



Hornsea Project Four

G1.22 Statement of Common Ground between Hornsea Project Four and the Royal Society for the Protection of Birds: Offshore and Intertidal Ornithology, Derogation and Compensation

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Table of Contents

1	Introduction.....	6
1.1	Reason for this document.....	6
1.2	Approach to SoCG.....	6
1.3	Application elements of interest to the RSPB.....	7
1.4	Overview of Hornsea Four.....	7
2	Consultation.....	8
2.1	Summary of consultation with the RSPB.....	8
3	Agreement Logs.....	14
3.1	Overview.....	14
3.2	Offshore and Intertidal Ornithology; and Derogation and Compensation.....	17
3.3	Other Documents and Plans.....	40
4	Summary.....	41

List of Tables

Table 1: Summary of pre-application consultation with the RSPB, in relation to offshore and intertidal ornithology and derogation and compensation.	8
Table 2: Relevant documents to this SoCG.....	14
Table 3: Position Status Key.....	16
Table 4: Agreement Log – Offshore and Intertidal Ornithology; and Derogation and Compensation.	17
Table 5: Agreement Log – Other Documents and Plans.....	40

Glossary

Term	Definition
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Projects (NSIP).
Hornsea Project Four Offshore Wind Farm	The term covers all elements of the project (i.e. both the offshore and onshore). Hornsea Four infrastructure will include offshore generating stations (wind turbines), electrical export cables to landfall, and connection to the electricity transmission network. Hereafter referred to as Hornsea Four.
Orsted Hornsea Project Four Ltd	The Applicant for the proposed Hornsea Project Four Offshore Wind Farm Development Consent Order (DCO).

Acronyms

Acronym	Definition
AEol	Adverse Effect on Integrity
CRM	Collision Risk Modelling
DMLs	Deemed Marine Licences
DCO	Development Consent Order
ECC	Export Cable Corridor
EIA	<i>Environmental Impact Assessment</i>
EP	<i>Evidence Plan</i>
ES	Environmental Statement
FFC	Flamborough and Filey Coast
HRA	Habitats Regulations Assessment
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LAT	Lowest Astronomical Tide
LSE	Likely Significant Effect
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
NSIP	Nationally Significant Infrastructure Project
PEIR	Preliminary Environmental Information Report
PINS	The Planning Inspectorate
PVA	Population Viability Analysis
RIAA	Report to Inform Appropriate Assessment
RR	Relevant Representation
SNCB	Statutory Nature Conservation Body

Acronym	Definition
SoCG	Statement of Common Ground
SPA	Special Protection Area

1 Introduction

1.1 Reason for this document

- 1.1.1.1 This Statement of Common Ground (SoCG) has been prepared between Orsted Hornsea Project Four Limited ('the Applicant') and The Royal Society for the Protection of Birds (the RSPB) to set out the areas of agreement and disagreement between the two parties in relation to the proposed Development Consent Order (DCO) application for the Hornsea Project Four offshore wind farm (hereafter referred to as 'Hornsea Four').
- 1.1.1.2 This SoCG covers offshore ornithology matters and derogation and compensation matters.
- 1.1.1.3 The need for a SoCG between the Applicant and the RSPB is set out within the Rule 6 letter that was issued by the Planning Inspectorate (PINS) on 24th January 2022¹.
- 1.1.1.4 Following detailed discussions undertaken through the Evidence Plan (EP) Process, the Applicant and the RSPB have sought to progress a SoCG. It is the intention that this document will provide PINS and the Examining Authority (ExA) with a clear overview of the level of common and uncommon ground between both parties at Deadline 1 of the Hornsea Four DCO Examination. This document will facilitate further discussions between the Applicant and the RSPB; the SoCG will be updated as discussions progress during the Hornsea Four DCO examination.

1.2 Approach to SoCG

- 1.2.1.1 The Applicant took the decision at an early stage to adopt a proportionate approach to Environmental Impact Assessment (EIA) for Hornsea Four which is detailed and integrated throughout the DCO application. This SoCG seeks to set out the agreements reached with the RSPB on the proportionate approach to EIA in addition to other matters such as (but not limited to) the adequacy of baseline data collection, the assessment methodology and conclusions reached ([Section 3.7](#)).
- 1.2.1.2 The structure of this SoCG is as follows:
 - [Section 1](#): Introduction;
 - [Section 2](#): Consultation;
 - [Section 3](#): Agreement Logs; and
 - [Section 4](#): Summary.

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010098/EN010098-000901-Hornsea%204%20Rule%206%20letter.pdf>

1.3 Application elements of interest to the RSPB

1.3.1.1 The elements of Hornsea Four which may affect the interests of the RSPB are Work Numbers 1 to 10, covering offshore works. These are detailed in Part 1 (Authorised Development) of Schedule 1 (Authorised Project) of the draft DCO ([C1.1: Draft DCO including DMLs](#)).

1.4 Overview of Hornsea Four

1.4.1.1 Hornsea Four is an offshore wind farm which will be located approximately 69 km offshore the East Riding of Yorkshire in the Southern North Sea and will be the fourth project to be developed in the former Hornsea Zone. Hornsea Four will include both offshore and onshore infrastructure and consists of:

- **Hornsea Four array area:** This is where the offshore wind generating station will be located which will include the turbines, array cables, offshore accommodation platforms and a range of offshore substations as well as offshore interconnector cables and export cables;
- **Hornsea Four offshore export cable corridor:** This is where the permanent offshore electrical infrastructure (offshore export cables, as well as the High Voltage Alternating Current (HVAC) booster station (if required), will be located;
- **Hornsea Four intertidal area:** This is the area between Mean High Water Springs (MHWS) and Mean Low Water Springs (MLWS) through which all of the offshore export cables will be installed;
- **Hornsea Four onshore export cable corridor:** This is where the permanent onshore electrical cable infrastructure will be located; and
- **Hornsea Four onshore substation including energy balancing infrastructure:** This is where the permanent onshore electrical substation infrastructure (onshore High Voltage Direct Current (HVDC) converter/HVAC substation, energy balancing infrastructure and connections to the National Grid) will be located.

2 Consultation

2.1 Summary of consultation with the RSPB

2.1.1.1 **Table 1** below summarises the consultation that the Applicant has undertaken with the RSPB relevant to offshore and ornithology during the pre-application phase.

Table 1: Summary of pre-application consultation with the RSPB, in relation to offshore and intertidal ornithology and derogation and compensation.

