



# Hornsea Project Four: Environmental Statement (ES)

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## Volume A1, Chapter 6: Consultation Report

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## Glossary

Term	Definition
Commitment	<p>A term used interchangeably with mitigation and enhancement measures. Commitments are Embedded Mitigation Measures. The purpose of Commitments is to reduce and/or eliminate Likely Significant Effects (LSEs), in EIA terms.</p> <p>Primary (Design) or Tertiary (Inherent) are both embedded within the assessment at the relevant point in the EIA (e.g. at Scoping, Preliminary Environmental Information Report (PEIR) or ES).</p> <p>Secondary commitments are incorporated to reduce LSE to environmentally acceptable levels following initial assessment i.e. so that residual effects are acceptable.</p>
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. 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).
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the importance, or sensitivity, of the receptor or resource in accordance with defined significance criteria.
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 Impact Assessment (EIA) Report.
EIA Regulations	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
Electrical Infrastructure Study Area	The study area between the onshore substation and offshore array area
Export cable corridor (ECC)	The specific corridor of seabed (seaward of Mean High Water Springs (MHWS)) and land (landward of MHWS) from the Hornsea Project Four array area to the Creyke Beck National Grid substation, within which the export cables will be located.
Habitats Regulations Assessment (HRA)	A process which helps determine likely significant effects and (where appropriate) assesses adverse impacts on the integrity of European conservation sites and Ramsar sites. The process consists of up to four stages of assessment: screening, appropriate assessment, assessment of alternative solutions and assessment of imperative reasons of over-riding public interest (IROPI).
High Voltage Alternating Current (HVAC)	High voltage alternating current is the bulk transmission of electricity by alternating current (AC), whereby the flow of electric charge periodically reverses direction.
High Voltage Direct Current (HVDC)	High voltage direct current is the bulk transmission of electricity by direct current (DC), whereby the flow of electric charge is in one direction.
Hornsea Project Four offshore wind farm	<p>The term covers all elements of the project (i.e. both the offshore and onshore).</p> <p>Hornsea Four infrastructure will include offshore generating stations (wind turbines), electrical export cables to landfall, and connection to the electricity transmission</p>

Term	Definition
	network. Hereafter referred to as Hornsea Four.
Local Authority	The Local Authority is a body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and the Broads Authority, as set out in Section 43 of the Planning Act 2008. East Riding of Yorkshire Council (ERYC) is the Local Authority for the entirety of the onshore project footprint.
Maximum design scenario	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).
Non-statutory consultee	Organisations that the Local Planning Authorities and/or PINS may choose to engage (if, for example, there are planning policy reasons to do so) who are not designated in law but are likely to have an interest in a proposed development.
Orsted Hornsea Project Four Limited	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).
Section 47 consultee	Consultees identified in the Hornsea Four Statement of Community Consultation (SoCC), including the local community. Once the SoCC is finalised, the Applicant has a duty under Section 47 of the Planning Act 2008 to carry out the consultation in accordance with that document.
Statutory consultee	Organisations that are required to be consulted by the Local Planning Authorities and/or PINs, and who also have with a duty to respond to that consultation within a set deadline. This includes consultees that the Applicant is required to consult with, under Section 42 of the Planning Act 2008. Not all consultees will be statutory consultees (see non-statutory consultee definition below).
The Secretary of State for Business, Energy and Industrial Strategy	The ultimate decision maker with regards to Hornsea Four's application for Development Consent.

## Acronyms

Acronym	Definition
AfL	Agreement for Lease
CLO	Community Liaison Officer
DCO	Development Consent Order
DAA	Developable Area Approach
EIA	Environmental Impact Assessment
ERYC	East Riding Yorkshire Council
LLFA	Lead Local Flood Authority
MCA	Maritime Coastguard Agency
NIC	National Infrastructure Commission
NPS	National Policy Statement

Acronym	Definition
NSIP	Nationally Significant Infrastructure Project
OSCG	Onshore Substation Consultation Group
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
SoCC	Statement of Community Consultation
SoCG	Statement of Common Ground
SoS	Secretary of State
TCE	The Crown Estate
THLS	Trinity House Lighthouse Services

## 6.1 Introduction

### 6.1.1 Background

- 6.1.1.1 Orsted Hornsea Project Four Limited (the 'Applicant') is proposing to develop Hornsea Project Four Offshore Wind Farm (hereafter 'Hornsea Four'). Hornsea Four 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, and on to an onshore substation (OnSS) with electrical balancing infrastructure (EBI), and connection to the electricity transmission network.
- 6.1.1.2 This chapter of the Environmental Statement (ES) provides an overview of the approach to, and summary of, statutory consultation (in accordance with Section 42 of the Planning Act 2008 (herein 'the Planning Act') and Regulation 12 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (herein 'the EIA Regulations')), and non-statutory consultation undertaken to date during the EIA for the Hornsea Project Four offshore wind farm (hereafter 'Hornsea Four').
- 6.1.1.3 The Applicant took the decision at an early stage to integrate proportionality into the EIA for Hornsea Four. This followed a report from the UK's professional body for EIA, the Institute of Environment Management and Assessment (IEMA), which promoted the need for more proportionate EIA (IEMA, 2017). The Applicant's approach to proportionate EIA is supported by an ethos of 'Commit, Consult, Design' (see [Figure 6.1](#), with a working example shown in [Figure 6.3](#)), which has been embedded for Hornsea Four and adopted throughout the pre-application phase. This ethos has supported the development and implementation of proportionality across the project including supporting a number of proportionality tools and process such as route planning and site selection (see [Section 6.3.2](#)) and adoption of project commitments in response to stakeholder feedback (see [Section 6.3.3](#)). The following sections of this chapter set out in further detail the Applicant's approach to consultation and how the ethos of 'Commit, Consult, Design' and proportionality have been applied. Fourteen key examples of how the 'Commit, Consult, Design' ethos have resulted in material change to the design of the project are presented in the [Volume B1 Chapter 1: Consultation Report](#). Further details of how the Applicant has sought to engage with stakeholders on proportionality are provided within [Section 6.3](#) and a detailed explanation of the proportionate approach is set out in [Chapter 5: Environmental Impact Assessment Methodology](#).



