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National Infrastructure Planning  
The Planning Inspectorate  
Temple Quay House  
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2 June 2026

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**

The following comments are in response to the letter of 5 May 2026, sent on behalf of the Secretary of State for Energy Security & Net Zero, inviting comments from the RSPB and others with regards to amendments to the Guillemot Compensation Implementation and Monitoring Plan (GCIMP) for the Hornsea Four Offshore Wind Farm.

We understand that the amendments to the GCIMP principally concern a reclassification of the Alderney predator control site from an adaptive measure to a primary delivery location (in addition to L’Etac, Sark) due to current access uncertainties at the preferred Herm Island complex, which may not be resolved within the necessary timeframe. It is noted that the revisions additionally clarify that eradication will commence at L’Etac first, with predator elimination/eradication on Alderney or Herm Island complexes to follow, pending landowner agreement.

We further note that the Marine Recovery Fund (MRF) is also now classified in the GCIMP as a contingency primary compensation mechanism, as well as remaining an adaptive management measure.

The RSPB broadly concurs with Natural England’s advice (letter dated 1 June 2026) in response to the amended GCIMP. We wish to emphasise and add the following points:

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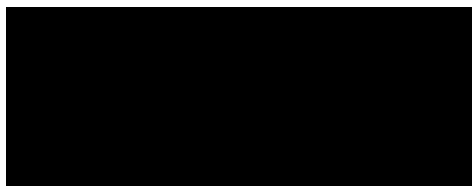
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1. Although benefiting from a confirmed local delivery mechanism, it is recognised that the Alderney location would be a predator (Black Rat) elimination site rather than an eradication site due to the anticipated recolonisation of rats, meaning that ongoing control measures will be necessary at the buffer site over the entire compensation period, with an associated increased level of risk to achieving the compensation success criteria.
2. While there is clear evidence of rats on Alderney (which we note is not the case for all potential delivery sites identified in the GCIMP) as well as potential habitat available for auk colony expansion at this location, the combined Alderney and Sark locations are predicted to deliver a substantially lower uplift in nest sites (4,827, equivalent to 101% of the target number) than the combined Herm Island and Sark locations (7,806, equivalent to 164% of the target number). Given the uncertainty around the success of the measures, with respect to their translation to Guillemot populations, this additionally increases the risk of failing to meet the compensation targets.
3. Due to the inherent risks associated with reliance on Alderney and Sark as the primary delivery locations, we strongly advise that Orsted continues to engage with the Herm Island complex land managers in order that they may at least be available as a contingency measure.
4. We note that implementation on Alderney (or Herm Island) will begin later on than at L'Etac and most likely not within two years of the commencement of offshore works. While this is not ideal, we also acknowledge the difficulties in setting up landowner agreements and therefore urge that such agreements are pursued as a matter of some urgency and that the Hornsea Four Offshore Ornithology Engagement Group (OOEG) is kept fully informed of progress.
5. As Natural England have highlighted in their advice, effective monitoring will be essential to demonstrate compliance with the compensation requirement. In addition to monitoring the predator eradication and elimination works and subsequent uptake of nest sites by breeding Guillemots, we would further advise that additional potential risks/complications, such as bait resistance build-up in local rat populations and impacts to non-target species, should also be monitored and addressed in control sites.
6. The RSPB supports a strategic approach to the delivery of compensation for offshore wind farms, as coordinated by measures delivered via the MRF. We therefore encourage developers to pursue this option in favour of project-level measures wherever appropriate. However, we note that the MRF may not currently have the capability to deliver Guillemot compensation on the scale required for Hornsea Four and therefore we would not presently support reliance on it as a primary compensation mechanism for this development.

The RSPB will endeavour to provide ongoing advice to Orsted as an advisory member of the Hornsea Four OoEG.

Yours faithfully



Senior Casework Officer

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