

Date: 10 October 2025
Our ref: 27347/528302
Your ref: EN010115



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BY EMAIL ONLY

Dear Sir/Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by Five Estuaries Offshore Wind Farm Limited (“the Applicant”) for an Order granting Development Consent for the proposed Five Estuaries Offshore Wind Farm (“Project”)

The following constitutes Natural England’s formal statutory response to the Secretary of State’s Request for Information (RFI) dated 26 September 2025. To inform this response Natural England have reviewed:

- C3-009 5.5.8 Guillemot and Razorbill Implementation and Monitoring Plan (Revision F) (Tracked)
- C1-037 9.22 Outline Landscape and Ecological Management Plan (Revision F) (Tracked)
- C3-013 5.5.5 Guillemot and Razorbill Compensation – Evidence, Site Selection and Roadmap (Revision E) (Tracked)
- C3-020 6.3.4 Onshore Biodiversity and Nature Conservation (Revision B) (Tracked)

Natural England has been invited to provide updates or information as appropriate in response to the queries set out in this latest letter from the Secretary of State (SoS) upon:

HRA – Guillemot and Razorbill Implementation and Monitoring Plan

5. Noting the response (Point 1 of Table 2.3) (5 September 2025) to the Secretary of State’s request for information (21 August 2025) in relation to the updated Guillemot and Razorbill Implementation and Monitoring Plan, NE is invited to provide draft wording to secure within the Order the site-by-site level of detail in the Plan, as recommended by NE.

The Applicant has provided Natural England with draft wording that they are proposing to submit in response to this query within the RFI, which we have carefully reviewed. The Applicant’s proposed wording for the update to the Guillemot and Razorbill compensation requirements addresses our concerns in relation to this issue and we are content for this to be adopted in the Development Consent Order (DCO).

HRA – Guillemot and Razorbill Evidence, Site Selection and Roadmap

6. NE is invited to confirm whether the requested amendments made by the Applicant (in response to the Secretary of State’s information request dated 21 August 2025) to the Guillemot and Razorbill Evidence, Site Selection and Roadmap resolve its outstanding

concern raised in relation to re-calculating the compensation quantum using the latest demographic rate advice.

Natural England welcome the changes made by the Applicant that now take into account the latest Statutory Nature Conservation Body (SNCB) advice on razorbill demographic rates. Natural England no longer have a concern regarding the Compensation Quantum (CQ) calculations presented by the Applicant for razorbill but wish to re-iterate we only support the figures shown that are derived from our preferred approach to the impact assessment.

However, we note the Applicant has also altered the CQ targets presented for the Central Impact Value (CIV) and Upper Confidence Interval (UCI) impacts on guillemot, yet the latest SNCB advice (NE & NRW, 2024), which was provided to the Applicant in March 2024, does not include any update on the demographics for this species. The revised figures have not been altered sufficiently to raise significant concerns, but in the interests of transparency, it would be reassuring to understand what brought about this change and for the Applicant to share the parameters used in their calculation.

HRA – Guillemot and Razorbill Evidence, Site Selection and Roadmap

7. NE is invited to confirm whether the requested amendments made by the Applicant (in response to the Secretary of State's information requested dated 21 August 2025) to the Guillemot and Razorbill Evidence, Site Selection and Roadmap resolve its outstanding concern raised in relation to presenting the expected number of recruits that would disperse or stay at the natal colonies.

Natural England welcome the new information presented by the Applicant and advise the Secretary of State (SoS) that this resolves our concern about the presented number of recruits that would be expected to disperse or stay at the natal colonies.

We also acknowledge our statement on compensation requirements in [REP8-051] and emphasised by the Applicant in section 2.10 of the revised document. We agree the success of the compensation measure should be judged against achieving the CQ target derived from the mean or central impact value (CIV) and calculated using the Natural England preferred approach.

In addition, we wish to highlight the other key aspects of the compensation requirement laid out in our REP8-051 response. It is important that (i) the compensatory proposals demonstrate an ability to compensate for the predicted upper confidence interval impacts should impacts be greater than predicted and (ii) the measure is scaled using a ratio to increase confidence that sufficient benefits will still arise should the measure underperform.

In this regard, the information presented in Tables 4 and 5 of the revised document indicate clearly that the compensation measure should be scaled using the UCI values and at a 3:1 ratio to achieve the target compensation. This corroborates our original advice laid out in REP8-051 on how to generate the number of pairs that the measure should be able to accommodate.

Onshore Ecology – ES 6.3.4 Onshore Biodiversity and Nature Conservation

9. NE is invited to confirm whether the amendments made by the Applicant as requested by the Secretary of State on 21 August 2024 to ES 6.3.4 Onshore Biodiversity and Nature Conservation resolves the outstanding concern raised in its Risk and Issues Log [REP8A-053] (Point 2 in J – Onshore Ecology). If this has not resolved its concerns, NE is requested to set out whether the mitigation measures within the Outline Landscape and Ecological Management Plan are sufficient in light of the updates made to the impact assessment, and provide further direction to the Applicant to resolve its concerns in relation to impact duration and species lifecycles.

Natural England considers this matter resolved. The mitigation measures within the Outline Landscape and Ecological Management Plan (OLEMP) are in line with best practice guidance. Natural England also welcomes the commitment to pre-construction surveys to further inform mitigation measures prior to construction.

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

Yours faithfully,

[REDACTED]

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REFERENCES

NE & NRW, 2024. NE and NRW interim advice regarding demographic rates, EIA scale mortality rates and reference populations for use in offshore wind impact assessments, 6pp.