Date	Form of consultation	Statutory/Non Statutory	Summary
Offshore and Intertidal Ornithology			
13/09/2018	Meeting	Non Statutory	<p>Offshore and Intertidal Ornithology Technical Panel Meeting 1</p> <p>Initial meeting to discuss the approach to the scoping report, the methods and scope of data collection and surveys, scope of EIA including assessment methodology, and preliminary discussion of key issues or areas of concern.</p> <p>Introduction to the project; introduction to the Technical Panel, the EEP process and the proportionate approach to EIA; and discussion on key position papers.</p>
15/10/2018	Consultation	Statutory	Hornsea Four Scoping Report
17/12/2018	Meeting	Non Statutory	<p>Offshore and Intertidal Ornithology Technical Panel Meeting 2</p> <p>Project updates; review of scoping responses and the Habitats Regulations Assessment (HRA) screening report; and discussion of next steps in relation to seeking agreement with stakeholders on the data to be included in the PEIR and ES.</p>
07/02/2019	Meeting	Non Statutory	<p>Developable Area Approach (DAA) 1</p> <p>Presentation / discussion on Hornsea Four's development aspirations and discussion on ornithological constraints and potential reduction of the Agreement for Lease (AfL) area in line with key potential consent risks.</p>
10/04/2019	Meeting	Non Statutory	<p>Offshore and Intertidal Ornithology Technical Panel Meeting 3</p> <p>Project updates; discussion on the proportionate approach to EIA; review of responses received through the Scoping</p>

Date	Form of consultation	Statutory/Non Statutory	Summary
			Opinion and Habitats Regulations Assessment (HRA) Screening Report consultation; discussion on next steps in relation to seeking agreement with key stakeholders on the data sources for baseline characterisation; and discussion on the next steps to agree appropriate methods for estimating potential impacts for the PEIR and ES.
11/06/2019	Meeting	Non Statutory	<p>Offshore and Intertidal Ornithology Technical Panel Meeting 4</p> <p>Project updates; discussion of the scope of the PEIR and ES chapters; further discussion relating to agreement of baseline data, assessment methodology and the Impacts Register for Collision Risk Modelling (CRM) and displacement analysis; and summary of key areas of agreement and disagreement between the Applicant and Technical Panel members.</p>
13/08/2019	Consultation	Statutory	<p>Hornsea Four PEIR</p> <p>Published for statutory Section 42 consultation.</p>
23/09/2019	Consultation response	Statutory	<p>The RSPB response to PEIR</p> <p>Providing comments on the PEIR.</p>
29/10/2019	Meeting	Non Statutory	<p>Offshore and Intertidal Ornithology Technical Panel Meeting 5</p> <p>Project updates and updates to the project programme; review of Section 42 responses; next steps to agree the key species and assessment methods for the assessment of displacement and disturbance; discussion on sCRM Shiny App and 'worse case' scenarios and discussion on Population Viability Analysis (PVA) tools.</p>
12/11/2019	Meeting	Non Statutory	<p>Offshore and Intertidal Ornithology Technical Panel Meeting 6</p> <p>Review of impact assessment methodology including values used to define value, sensitivity and importance, and the use of a matrix approach to determine significance; approach to the</p>

Date	Form of consultation	Statutory/Non Statutory	Summary
			cumulative assessment including key data sources for displacement analysis, CRM and CEA tables; and discussion on barrier effects and approach to the lighting impact assessment.
26/11/2019	Meeting	Non Statutory	<p>Offshore and Intertidal Ornithology Technical Panel Meeting 7</p> <p>Discussion on designated sites screened in for assessment, and defining the designated features and assemblages of those sites screened in for assessment; and updates on species-specific work undertaken to inform the EIA.</p>
27/02/2020	Meeting	Non Statutory	<p>Offshore and Intertidal Ornithology Technical Panel Meeting 8</p> <p>Project updates; discussions over additional camera analysis, CRM, cumulative effects assessment and species densities; and updates to foraging ranges based on the Woodward et al (2019) paper.</p>
21/04/2020	Meeting	Non Statutory	<p>Offshore and Intertidal Ornithology Technical Panel Meeting 9</p> <p>Project updates and programme; additional camera analysis; species-specific data to inform populations and densities; and data sources for intertidal ornithology.</p>
09/06/2020	Meeting	Non Statutory	<p>Offshore and Intertidal Ornithology Technical Panel Meeting 10</p> <p>Project updates, programme and derogation update; CRM and PVA assessments; and productivity, Mortality Rates and Seabird Populations.</p>
15/07/2020	Meeting	Non Statutory	<p>Offshore and Intertidal Ornithology Technical Panel Meeting 11</p> <p>Presentation of revised offshore ornithology data, following changes to the Hornsea Four Order Limits; presentation of results from CRM and PVA workstreams; discussion on other ongoing offshore wind farm examinations; apportionment methodology for the Report to Inform Appropriate Assessment</p>

Date	Form of consultation	Statutory/Non Statutory	Summary
			(RIAA); additional camera analysis; and HRA screening update.
23/11/2020	Meeting	Non Statutory	<p>Offshore and Intertidal Ornithology Technical Panel Meeting 13</p> <p>Review of Baseline and MRSea ES deliverables; discussion on the cumulative and in-combination totals for other offshore wind farms; and presentation of updated PVA modelling results.</p>
04/03/2021	Meeting	Non Statutory	<p>Offshore and Intertidal Ornithology Technical Panel Meeting 14</p> <p>Project updates including the reduction in the developable area and the change to the project programme; discussion on the auk habituation and displacement report and associated feedback; discussion on guillemot conclusions on AEol; and discussion on potential mitigation options. NOTE: the RSPB were absent but were sent the invite with material attached.</p>
Derogation and Compensation			
24/06/2020	Online Hornsea Three and Four Compensation Workshop	Non Statutory	<p>Hornsea Four Workshop #1: Long list</p> <p>To introduce intention to produce 'without prejudice' derogation case. The applicant discussed and obtained feedback on the draft long-list of potential compensation measures presented. The applicant shared their approach to identifying compensation options and long-term implementation. Presenting details of Hornsea Four's programme, including a delay to the DCO submission date to account for other project delays.</p>
11/08/2020	Online Hornsea Three and Four Compensation Workshop	Non Statutory	<p>Hornsea Four Workshop #1.1: Onshore nesting and prey availability</p> <p>Presentation and discussion of work completed to date on feasible compensation measures, namely artificial nest provision and prey availability research; this was predominately on options for Hornsea Three but informed Hornsea Four's case. Stakeholder responses to the measures were determined.</p>