**Figure 6.1: Hornsea Four Commit, Consult, Design Ethos**

6.1.1.4 The Applicant submitted a Scoping Report to the Secretary of State on 15th October 2018. A Scoping Opinion was adopted by the Secretary of State on 23rd November 2018. Further, the EIA Regulations require Preliminary Environmental Information (PEI) to be provided for public consultation by those seeking a DCO for development that constitutes EIA development. The Applicant undertook such consultation with stakeholders in accordance with section 42 and section 47 of the Planning Act 2008 (as amended) with the publication of and consultation on the Preliminary Environmental Information Report (PEIR) in September 2019 and an additional Focussed Statutory Consultation under section 42 of the Planning Act 2008 in February 2020. Hornsea Four has been further refined post PEIR, based upon the consultation responses received from the PEI process and where feedback has informed the site selection or project design; this is outlined in [Chapter 3: Site Selection and Assessment of Alternatives](#) and [Chapter 4: Project Description](#).

6.1.1.5 All consultation, including technical, community, landowner, other stakeholders and statutory consultation under Sections 42, 47 and 48 of the Planning Act, has been recorded within [Volume B1 Chapter 1: Consultation Report](#) and relevant appendices which accompanies the Development Consent Order (DCO) application. In discharging its duties under Section 49 of the Planning Act 2008, the Applicant has had regard to the relevant responses received following compliance with its statutory consultation and publicity requirements, and responded to them

## **6.1.2 Statement of Community Consultation**

6.1.2.1 Under Section 47 of the Planning Act (2008), Hornsea Four has a duty to prepare a Statement of Community Consultation (SoCC) which sets out how it plans to consult local communities on the proposed development. Hornsea Four must conduct its consultation in accordance with the proposals set out in the SoCC. Hornsea Four must consult on the contents of the SoCC with each of the local authorities, in whose area the proposed development is situated (as prescribed in section 43(1)). Due regard must be given to any



responses received from the local authorities. A summary of the responses received, and the regard had by the Applicant is set out in [Table 6.1](#).

6.1.2.2 In the case of Hornsea Four, the onshore works will be situated in, on, over or under land that is under the local authority jurisdiction of East Riding of Yorkshire Council (ERYC). Consultation on the draft SoCC was carried out between June and July 2018.

6.1.2.3 In addition to ERYC, a number of neighbouring local authorities were consulted on the contents of the SoCC. Specifically, this included:

- Hull City Council;
- Scarborough Borough Council;
- Ryedale District Council;
- North Yorkshire County Council;
- York City Council;
- Selby District Council;
- Doncaster Metropolitan Borough Council; and
- North Lincolnshire Council.

**Table 6.1: Local Planning Authority comments received on the draft SoCC.**

Date	Consultee	Comment on draft SoCC	Changes made to SoCC
26/06/2018	Doncaster Metropolitan Council	Could you please confirm that the cable will run only within East Riding of Yorkshire Council area and have its final destination a location north of Hull as shown on the indicative map on attached consultation document?	Noted – no further action required.
26/06/2018	Ryedale District Council	The Council have no comments to make at this stage. As an adjacent authority, we note that we will be consulted again in due course.	Noted – no further action required.
04/07/2018	East Riding of Yorkshire Council	<p>We (East Riding of Yorkshire Council) raised several points during our meeting on 22<sup>nd</sup> June, and I can summarise them here:</p> <ul style="list-style-type: none"> <li>• No Comments on the content which is comprehensive. For appearance: Font size/colour could be made clearer in section 1 to 3 in particular;</li> <li>• The map 'Onshore Consultation Area' – 'Pecklington' should be 'Pockington'. Could include more detail such as main roads to get a better idea of the location of the works. Include the man villages nearest the cable route – in</li> </ul>	<p>Changes were made by Hornsea Four in response to the comments raised including an update to the maps to show local road networks and villages in the vicinity of the core consultation zone, including Leconfield.</p> <p>Local information event were organised in Foston on the Wolds, Barmston, Leconfield and Woodmansey. These details were included in the final SoCC.</p>



Date	Consultee	Comment on draft SoCC	Changes made to SoCC
		<p>particular, Leconfield, Cottingham;</p> <ul style="list-style-type: none"> <li>No need to include adjoining authorities in such big type.</li> <li>Map in section 4 should show Beverley and Bridlington;</li> <li>For consultation: Suggest Civic Societies in Beverley, Cottingham and Bridlington are included. There are no local interest groups of note in this area that could be consulted; and</li> <li>Local newspapers include the Hull Daily Mail, Holderness Gazette, Bridlington Free Press, Driffield and Wolds Weekly (also does 'Beverley Life).</li> </ul> <p>Possible locations for public events could be Cottingham, Leconfield and Ulrome or Barmston.</p>	
23/07/2018	Scarborough Borough Council	<p>It can confirm that the Borough Council is satisfied with the consultation process outlined within the draft SoCC and would ask that it is kept abreast of the project as it proceeds.</p>	Noted – no further action required.

