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20 July 2026

Dear [REDACTED]

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 17 April 2026 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. The Applicant submitted an amended GCIMP detailing changes to the location of the compensatory measures, which are comprised of predator eradication measures. The changes include changing the location of the implementation of these measures, with the preferred location now being the Sark Island complex, with commencement intending to begin in 2026. The secondary implementation location is the Alderney Island complex to provide additional nesting spaces to meet the compensation requirement. The Herm Island complex has been retained as a contingency measure. All documents are available on the Planning Inspectorates project website².

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>

Consultation

4. On 24 April 2026, the Secretary of State invited comments from Natural England (“NE”), The States of Alderney, the Marine Maritime Organisation (“MMO”) 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.
5. NE responded on 1 June 2026 that it was in broad agreement with the content of the GCIMP, confirming that the combination of predator eradication at the Twin Sisters stacks, a coastal buffer zone at Alderney as well as predator eradication on the Sark Island complex (L’Etac) would provide a suitable alternative compensation mechanism.
6. NE did highlight, however, that the updated locations offer significantly fewer nest sites (4825, 101% of the requirement) than the original proposals on the Herm Island complex, which offered 7,806 spaces (164% of the required capacity). The updated locations did still meet the required number of nest spaces of 4760. NE made clear that success at both the alternative sites was imperative to successfully delivering the required compensation and that robust monitoring would be needed to ensure this is achieved. As such, retaining the option of Herm Island as an adaptive management strategy was welcomed by NE.
7. NE maintained its previous position that there remains uncertainty over the proportion of guillemot that will be recruited into the Flamborough and Filey Coast Special Protection Area (“FFC SPA”). Although NE welcomes the use of 58% natal philopatry, it advised that it cannot be confidently assumed that the remaining 42% of adult guillemot will be recruited into the FFC SPA or UK National Site Network. Nevertheless, NE acknowledges 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. The RSPB responded on 2 June 2026, stating that it broadly agreed with the comments left by NE in its consultation response, including the requirement to retain the option of Herm as an eradication location given the reduced uplift in nest sites at the new locations. The RSPB added that the predator elimination of brown rats on Alderney would require ongoing control measures for the entire compensation period to avoid re incursion, and that this added uncertainty to the success of the mitigation measures. As such, the RSPB also stressed that monitoring of the measures is required to demonstrate compliance, and additional risks such as bait resistance and impacts to non-target species should also be monitored.
9. The MMO responded on 22 May 2026 that it was content with the proposed amendments despite the fine margin for target nest spaces, and deferred matters relating to ornithological impacts to Natural England. The States of Alderney did not provide a response.

The Secretary of State’s consideration of the approval request

10. The Secretary of State has considered the amended GCIMP and responses of consultees. He notes the difficulties in securing the access requirements on the Herm Island complex, and notes efforts made by the Applicant to ensure compliance with Schedule 16 of the DCO. He is content that an appropriate methodology has been used to predict the availability of nesting space at the proposed locations, and that it

has been demonstrated that the presence of predators may be preventing guillemot from breeding at these locations.

11. The Secretary of State notes the reduction in target nest spaces at the proposed new location in comparison to the potential space available at Herm but is satisfied that the required 4760 nesting spaces can be delivered across the suggested sites. There is further reassurance that the required obligation can be met through the continued exploration of Herm as compensation location, the utilisation of the Marine Recovery Fund as a primary mitigation measure if available and required, and the use of adaptive management measures if needed. Further, the Secretary of State is content that the proposed changes provide increased certainty that eradication on the Sark Islands complex can begin in 2026.
12. The Secretary of State is satisfied that the GCIMP has been updated accordingly to include the additional locations within the monitoring protocol, and that 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 within the GCIMP. 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 Offshore Ornithology Engagement Group as the measure progresses throughout the lifetime of the offshore wind farm.
13. 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,



Energy Infrastructure Planning Delivery
Department for Energy Security & Net Zero