Date	Form of consultation	Statutory/Non Statutory	Summary
25/08/2020	Online Workshop Compensation Measures	Non Statutory	<p>Online Compensation Measures Workshop</p> <p>More in-depth discussion of artificial nesting as compensation option for kittiwake. Agenda was focused primarily on Hornsea 3 but informed Hornsea Four's case. The applicant presented calculations to determine number of nest sites required, and also discussed suitable locations, securing sites, adaptive management and roadmap to delivery of the measure.</p>
08/09/2020	Meeting Notes: joint Hornsea Three and Four agenda	Non Statutory	<p>The Applicant obtained advice in relation to offshore fisheries management and the effectiveness of the proposed prey-related compensation. The Applicant discussed offshore fisheries management, with the position that it is legally inappropriate to pursue in the DCO and must be Government led. The effectiveness of prey-related compensation was discussed, with stakeholders reiterating their support for inclusion of prey availability.</p>
25/11/2020	Online Workshop Compensation Measures	Non Statutory	<p>Hornsea Four Workshop #1</p> <p>This meeting provided feedback on the feasibility and preference for the measures presented, and introduced workstreams pursued for kittiwake, guillemot, razorbill and gannet. The Applicant presented on the PVA modelling, the use of EC Guidance (2018) criteria to identify feasible compensation measures and the feasibility and preferences for measures.</p>
20/01/2020	Online Workshop Compensation Measures	Non Statutory	<p>Hornsea Four Workshop #2</p> <p>This meeting provided The Applicant the opportunity to discuss the proposed compensation measures and establish whether they are feasible (either alone or as part of a suite of measures). The Applicant presented on the offshore nesting, Guillemot and Razorbill Fisheries Bycatch and prey availability and</p>

Date	Form of consultation	Statutory/Non Statutory	Summary
			<p>seagrass restoration evidence bases and next steps.</p> <p>An update on prey available evidence was provided, as well as DMP and British True for Ornithology modelling progress to date.</p>
28/05/2020	Online Workshop Compensation Measures	Non Statutory	<p>Hornsea Four Workshop #3</p> <p>The Applicant provided an update on the compensation workstreams. The Applicant presented on kittiwake nesting census survey work of oil and gas platforms, as well as prey distribution work. Location and colonisation period of potential new or repurposed offshore nesting structures discussed, in addition to decommissioning of oil and gas structures.</p> <p>The Applicant presented on the results of bycatch reduction to date. Proposals for bycatch reduction trials were also discussed.</p> <p>The Applicant presented on predator eradication results: the shortlisting process and potential of the Channel Islands and Isles of Scilly.</p>
03/08/2020	Online Workshop Compensation Measures	Non Statutory	<p>Hornsea Four Workshop #4</p> <p>The Applicant provided an update on the progress of Hornsea Four evidence workstreams for compensation measures. Prior to the workshop, the Applicant submitted several compensation plans and requested comments on them. The outline structure of the Roadmaps was presented.</p> <p>The Applicant also presented on kittiwake population modelling to identify the population of first-time breeders available to recruit to new colonies and site selection work for offshore nesting structures and early-stage designs.</p>

Date	Form of consultation	Statutory/Non Statutory	Summary
			<p>The Applicant gauged views on the merit of the compensation measures.</p> <p>The Applicant presented an update on the bycatch reduction proposals, results of fisheries consultation, the details of proposed pilot study; predator eradication work including proposed locations for inclusion; and seagrass restoration proposals.</p> <p>The commitments as part of the HOW03 submission and HOW04 potential extension to the research regarding seabird prey resource were presented.</p>

3 Agreement Logs

3.1 Overview

3.1.1.1 The following sections of this SoCG set out the level of agreement between the parties for each relevant topic of the application (as identified in paragraph 1.3.1.1).

3.1.1.2 **Table 2** presents the list of documents that have informed the level of agreements presented in **Section 3.2– 3.3**.

Table 2: Relevant documents to this SoCG.

Document Title
Offshore Environmental Assessment
A2.5 ES Volume A2 Chapter 5 Offshore and Intertidal Ornithology
A2.5.1 Offshore and Intertidal Ornithology Chapter Schedule of Change
Offshore Annexes
A5.5.1 ES Volume A5 Annex 5.1 Offshore and Intertidal Ornithology Baseline Characterisation Report
A5.5.2 ES Volume A5 Annex 5.2 Offshore Ornithology Displacement Analysis
A5.5.3 ES Volume A5 Annex 5.3 Offshore Ornithology Collision Risk Modelling
A5.5.4 ES Volume A5 Annex 5.4 Offshore Ornithology Population Viability Analysis
A5.5.5 ES Volume A5 Annex 5.5 Offshore Ornithology Migratory Birds Report
A5.5.5.1 Offshore Ornithology Migratory Birds Report Schedule of Change
A5.5.6 ES Volume A5 Annex 5.6 Offshore Ornithology MRSea Report
Compensation Environmental Impact Assessment Methodology Annexes
A4.6.1 ES Volume A4 Annex 6.1 Compensation Project Description.

Document Title

A4.6.2 ES Volume A4 Annex 6.2 Compensation Location Plans.

A4.6.3 ES Volume A4 Annex 6.3 Compensation Impacts Register.

A4.6.4 ES Volume A4 Annex 6.4 Compensation Commitments Register.

A4.6.5 ES Volume A4 Annex 6.5 Compensation EIA Annex Part 1.

A4.6.5 ES Volume A4 Annex 6.5 Compensation EIA Annex Part 2.

A4.6.5 ES Volume A4 Annex 6.5 Compensation EIA Annex Part 3.

A4.6.5 ES Volume A4 Annex 6.5 Compensation EIA Annex Part 4.

A4.6.5 ES Volume A4 Annex 6.5 Compensation EIA Annex Part 5.

A4.6.5 ES Volume A4 Annex 6.5 Compensation EIA Annex Part 6.

Report to Inform Appropriate Assessment (RIAA)

B2.2 RP Volume B2 Chapter 2 Report to Inform Appropriate Assessment

Derogation

B2.4 RP Volume B2 Chapter 4 Summary Statement.

B2.5 RP Volume B2 Chapter 5 Without Prejudice Derogation Case.

B2.6 RP Volume B2 Chapter 6 Compensation measures for FFC SPA Overview.

