Hornsea Project Four: Environmental Statement (ES)

Onshore Nesting Project Description

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Doc. No: A4.6.1
Version: A

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Glossary

Term	Definition
Commitment	Hornsea Four, throughout the pre-Application consultation process, has produced a Commitments Register which forms a quick reference guide to commitments the project has made. Commitment is a term used interchangeably with mitigation and enhancement measures. The purpose of Commitments is to reduce and/or eliminate Likely Significant Effects (LSEs), in EIA terms. Primary (Design) or Tertiary (Inherent) are both embedded within the assessment Secondary commitments are incorporated to reduce LSE to environmentally acceptable levels following initial assessment i.e. so that residual effects are acceptable.
Compensation Measures	The measures that have been developed by the Applicant pursuant to the HRA Derogation Provisions "without prejudice" to the Applicants position of no Adverse Effect on Site Integrity at the Flamborough and Filey Coast in respect of the qualifying features. The Compensation Measures are: [offshore and onshore nesting; predator eradication; bycatch and fish habitat enhancement measures]. Each a Compensation Measure and together Compensation Measures.
Cumulative effects	The combined effect of Hornsea Four in combination with the effects from a number of different projects, on the same single receptor/resource. Cumulative impacts are those that result from changes caused by other past, present or reasonably foreseeable actions together with Hornsea Project Four.
Design Envelope	A description of the range of possible elements that make up the Hornsea Project Four design options under consideration, as set out in detail in the project description and this Compensation Project Description. This envelope is used to define Hornsea Project Four for Environmental Impact Assessment (EIA) purposes when the exact engineering parameters are not yet known. This is also often referred to as the "Rochdale Envelope" approach.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Projects (NSIP).
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Directive and EIA Regulations, including the publication of an Environmental Statement (ES).
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, connection to the electricity transmission network. Hereafter referred to as Hornsea Four.
Landfall	The generic term applied to the entire landfall area between Mean Low Water Spring (MLWS) tide and the Transition Joint Bay (TJB) inclusive of all construction

	works, including the offshore and onshore ECC, intertidal working area and landfall compound. Where the offshore cables come ashore east of Fraisthorpe.
Maximum Design Scenario (MDS)	The maximum design parameters of each Hornsea Four asset (both on and offshore) considered to be a worst case for any given assessment.
Mitigation	A term used interchangeably with Commitment(s) by Hornsea Four. Mitigation measures (Commitments) are embedded within the assessment at the relevant point in the EIA (e.g. at Scoping, or PEIR or ES).
Order Limits	The limits within which Hornsea Project Four (the 'authorised project) may be carried out.
Orsted Hornsea Project Four Ltd.	The Applicant for the proposed Hornsea Project Four Offshore Wind Farm Development Consent Order (DCO).
Planning Inspectorate (PINS)	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects (NSIPs).

Acronyms

Term	Definition
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
HRA	Habitats Regulations Assessment
MDS	Maximum Design Scenario
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
PEIR	Preliminary Environmental Information Report
PINS	The Planning Inspectorate
PSA	Particle Size Analysis
SAC	Special Area of Conservation
SPA	Special Protection Area
SSS	Side-Scan Sonar
TCE	The Crown Estate
UKHO	UK Hydrographic Office

Units

Unit	Definition
dB	Decibel (sound pressure)
Hz	Hertz (frequency)

1 Introduction

1.1 Project Background

1.1.1.1 Orsted Hornsea Project Four Limited (the 'Applicant') is proposing to develop Hornsea Project Four Offshore Wind Farm ('Hornsea Four').

1.1.1.2 The purpose of this Environmental Impact Assessment (EIA) Project Description Annex is to provide a description of the proposed Compensation Measures the Applicant may be required to deliver to compensate for potential impacts upon certain seabird species at the Flamborough and Filey Coast Special Protection Area (FFC SPA), located on the East Coast of England. The Compensation Measures are proposed "without prejudice" to the Applicant's conclusion of No Adverse Effect on Integrity (AEoI) upon the seabird species (kittiwake, gannet, guillemot and razorbill) in the Report to Inform the Appropriate Assessment (RIAA).

