



NABU Mecklenburg-Vorpommern · Wismarsche Str. 146 · 19053 Schwerin

The Planning Inspectorate Yr Arolygiaeth Gynllunio  
by e-mail to [fiveestuaries@planninginspectorate.gov.uk](mailto:fiveestuaries@planninginspectorate.gov.uk)

Bundesamt für Seeschifffahrt und Hydrographie  
by e-mail to [REDACTED] and [REDACTED]

## Landesgeschäftsstelle

Antje Seebens-Hoyer

Tel. +49 (0) [REDACTED]

Fax +49 (0) [REDACTED]

## Five Estuaries Offshore Wind Farm - EN010115

Planning Act 2008 and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 - Regulation 32

Application by Five Estuaries Offshore Wind Farm Ltd (the Applicant) for an Order Granting Development Consent for the Five Estuaries Offshore Wind Farm (the Proposed Development)

Notification under the EIA Regulations that the Proposed Development is likely to have significant effects on the environment in an EEA State

17. June 2024

Dear Sir or Madam,

the NABU e.V. is the largest environmental NGO in Germany with more than 940,000 members and supporters. The NABU, represented by the NABU Mecklenburg-Vorpommern, comments on Five Estuaries Offshore Wind Farm as announced above. This is on behalf of the NABU Mecklenburg-Vorpommern and the NABU Germany. It may be completed by additional comments.

It is well known that migrating bats regularly cross the North Sea between Great Britain and the Netherlands, Belgium and France, where they are detected in very high numbers area-wide including the surroundings of the project area (Brabant 2019, 2021, Lagerveld 2021, 2023). Main species using this very high concentration migration corridor are *Pipistrellus nathusii*, *Pipistrellus pipistrellus*, *Nyctalus noctula*, *Nyctalus leisleri* and *Vespertilio murinus* (Brabant et al. 2015, Lagerveld et al. 2014 e.g.).

In addition to acoustic survey, several recordings of individual *Pipistrellus nathusii* crossing the North Sea between Great Britain and the Netherlands have been made using coded VHF-tags and the Motus network:



## NABU Mecklenburg-Vorpommern

Wismarsche Straße 146

19053 Schwerin

Tel. +49 (0385)59 38 98 0

Fax +49 (0385)59 38 98 29

lgs@NABU-MV.de

www.NABU-MV.de

## Geschäftskonto

GLS Bank Bochum

BLZ 430 609 67

Konto 2045 381 600

IBAN DE98 4306 0967 2045 3816 00

BIC GENODEM1GLS

USt-IdNr. DE 166961701

## Spendenkonto

GLS Bank Bochum

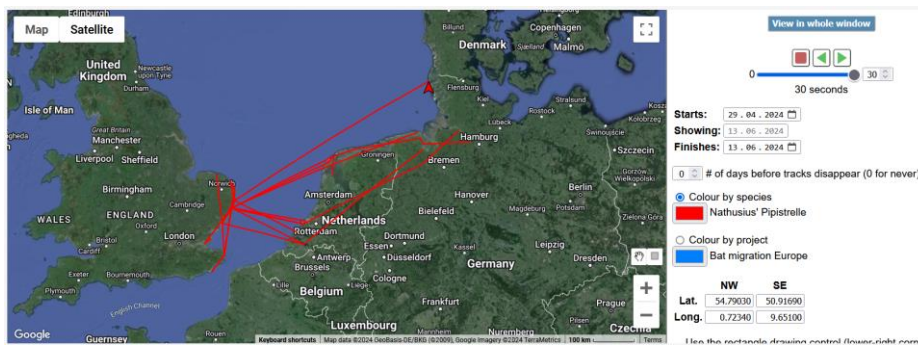
BLZ 430 609 67

Konto 2045 381 601

IBAN DE98 4306 0967 2045 3816 01

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Der NABU ist ein staatlich anerkannter Naturschutzverband (nach § 63 BNatSchG) und Partner von Birdlife International. Spenden und Beiträge sind steuerlich absetzbar. Erbschaften und Vermächnisse an den NABU sind steuerbefreit. Vereinsregister VR 13 AG Rostock



Due to the very high collision risk of bats at offshore wind turbines (Ahlén et al. 2009, Brabant et al. 2019, Gaultier et al. 2020, Hüppop et al. 2019, Lagerveld et al. 2021, Rydell et al. 2014, Seebens-Hoyer et al. 2022, 2024 in prep. e.g.), very high concentration areas like the project area should be free of offshore wind turbines. Minimally, strict mitigation measures covering the whole migration periods are absolutely necessary in the project area.

