



# Hornsea Project Four: Environmental Statement

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## **Volume A4, Annex 1.1:** **How to read this ES**

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## 1 Background and Purpose

Hornsea Four took the decision at an early stage to implement proportionality into the Environmental Impact Assessment (EIA) and developed a strategy for how a proportionate approach would be applied. There are a number of deliverables which are key to delivering proportionality within the Hornsea Four EIA which include:

1. Impacts Register (see [Volume A4, Annex 5.1](#))
2. Commitments Register (see [Volume A4, Annex 5.2](#));
3. DCO Application Document Register (see [Volume 1, Chapter 2](#)); and
4. ES Chapters and Technical Reports (see [Volume A2, A3, A5 and A6](#)).

This document provides supporting information to guide the reader in navigating the various documents and registers that have been provided to support the proportionate approach to the Hornsea Four application for development consent.

The role of each of these documents is described in the following sections in sequential order (“the Four Steps”) which are intended to familiarise the reader with the proportionate approach. The “Four Steps” are also summarised in section 2.

Through consultation, the requirement to provide guidance on how the documents come together to deliver proportionality was suggested. This document has therefore been provided to assist the reader to navigate what is a new approach to delivering a proportionate EIA that readers may not be familiar with.

## 2 Four Step Guide

### STEP 1 – Impacts Register

The function of the Impacts Register is to document **ALL** potential impacts associated with the proposed development of Hornsea Four and to identify those that are 'scoped out', 'not considered in detail in the ES' and those of Likely Significant Effect (LSE) to be considered through a simple or detailed assessment in the ES.



### STEP 2 - Commitment Register

The function of the Commitment Register is to serve as a repository of **ALL** Hornsea Four commitments. The key function of Commitments is to eliminate or reduce LSE.



### STEP 3 – DCO Application Document Register

The Application Register lists all documents submitted as part of Hornsea Four's application for Development Consent. A key function of the Application Register is to present the relevant documents that secure the Applicant's commitments.



### STEP 4 - ES Chapter and Technical Report

The ES Chapters provide an assessment (simple or detailed) of the LSEs. The Technical Reports provide a description of the baseline environment to inform the assessment in the ES Chapter.

## STEP 1 – Impacts Register

The function of the Impacts Register is to document ALL potential impacts associated with the proposed development of Hornsea Four and to identify those that are 'scoped out', 'not considered in detail in the ES' and those of Likely Significant Effect (LSE) to be considered through a simple or detailed assessment in the ES.

The Impacts Register is the starting point for reading the EIA. It provides several separate functions which are set out in detail within the worksheet 'Impacts Register Explained' of the Impacts Register and summarised here:

1. Details all potential impacts associated with the proposed development and provides a unique ID which can be traced through the subsequent steps/documents (e.g. GGC-C-8);
2. Sets the scope of the EIA at Scoping, PEIR and ES with appropriate justification including references to agreements reached with stakeholders through the Evidence Plan Process;
3. States the magnitude, sensitivity and significance for impacts considered in detail in the PEIR and ES stage of all potential impacts associated with all activities, in all phases of development for Hornsea Four;
4. Identifies Commitments to reduce or eliminate Likely Significant Effect<sup>1</sup> (LSE) (see Step Two); and,
5. Defines the Maximum Design Scenario (MDS)<sup>2</sup> for any given impact.

In terms of setting the scope of the EIA at PEIR and ES, the Impacts Register clearly distinguishes:

1. Potential impacts that are 'scoped out', whereby the Planning Inspectorate and Hornsea Four agree that the potential impact does not need to be included in the scope of the EIA at ES and no assessment is needed. The term 'scoped out' only refers to the impacts that were assessed and scoped out at the Scoping Stage;
2. Potential impacts that were 'not considered in detail in the PEIR' and agreement between the Planning Inspectorate and Hornsea Four was not reached;
3. Potential impacts that are 'not considered in detail in the ES' as no LSE was identified at PEIR; and
4. Potential Impacts that are considered in detail in ES chapters through either a 'simple' or 'detailed' assessment (see Appendix A).