6.1.2.4 The SoCC can be found on the Hornsea Four website, along with other consultation materials in the Document Library:

<https://hornseaprojects.co.uk/Hornsea-Project-Four/Documents-Library>

## 6.2 Policy and Guidance

### 6.2.1 The Planning Act

6.2.1.1 As detailed in **Chapter 2: Planning and Policy Context**, the project is defined under Part 3, Section 15(3) of the Planning Act 2008 as a Nationally Significant Infrastructure Project (NSIP). Hornsea Four must therefore undertake pre-application consultation in accordance with the requirements of the Planning Act 2008. As the development is EIA development, Hornsea Four must also ensure that it complies with the consultation requirements under the EIA Regulations.

6.2.1.2 The relevant sections of Part 5, Chapter 2 of the Planning Act 2008 are:

- Section 42 – Duty to consult;
- Section 43 – Local authorities for the purpose of section 42(1)(b);
- Section 44 – Categories for purposes of section 42(1)(d);
- Section 45 – Timetable for consultation under section 42;

- Section 46 – Duty to notify the Secretary of State of proposed application;
- Section 47 – Duty to consult local community;
- Section 48 – Duty to publicise; and
- Section 49 – Duty to take account of responses to consultation and publicity.

## 6.2.2 National Policy Statements

6.2.2.1 The relevant National Policy Statements (NPS) which form the primary national guidance documents for NSIPs are listed below. These documents encourage applicants to carry out pre-application consultation with a range of stakeholders.

- EN-1 - Overarching NPS for Energy;
- EN-3 - Renewable Energy Infrastructure; and
- EN-5 - Electricity Networks, which covers the electrical infrastructure in conjunction with EN-1.

## 6.2.3 EIA Regulations

6.2.3.1 The Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that it proposes to provide an ES in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development and an ES presenting the findings of the EIA is provided with the DCO application.

6.2.3.2 An EIA Scoping Report was submitted to the Planning Inspectorate on 8th October 2018 and can be viewed at:

<https://hornseaprojects.co.uk/Hornsea-Project-Four/Documents-Library>

6.2.3.3 The Planning Inspectorate reviewed and consulted on the EIA Scoping Report and published a Scoping Opinion on 23rd November 2018 which can be viewed at:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010098/EN010098-000064-H4WF%20-%20Scoping%20Opinion.pdf>

6.2.3.4 The Applicant acknowledges the comments of the Planning Inspectorate given within the Scoping Opinion and also notes the comments provided by the statutory consultees in Appendix 2 to the Scoping Opinion. Both the Scoping Opinion and the comments from the consultees have been considered in undertaking the ongoing EIA and in preparing the PEI Report and ES.

6.2.3.5 The Applicant has maintained ongoing dialogue with the Planning Inspectorate and other relevant statutory stakeholders in relation to the scope of EIA in order to ensure that the ES is proportionate and meets the requirements of the EIA Regulations. The scope of the EIA for each topic has been discussed through the Evidence Plan Process (see [Section 6.3.5](#))

with the relevant statutory stakeholders. Key agreements reached with stakeholders are reported within [Volume B1, Annex 1.1 of the Consultation Report](#).

- 6.2.3.6 The evolution of the scope of the EIA for each individual technical topic area has been presented in [Volume A4, Annex 5.1: Impacts Register](#). The Impacts Register has been utilised throughout the consultation process and captures the narrative (both the Applicant and stakeholders) for each individual impact from EIA Scoping, PEIR to ES.

#### **6.2.4 Planning Inspectorate Advice Notes**

- 6.2.4.1 The Planning Inspectorate has published a series of advice notes in relation to NSIPs. The advice notes are non-statutory but provide advice and information on a range of issues arising throughout the whole life of the application process.

- 6.2.4.2 The Applicant's approach to consultation has been informed by a range of the Planning Inspectorate's Advice Notes, with reference to:

- Advice Note 3: EIA consultation and notification (August 2017);
- Advice Note 6: Preparation and Submission of Application Documents (2019);
- Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping (December 2017);
- Advice Note 9: Rochdale Envelope (2012);
- Advice Note 10: Habitat Regulations Assessment (HRA) relevant to Nationally Significant Infrastructure Projects (November 2017);
- Advice Note 11: Working with public bodies in the infrastructure planning process (November 2017);
- Advice Note 14: Compiling the Consultation Report (April 2012); and
- Advice Note 17: Cumulative Effects Assessment (2019).

