



Felicity Le Page
Environment Manager (Kittiwake Compensation Lead)
Orsted Hornsea Project Four (UK) Limited
5 Howick Place
Westminster
London
SW1P 1WG

7 January 2025

Dear Ms Le Page,

PLANNING ACT 2008

HORNSEA FOUR OFFSHORE WIND FARM ORDER 2023 (AS AMENDED) (“the Order”)

APPROVAL OF KITTIWAKE COMPENSATION IMPLEMENTATION AND MONITORING PLAN UNDER PART 2 OF SCHEDULE 16 TO THE ORDER

1. Orsted Hornsea Project Four (UK) Limited (“the Applicant”) made a request to the Secretary of State for Energy Security and Net Zero (“the Secretary of State”) on 30 September 2024 for approval of the Kittiwake Compensation Implementation and Monitoring Plan (“KCIMP”)¹, in accordance with Part 2 of Schedule 16 to the Order.
2. On 24 October 2024, the Secretary of State issued a letter² to the Applicant requesting clarifications on the KCIMP. The Applicant responded on 31 October 2024³. The Secretary of State considers the KCIMP and two subsequent letters form the Approval Request.
3. Following the close of consultation with Natural England (“NE”)⁴ and Hartlepool Borough Council on 5 December 2024, the Secretary of State would be grateful if the **Applicant** could provide updates or information as appropriate.

Feasibility of other onshore artificial nesting structure (“ANS”)

4. The Secretary of State notes that the Applicant considers the Hartlepool ANS will have sufficient space to accommodate the compensation needs for both Hornsea Three and Hornsea Four. However, the **Applicant** is requested to provide detail as to why other onshore locations were not considered in addition to, or instead of, the Hartlepool ANS. If other onshore options were considered, the Applicant should explain why these were discounted.

¹ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010098/EN010098-002394-Hornsea%20Four%20KCIMP%20Updated_Redacted.pdf

² https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010098/EN010098-002396-H4%20KCIMP%20-%20SoS%20Clarifications%20-%202024%20October%202024_Redacted.pdf

³ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010098/EN010098-002395-Hornsea%20Four%20KCIMP%20Submission%20-%20Clarifications%20for%20the%20SoS%2031st%20October%202024_Redacted.pdf

⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010098/EN010098-002397-EN010098%20Hornsea%204%20KCIMP%20-%20NE%20Response%20051224.pdf>

Feasibility of the offshore ANS

5. The **Applicant** is requested to provide further project-level detail as to why an offshore ANS is no longer considered a feasible option to fulfil the kittiwake compensation measures secured in the Order. The Secretary of State notes that paragraph 2.1.1.5 of the KCIMP states there are increasing risks to the Applicant regarding supply chain constraints and escalating costs for offshore construction. The Applicant is requested to expand on this issue in the context of the project and provide details of expected timings for both compensation and project delivery, as well as detailed impacts to construction costs, were an offshore ANS taken forward. This should include an explanation as to how the feasibility of implementing an offshore ANS has changed since the Order was made.

NE's alternative proposal

6. The Secretary of State notes that, in its consultation response, NE "*suggested an alternative proposal to enable an offshore ANS to be progressed whilst reducing the immediate risks to the project*" during a meeting of the Offshore Ornithology Engagement Group ("OoEG") with "*initial compensation to be delivered at Hartlepool, meeting the requirements of delivery four breeding seasons in advance of operation, to be followed in due course by the construction of an offshore ANS*". The **Applicant** is requested to provide minutes from the OoEG meeting(s) where this discussion took place. The **Applicant** is also requested to provide further detail as to why NE's alternative proposal was considered not viable and excluded from consideration in the KCIMP.

The development of an offshore structure

7. The Secretary of State notes that paragraph 8.3.1.8 of the KCIMP states that the Applicant is in discussion regarding the potential to facilitate the development of an offshore structure by another developer, potentially allowing it the opportunity to utilise nest space on that structure as an option for adaptive management (if required) in the future. The **Applicant** is requested to provide an update on these discussions, the progression and implementation timescales of the offshore structure, and how this measure would become a feasible adaptive management tool for the project.

Appendix A – colony growth scenarios

8. The Secretary of State notes that the modelling presented in Appendix 3 of the application to make a second non-material change to Hornsea Three⁵ suggests that, for most growth and productivity scenarios, each of the four ANS's could compensate for **100%** of the cumulative mortality for Hornsea 3 (Table 8.1). This assumes each ANS has a carrying capacity of 467 nest spaces.
9. The modelling presented in Appendix A of the KCIMP suggests that, for most scenarios, the Hartlepool ANS could compensate for **25%** of the cumulative mortality for Hornsea 3 (Table 8.1). 'Setup one' of this modelling assumes that the carrying capacity available to Hornsea 3 is 526 nest spaces (38% of 1384).
10. The Applicant is invited to explain these differences in modelled outputs.
11. Responses to this letter should be submitted by email only to energyinfrastructureplanning@energysecurity.gov.uk before 23:59 on 4 February 2025.

⁵ <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010080/EN010080-003691-Covering%20Letter%20and%20Application%20Document.pdf>

12. This letter is without prejudice to the Secretary of State's consideration of whether to accept or refuse the KCIMP. Nothing in this letter is to be taken to imply what the eventual decision might be or what final conclusions the Secretary of State may reach on any particular issue which is relevant to the determination of the approval request.

Yours sincerely



John Wheadon
Head of Energy Infrastructure Planning Delivery