

BY EMAIL ONLY

Jo Dowling
Lead Member of the Examining Authority
Hornsea Project Four
National Infrastructure Planning
Temple Quay House
2 The Square Bristol
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21 April 2022

Dear Jo Dowling,

Application by Ørsted Hornsea Project Four Limited for an Order granting Development Consent for the Hornsea Project Four Offshore Wind Farm (EN010098)

Issue Specific Hearing 5 (marine and coastal ornithology) and 6 (Habitats Regulations Assessment)

RSPB reference: 20029909

I am writing further to the emails from Caroline Hopewell containing the invitation from the Examining Authority to the RSPB to attend the above Issue Specific Hearings. The RSPB would like to thank the Examining Authority for its invitation to attend the hearings.

We are also in receipt of an invitation to attend Issue Specific Hearing 4 (marine environment, excluding ornithology). Given the hearing specifically excludes ornithology and appears to cover matters outside of the RSPB's concerns, we will not be attending this hearing.

We have carefully reviewed the draft agenda for each of hearings 5 and 6, the issues to be discussed and the current progress on those matters in respect of information submitted by the Applicant to the examination. We have concluded that it would be of greater benefit to the examination and the Examining Authority for the RSPB to concentrate its limited resources on the review and response to the Applicant's upcoming submissions at Deadline 3. Therefore, we regret we will not be able to attend Issue Specific Hearings 5 and 6.

We have briefly summarised our reasoning in respect of each of the hearing agendas below.

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The RSPB is part of BirdLife International,
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working to give nature a home around the world.

Patron: Her Majesty the Queen **Chairman of Council:** Kevin Cox
President: Miranda Krestovnikoff **Chief Executive:** Beccy Speight

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Issue Specific Hearing 5: marine and coastal ornithology

Central to any discussion relating to agenda items 2 to 5 are the fundamental concerns of both the RSPB and Natural England with the Applicant's baseline characterisation and related analyses. Our views on these issues are set out in section 4 of our main written representation (REP2-089), with partial updates at Deadline 3 based on the Applicant's submissions at Deadlines 1 and 2.

The key to making progress on these matters during the examination is the programme for re-running the model as described under agenda item 2, along with updates to associated analyses, taking account of the RSPB's comments at Deadline 3. We would welcome a clear timetable from the Applicant on these critical issues. We understand some new documents will be submitted at Deadline 3, although it is unclear if these will cover the full breadth of issues that need to be addressed.

To help us contribute meaningfully to these discussions and provide the Examining Authority with our considered view, it would also be helpful if a report for Natural England was submitted formally to the examination. It is referred to by the Applicant in paragraph 2.1.1.1 and Table 2 of REP2-046 G2.10 MRSea Baseline Sensitivity Report (Gannet). We understand the report sets out a critique of the Applicant's baseline characterisation commissioned by Natural England and entitled "Scott-Hayward, L.A.S. (2021). Statistical Review of Hornsea Project Four: Environmental Statement for Natural England. CREEM, University of St Andrews". In its absence as a formal examination document, we are unable to assist the examination fully on this issue.

Issue Specific Hearing 5: Habitats Regulations Assessment

Given our position in respect of the topics to be covered in ISH5, we will not be able to state anything beyond our Deadline 2 and Deadline 3 submissions in respect of agenda items 2.5 to 2.12. Similarly, in respect of item 3.1, and items 4.1 to 4.6 our submissions at Deadline 2 set out the RSPB's current position on the issues raised, with some updates contained in our Deadline 3 submissions. In respect of item 4.7 (predator reinvasion risk), in order to be able to offer an informed view we need to await submission of a full island restoration Feasibility Study by the Applicant, which we understand is due at Deadline 5.

I hope these comments are helpful. For any queries relating to the content of this letter, please contact me using the information provided below.

Yours sincerely,

Andrew Dodd
Head of Casework
RSPB