B2.6.1 RP Volume B2 Annex 6.1 Compensation measures for FFC SPA Compensation Criteria.

B2.6.2 RP Volume B2 Annex 6.2 Compensation measures for FFC SPA Prey Resource Evidence.

B2.7 RP Volume B2 Chapter 7 FFC SPA Gannet and Kittiwake Compensation Plan.

B2.7.1 RP Volume B2 Annex 7.1 Compensation measures for FFC SPA Offshore Artificial Nesting Ecological Evidence.

B2.7.2 RP Volume B2 Annex 7.2 Compensation measures for FFC SPA Offshore Artificial Nesting Roadmap.

B2.7.3 RP Volume B2 Annex 7.3 Compensation measures for FFC SPA Onshore Artificial Nesting Ecological Evidence.

B2.7.4 RP Volume B2 Annex 7.4 Compensation measures for FFC SPA Onshore Artificial Nesting Roadmap.

B2.7.5 RP Volume B2 Annex 7.5 Compensation measures for FFC SPA Artificial Nesting Site Selection and Design.

B2.7.6 RP Volume B2 Annex 7.6 Outline Gannet and Kittiwake Implementation and Monitoring Plan.

B2.8 RP Volume B2 Chapter 8 FFC SPA Gannet Guillemot and Razorbill Compensation Plan.

B2.8.1 RP Volume B2 Annex 8.1 Compensation measures for FFC SPA Bycatch Reduction Ecological Evidence.

B2.8.2 RP Volume B2 Annex 8.2 Compensation measures for FFC SPA Bycatch Reduction Roadmap.

B2.8.3 RP Volume B2 Annex 8.3 Compensation measures for FFC SPA Predator Eradication Ecological Evidence.

B2.8.4 RP Volume B2 Annex 8.4 Compensation measures for FFC SPA Predator Eradication Roadmap.

B2.8.5 RP Volume B2 Annex 8.5 Compensation measures for FFC SPA Fish Habitat Enhancement Ecological Evidence

B2.8.6 RP Volume B2 Annex 8.6 Compensation measures for FFC SPA Fish Habitat Enhancement Roadmap

B2.8.7 RP Volume B2 Annex 8.7 Outline Gannet Guillemot and Razorbill Implementation and Monitoring Plan

B2.9 RP Volume B2 Chapter 9 Record of Consultation

B2.10 RP Volume B2 Chapter 10 Without Prejudice Derogation Funding Statement

Pre Examination Documents

G1.5 Kittiwake AEoI Conclusion Position Paper

3.1.1.3 In order to easily identify whether a matter is 'agreed', 'not agreed' or an 'ongoing point of discussion', the colour coding system set out in **Table 3** below is used within the 'position' column of the following sections of this document.

Table 3: Position Status Key.

Position Status	Position Colour Coding
<p>Agreed The matter is considered to be agreed between the parties</p>	Agreed
<p>Not Agreed – no material impact The matter is not agreed between the parties, however the outcome of the approach taken by either the Applicant or the RSPB is not considered to result in a material impact to the assessment conclusions.</p>	Not Agreed – no material impact
<p>Not Agreed The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or the RSPB is considered to result in a materially different impact to the assessment conclusions.</p>	Not Agreed
<p>Ongoing point of discussion The matter is neither 'agreed' nor 'not agreed' and is a matter where further discussion is required between the parties (e.g where documents are yet to be shared with the RSPB).</p>	Ongoing point of discussion

3.2 Offshore and Intertidal Ornithology; and Derogation and Compensation

Table 4: Agreement Log – Offshore and Intertidal Ornithology; and Derogation and Compensation.

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
Offshore and Intertidal Ornithology				
Environmental Impact Assessment				
The RSPB-ORN-OFF-01	Baseline Environment	Sufficient survey data (24 months of site-specific aerial digital survey data) has been collected to define the baseline inform the assessment.	The RSPB are in agreement that 24 months of survey data is sufficient for baseline characterisation.	Agreed Evidence Plan (EP) Log: OFF-ORN-1.8
		The reliance on aerial digital survey data from two cameras (approximately 10% coverage of the survey area) is a sufficient survey dataset that is appropriate to inform the assessment.	The RSPB agree that there was no material difference between the baseline results of the 2 vs 4 camera analysis and are therefore content with the use of 10% coverage for baseline characterisation.	Agreed EP Log: OFF-ORN-1.5 and 1.19
		The aerial digital video survey methodology implemented for the offshore ornithological surveys is appropriate for characterising the baseline.	The RSPB is content that this is a robust method if used correctly and transparently.	Agreed EP Log: OFF-ORN-1.8
		The methods and techniques used to analyse offshore ornithological data are appropriate for characterising bird distributions and estimating populations, attribution and apportionment of unidentified birds, correction of availability bias.	The RSPB are content that these methods are now suitable for baseline characterisation	Agreed
		Through consultation with the RSPB prior to the PEIR and following their Section 42 responses a method was developed and agreed to estimate red-throated diver	The RSPB agree that the 'benchmark' assessment method is appropriate for	Agreed EP Log: OFF-ORN-1.11 and 2.25

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
		<p>densities within the Hornsea Four Export Cable Corridor. This included a 'benchmark' approach being applied to seabird densities from the predicted density maps and the underlying dataset of the SeaMaST project (Seabird Mapping and Sensitivity Tool) described in Bradbury et al. (2014) as the most appropriate dataset for this.</p>	<p>calculating red-throated diver density within the ECC.</p>	
		<p>The migratory seabird and non-seabird population estimates detailed in Appendix C of Volume A5, Annex 5.5: Offshore Ornithology Migratory Birds Report is appropriate to inform the assessment.</p>	<p>The RSPB agree with the assessment of migratory seabird and non-seabirds.</p>	<p>Agreed</p>
	<p>Assessment Methodology (General)</p>	<p>The list of offshore ornithology receptors and the potential impacts on them assessed are appropriate for all phases of development.</p>	<p>The RSPB agree with the receptors identified for impact assessment.</p>	<p>Agreed</p>
		<p>The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of Hornsea Four.</p>	<p>The RSPB agree with the impact assessment methodologies used in the EIA</p>	<p>Agreed</p>
		<p>The maximum design scenarios (MDS) for impacts on offshore and intertidal receptors is clearly defined and are representative of the likely Worst Case Scenarios (WCS) and appropriate to be used in the assessment.</p>	<p>The RSPB agree that the MDS is clearly defined.</p>	<p>Agreed</p>

