

**This letter is sent by email only**

[HornseaProjectFour@planninginspectorate.gov.uk](mailto:HornseaProjectFour@planninginspectorate.gov.uk)

National Infrastructure Planning,  
The Planning Inspectorate,  
Temple Quay House,  
2 The Square,  
Bristol,  
BS1 6PN.



20 March 2025

Dear Sir/Madam,

**ORSTED HORNSEA PROJECT FOUR LIMITED**

**SECTION 153 OF THE PLANNING ACT 2008 AND REGULATION 6 OF THE  
INFRASTRUCTURE PLANNING (CHANGES TO, AND REVOCATION OF,  
DEVELOPMENT CONSENT ORDERS) REGULATIONS 2011**

**NOTICE OF APPLICATION TO MAKE A NON-MATERIAL CHANGE TO THE  
FOLLOWING DEVELOPMENT CONSENT ORDER:**

**THE HORNSEA FOUR OFFSHORE WIND FARM ORDER 2023 (SI 2023/800) AS  
CORRECTED BY THE HORNSEA FOUR OFFSHORE WIND FARM (CORRECTION)  
ORDER 2024 (SI 2024/117) AND AS AMENDED BY THE HORNSEA FOUR  
OFFSHORE WIND FARM (AMENDMENT) ORDER 2024 (SI 2024/800)**

We are writing in response to the above consultation on Hornsea Project Four's proposed Non-Material Change to its Development Consent Order (as amended).

As set out in the consultation, the proposal is to:

- Remove the requirements in Part 3 of Schedule 16 to the Amended Order relating to carrying out bycatch reduction through contracts with fishers and to scale down the bycatch reduction measures to zero; and
- Fulfil the compensation requirements for Guillemot solely via the predator eradication measures.

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**RSPB Headquarters**

RSPB The Lodge  
Potton Road  
Sandy  
SG19 2DL



The RSPB is part of BirdLife International, a network of passionate organisations, working together to save nature across the world.

**Patron:** His Majesty The King **President:** Dr Amir Khan **Chief Executive:** Beccy Speight

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654.  
Registered address: The Lodge, Potton Road, Sandy, Bedfordshire, SG19 2DL

The RSPB wishes to **support** the proposed removal of the requirement relating to carrying out bycatch reduction measures and to scale them down to zero. Our primary reason is set out in the amended minutes for the meeting of the Offshore Ornithology Engagement Group meeting held on 31 January 2025 i.e the RSPB:

*"Support the bycatch measure being removed as a primary compensation measure for reasons set out at previous meetings as the RSPB does not consider H4's evidence shows the LEB [Looming Eyes Buoy] measure works to reduce guillemot bycatch."*  
(emphasis added)

At the time of writing, there is no published, peer-reviewed evidence in the public domain that demonstrates an effective measure to reduce bycatch of Guillemot. Should that change, the RSPB would be happy to review its position if, in the future, Hornsea Four then wish to consider bycatch reduction as an adaptive management measure.

The RSPB acknowledges that Hornsea Four's predicted scale of rat-free nesting spaces to be provided by the proposed predator eradication component of its Guillemot compensation package is significant. Success will ultimately be gauged by the successful colonisation by breeding Guillemots in the required numbers and breeding success to meet the compensation objectives.

Yours faithfully,



Head of Casework