1.1.1.3 The Hornsea Four offshore wind farm 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 including an offshore generating station (wind farm), export cables to landfall (at Fraisthorpe), and connection to the electricity transmission network at National Grid Creyke Beck. Detailed information on the project design can be found in **Volume 1: Project Description**, with detailed information on the site selection process and consideration of alternatives described in **Volume 1: Site Selection and Consideration of Alternatives** which are provided on the Hornsea Four website in the Documents Library at:

1.1.1.4 https://hornseaprojects.co.uk/hornsea-project-four/documents-library/formal-consultation

1.1.1.5 The Hornsea Four Agreement for Lease (AfL) area was 846 km^2 at the Scoping phase of project development. In the spirit of keeping with Hornsea Four's approach to Proportionate Environmental Impact Assessment (EIA), the project has given due consideration to the size and location (within the existing AfL area) of the final project that is being taken forward to Development Consent Order (DCO) application. This consideration is captured internally as the "Developable Area Process", which includes Physical, Biological and Human constraints in refining the developable area, balancing consenting and commercial considerations with technical feasibility for construction.

1.1.1.6 The combination of Hornsea Four's Proportionality in EIA and Developable Area Process has resulted in a marked reduction in the array area taken forward at the point of DCO application. Hornsea Four adopted a major site reduction from the array area presented at Scoping (846 km^2) to the Preliminary Environmental Information Report (PEIR) boundary (600 km^2), with a further reduction adopted for the Environmental Statement (ES) and DCO application (468 km^2) due to the results of the PEIR, technical considerations and stakeholder feedback..

1.1.1.7 The Applicant is submitting an application for a DCO to the Planning Inspectorate (PINS), supported by a range of plans and documents including an ES which sets out the results of

the EIA on the proposed offshore wind farm and its associated infrastructure, and an Annex to the EIA which assesses the environmental impact associated with the implementation of the proposed Compensation Measures, which are set out in this Compensation Project Description.

1.1.1.8 The Applicant is also submitting a RIAA which sets out the information necessary for the competent authority to undertake a Habitats Regulations Assessment (HRA) to determine if there is any Adverse Effect on Integrity (AEoI) on the national site network as a result of the development of the Hornsea Four offshore wind farm and its associated infrastructure. A separate HRA Screening exercise has been complete for the implementation of the Compensation Measures as presented in **Volume B2, Annex 2.2**.

1.2 The Derogation Provisions of the Habitats Regulations

1.2.1.1 The Habitat Regulations transposed into UK law the requirements of the Habitats Directive. Although the UK left the European Union (EU) on 31 January 2020, the Habitats Directive provides the legislative backdrop to the Habitats Regulations. The Habitats Directive seeks to conserve particular natural habitats and wild species across the EU by, amongst other measures, establishing a network of sites ("European sites") which together form the "National Site Network." The aim is to ensure the long-term survival of viable populations of Europe's most valuable and threatened species and habitats, to maintain and promote biodiversity.

1.2.1.2 The Habitats Directive acknowledges that the imperative of some plans and projects can outweigh the possible harm to a European site if that harm can be adequately compensated. The Directive provides a derogation under Article 6(4) that allows projects that may have an AEoI to be consented. In such a scenario, a derogation could only be provided under Article 6(4) if three tests are met in a sequential order:

i. There are no feasible alternative solutions to the project;
ii. There are "imperative reasons of overriding public interest" (IROPI) for the project to proceed; and
iii. Compensatory measures are secured that ensure that the overall coherence of the network of European sites is maintained.

1.2.1.3 The derogation tests thereby underpin a three-step process, which are hereafter referred to as the "HRA Derogation Provisions".

1.2.1.4 The Habitats Regulations do not define what is meant by or may comprise "compensatory measures" or when they must be delivered. There is also no definition of the "overall coherence of the National Site Network". In principle, both are broad concepts. The limited case law on compensation confirms only:

- Compensation is distinct from mitigation (i.e., measures which prevent, avoid or reduce the harm to the integrity of the affected European site)[1].
- Compensation can be delivered inside or outside a European site[2].