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
	Assessment Methodology (Construction Impacts)	The methods of assessing disturbance and displacement during construction activities within the array area and 2 km buffer (being treated as half the predicted values of the operational and maintenance phase) is appropriate for the purposes of assessing the risks of displacement of gannet, guillemot, razorbill and puffin in relation to Hornsea Four.	The RSPB agree with the methods of assessing disturbance and displacement during construction activities within the array area and 2 km buffer	Agreed
		The methods of assessing disturbance and displacement during construction activities within the ECC (associated with export cable laying), within an area out to 2 km from cable laying vessel, is appropriate for the purposes of assessing the risks of displacement of red-throated diver in relation to Hornsea Four.	The RSPB agree that the 'benchmark' assessment method and approach to ECC construction phase assessment.	Agreed EP Log: OFF-ORN-1.11, 2.12 and 2.25
	Assessment Methodology (Operation Impacts)	The methods of assessing disturbance and displacement during the operation and maintenance phase for gannet of between 60-80% is appropriate for the purposes of assessing the risks in relation to Hornsea Four.	The RSPB agree with the focus of gannet displacement being based on 60-80% displacement rate, in conjunction with full matrices being presented alongside.	Agreed
		The methods of assessing displacement consequent mortality during the operation and maintenance phase for gannet of up to 1% is appropriate for the purposes of assessing the risks in relation to Hornsea Four.	The RSPB's position is that at minimum the displacement consequent mortality should be 1 and 3%, but acknowledge that a range of values has been presented	Not Agreed
		The methods of assessing disturbance and displacement during the operation and	The RSPB's position is the displacement rate for auk	Not Agreed

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
		maintenance phase for auk species (guillemot, razorbill and puffin) of 50% is appropriate for the purposes of assessing the risks in relation to Hornsea Four.	species should be 60%, but acknowledge that a range of values has been presented	
		The methods of assessing displacement consequent mortality during the operation and maintenance phase for auk species (guillemot, razorbill and puffin) of up to 1% is appropriate for the purposes of assessing the risks in relation to Hornsea Four.	The RSPB's position is that at minimum the displacement consequent mortality for auk species should be 3 and 5% in the breeding season and 1 and 3% in the non breeding season, but acknowledge that a range of values has been presented	Not Agreed
		The methods of assessing collision risk for key seabirds including gannet, kittiwake, great black-backed gull, lesser black-backed gulls and herring gull are appropriate and have been applied accurately.	The RSPB do not agree with the use of a 98.9% avoidance rate for gannet collision risk assessment during the breeding season. We also do not agree with application of a macro avoidance rate to baseline densities	Not Agreed
		The methods of assessing collision risk on migratory seabirds and non-seabirds are appropriate and have been applied accurately.	The RSPB agree with the assessment of migratory seabird and non-seabirds.	Agreed
		The methods of assessing indirect effects are appropriate and have been applied accurately.	The RSPB is aware of the discussions and exchanges between the Applicant and Natural England relating to the Flamborough Front and the issue of indirect effect on forage fish and thereby ornithology. Our position is set out in our	Not agreed

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
			<p>Deadline 7 response to the ExA's Action 5 for ISH12.</p> <p>In summary, the RSPB agrees with Natural England's conclusion in the ornithology section of REP6-060 that "it remains unclear whether such effects could have a net negative or net-positive impact upon these species [guillemot and razorbill]". We note and support Natural England's proposal for a monitoring strategy to address the uncertainties around the impact of Hornsea Four on stratification and mixing of the Flamborough Front (see row E42 of Natural England's REP6-057 Risk and Issues Log and pages 3-4 of AS-048).</p>	
		<p>The methods of assessing barrier effects are appropriate and have been applied accurately.</p>	<p>Following the inclusion of birds in flight to the displacement assessment, the RSPB agree with the methods of assessing barrier effects</p>	<p>Agreed</p>
	<p>Assessment Methodology (Cumulative Impacts)</p>	<p>The plans and projects considered within the cumulative assessment are appropriate.</p>	<p>The RSPB agree with the projects included within the cumulative assessments.</p>	<p>Agreed.</p>
		<p>The abundance (displacement) values for all other plans and projects considered</p>	<p>The RSPB agree that the abundance (displacement)</p>	<p>Agreed</p>

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
		within the cumulative displacement assessment are appropriate for gannet and auk species (razorbill, guillemot and puffin).	values for all other plans and projects considered within the cumulative displacement assessment are appropriate for gannet and auk species	
		The collision mortality values for all other plans and projects considered within the cumulative collision risk assessment are appropriate for gannet, kittiwake, great black-backed gull, lesser black-backed gull and herring gull.	The RSPB agree that the collision mortality values for all other plans and projects considered within the cumulative collision risk assessment are appropriate for kittiwake, great black-backed gull, lesser black-backed gull and herring gull. For gannet the RSPB has recalculated based on these figures to account for our preferred 98% breeding season avoidance rate.	Agreed for all species except gannet
				Not agreed for gannet
	Outcomes of the EIA	The conclusions of the assessment of impacts for construction, operation and decommissioning phases are appropriate and agreed that no impacts of greater than minor adverse significance are predicted.	The RSPB disagree that no impacts of greater than minor adverse significance will occur	Not Agreed
		The conclusions of the assessment of impacts for operation and maintenance phases are appropriate and agreed that no impacts of greater than minor adverse significance are predicted.	The RSPB disagree that no impacts of greater than minor adverse significance will occur	Not agreed
		The conclusions of the assessment of cumulative construction and decommissioning impacts appropriate and	The RSPB agree that no cumulative impacts of greater than minor adverse significance	Agreed

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
		agreed that no impacts of greater than minor adverse significance are predicted.	are predicted to occur during construction and decommissioning	
		The conclusions of the assessment of cumulative operation and maintenance impacts appropriate and agreed that no impacts of greater than minor adverse significance are predicted.	The RSPB disagree that no impacts of greater than minor adverse significance will occur.	Not agreed
Report to Inform Appropriate Assessment				
	Screening	The RIAA has identified all relevant features of the designated sites that may be sensitive to changes as a result of the proposed activities.	The RSPB agree that all relevant features of designated sites where a LSE may occur have been identified.	Agreed.
	Assessment Methodology	The apportioning approach is appropriate.	The RSPB disagree with the approach taken to apportioning guillemot and agree with Natural England's preferred approach. However the RSPB acknowledge that full ranges of apportioning methods are presented, on which it is possible to base conclusions.	Agree on ranges of apportioning methods presented
				Not agreed on approach to apportioning guillemot
		The breeding seasons as defined in the RIAA are appropriate for the assessment.	The RSPB has outstanding issues with manner in which the bio-seasons have been defined, for example the kittiwake breeding season is defined as May to July, when evidence from colony monitoring shows birds are	Not agreed