### **6.3 Consultation Process**

- 6.3.1.1 Aligned with Hornsea Four's ethos of 'Commit, Consult, Design', the Applicant has sought to engage actively and openly with a range of key stakeholders throughout the pre-application phase (including route planning and site selection (RPSS) ([Section 6.3.2](#)), local information events ([Section 6.3.3](#)), the Proportionality Roadshow ([Section 6.3.4](#)), Evidence Plan Process ([Section 6.3.5](#)), Onshore Substation Consultation Group (OSCG) ([Section 6.3.7](#)) drop-in PEIR workshop with ERYC ([Section 6.3.5](#))), seeking feedback and providing updates at key stages and intervals. Introductory meetings were held with the Planning Inspectorate, East Riding of Yorkshire Council, MMO and Natural England in April and May 2018. An overview of key consultation activities is presented in the following sections.

### 6.3.2 Route Planning and Site Selection

- 6.3.2.1 An important part of the project development process is the refinement, and subsequent selection of, the final configuration of project infrastructure, taking into consideration the sensitivity of the existing environment, wider engineering considerations and consultation feedback.
- 6.3.2.2 Hornsea Four has engaged with East Riding of Yorkshire Council specifically on the RPSS process with an initial workshop held in October 2018 and a further workshop held in November 2018. The latter workshop discussed matters relating to selection of the OnSS and key issues relating to traffic.
- 6.3.2.3 Hornsea Four has used the consultation feedback from the Scoping Report (Orsted, 2018) and subsequent formal and informal consultation activities with key stakeholders, including The Crown Estate, Planning Inspectorate, East Riding of Yorkshire Council, MMO, Natural England, MCA and Trinity House, to inform the RPSS process to date. Where feedback has informed the site selection process or project design; this is outlined in [Chapter 3: Site Selection and Assessment of Alternatives](#).
- 6.3.2.4 Further to this, Hornsea Four have adopted a range of commitments which include a number of primary design principles to avoid a range of sensitive sites within the onshore and offshore environment. Notable examples include the avoidance of marine conservation zones which informed the routing of the offshore export cable corridor (ECC) and landfall location (Co2) and the reduction of the agreement for lease area to avoid areas with the highest concentrations of birds (Co87). All such commitments are detailed within the [Volume A4, Annex 5.2: Commitments Register](#).

### 6.3.3 Local Information Events

- 6.3.3.1 In parallel with consultation activities in support of the preparation of the Scoping Report and PEIR, the Applicant held a number of public consultation events as set out in SoCC. These Local Information Events (LIEs) provided attendees with the opportunity to provide feedback on the project proposals. Full details of the feedback received is be provided within [Volume B1, Chapter 1: Consultation Report](#) and relevant appendices.
- 6.3.3.2 Specific feedback from members of the public at the LIEs has been taken on board. In particular, where possible Hornsea Four have amended existing commitments or adopted new commitments directly in response to such feedback (including amending to the OnSS access strategy (Co150), avoidance of construction traffic through Foston on the Wolds (Co171), avoiding visual impacts on specific heritage assets through RPSS (Co145 and Co151) and avoiding works at the Barmston main drain (C143)). The feedback received from members of the public and details how such feedback has been considered by Hornsea Four is set out within the Commitments Register (see [Volume A4, Annex 5.2](#)). Tab 7 of the Commitments Register identifies all example of public driven amendments or additions, with Tab 6 outlining the change log for all commitments.