1.2.1.5 As there is no binding EU or UK case law that fixes the precise parameters of or timing for delivery of compensation, there is a degree of flexibility and it will be a matter of judgement for the Secretary of State (SoS) to determine what is "necessary" by way of compensation, acting reasonably and proportionately.

1.2.1.6 The Applicant firmly maintains the position that in respect of the designated sites, that there would be no AEoI as a result of the project alone and in-combination with other plans and projects and an AEoI can be ruled out beyond reasonable scientific doubt. The offshore wind farm and associated infrastructure RIAA will be submitted with the DCO application and will set out the in detail the assessment and conclusion of no AEoI.

1.2.1.7 Nonetheless, in light of the SoS's decision letters for recent windfarm applications (e.g. Hornsea Three and Norfolk Vanguard) that future projects should be mindful to ensure consideration of the need for derogation, including possible in-principle compensation measures are presented for consideration during the Examination of DCO application.

1.3 Development of Compensation Measures

1.3.1.1 The Applicant recognises the importance of engaging with the relevant stakeholders with respect to derogation and developing any potential compensation measures, as their knowledge is important. The Applicant has therefore sought to engage openly and transparently with the key stakeholders.

1.3.1.2 Consultation on the HRA Derogation Provisions has been ongoing in the latter stages of the pre-application stage during the course of a series of online workshops (employed during the COVID-19 pandemic to substitute meetings in-person). The Evidence Plan Process has been followed during the development of the derogation case and included a number of relevant authorities and stakeholders.

1.3.1.3 Throughout the Consultation period, the Applicant has sought the advice of key stakeholders and kept them updated on project developments. The online workshops were attended variably by Natural England, the Marine Management Organisation (MMO), the Department for Environment, Food and Rural Affairs (Defra), the Joint Nature Conservation Committee (JNCC), The Wildlife Trust (TWT), Royal Society for the Protection of Birds (RSPB), National Federation of Fishermen's Organisations (NFFO) the Planning Inspectorate (PINS),

[1] Case C-521/12 Briels and Others, paragraphs 38 – 39.
[2] Case C-521/12 Briels and Others, paragraphs 38 – 39

East Riding of Yorkshire Council (ERYC) and The Crown Estate (TCE). Detail of consultation activity undertaken will be submitted with the DCO application in the Record of Consultation.

1.3.1.4 The Compensation Measures outlined herein could be implemented should the SoS conclude AEoI on any of the qualifying features of FFC SPA.

1.4 Compensation measures

1.4.1.1 This EIA Project Description Annex describes the Compensation Measures that could be implemented to compensate for potential impacts upon ornithological features of FFC SPA. In summary, the potential Compensation Measures proposed, sub-options, locations, location ID and species being compensated are set out Table 1. It is anticipated that for guillemot and razorbill a package of measures could be required, rather than a single compensation measure. Compensation Measure Areas of Search are presented in the accompanying Location Plan (see **Figure 1**).

Table 1: Compensation Measures, sub-options, locations, location ID and species being compensated.

Compensation Measure	Option	Location	Location ID	Kittiwake	Gannet	Guillemot	Razorbill
Offshore nesting	New	southern North Sea	A1				
Offshore nesting	Repurposed	southern North Sea	A1				
Onshore nesting	New	Cayton Bay to Newbiggin by the Sea	B1				
		Suffolk Coast	B2				
Bycatch		Thames Estuary	C1				
		South coast of England: Broadstairs to Plymouth	C2				
Predator eradication		Isles of Scilly	D1				
		Rathlin Island, Moyle, Northern Ireland	D2				
		Torquay, Devon	D3				
		Guernsey and Aldernery	D4				
Fish habitat enhancement	Seagrass	Rathlin Island, Moyle, Northern Ireland	E1				
	Seagrass	Isles of Scilly	E2				
	Seagrass	Celtic Sea, Wales	E3				
	Seagrass	Plymouth Sound to Helford River	E4				
	Seagrass	Solent	E5				
	Seagrass	Essex Estuaries	E6				