Even if wind turbines often operate at low speed they still are a collision risk for bats. Also, a low flight altitude during offshore migration does not fully protect against collision, as “It is when bats stop over and forage for insects that are accumulated around the wind turbines that accidents become more likely.” (Ahlén et al. 2009). Furthermore “Bats changed altitude rapidly when they were near tall vertical obstacles such as ships, bridges, and wind turbines.” (Ahlén et al. 2009), a behaviour proved and observed by several authors (e.g. Lothar Bach pers. comm., Seebens-Hoyer et al. 2022, 2024 in prep.). Still a high rotor-free zone helps the part of the bat population (approximately more than 50 %) only crossing in 10-30 m above sea level (Seebens-Hoyer et al. 2024 in prep.).

Cutting off wind turbines in periods with high bat activity can effectively protect bats resulting in only very low profit cuts. Most offshore bat activity takes place at windspeeds of and below 6-7 m/s (Ahlén et al. 2009, Brabant et al. 2021, Lagerveld et al. 2021, Seebens-Hoyer et al. 2022), therefore energy loss by cutting off at these windspeeds is rather low. To prevent killing of bats and therefore fulfil national protection law, the UN Convention on the Protection of Migrating Species and the EUROBATS-Agreement the application of mitigation guidelines by means of cutting off the wind farm during the main migration nights at windspeeds at and below 6 m/s is mandatory with operation.

In addition, there may be applied a two-year acoustic monitoring from the beginning of April to the mid of June and beginning of August till the mid of November

- 1.- prior to construction at 3-5 buoys transversely to the presumed migration direction for survey issues and
- 2.- when built at 3-5 wind turbines (each 1 microphone at nacelle height and one microphone at height of the lower rotor swept zone to adapt cutting off periods by specifying the wind conditions at which most bat migration occurs in the area.

All data needs to be made available for studying cumulative effects of other wind farms. Cumulative effects of the Five Estuaries wind farm also has to be addressed.

The NABU asks for a reply and - in case - a detailed subject-specific explanation on the comment.

Best regards,

Antje Seebens-Hoyer

### Literature cited

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**From:** [Voigt, Jan](#) on behalf of [GP Bw BAIUDBw Infra I 3 TOeB](#)  
**To:** [EingangOdM](#)  
**Cc:** [Nico Nolte](#); [Dajana Ruge](#)  
**Subject:** AW: Grenzüberschreitende BöB gem. UVPG Bekanntmachung des BSH gem. Espoo-Konvention für den Antrag auf Erteilung einer Genehmigung für die Erweiterung des "Five Estuaries" OWP  
**Date:** 20 June 2024 20:55:36  
**Attachments:** [image001.gif](#)  
[image002.png](#)  
[image003.png](#)

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**Klassifizierung: OFFEN – AMTS- U. DIENSTGEHEIMNIS/PersDat Schutzbereich 1**

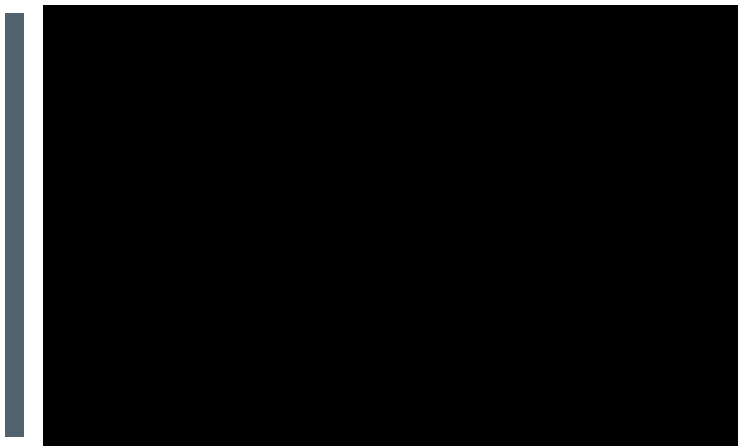
**Bundesamt für Infrastruktur Umweltschutz  
und Dienstleistungen der Bundeswehr  
Referat Infra I 3**

Sehr geehrte Damen und Herren,

seitens der Bundeswehr bestehen keine Einwände.

