

Date: 21 March 2025  
Our ref: 506589  
Your ref: EN010098



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National Infrastructure Planning  
The Planning Inspectorate  
Temple Quay House  
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Bristol  
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**BY EMAIL ONLY**

Dear Planning Inspectorate

**Application for a non-material change to the Hornsea Project Four Offshore Wind Farm Development Consent Order – Bycatch Reduction Compensation Measure.**

Thank you for the above consultation, dated 13 February 2025. The following constitutes Natural England's formal statutory response.

Hornsea Project Four (HOW4) Offshore Wind Farm (OWF) have submitted a non-material change (hereafter referred to as "NMC2") to the Hornsea Four Offshore Wind Farm (Amendment) Order 2024.

The NMC2 relates to Part 3 of Schedule 16 of the Amended Order, in which the Applicant are required to submit a Guillemot Compensation Implementation and Monitoring Plan (GCIMP) detailing how impacts to guillemot at Flamborough and Filey Coast Special Protection Area will be compensated for through the following measures:

- (a) Predator eradication
- (b) Bycatch reduction

The requested NMC2 seeks to remove bycatch reduction as a primary compensation measure required through the GCIMP (effectively scaling the requirements down to zero). The Application proposes instead to retain the measure as one of a range of potential adaptive management measures for future consideration.

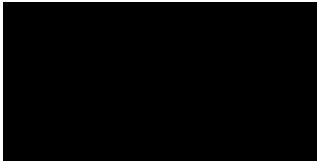
We confirm that Natural England have been involved in discussions relating to the NMC2, via the Hornsea 4 Offshore Ornithological Engagement Group (OOEG) meetings, (most recently during OOEG#8 on 31 January 2025). Based on the evidence from bycatch reduction trials, presented in the OOEG meetings, we agree with the Applicant's conclusions that the contribution of bycatch measures towards delivering compensation would be minimal. We consider that further research and evidence would be needed to adequately demonstrate efficacy, which retaining the measure for adaptive management purposes only would allow time for. Natural England have also held concerns regarding

how financial incentives of bycatch reduction measures may lead to an uptake of gillnet fishing, possibly cancelling out any of the small compensation benefit and/or leading to implications for wider species. Furthermore, we are broadly supportive of the Applicant's progress towards delivery of predator eradication measures, which the Applicant predicts will deliver 160% of the guillemot compensation requirement.

For these reasons, Natural England concludes that the proposed NMC2 will not significantly impair the effectiveness of the DCO in securing appropriate compensatory measures.

For any queries relating to the content of this letter please contact me using the details provided below.

Yours sincerely



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