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			present April to September. Similarly Gannet are present in the colony into October.	
	PVA	The PVA has been undertaken in an appropriate manner and the approach is robust providing sound results and analysis..	Despite advice from both Natural England and the RSPB the Applicant has only presented outputs for the Counterfactual of Population Growth (CFOPG), the RSPB consider that the Counterfactual of Population Size (CFOPS) also needs to be presented and assessed (see section 5 in RSPB REP6-068).	Not agreed
	Outcomes of the RIAA	Conclusion of no AEol at any sites is appropriate, either alone or in-combination as a result of the proposed activities (except at Flamborough and Filey Coast (FFC) Special Protection Area (SPA)).	The RSPB agree, but highlight the situation at Bass Rock where there has been a 95% nest failure rate in 2022 due to the outbreak of Highly Pathogenic Avian Influenza. As a result, this population may longer be considered in favourable conservation status and be robust to additional mortality. Bass Rock gannets have been recorded flying into the Hornsea zone	Agreed
		Conclusion of no AEol at FFC SPA is appropriate in relation to Hornsea Four	The RSPB considers that an adverse effect on the integrity	Not agreed

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
		<p>alone, for any relevant features (including designated features of gannet, kittiwake, guillemot, razorbill, seabird assemblage), as a result of the proposed activities.</p>	<p>(AEOL) on the following qualifying features of the Flamborough and Filey Coast Special Protection Area (SPA) cannot be ruled out in relation to Hornsea Four alone.:</p> <ul style="list-style-type: none"> - Gannet - Kittiwake - Guillemot - Seabird assemblage 	
		<p>Conclusion of no AEOL at FFC SPA is appropriate in relation to Hornsea Four in combination with other projects, for the designated features of gannet, guillemot, razorbill and seabird assemblage, as a result of the proposed activities.</p>	<p>In addition to kittiwake (see below), the RSPB considers that an adverse effect on the integrity (AEOL) on the following qualifying features of the Flamborough and Filey Coast Special Protection Area (SPA) exists in relation to Hornsea Four in combination with other projects.:</p> <ul style="list-style-type: none"> - Gannet - Guillemot - Seabird assemblage <p>The RSPB also considers that an adverse effect on the integrity (AEOL) on the following qualifying feature of the Flamborough and Filey Coast</p>	<p>Not agreed</p>

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
			Special Protection Area (SPA) cannot be ruled out in relation to Hornsea Four in combination with other projects.: <ul style="list-style-type: none"> - Razorbill 	
		Conclusion of an AEoI at FFC SPA is appropriate in relation to from Hornsea Four in-combination with other projects, for the designated feature of kittiwake, as a result of the proposed activities.	The RSPB considers that an adverse effect on the integrity (AEoI) on the kittiwake feature of the Flamborough and Filey Coast Special Protection Area (SPA) exists in relation to Hornsea Four in combination with other projects.	Agreed
Draft DCO and Deemed Marine Licences				
		The wording of the following requirements and conditions pertaining to offshore ornithology are appropriate and adequate: <ul style="list-style-type: none"> • Part 3 - DCO Requirement 2(2)(c) and DCO Schedule 11, Part 2 - Condition 1(2)(c) with reference to the lowest point of the rotating blade (42.43m Lowest Astronomical Tide (LAT)); • Part 2 - Condition 13(1)(k) of DCO Schedule 11 with reference to an Ornithological Monitoring Plan. 	The RSPB considers the requirement and condition relating to the lowest point of the rotating blade is appropriate, as set out in DCO Schedule 1, Part 3, 2(2)(c) and DCO Schedule 11 (Deemed Marine Licence – Generation Assets), Part 2, Condition 1(2)(c). However, with respect to the Ornithological Monitoring Plan, the Deemed Marine Licence,	Not agreed

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
			<p>Schedule 11, Condition 13(1)(k) includes a requirement for an OMP which accords with the principles set out in the outline ornithological monitoring plan (OOMP)(APP-254). The RSPB does not agree with the assessment conclusions on which the OOMP is based. Our concerns with the assessment conclusions are outlined above. Consistent with its position on other offshore wind farm projects, the RSPB would like to see a detailed monitoring plan that is flexible enough to accommodate changes in the science and data between application and operation. A full draft of that monitoring plan should be available during the examination to enable Interested Parties to review and provide comments, and for the ExA to have relevant information available to it, in order to take it into account when determining the application.</p> <p>For completeness, whilst appreciating the Article 38 process for certification of the</p>	

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
			documents listed in Schedule 15 we also believe that this plan should be a requirement within DCO, Schedule 1.	
Derogation and Compensation Measures				
	Derogation	Conclusion of an AEol at FFC SPA is appropriate in relation to from Hornsea Four in-combination with other projects, for the designated feature of kittiwake, as a result of the proposed activities. Therefore, a derogation case has been provided including compensation.	<p>The RSPB considers that an adverse effect on the integrity (AEol) on the kittiwake feature of the Flamborough and Filey Coast Special Protection Area (SPA) cannot be ruled out in relation to Hornsea Four alone and that an adverse effect in integrity exists in combination with other projects.</p> <p>Therefore, the RSPB agrees that a derogation case must be provided, including compensation measures.</p>	Agreed
		The RIAA concludes no AEol for all other species and all other sites and therefore, the derogation case is presented 'without prejudice'.	The RSPB considers that an adverse effect on the integrity (AEol) on the following qualifying features of the Flamborough and Filey Coast Special Protection Area (SPA) either exists and/or cannot be ruled out:	Not agreed