### 6.3.4 Proportionality Roadshows

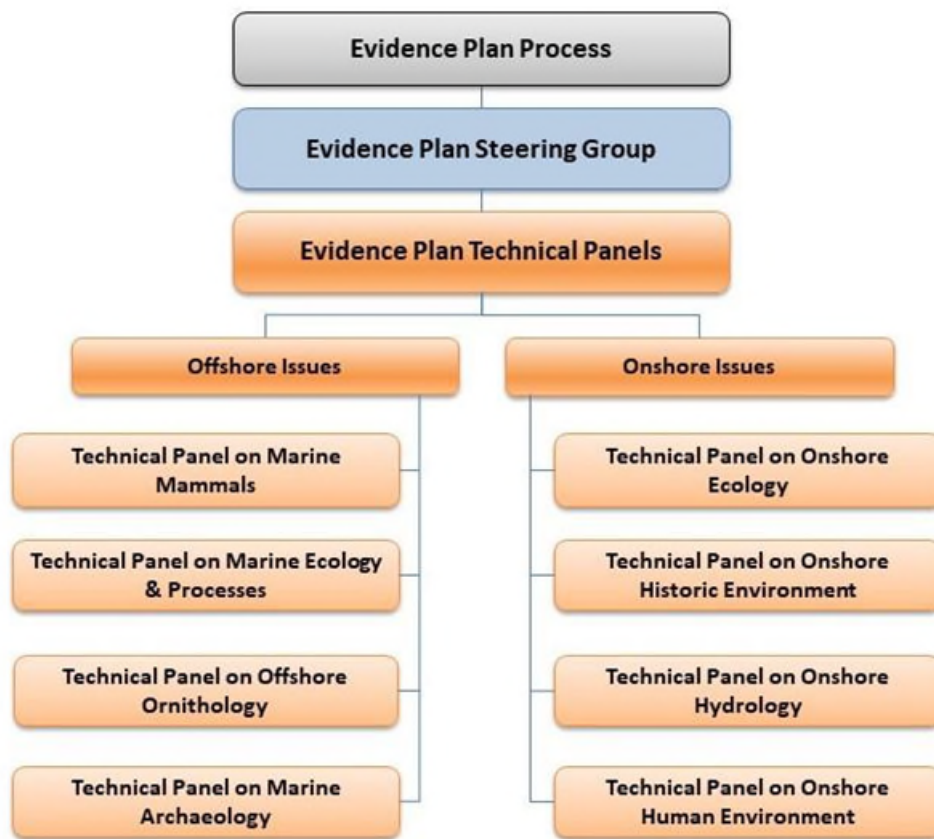
- 6.3.4.1 In line with the guidance from the Planning Inspectorate in Advice Note 6 and 7, Hornsea Four has sought to undertake a proportionate approach to EIA. The approach follows a recent report (IEMA, 2017), by the UK's professional body for EIA, the Institute of Environment Management and Assessment (IEMA) which set out details of a collaborate strategy for enhancing EIA practice.
- 6.3.4.2 The Applicant identified a range of tangible actions, tools and processes to support the delivery of a proportionate EIA. These measures are described in detail in [Chapter 5: Environmental Impact Assessment Methodology](#). Due to the variable understanding of, and sign up to the proportionate approach, it was considered important by the project to undertake specific consultation on the topic of proportionality. The Applicant therefore undertook a Proportionality Roadshow with a range of key consultees. [Table 6.2](#) sets out the stakeholders which Hornsea Four engaged with specifically on proportionality, however as proportionality is central to Hornsea Four, this has been presented and discussed with stakeholders throughout the process, for example through Evidence Plan meetings (see [Section 6.3.5](#)).
- 6.3.4.3 The Roadshow aimed to familiarise consultees with the proportionate approach Hornsea Four has adopted in relation the ES. The following information was presented and discussed during the Roadshow:
- Overview of the purpose and aim of proportionate EIA;
  - Update on Hornsea Four's approach to proportionality since Scoping, including an update on impacts to be 'scoped out' of the assessment;
  - Overview of the Hornsea Four's proportionality tools including the Impacts Register and Commitments Register;
  - Provided information on Hornsea Fours approach to the PEIR and what it will look like; and
  - Provided a timeline for future engagement.
- 6.3.4.4 In response to feedback received from stakeholders during the Proportionality Roadshow, a guide to Hornsea Fours proportionate PEIR was prepared for consultation. This document has been updated for Application and is provided within [Volume A4, Annex 1.1: How to read this ES](#).

**Table 6.2: Proportionality Roadshow Meetings.**

Date	Activity/ Consultees
03/04/2019	Proportionality Meeting – MMO
10/04/2019	Proportionality Meeting – Natural England
18/04/2019	Proportionality Meeting – PINS
29/05/2019	Proportionality Meeting – RSPB
17/06/2019	Proportionality Meeting – The Wildlife Trusts & The Yorkshire Wildlife Trust

### 6.3.5 Evidence Plan Process

- 6.3.5.1 In order to ensure key stakeholders are consulted on a regular and formalised basis an Evidence Plan (EP) process has been adopted. The EP process for Hornsea Four commenced in September 2018 and aimed to agree the evidence required to be submitted within the ES as part of the DCO Application.
- 6.3.5.2 The primary objective of the EP process was to seek agreement with key stakeholders on the data and information to be included in the ES. The process was also be used to supplement the Proportionate Roadshow (see [Section 6.3.4](#)) in communicating Hornsea Four's approach to proportionate EIA and how proportionality is delivered through the ES. A further detailed overview of the approach by Hornsea Four to proportionality is provided within [Volume A4, Annex 1.1: How to Read this ES](#). The EP process was also used as a forum to discuss and agree matters relevant to the Habitat Regulations Assessment (HRA) which accompanies the DCO application (taking into account the guidance in PINS Advice Note 10).
- 6.3.5.3 The EP process is a voluntary informal process and forms a record of the agreements and disagreements between Hornsea Four and the interested parties and helps to inform Statements of Common Ground (SoCG) (see [Section 6.3.11](#)).
- 6.3.5.4 The EP Steering Group consists of the following organisations:
- the Applicant;
  - PINS;
  - Natural England;
  - Marine Management Organisation (MMO);
  - East Riding of Yorkshire Council (ERYC); and
  - Historic England.
- 6.3.5.5 The EPP is divided into Expert Topic Group (ETG) areas which are summarised in [Figure 6.2](#).



**Figure 6.2: Overview of Expert Topic Groups.**

6.3.5.6 In addition to the meetings undertaken through the Evidence Plan Process, Hornsea Four has met with the Planning Inspectorate, ERYC, Historic England and Natural England on a regular basis, to provide updates and to seek advice on subjects including the site selection process, approach to the EIA and drafting the application documents. Hornsea Four has also met with a range of key stakeholders prior to PEIR specifically to discuss the adoption of a proportionate approach to EIA. These meetings have supplemented discussions within the EP process where proportionality has also been presented.

6.3.5.7 Furthermore, in order to inform the consultation process on the PEIR, the Applicant organised a drop-in workshop at the ERYC offices to enable all technical reviewers of PEIR documentation to ensure the content and interaction between submission documents was understood. The session also provided an opportunity to ask the Applicant any specific questions.