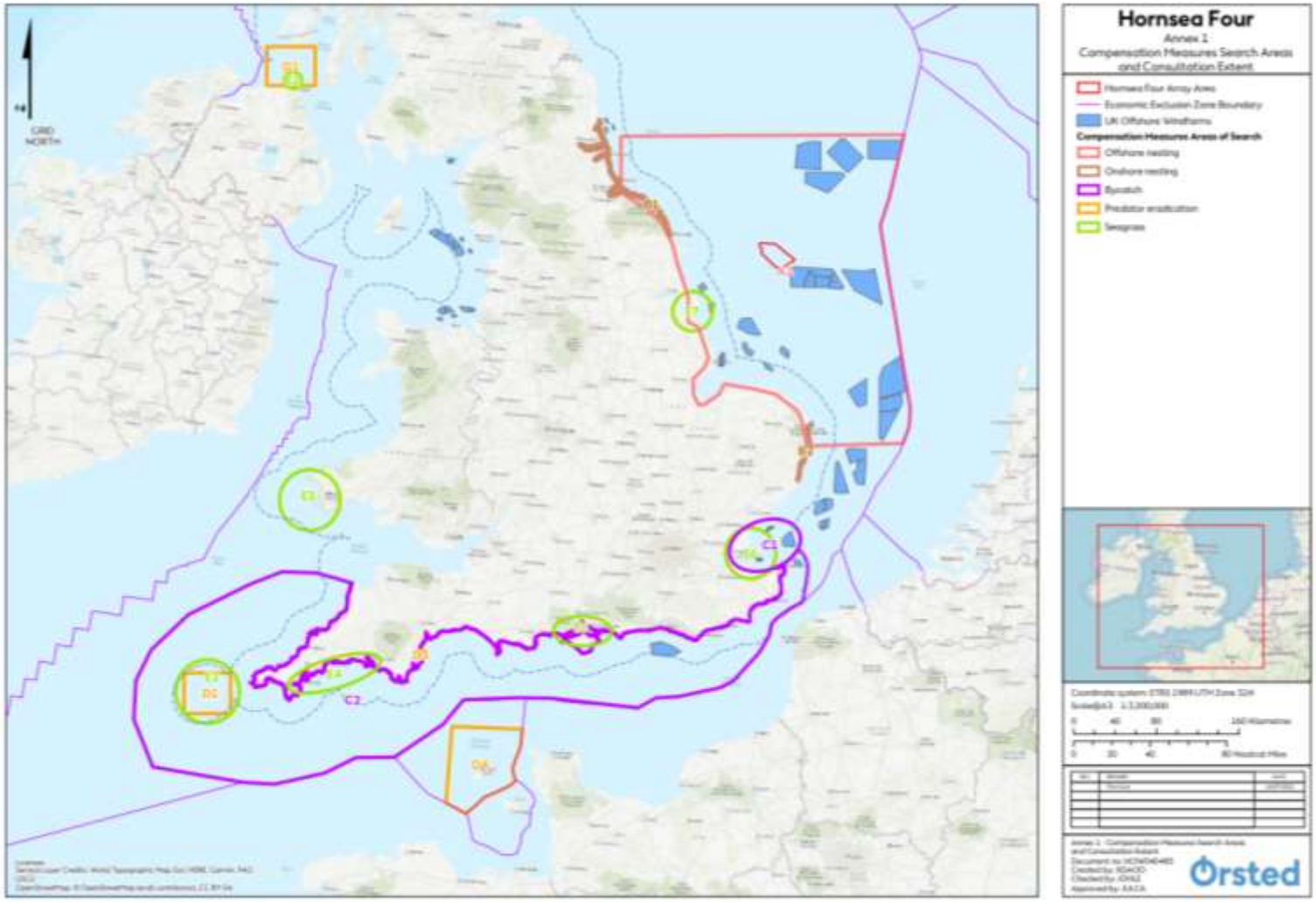

Figure 1: Compensation Search Areas

1.5 Programme

1.5.1.1 The high-level programme presented below is applicable to the implementation and delivery of all compensation measures.

