

Date: 10 January 2025
Our ref: Case: 27347 Consultation: 496835
Your ref: EN010115



National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Hornbeam House
Crewe Business
Park Electra Way
Crewe
Cheshire CW1
6GJ

VIA WEBSITE ONLY

T 0300 060 3900

Dear Sir/Madam,

The Infrastructure Planning (Examination Procedure) Rules 2010 (as amended) – Rule 17

Application by Five Estuaries Offshore Wind Farm Limited for an order granting development consent for the Five Estuaries Offshore Wind Farm project

Request for further information – Migrating Bats

We write in respect of the following Rule 17 Letter issued on 16 December 2024 to both Natural England and the Applicant:

- Examining Authority's Rule 17 Letter to Applicant and Natural England issued on 16 December 2024.pdf [PD-016]

We note the request for further information in relation to potential impacts of the Proposed Development on migrating and foraging bats, as follows:

In responding to the Examining Authority's (ExA) second written questions (ExQ2) ME.2.10, Natural England (NE) has raised concern regarding the impacts of the Proposed Development on migrating and foraging bats [REP4-063]. This now reflects similar concerns raised by the German Government at [RR-035]. In the absence of survey work associated with migrating bats, NE has stated it currently has insufficient information to assess the impacts of the Proposed Development in this regard. The ExA notes from NE's response to ExQ2 ME.2.10 that it advised the Applicant of the need to undertake migratory bat surveys during the pre-application stage for the Proposed Development.

For Natural England

Notwithstanding the absence of species surveys, in [REP4-063] NE has advised that "... the only long-term mitigation at present known to reduce fatalities from collision is curtailing (slowing) blade rotation speed or further still stopping the blades all together". That said, given the presence of other nearby operational windfarms, NE has gone onto to advise that such mitigation would be unlikely to be effective. Can NE clarify why it considers curtailing turbine speed or stopping rotation altogether would be unlikely to be effective?"

Natural England has considered this request for further information and below is our detailed advice.

1. Existing Offshore Windfarms

To clarify our earlier advice, curtailing the Five Estuaries wind turbines in isolation of the neighbouring OWFs, would be unlikely to be an effective mitigation measure. Instead, all four OWFs (Five Estuaries, Galloper, Greater Gabbard and North Falls) would need to adopt an identical curtailment strategy for this mitigation measure to be effective. As stated in our earlier advice, curtailment is currently the only long-term mitigation known to reduce bat fatalities from collision and has been used extensively as bat mitigation for onshore wind farm developments. However, at present there is limited information on migrating bat ecology and collision risk factors offshore to design a targeted and (therefore effective and proportionate) curtailment strategy for an OWF.

2. Evidence Gaps

While there is some evidence to suggest that the proposed Five Estuaries offshore wind farm may be located within an important migration route for *Nathusius' pipistrelle*, there is a continued lack of empirical data regarding offshore bat ecology, their migration and their interaction with offshore wind farms. Without this information, it would be very challenging to identify the collision risk factors for migratory bats that would inform a targeted (and therefore effective and proportionate) curtailment. Very little is known about bat presence offshore (this is restricted to a small number of studies).

3. Monitoring and Mitigation

Pre-construction surveys of bat presence offshore could be compared with post-construction surveys and in turn be used to inform potential adaptive management and/or mitigation measures. Therefore, Natural England advises that pre-construction bat surveys would help establish presence, species of bat, relative abundance at different locations. These surveys could potentially provide a more robust baseline against which to compare post-construction monitoring of migrating bats at the proposed development site.

Monitoring of offshore/migrating bats could include both the use of acoustic detectors and associated bat tagging/tracking, and should be designed to detect changes in bat activity (such as changes in flight height, evidence of resting on or increased foraging around turbines) after construction compared to before construction. Depending on the technology available, it may also be feasible to monitor interactions of bats with wind turbines through remote sensing techniques e.g. infrared. The monitoring should focus on those areas where bats have been recorded pre-construction and should be designed to provide evidence to inform any adaptive mitigation and management depending on the results, as well as the effectiveness of any such measures.

We also advise that any data collected during the proposed surveys/monitoring should be made publicly-available (e.g. Marine Data Exchange) to inform offshore bat distribution/migration route mapping, as well as future impact assessments and marine spatial planning.

Natural England notes that designing monitoring for bats offshore presents a considerable technical challenge and that, if possible, a coordinated approach with other developments may be more effective.

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

Yours sincerely

Yolanda Foote
Marine Senior Officer – Sussex and Kent Area Team
E-mail: [REDACTED]@naturalengland.org.uk