#### *Habitat Regulations Assessment consultation*

6.3.5.8 Hornsea Four has consulted specifically on HRA through the EP process, in line with the Planning Inspectorate's Advice Note 10: Habitats Regulations Assessment relevant to Nationally Significant Infrastructure Projects (January 2017). Hornsea Four submitted the



Habitats Regulations Assessment (HRA) Screening Report for consultation on the 08 October 2018. At the request of Natural England, additional sites were “screened in” to the HRA and the report updated and issued as part of the draft RIAA on 18 June 2019. A further and subsequent update was made following PEIR which is appended to the final RIAA submitted at DCO Application ([Volume B2, Annex 2.1](#)).

- 6.3.5.9 The Draft Report to Inform Appropriate Assessment (RIAA) was made available for consultation with the statutory nature conservation bodies (SNCBs) and other potentially affected transboundary consultees and interested parties. The consultation period for the RIAA concluded on 23 September 2019, aligned with the conclusion of the S42 consultation of the PEIR. Consultation responses on the draft RIAA and the Applicants responses are reported on within [Volume B1, Chapter 6](#) of the Consultation Report and the updated RIAA accounting for comments is submitted with the application ([Volume B2, Chapter 2](#)).

### **6.3.6 Developable Area Approach**

- 6.3.6.1 In keeping with the approach by Hornsea Four to proportionate EIA, due consideration was given to the size and location (within the exiting offshore Agreement for Lease array area) of the final project that will be taken forward in the application for development consent. This consideration has been captured internally as a “Developable Area Approach” (DAA), which includes Physical, Biological and Human constraints in refining the developable area, balancing consenting and commercial considerations with technical feasibility for construction.
- 6.3.6.2 Hornsea Four sought to engage with a number of key stakeholders on the DAA. Specifically, between December 2018 and February 2019, Hornsea Four held meetings with The Crown Estate (TCE); Maritime Coastguard Agency (MCA); Trinity House; Natural England and the RSPB to present the DAA and seek early feedback on the approach. The DAA has sought to promote more pro-active and early engagement with relevant stakeholders on refining the site to reduce constraints where possible and provide stakeholders with the opportunity to influence the final shape and size of the project.
- 6.3.6.3 The combination of Hornsea Four’s proportionality in EIA and developable area process has resulted in a marked reduction in the Order Limits taken forward at the point of DCO application. Hornsea Four adopted a major site reduction from the AfL presented at Scoping (846 km<sup>2</sup>) to the Preliminary Environmental Information Report (PEIR) boundary (600 km<sup>2</sup>), with a further reduction adopted for the Environmental Statement (ES) and DCO application (468 km<sup>2</sup>) due to the results of the PEIR, technical considerations and stakeholder feedback.

6.3.6.4 Reductions to the Order Limits were applied to reduce both commercial transboundary impacts as a consequence of shipping route deviations, and ornithological feature impacts as a result of seabird collision risk. Combined with two previous design iterations the project has now committed to reduce the area granted through the project's AfL by 50% in order to reduce both environmental and commercial impacts.

6.3.6.5 While the initial requirements of various stakeholders proved challenging to reconcile with Hornsea Four's commercial aspirations, the DAA meetings have ultimately led to a major site reduction, the narrative of which is captured in [Chapter 3: Site Selection and Consideration of Alternatives](#).

### **6.3.7 Onshore substation consultation group**

6.3.7.1 The aim of the OSCG is to create a consultation forum within which the local community can materially influence site selection and alternatives, design and mitigation. The OSCG focus is on the key areas of interest for respective local communities (via their respective Parish Council representative(s)) in relation to the design evolution of the Hornsea Four OnSS and EBI.

6.3.7.2 The OSCG first convened in March 2019 and set out a timeframe for regular interaction between Hornsea Four and interested parties on key issues raised through consultation (e.g. construction traffic access through Cottingham and protection of views to and from Beverley Minster). Engagement is achieved via planned early and focused engagement with the local representatives to gain feedback into the Hornsea Four plans and proposals and is facilitated by a full-time and locally residing Community Liaison Officer (CLO). Furthermore, the Applicant undertook an initial trial of Commonplace, an online community consultation tool, which following the success of the tools use within the OSCG, was adopted for wider consultation on the PEIR. Further details on Commonplace are set out in [Section 6.3.9](#).

6.3.7.3 The Applicant has considered the feedback received from the OSCG in the development of a Design Vision Statement (see [Section 6.3.8](#)) which aligns and evidences the Applicant's ethos and approach of 'Commit, Consult, Design'. Full details of engagement are detailed within the Consultation Report ([Volume B1, Annex 1.1](#)).

## 6.3.8 Design Vision Statement

- 6.3.8.1 The Design Vision Statement (see [Volume A4, Annex 4.6](#)) sets out methods of best practice alongside aspirational approaches that will guide the future development of Hornsea Four's onshore infrastructure, in consultation with the local community and key stakeholders. The Design Vision Statement has been developed with consideration of the NIC's Design Principles (2020) for National Infrastructure which promotes the planning and delivery of major infrastructure to consider the four design principles of: climate, people, places and value (see [Chapter 5: EIA Methodology](#)).
- 6.3.8.2 The Design Vision Statement has been developed through early consultation with the OSG and aims to ensure that a sense of place is considered and integrated throughout the design process and significant adverse environmental effects are mitigated, and enhancement opportunities provided, where possible whilst respecting landscape character. This will be achieved through the integration of locally inspired design principles and engineering optimisation. Key factors including the use of materials, colour and landscape treatments will be considered. Proposals seek to bring not only greater visual mitigation as part of Hornsea Four but also encourage ecological and amenity benefits. The Design Vision Statement has evolved following statutory consultation and has been updated to incorporate stakeholder feedback.