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
			<ul style="list-style-type: none"> - Gannet - Guillemot - Razorbill - Seabird assemblage <p>The RSPB's detailed conclusions in relation to alone and in-combination impacts are set out in the RSPB's Deadline 7 submission on offshore ornithology.</p> <p>Therefore, a derogation case must be provided, including detailed compensation measures for each qualifying feature listed above.</p>	
	Compensation Measures	Compensation measures have been presented in the DCO submission 'without prejudice' for gannet, guillemot and razorbill. Compensation measures are presented for kittiwake due to the conclusion of an AEOL in combination with other plans and projects. The DCO submission includes the ecological evidence reports for all measures which demonstrate the ecological efficacy of all the measures. The compensation plans and roadmaps demonstrate how the suite of compensation measures will be	<p>The Applicant has failed to put forward detailed, proven and location specific compensation measures for any impacted species. Neither have any been secured.</p> <p>The RSPB has submitted its assessment of the Applicant's various compensation measures at Deadline 6 (REP6-069). For the various reasons set out in that submission, the RSPB</p>	Not agreed

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
		<p>effective, viable and can be secured and delivered to ensure the coherence of the UK national site network is maintained.</p>	<p>considers that the compensation proposals continue to have significant uncertainties attached to them. We consider these uncertainties undermine the ability to assess and determine whether each measure can meet the ecological, technical and legal requirements to enable the Secretary of State to have confidence it will have a reasonable guarantee of success, and thereby protect the overall coherence of the relevant species' National Site Network.</p> <p>In respect of gannet, it is the RSPB's view that the issues are so fundamental as to question whether the measure should be considered as a possible compensation measure.</p>	
	<p>Compensation Measures – Predator eradication</p>	<p>Annex 1.37 – Non Statutory Targeted Compensation Measures Consultation Responses (pages 25-30)</p> <p>Further updates on the feasibility study progress and securing MOUs will be submitted to the Examination. The Applicant's B2.8.4 Compensation measures for FFC SPA: Predator</p>	<p>The RSPB has considered the additional information on Predator Eradication submitted at Deadlines 5 and 5a. These did not comprise the originally proposed feasibility study and associated information. The</p>	<p>Not agreed</p>

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
		<p>Eradication: Roadmap presents letters of comfort from the Alderney Wildlife Trust and the States of Guernsey in support of a predator eradication as compensation for Hornsea Four. States of Alderney and States of Guernsey are the landowners of the islands/islets where the rat eradication would be undertaken and permission has already been granted to Alderney Wildlife Trust to undertake predator eradication.</p>	<p>RSPB's views are set out in REP6-069.</p> <p>The RSPB considers there are substantive issues with the Applicant's predator eradication compensation measure proposals. These revolve around the inadequate evidence base underpinning the proposals. The RSPB has identified the detailed information it considers needs to be submitted to the Secretary of State before a decision on whether to grant consent for the DCO and following consultation with Interested Parties. This information is set out in Table 3 of REP6-069.</p>	
		<p>The Applicant has employed international eradication and island restoration experts to undertake a detailed feasibility study (as described within B2.8.4 Compensation measures for FFC SPA: Predator Eradication: Roadmap) of Herm, The Humps, Jethou, Sark and the surrounding islands and islets.</p> <p>The eradication feasibility assessment with include consideration of:</p> <ul style="list-style-type: none"> • Technical feasibility; 	<p>The RSPB does not consider a Feasibility Study and the associated information has been submitted to the Examination, including a biosecurity and emergency response plan.</p> <p>In Table 3 of its REP6-069 the RSPB has identified the information it considers needs to be submitted to the Secretary of State before a decision on</p>	Not agreed

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
		<ul style="list-style-type: none"> • Sustainability; • Social acceptability; • Political and legal acceptability; • Environmental acceptability; • Capacity; and • Affordability. <p>This will include biosecurity.</p>	<p>whether to grant consent for the DCO can be made, and following consultation with Interested Parties.</p>	
		<p>The Applicant recognises the need for community and local stakeholder support for predator eradication.</p>	<p>The RSPB welcomes the recognition of the need for community and local stakeholder support for predator eradication. It considers full community support is required for a successful eradication both in the immediate implementation and over the long-term. As set out in its REP6-069, the RSPB considers there remains a significant amount of work for the Applicant to secure full community support, based on the information provided at Deadlines 5 and 5a.</p>	<p>Not agreed</p>
		<p>Predator control was suggested by the applicant for some of the shortlisted islands being considered for island eradication and or control as a compensation measure. Islands where control was being considered was in relation to small islands and islets along the south Devon coast and certain</p>	<p>The RSPB welcomed the Applicant's initial removal of "predator control" as a possible compensation measure. This was because we do not consider a "control" approach acceptable in conservation and</p>	<p>Not agreed</p>

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
		<p>locations within the Isle of Scilly archipelago.</p> <p>Due to a lack of information available in support of delivering compensation for guillemot and razorbill (via predator control/ eradication) on the south coast of Devon and within the Isles of Scilly, the Applicant is no longer pursuing either location. Potential sites within the Channel Islands are being considered further on a full eradication and biosecurity measures basis. The islands focused upon are being considered on a full eradication and biosecurity measures basis.</p>	<p>compensation terms unless there is overwhelming benefit (for the seabird species) to be had, which has not been shown.</p> <p>Control operations may hinder a future eradication attempt at a site.</p> <p>However, having reviewed the Applicant's latest submissions at Deadline 5 and 5a, it appears that predator control could form part of the Applicant's future approach. We have set out our comments on these aspects in REP6-069.</p>	
		<p>Since the submission of the DCO documents, it has been publicly announced that Rathlin Island has secured funding. Therefore, Rathlin Island will no longer be considered as part of the shortlist by the Applicant. The Applicant is undertaking feasibility studies on islands in the Bailiwick of Guernsey only.</p>	<p>The RSPB welcomes the removal of Rathlin Island as a possible location for island restoration. The RSPB had informed the Applicant in early September 2021 that Rathlin Island was the site of a fully funded island restoration partnership project..</p> <p>As stated above, the RSPB has now reviewed the additional information submitted by the Applicant at Deadlines 5 and 5a and consider there remains</p>	Not agreed

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
			<p>substantive uncertainties regarding the Applicant's predator eradication proposals which require further, detailed information i.e. feasibility study and associated implementations plans (see Table 3 in REP6-069).</p>	
	<p>Compensation Measures – bycatch mitigation trial</p>	<p>The Roadmaps have set out the feasibility studies and bycatch reduction selection phase for the compensation measures. Preliminary findings from the feasibility studies appear promising, with an initial reduction in bycatch of auks identified from the bycatch reduction selection phase and initial findings in the predator eradication being even more promising than expected at this stage. The significance of the bycatch reduction will be fully analysed following completion of the bycatch reduction selection phase.</p>	<p>We consider this proposal is best described as experimental research and cannot yet be considered as a compensation measure, primary or otherwise. It is not possible to assess the proposed measures or state whether there will be any benefits, as the detail of the exact bycatch measures (evidence, scale, methods, time, locations etc.) has not yet been provided. Before any measures can be deemed acceptable as bycatch mitigation they must be proven through a robust trial, with all data made available for peer review. Notwithstanding the absence of data, it had been the RSPB's expectation that robust scientific analysis of the results would be provided, in the documents submitted at</p>	<p>Not agreed</p>