Mit freundlichen Grüßen  
Im Auftrag

Jan Voigt  
Regierungsinspektor



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**Von:** EingangOdM <[REDACTED]>  
**Gesendet:** Donnerstag, 23. Mai 2024 12:55  
**An:** EingangOdM [REDACTED]  
**Cc:** Nico Nolte [REDACTED]; Dajana Ruge [REDACTED]  
**Betreff:** Grenzüberschreitende BöB gem. UVPG Bekanntmachung des BSH gem. Espoo-Konvention für den Antrag auf Erteilung einer Genehmigung für die Erweiterung des "Five Estuaries" OWP

Sehr geehrte Damen und Herren,

anbei übersende ich Ihnen die im Rahmen der Benachrichtigung gemäß Artikel 3 des Übereinkommens über die Umweltverträglichkeitsprüfung im grenzüberschreitenden Rahmen (Espoo-

Vertragsgesetz) bezüglich des Antrages auf Erteilung einer Genehmigung für die Erweiterung des "Five Estuaries" Offshore Windparks in der britischen ausschließlichen Wirtschaftszone vor der Ostküste Englands übermittelten Dokumente mit der Gelegenheit zur Stellungnahme oder Widerspruch bis **zum 20. Juni 2024**.

Details entnehmen Sie bitte den beigefügten Unterlagen und folgenden Links:

[Home - Five Estuaries](#)

[Five Estuaries Offshore Wind Farm - Project information](#)

Weiterhin werden die übersandten Dokumente in der Zeit **vom 31. Mai 2024 bis zum 20. Juni 2024** auf der Webseite des BSH unter: [www.bsh.de](http://www.bsh.de) (Bekanntmachungen) zur Verfügung gestellt.

Ihre/n Stellungnahme/Widerspruch richten Sie bitte an das Funktionspostfach [REDACTED] und an [REDACTED]

Für Rückfragen steht Ihnen Frau Ruge unter der Telefonnummer 040/3190-6314 gern zur Verfügung.

Anlagen:


- notification der britischen Regierung vom 14.05.2024 (EN010115)
- transboundary screening document, Five Estuaries Offshore Wind Farm

Mit freundlichen Grüßen  
Im Auftrag

Sarah Hohenberg

BSH

Sarah Hohenberg (O1517)  
Sachgebiet „Zentrale Verfahrensunterstützung“



**From:** [REDACTED]  
**To:** [EingangOdm](#); [Dajana Ruge](#)  
**Subject:** WG: Five Estuaries Offshore Wind Farm- EN010115  
**Date:** 19 June 2024 10:35:40  
**Attachments:** [image001.png](#)

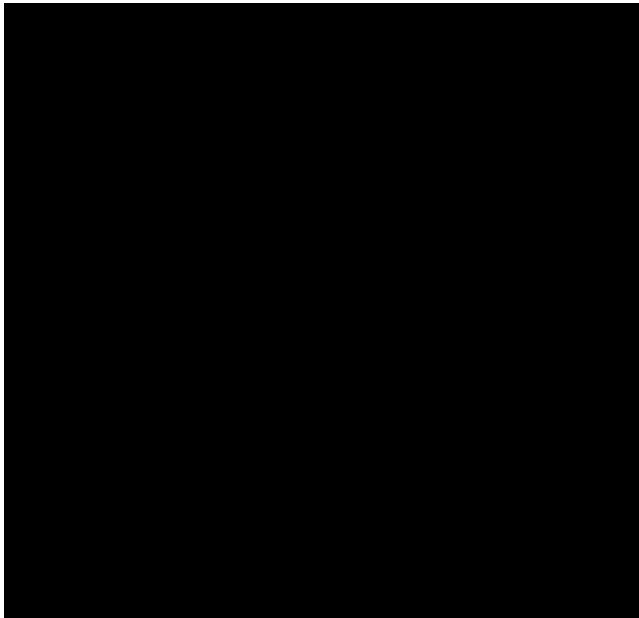
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Sehr geehrte Damen und Herren,

u.s. Mail schicke ich Ihnen z.K..

Mit freundlichen Grüßen

Diana Barteldt



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**Von:** Barteldt, Diana (MEKUN)

**Gesendet:** Mittwoch, 19. Juni 2024 11:30

**An:** 'fiveestuaries@planninginspectorate.gov.uk' <fiveestuaries@planninginspectorate.gov.uk>

**Betreff:** Five Estuaries Offshore Wind Farm- EN010115

Dear Ms. Newman,

in a letter dated May 14, 2024, you gave us the opportunity to comment on the above-mentioned offshore wind project. Due to the large distance of the project from the Schleswig-Holstein coastal waters, no negative effects are expected. In this respect, we refrain from commenting.

Best regards

Diana Barteldt



Ministerium für Energiewende, Klimaschutz,  
Umwelt und Natur des Landes Schleswig-Holstein

[REDACTED]

[REDACTED]