## 6.3.9 Public consultation at PEIR

- 6.3.9.1 Members of the public were encouraged to provide feedback on the PEIR. A series of Local Information Events took place in September 2019, where the local community viewed the project proposals and discussed with the Hornsea Four team.
- 6.3.9.2 Furthermore, throughout PEIR the Applicant adopted Commonplace, an online community consultation tool. The tool helped Hornsea Four to engage with a wider audience and receive digital feedback on core aspects of the project. Details of feedback received via Commonplace are included within [Volume B1, Chapter 1: Consultation Report](#).
- 6.3.9.3 All feedback from the Local Information Events and Commonplace along with a summary of how feedback has shaped the proposals has been provided in the Consultation Report that accompanies the DCO application.

### 6.3.10 Targeted Statutory Consultation

6.3.10.1 In February to March 2020 the Applicant undertook an additional Targeted Statutory Consultation under section 42 of the Planning Act 2008. The Targeted Statutory Consultation covered a number of discrete changes which were identified through and in response to the statutory consultation on the PEIR. The changes consulted on comprised the addition of an alternative onshore ECC routing option at Lockington Carr Cross, 34 minor amendments to the onshore ECC additional operational access rights. Full details of the responses received, and the Applicant's response is provided within the Consultation Report ([Volume B1, Chapter 1](#)) and relevant appendices.

6.3.10.2 In July to August 2020 the Applicant undertook a second additional Targeted Statutory Consultation under Section 42 of the Planning Act 2008. The changes consulted on related to the OnSS access strategy. As a result of feedback from the local community during statutory consultation on the PEIR, construction and operation and maintenance access tracks had been removed from the south of the OnSS site, with the previously identified OnSS construction access road off the A1079 amended to be permanent (see [paragraph 6.3.3.2](#)).

6.3.10.3 In June to July 2021 the Applicant undertook a third additional Targeted Statutory Consultation under Section 42 of the Planning Act 2008. The Targeted Consultation covered the existing construction access off the A164. A workshop was organised with ERYC to discuss the access point from the A164 to the Hornsea Four cable corridor and the interaction between the Jock's Lodge Scheme and Hornsea Four. As a result of feedback during the statutory consultation the existing Hornsea Four construction access point was moved to the south. This request was made to reduce the overall construction activity and the number of accesses taken off the A164.

### 6.3.11 Targeted Non-Statutory Consultation

6.3.11.1 In August to September 2021 the Applicant undertook additional Targeted Non-Statutory Consultation. This consultation covered the suitability of the compensation measures designed and proposed as part of the without prejudice derogation case. This consultation was undertaken with all relevant stakeholders in the areas potentially impacted by the proposed compensation measures. Full details of the responses received is provided within the Consultation Report ([Volume B1, Chapter 1](#)).

### 6.3.12 Statements of Common Ground

6.3.12.1 Following detailed discussions undertaken through the Evidence Plan Process, the Applicant has proactively sought to engage a range of key stakeholders (e.g. Natural England, ERYC and the Environment Agency) to progress Statements of Common Ground (SoCG). By undertaking early engagement on SoCGs through the pre-application phase, the Applicant has sought, where possible, to provide the Planning Inspectorate with an early view of the agreements reached with stakeholders and matters that are outstanding based on the status of discussion at the point of Application (see [Volume F3](#) for draft

SoCGs provided at the point of DCO application). The Applicant will continue to progress discussions with relevant stakeholders on matters relevant to the SoCG process prior to and during the project examination and updated SoCGs will be provided to the Planning Inspectorate as required through the examination phase.

## 6.4 Transboundary Consultation

6.4.1.1 Transboundary effects arise when impacts from the development within one European Economic Area (EEA) state affects the environment of another EEA state(s). The need to consider such transboundary effects has been embodied by the United Nations Economic Commission for Europe Convention on EIA in a Transboundary Context (commonly referred to as the 'Espoo Convention'). The Convention requires that assessments are extended across borders between Parties of the Convention when a planned activity may cause significant adverse transboundary effects. **Table 6.3** identifies the approximate distances of Hornsea Four from the Exclusive Economic Zone (EEZ) boundaries of other EEA states that share a maritime border with the UK.

**Table 6.3: Summary of approximate distance to nearest EEZ (median line) of other EEA states.**

EEA state	Distance from Hornsea Four to the nearest marine boundary (km)
The Netherlands	84
Germany	222
Belgium	243
Denmark	235
Norway	247
France	271
Iceland	1,153
Republic of Ireland	333

6.4.1.2 The Espoo Convention has been implemented in the UK for the purposes of NSIPs by the Infrastructure Planning (EIA) Regulations 2017. Regulation 32 of the EIA Regulations sets out a prescribed process for notifying and consulting EEA States that maybe affected by a development that is likely to have significant transboundary effects.