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
			<p>Deadline 5, to enable expert evaluation and provision of advice to the Examining Authority. However, the findings provided at Deadline 5 lack robust scientific analysis (see our REP6-069). Based on the information provided by the Applicant to date, the proposed bycatch measures remain unproven and unsupported by evidence.</p>	
		<p>Further updates on the bycatch reduction selection phase will be submitted to the Examination, the approach has been set out in the B2.8.2 Volume B2, Annex 8.2: Compensation measures for FFC SPA: Bycatch Reduction: Roadmap.</p>	<p>The RSPB considers there are numerous actions the Applicant could take to provide confidence in their findings, even in the absence of data transparency. Key issues to resolve revolve around the inadequate evidence base underpinning the Applicant's proposals. In REP6-069 we set out the actions required to address these prior to the Secretary of State carrying out further consultation with interested parties.</p>	Not agreed
	<p>Compensation Measures – onshore</p>	<p>The search zone for Hornsea Four onshore nesting is wider than that of Hornsea Three extending further North to allow more flexibility and choice in the search for</p>	<p>The RSPB is concerned with onshore nesting structures, given the number of offshore wind farm projects (consented</p>	Not agreed

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
	nesting platforms	suitable land and the Applicant has received expressions interest from a number of landowners.	<p>and submitted) already proposing such measures, with a particular preponderance in Suffolk. This raises concerns in the identification and securing of suitable locations capable of addressing the many uncertainties. These concerns remain, notwithstanding submission of recent information at Deadline 6 (REP6-031).</p> <p>The RSPB shares Natural England's concerns in this respect and is "not persuaded that further onshore artificial nesting structures are likely to result in sufficient benefits to produce compensation, given the number and location of such structures already proposed by submitted OWF projects. It has not been demonstrated there is a sufficient pool of nest-limited kittiwake recruits, suitable locations and/or prey availability available to meet and sustain the existing demand for this measure. We therefore recommend that this measure should not be taken forward by the Applicant".</p>	

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
		<p>The evidence presented on the use of artificial nesting structures by gannet is provided in B2.7.3 Compensation measures for FFC SPA: Onshore Artificial Nesting: Ecological Evidence.</p>	<p>The RSPB considers the concept of artificial nesting structures is a wholly unproven compensation measure for Northern Gannets. The RSPB considers the evidence presented by the Applicant demonstrates clearly that Northern Gannet is dependent on natural nesting habitats. In the absence of substantive and compelling evidence otherwise, we are not persuaded that artificial nesting structures can be considered even theoretically feasible as a compensation measure for this species.</p>	<p>Not agreed</p>
	<p>Compensation Measures – offshore nesting platforms</p>	<p>There is substantial evidence of artificial nesting structures being effective and are a viable compensation measure as presented in B2.7.1 Compensation measures for FFC SPA: Offshore Artificial Nesting: Ecological Evidence.</p>	<p>In our comments on the August 2021 consultation, the RSPB agreed that artificial nesting structures are a possible compensation measure for kittiwake but with such substantial caveats that we considered they are unproven as a compensation measure. That remains the RSPB's position. It is apparent that a significant amount of further work is still</p>	<p>Not agreed</p>

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
			<p>required before detailed proposals can be presented to the examination so that they can be fully scrutinised. At this stage, we consider the measure experimental.</p> <p>At Deadline 5, the Applicant indicated a potential location. However, no definite location and design has been proposed or secured, so it is not possible to evaluate and advise, or assess whether any site specific constraints could undermine confidence in long-term implementation.</p> <p>In order to address these uncertainties, we continue to recommend that a meta-population analysis is carried out to clarify the dynamics between potential purpose-built artificial nest sites (offshore and, if pursued, onshore) and SPA and other colony populations (see REP2-089).</p> <p>In the RSPB's view, substantive uncertainty remains with regard to the location and the regulatory pathway to take</p>	

ID	Topic	Hornsea Four's Position	The RSPB's Position	Position Summary
			forward a repurposed offshore structure (see REP6-069).	
	Compensation Measures – fish habitat enhancement	The fish habitat enhancement (seagrass restoration) is a resilience measure and will be used to support the full suite of proposed compensation measures for the target seabirds species, kittiwake, guillemot, razorbill and gannet. There is substantial evidence of seagrass acting as a nursery for fish species (see B2.8.5 Compensation measures for FFC SPA: Fish Habitat Enhancement: Ecological Evidence).	While the RSPB welcomes the work carried out by Hornsea Project Four on this topic, it remains its view that it cannot yet be considered even a supportive measure. This is due to a combination of the weak evidence base capable of linking this measure with measurable benefits to the target seabird species and the experimental nature of seagrass restoration itself. Like Natural England, we do not consider the measure to be compensation and so have not commented further.	Not agreed
Other Matters				

3.3 Other Documents and Plans

Table 5: Agreement Log – Other Documents and Plans.

ID	Hornsea Fours Position	The RSPB's Position	Position Summary
Outline Ornithological Monitoring Plan	<p>F2.19 Outline Ornithological Monitoring Plan provides an appropriate framework to agree monitoring with Statutory Nature Conservation Bodies (SNCBs) and the MMO prior to construction.</p>	<p>The RSPB does not agree with the assessment conclusions on which the OOMP is based. Our concerns with the assessment conclusions are outlined above. Consistent with its position on other offshore wind farm projects, the RSPB would like to see a detailed monitoring plan that is flexible enough to accommodate changes in the science and data between application and operation. A full draft of that monitoring should be available during the examination to enable Interested Parties to review and provide comments and for the ExA to have relevant information available to it in order to be able to take it into account when determining the application.</p>	Not agreed

4 Summary

- 4.1.1.1 This SoCG has outlined the consultation that has taken place between the Applicant and the RSPB during the pre-application and Examination phase (to date). The agreement logs present the position reached at the point of submission of this SoCG to PINS in relation to offshore and intertidal ornithology.
- 4.1.1.2 This SoCG will be updated as discussions progress and made available to PINS as requested through the DCO examination phase.