

National Infrastructure Directorate
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

23 May 2022

Our ref. G4.15 Rule 17

Orsted Hornsea Project Four Limited
Development Consent Order (DCO) Application for Hornsea Project Four
Offshore Windfarm
Application Reference: EN010098

G4.15 Applicants Response to Rule 17 Deadline 4A

Dear Mr Johansson

On 19 May 2022, the Examining Authority (ExA) issued a request under Rule 17 to Orsted Hornsea Project Four Limited, the Applicant, requesting further information and comments as part of the Hornsea Project Four Examination Process. This letter provides a response to the points raised by the ExA in their request, which is broken into constituent parts for ease of response in the table below.

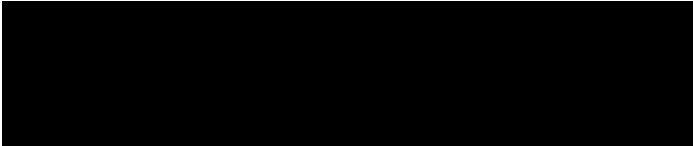
Comment	Response
<p><i>In relation to the seabird baseline characterisation data and the use and interpretation of MRSea, NE [REP4-055] has advised that, in its opinion, the original model-based estimates are not fit for purpose and cannot be reliably used to inform the assessment of impacts within the Environmental Impact Assessment (EIA) or the Report to Inform Appropriate Assessment (RIAA), potential compensation requirements or future cumulative or in-combination assessments.</i></p>	<p>The Applicant reaffirms its position that the original model-based estimates are fit for purpose and can be reliably used to inform the assessment of impacts within the EIA, RIAA and provide reliable information to inform potential compensation quantum and cumulative or in-combination assessments.</p> <p>This position has been confirmed in the submissions of G4.13 Comparative Gannet Assessment (REP4-047) which confirmed no material difference between the assessment presented for gannet using MRSea_v1 or MRSea_v2 at the EIA and HRA level.</p> <p>The SNCB and Examining Authority (ExA) can therefore take comfort that the DCO Application documents for ornithology (reliant upon MRSea_v1) present a robust and suitably precautionary assessment.</p>
<p><i>To ensure that sufficient progress is made on these matters prior to the close of the Examination, NE has suggested that a revised baseline would need to be agreed for key species and subsequent assessments undertaken for submission into the Examination at Deadline 5.</i></p>	<p>The Applicant has been progressing additional analysis and model runs in anticipation of the advice from the SNCB and request from the ExA. We are pleased to confirm that MRSea_v2 has now been completed for all key species (gannet, kittiwake, razorbill and guillemot) following the guidance received from Natural England and Centre for Research into Ecological & Environmental Modelling (CREEM).</p> <p>For the key species (gannet, kittiwake, guillemot and razorbill) where the Applicant has remodelled MRSea, the best-fit model following advice provided by CREEM as advised to follow by Natural England, has provided the following number of monthly outputs from the 24 months of site-specific survey data:</p> <ul style="list-style-type: none"> • Gannet – 12 • Kittiwake – 12 • Razorbill – 12 • Guillemot - 24 <p>The above MRSea_v2 model outputs are suggested by the Applicant to provide the revised baseline for the key feature of ornithological interest at Hornsea Four and will be provided into</p>

	<p>examination as an Annex at Deadline 5. For the three remaining species where MRSea_v1 was originally used for characterisation (fulmar, great black-backed gull and puffin), the Applicant intends to revert back to design-based abundance estimates.</p> <p>To adhere to the advice provided in Natural England's most recent submission Appendix B4 – Comments on G2.10 MRSea Baseline Sensitivity Report (Gannet) received at Deadline 4 (REP4-055), the Applicant proposes to use the following datasets for baseline characterisation:</p> <ul style="list-style-type: none">• Gannet will rely on both MRSea_V2 and design-based abundance estimates. The 12 month MRSea_V2 outputs will be used to inform collision risk modelling as Natural England stated that 12 months of data was acceptable for collision risk modelling (REP4-055). For displacement, design-based abundance estimates providing 24 months of data will be used to inform displacement analysis due to the 12 months of data from the MRSea v2 not adhering to SNCB (2022) guidance;• Kittiwake will rely on MRSea_V2 abundance estimates, which will be used to inform collision risk modelling, as Natural England stated that 12 months of data was acceptable for collision risk modelling (REP4-055);• Guillemot will rely on MRSea_V2 abundance estimates, which will be used to inform displacement analysis as the best fit model results in 24 months of data allowing for displacement analysis in line with SNCB (2022) guidance;• Razorbill will rely on design-based abundance estimates providing 24 months of data which will be used to inform displacement analysis, due to the best fit model only producing 12 months of data which does not adhere with SNCB (2022) guidance for displacement analysis; and
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	<ul style="list-style-type: none"> All remaining species (including fulmar, great black-backed gull and puffin) will rely on design-based abundance estimates providing 24 months of data. <p>The above shall be agreed in consultation with Natural England and will be provided into examination as an Annex at Deadline 5.</p>
<p><i>NE has made suggestions about a possible way forward and offered to work with the Applicant to secure this.</i></p>	<p>The way forward as set out above shall be presented and agreed with Natural England at the Ornithology Technical Panel Meeting #16 on 25 May 2022.</p> <p>The Applicant thanks Natural England for their offer of working with the Applicant in a timely and constructive manner to close out issues by Deadline 5.</p> <p>The Applicant is confident that the ExA will have all the relevant information to hand at this point to make suitable progress on the matter of ornithology (EIA and HRA), derogation and compensation.</p>
<p><i>The ExA requests the Applicant to indicate its broad intention in relation to this advice from the statutory nature conservation body that a revised baseline and assessment should now be submitted and its offer of assistance, and - if any further work in this respect is to be carried out – whether it would be completed for submission at Deadline 5</i></p>	<p>The Applicant confirms our intention to present a revised baseline, in the form of tabulated abundances for key species (gannet, guillemot, kittiwake and razorbill) and an updated EIA and HRA Assessment Annex at Deadline 5. The Applicant will consult with Natural England during the Ornithology Technical Panel Meeting #16, on 25 May 2022, to ensure that the annexes narrative on the modelling process, diagnostics and form of the final selected model satisfies Natural England.</p> <p>The applicant is confident that no further analysis shall be required post-Deadline 5 to meet the Natural England advice as currently known and understood.</p>

We trust you find the above responses adequately address your concerns.

Yours sincerely



Julian Carolan



For and on behalf of Orsted Hornsea Project Four Ltd.