

10 January 2025  
Our ref: Case: 27347 Consultation: 497797  
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

T 0300 060 3900

**VIA WEBSITE ONLY**

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 – Guillemot and Razorbill Compensation Measures**

We write in respect of the following Rule 17 Letter issued on 23 December 2024 to both Natural England and the Applicant:

- EN010115-001224-Applicant and Natural England Rule 17 – Ornithology.pdf [PD-022]

We note the request within this Rule 17 Letter for further information in relation to Guillemot and Razorbill Compensation Measures as follows:

**For Natural England**

*“Natural England previously requested in [PD2-006] that the Applicant carries out significant amounts of on-site monitoring and engagement with local experts to establish a baseline for disturbance at the proposed compensation sites in the south west of England. How far does the surveying work carried out in the 2024 breeding season, as reported on in [REP1-054], address Natural England’s request? What remaining work, if any, do you consider would be required to address your concerns?”*

**Natural England’s Response**

The surveys undertaken in the 2024 breeding season do not fully address our request for significant amounts of on-site monitoring and engagement with local experts to establish a baseline for disturbance at the proposed compensation sites.

The surveys undertaken by the Applicant in 2024 were designed to reconnoitre sites in North Cornwall for potential inclusion in the compensation project. They were not undertaken to provide comprehensive data on the guillemot and razorbill population sizes, their breeding status or the impacts from disturbance and predation. Visits to individual candidate sites were undertaken over one day and only provided a snapshot of data to identify each site’s potential suitability for compensation and monitoring, e.g. to determine whether breeding colonies were present, observable, vulnerable to

anthropogenic disturbance and amenable to the proposed compensation.

To this end the work undertaken in 2024 has identified several potential sites for inclusion in the compensation project, however, further work in subsequent breeding seasons will be necessary to test the survey approach at these sites and establish a baseline for disturbance. In 2024, insufficient data were collected at each site to adequately assess the guillemot and razorbill population sizes, their breeding status and success as well as the levels of disturbance and predation. To obtain these data, the applicant will need to undertake generic seabird surveys and plan a program of observations to monitor any impacts from disturbance and predation.

The Applicant has proposed initial monitoring over 2 years to test a survey methodology and establish a baseline of data, but also investigate appropriate set-back distances to advocate for water-borne craft approaching colonies. These commitments are welcome. We understand that details of this work are to be presented in an updated implementation and monitoring plan (IMP) at a later Examination deadline. We recommend the Applicant includes adaptive measures (i.e. alternative survey options and/or sites) and, where data collection proves difficult, investigates the use of novel techniques, such as drones or remote cameras. These may prove useful, particularly where proportions of a breeding colony are not visible from vantage points or when staffing sites for long hours may be impractical.

To alleviate our concerns regarding engagement with local experts, further liaison is needed. We recommend liaison with the local bird community, particularly the individuals that undertake the local seabird surveys for the national Seabird Monitoring Programme, or groups such as the Cornwall Bird Watching and Preservation Society (<https://cbwps.org.uk/>) and the South-West Marine Ecosystems programme (<https://swmecosystems.co.uk/>). This could provide valuable information to help select other appropriate sites and monitor those already chosen. More generally, evidence of engagement with delivery stakeholders (e.g. landowners, potential partner organisations) needs to be presented. Effort should be made to reach delivery agreements with relevant parties, in order to demonstrate that the proposed compensation measures can be applied effectively.

The Applicant should undertake these tasks with a view to ensuring that the response to the compensation measure can be quantified over time, its success rated and, if necessary, adapted or altered in a timely manner to make improvements. Once appropriate monitoring is in place and a baseline of data obtained, the compensation measure should be implemented within at least 4 years of operations commencing at the wind-farm. This will ensure birds hatched as a result of the compensation measure have had time to mature and recruit into the adult breeding population when predicted impacts commence or in the early years of operation.

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