensation Implementation and Monitoring Plan Amendment Note (Revision 01)

## Summary

The amended Guillemot Compensation Implementation and Monitoring Plan (GCIMP) has been submitted to reflect a change in the primary delivery location of the predator eradication measure from the Herm Island complex to the Alderney Island complex, in addition to L'Etac (Sark Island complex). This is due to challenges experienced by the Applicant in securing the landowner agreements required to deliver the eradication at Herm in the expected delivery timeframe. Natural England understands that delivery of the eradication programme is indicatively planned to commence in 2026 (L'Etac), in line with requirements for two years to elapse between the start of eradication works and commencement of offshore works. Elimination on Alderney will follow sequentially once necessary agreements are finalised. Having reviewed the amendments to the GCIMP, we are satisfied that the anticipated changes to the delivery location should not impact the Project's ability to fulfil their guillemot compensation requirements set out in Part 3 of Schedule 16 of the Order.

## Detailed comments

Natural England have reviewed the amended GCIMP and consider the prioritisation of predator elimination at the Twin Sister stacks and a coastal buffer zone at Alderney, in addition to predator eradication on L'Etac (Sark Island complex), to be an appropriate alternative compensation proposal given the major difficulties and uncertainties around delivery at Herm. We consider that the update has been sufficiently detailed in the submitted GCIMP, and we agree that the evidence presented indicates the presence of guillemot that may be being prevented from breeding at these locations due to predator (rat) presence.

Whilst we are supportive of the change, we wish to highlight that the previous planned delivery across the Herm Island complex offered the prospect of contributing a significantly higher number of potential nest sites than the Twin Sisters stacks in Alderney. Under the assumption that occupancy of suitable habitat could achieve 27 guillemot pairs/m<sup>2</sup>, sufficient nest spaces will still be delivered across Alderney and L'Etac. However, the revised proposal represents a reduction in nest site delivery from 7,806 to 4,827, or 164% of the required capacity (4,760) to 101%. It is of note that the Herm Island complex was estimated to be sufficient to deliver the required number of nests alone (4,971, 104%). Thus, it will be imperative that both Alderney and L'Etac are successful to ensure compliance with the success criteria. In that light, we welcome that the Herm Island complex has been retained as a contingency measure should substantial levels of adaptive management be required in the future.

We advise that the proposed monitoring will be integral to demonstrating the successful delivery and ongoing effectiveness of the measure, both with respect to the predator eradication and elimination works and any subsequent uptake of habitat by breeding guillemots.

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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