- Anticipated Hornsea Four DCO Granted – Q1 2023
- Compensation implementation licencing – 2022/24
- Compensation Implementation – 2023/24
- Offshore Construction of Hornsea Four Offshore Wind Farm – 2027/28

1.6 Decommissioning

1.6.1.1 The requirement for, and the exact nature of decommissioning the offshore and onshore nesting structures, will be determined in consultation with the relevant authorities towards the end of the 35-year operational life of Hornsea Four. The Applicant will design the structures for a design life equal to that of the windfarm (i.e. 35 years plus 4 years to establish the compensation measures, pre-wind farm operation. Therefore, the lifetime of the structure is approximately 39 years). In the final few years of wind farm operation, the Applicant will commence inspections and surveys of the bird nesting structures to determine if an extension of the lifetime is possible.

1.6.1.2 It is currently anticipated that the predator eradication and bycatch measures implementation will result in new management practices which shall continue for the lifetime of Hornsea Four. Fish habitat enhancement (seagrass) compensation measure sites will be left in perpetuity.

2 Onshore Artificial Nesting Platform

2.1 Introduction and Background

2.1.1.1 Onshore artificial nesting structures are being proposed for kittiwake by Hornsea Four and are put forward for if following Examination, the Secretary of State considers that an additional or alternative (alternative to offshore nesting) measure is required to the proposed primary measures. The approach to site selection and design are primarily driven by ecological/habitat requirements of the ornithology interests to increase the likelihood of colonisation and ensure the success of the structures. The artificial nesting structures will be located within one of two search zones (one in East Suffolk, and the other between Blyth and Newbiggin). The structures will be designed to accommodate the level of compensation required with greater capacity available for kittiwake and will accord with the design principles and indicative maximum parameters set out below.

2.2 Design Principles

2.2.1.1 The design principles for onshore artificial nesting structures are subject to significant further development; however, design principles of direct relevance to the size or appearance of the structures are as follows:

- Steep sided with a near vertical back wall and narrow horizontal ledges.
- Located close to water, facing out to sea (i.e. nest adjacent to/above harbour waters/sea).

- Inaccessible to predators (additional anti-predation features may be required at some sites – e.g. fences/ barriers to deter mammalian predators (e.g. foxes and rats) and dependent on design bird spikes may be required as avian predator deterrents).
- Nesting ledges located above the level of highest astronomical tide and beyond the reach of wave or tidal action.
- Adequate ledge dimensions: Horizontal ledges 20 cm width; length per pair from 30 cm (working length 40 cm); and height between ledges at a minimum of 40 cm and maximum of 60cm. (Note these may be subject to change based on feedback from the stakeholders during detailed design).
- Minimum height at which the lowest shelves should begin depends whether the structure is located directly over water or set back slightly, as well as the level of human disturbance anticipated.
- Overhang/roof to buffer against weather conditions as to act as and additional predator deterrents.
- Vertical wall leaning slightly forward (working angle of 5°; to minimise lower ledges becoming fouled by droppings and reduce predation risk).
- Using materials which are in-keeping with the structure's surroundings whilst ensuring they meet the requirements of kittiwake's natural habitat as much as possible.
- Higher ledges could be wider than lower ledges (to prevent lower ledges becoming fouled by droppings) (BTO Field Guide No. 23, du Feu (2015)). However, wider upper ledges may increase predation risk/ allow non target species to nest.

2.3 Indicative Maximum Parameters

2.3.1.1 The design of the onshore artificial nesting structures is subject to significant design development and refinement. It is anticipated that the structures will be located either at a waterfront location, or at a set-back location, dependant on land availability. The structures may be permanent buildings, allowing for internal access for monitoring, or may be prefabricated structures without internal access. An allowance for both has been included within this project description as the appearance and construction methodology would differ considerably.

2.3.1.2 The maximum parameters of the onshore artificial nesting structures are dependent on the number of kittiwake pairs to be provided for, and the distribution of the 'adequate ledge dimensions' identified above within the 'Design Principles'. Each kittiwake pair will require a ledge of up to 20cmx40cmx60cm (width, length, height). The distribution of these ledges can be tailored to a taller structure (by stacking more ledges on top of each other), or a longer structure (by providing more ledges on each row). This is based on ecological requirements in addition to the surrounding landscape and available land. As such, the indicative maximum parameters (shown in **Table 2**, with design principles in **Table 3**) have been developed to account for all scenarios.