6.4.1.3 In addition, PINS Advice Note Twelve: Transboundary Impacts and Processes (PINS, 2018b) sets out the procedures for a consultation in association with an application for a DCO where such a development may have significant transboundary effects. It recommends that the developer undertakes independent consultation with other EEA states that may be affected to speed up the consultation process and reduce the risk to the development of a lack of time to consider transboundary impacts at a later stage in the application process.

6.4.1.4 A transboundary screening process was carried out provided at Annex K of Scoping Report (Orsted, 2018). This report confirmed that only certain offshore (marine) technical aspects could result in transboundary effects, namely: fish and shellfish ecology; marine mammals;

ornithology; commercial fisheries; shipping and navigation; and aviation and radar. Each of these technical assessment chapters includes details of such potential transboundary effects. An updated transboundary screening report was subsequently provided to the Planning Inspectorate on 12<sup>th</sup> September 2019 who undertook a transboundary consultation with the relevant EEA states. All consultation is recorded within the [Volume B1, Chapter 1: Consultation Report](#) and relevant appendices.

## 6.5 Summary

- 6.5.1.1 The Applicant engaged stakeholders in the project from an early stage and subsequently throughout the process and has employed an ethos of 'Commit, Consult, Design' throughout the pre-application phase of the project. An example of how the Applicant has employed the ethos of 'Commit, Consult, Design' during the pre-application phase is provided in [Figure 6.3](#). Responses to the Scoping Report, feedback from the Evidence Plan Process and other stakeholder meetings (see [Section 6.3](#)) and consultation on the PEIR has been carefully considered in the ongoing design of the project, resulting in amendments to the project, additional and amended commitments, with comments considered in the ES where appropriate. Responses which are considered relevant to specific topic areas are set out within each of the individual technical chapters in [Volume A2](#) and [Volume A3](#).
- 6.5.1.2 The Applicant has adopted a proportionate approach to EIA which has shaped the development of the ES. Hornsea Four has engaged with key stakeholders on the topic of proportionality and undertook targeted meetings in the form of a Proportionality Roadshow to ensure clear messaging and a consistent understanding of the approach adopted by the project.
- 6.5.1.3 Further information on the consultation activities undertaken, and how consultation responses have influenced the project design and the preparation of the EIA, is reported within [B1.1: Consultation Report](#) and relevant appendices.

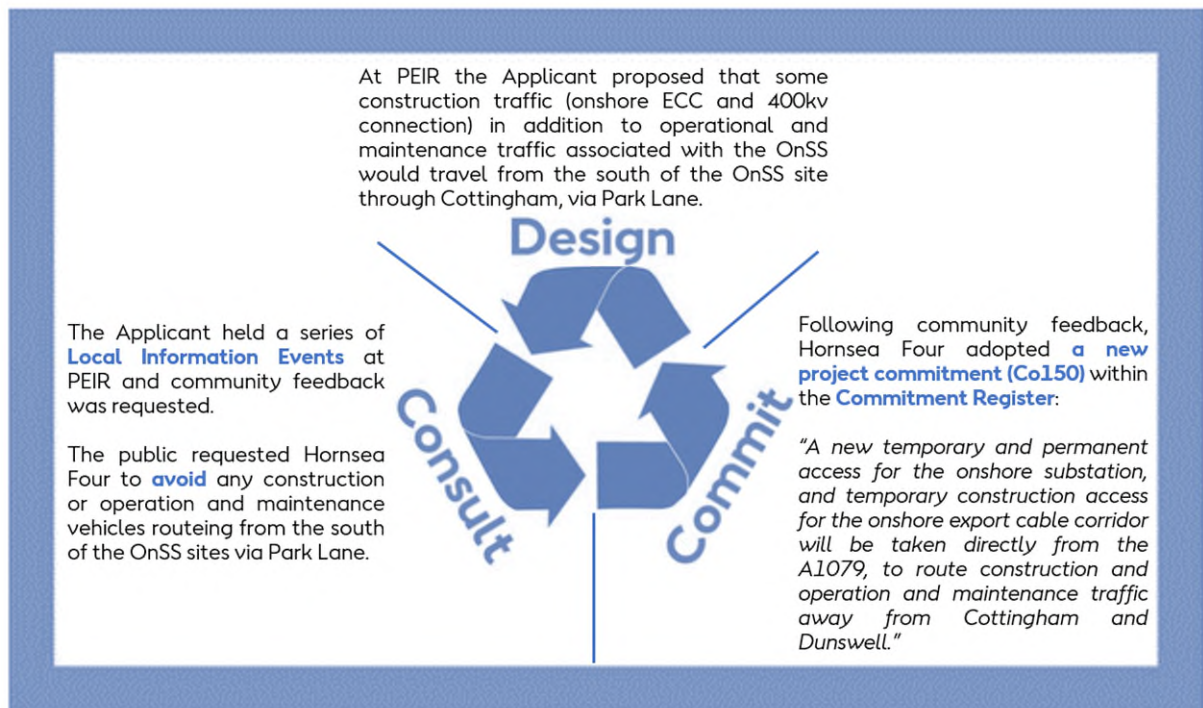


Figure 6.3: Example of Hornsea Fours Ethos of 'Commit, Consult, Design' in practice



## 6.6 References

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