2.3.1.3 The shape of each structure is dependent on the detailed design stage and the surrounding landscape – the shape may be triangular, rectangular, hexagonal, etc.

Table 2: Indicative maximum design parameters for the onshore nesting platforms.

Parameter	Maximum design parameters
Maximum number of structures	4
Maximum height of structures (m)	15
Maximum length of structures (m)	40
Maximum width of structures (m)	10
Height of fencing (m)	1.8
Foundation type	Existing structure or new structure

2.3.2 Construction

2.3.2.1 The construction of the onshore artificial nesting structures depends on whether the structure comprises a building, or prefabricated structure (dependant on monitoring and access requirements for tagging): Building construction works, are anticipated to comprise:

- Site preparation works, including vegetation clearance (if required), erection of site fencing and small-scale enabling works;
- Establishment of a site compound and temporary site infrastructure, including a site cabin and welfare facilities;
- Delivery of construction materials and equipment;
- Installation of necessary foundations (to be confirmed, dependant on detailed design and site location, may require piling); and
- Construction of the nesting structures on-site, methodology of which is dependent on the materials to be used (to be agreed as part of detailed design). Materials used for the building may comprise concrete, wood, or metal).

2.3.2.2 Prefabricated structure construction works are anticipated to comprise:

- Site preparation works, including vegetation clearance (if required), erection of site fencing and small-scale enabling works;
- Establishment of a site compound and temporary site infrastructure, including a site cabin and welfare facilities;
- Delivery of prefabricated components of the nesting structures and equipment;
- Installation of necessary foundations (to be confirmed, dependant on detailed design and site location, may require piling); and
- Assembly and Installation of the nesting structures on-site, methodology of which is dependent on the materials to be used (to be agreed as part of detailed design). Materials used for the prefabricated structure may comprise wood or metal.

2.3.2.3 Construction is anticipated to comprise a maximum of 10 AADT HGV movements (subject to detailed design). The site may require a temporary construction access track (dependant on site location), using crushed aggregate on geo-textile, soil stabilisation or temporary trackway. The access track will be 10m wide, comprising 6m wide road (with 7m wide passing places) and additional width for topsoil storage. The maximum depth of the access track would be 1m.

2.3.2.4 A temporary logistics compound may be required and the dimensions of which would be approximately 70x70m.

2.3.3 Operation and Maintenance

2.3.3.1 Once the construction of the onshore artificial nesting structure(s) is complete, the site will be secured using fencing and the structures will be operational. Whilst operational activities are under development, **Section 2.2** outlines some design principles that may be of relevance, dependant on stakeholder input and detailed design consideration.

2.3.3.2 The number of monitoring visits is anticipated to be low, accessing the site on foot where possible. It is acknowledged that the amount of guano and the surface on which it will fall on is to be determined; however, impacts on soils, and the water environment (both ground and surface waterbodies) will be considered as part of the detailed design. Furthermore, noise and odour levels are to be determined during detailed design phase, anticipated to be post-consent.

2.3.3.3 Monitoring and maintenance activities could theoretically comprise the following:

- Removal of kittiwake guano from structure and appropriate disposal.
- Remedial works to structure (i.e. storm damage to nesting ledges);
- Ensuring structure is structurally sound;
- Changing batteries used for speakers playing kittiwake calls; and
- Removal of litter, graffiti or any objects deemed hazardous to kittiwakes.

Table 3: Onshore nesting structure design principles.

Importance	Principle Description
Optimising monitoring	Capacity for remote monitoring devices e.g. cameras to be fitted to the structure. Ideally these would need to provide coverage of all available ledges at a sufficiently high resolution to monitor individual nests and their contents e.g., chicks and eggs, to be inspected.
Optimising monitoring / essential at some sites	Complex monitoring features at a minimum of 2 of the 4 structures, to include: • Internal access; • Enclosed structures where the personnel monitoring within would be hidden from view, including to birds flying above and therefore minimising any disturbance; • Either with hatches to allow access from behind/within the structure to individual nests by suitably qualified ornithologists undertaking monitoring works; • And / or one-way glass to allow observations to be made from interior/back of structure; • Capacity for additional monitoring equipment to be accommodated within/on the structure (nice to have, not essential); and • Sanitation facilities (requirement to be determined).
Desirable (a, d) Optimising success (b, c, e)	Capacity for the structure to be modified to facilitate adaptive management design features after they have been operational for some time and if required. These may include: • Extension of structure to facilitate further nesting spaces. This would require either sufficient space to expand (laterally or vertically) or designed-in expansion points – for example a modular structure which can be extended; • Relocation of nesting structure. This would require straightforward assembly of components and potential to disassemble, balanced against longevity and stability of the structure; • Additional protection from elements e.g. wind/weather shield location points; • Enhanced predator deterrent e.g. straightforward roof and fencing maintenance, including opportunities to add avian predator deterrents; and • Provision of nesting material, such as seaweed. This would require additional protected space around or under the structure.

2.4 Decommissioning

2.4.1.1 The requirement for, and the exact nature of, decommissioning will be determined in consultation with the relevant authorities and stakeholders towards the end of the 35-year operational life of Hornsea Four.

2.5 Location

2.5.1.1 Site selection and the consideration of alternatives for onshore artificial nesting structure locations, identifying the ecological, land acquisition and technical constraints and requirements, will be further developed and information submitted with the DCO application. The Applicant has been exploring the analysis undertaken for Hornsea Three to build upon the extensive site selection work and considering the potential opportunities for Hornsea Four. The Blyth to Newbiggin search area is being further considered for Hornsea Four in addition to East Suffolk, to establish specific sites on which artificial nests will be developed (see **Figure 1**). Future work, such as progression of land agreements, has also been identified as being required.

2.5.1.2 The constraints and requirements established as a part of the site selection process have been led by the evidence-based approach, which will be described in the Ecological

Evidence reports submitted as part of the Applicants Development Consent Order application. Initial consultation has been carried out and no significant obstacles to development have been identified.

2.5.1.3 A full account of the ecological criteria for the site selection process undertaken to date will be submitted with the DCO application. The purpose of site selection has been to identify an area to host onshore artificial nesting sites that will be occupied by new recruits in the English southern North Sea, whilst contributing to an increase of breeding adults to the Eastern Atlantic kittiwake population. The principles influencing this initial site selection work comprise:

- Locations which kittiwake with certainty will be able to find (for example either locations where there are existing (smaller) populations of kittiwake, or where there are factors which attract kittiwake);
- Locations where there is evidence of stable/increasing productivity and evidence of an expanding population (as a proxy for favourable prey resource);
- Locations where there is a lack of existing natural or man-made habitat (locations where kittiwake are attempting to nest in unfavourable conditions such as ground nesting);
- Waterfront locations away from urban housing which minimise human interaction and where purpose built onshore artificial nests can ideally overhang water, to mimic the natural nesting conditions of the target species as far as possible.

2.5.1.4 The preferred zone for installing onshore artificial nesting sites is located within the onshore to nearshore environment. Further site selection, engagement with landowners and stakeholders and final site selection will be undertaken.

2.6 Summary of Onshore Artificial Nesting Structures

2.6.1.1 Onshore artificial nesting structures are put forward, if following Examination, the Secretary of State considers that an alternative (alternative to offshore nesting) measure is required. These structures would be capable of delivering the level of compensation required. A detailed evidence report will be submitted with the DCO application which presents the evidence to support the scale and efficacy of the Compensation Measure ensuring that significant contingency is built into the measure to provide the necessary confidence that it will substantively offset the impact. The compensation is effective, feasible and securable that can be functional prior to the impact occurring and sustainable for the lifetime of the project. Further details of the compensation plan and roadmaps to delivery will be provided with the DCO application. The Applicant has undertaken engagement with statutory and non-statutory stakeholders including, but not limited to, Natural England and consultation will be ongoing.