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<sup>1</sup> Likely Significant Effect (LSE) in Environmental Impact Assessment (EIA) terms

<sup>2</sup> Maximum Design Scenario (MDS) is the aspects of each project design parameter that will result in the greatest impact upon each respective receptor

The above positions are presented as colour coded categories for all potential impacts considered. These categories and a summary of how an impact is considered in the ES are set out [Table 1](#).

The Impacts Register is provided as an interactive searchable spreadsheet allowing the user to identify Impacts relevant to a particular receptor, project element or phase.

**Table 1: Categories used within the Impacts Register, assessment requirements and approach in the ES.**

Category	Assessment Requirements	Approach in ES chapter
Potential impact is <b>scoped out</b> and both the Planning Inspectorate and Hornsea Four agree.	No assessment in ES chapter required. These impacts are presented within the Impacts Register.	Presented in the Impact Register table of the ES chapter section: Project Basis for Assessment.
The Planning Inspectorates Scoping Opinion states that the impact should be assessed in the ES but following further consultation and agreement with relevant key stakeholders Hornsea Four maintain approach set out at Scoping and potential impact was <b>not considered in detail in the PEIR and / or ES</b> .	Following further consultation and agreement with relevant key stakeholders prior to PEIR and ES, such impacts were not considered in detail in the PEIR and / or ES. A justification for the project position at PEIR is presented in the Impacts Register which includes references to stakeholder consultation where appropriate.	Presented in the Impact Register table of the ES chapter section: Project Basis for Assessment.
Potential Impact <b>not considered in detail in the ES</b> . No likely significant effect identified at PEIR.	Assessment was undertaken at PEIR and concluded no LSE (post-mitigation) and is therefore not considered in detail in the ES. A justification for the project position at PEIR and ES is presented in the Impacts Register. An overview of the sensitivity, magnitude and assessment conclusions at PEIR is also presented in the Impacts Register.	Presented in the Impact Register table of the ES chapter section: Project Basis for Assessment.
Potential impact is <b>considered in the ES</b> - both the Planning Inspectorate and Hornsea Four agree.	Simple assessment undertaken. There are several potential effects that require assessment but due to their nature do not require detailed assessment.	Assessed in Impact Assessment section of the relevant ES chapter.
Potential impact is <b>considered in the ES</b> - both the Planning Inspectorate and Hornsea Four agree.	Detailed assessment required. The complexity or potential significance of these potential effects has been determined to require a detailed assessment. Such detailed assessments will form the bulk of any technical assessment section.	Assessed in Impact Assessment section of the relevant ES chapter.

## STEP 2 - Commitment Register

The function of the Commitment Register is to serve as a repository of **ALL** Hornsea Four commitments. The key function of Commitments is to eliminate or reduce LSE.

The Commitments Register should be read in conjunction with the Impacts Register (see Step 1) as the two documents are inter-related (e.g. the Impact Register proposes Commitments which eliminate or reduce LSE and the Commitments Register details how these measures are secured). The Commitments Register provides several functions which are set out in detail within the worksheet 'Commitments Register Explained' of the Commitments Register and summarised here:

1. Provides a unique ID for each proposed Commitment facilitating tracking and consultation through the development of the EIA (e.g. Co1);
2. Identifies the project element (Export Cable Corridor, Landfall etc), activity and stage that the Commitment relates;
3. Identifies the relevant onshore or offshore environmental receptor topic of relevance (e.g. benthic ecology); and
4. Provides reference to the relevant Requirements and documentation that secures the Commitment.

In line with the IEMA 'Guide to Shaping Quality Development' (2015), commitments are classified as:

- **Primary** (inherent) mitigation: an intrinsic part of the design that should be described in the design evolution narrative and included within the project description e.g. reducing development heights to reduce visual impact.
- **Secondary** (foreseeable) mitigation: those measures that require further activity to achieve the anticipated outcome, e.g. description of certain lighting limits that will be subject to submission of a detailed lighting layout as a condition of approval.
- **Tertiary** (inexorable): which will be required regardless of the EIA as it is imposed e.g. because of legislative requirements and/or standard sectoral practices (e.g. via a CoCP).

Hornsea Four has sought to consult widely on project Commitments at all stages including with members of the public. Worksheet 3 of the Commitments Register provides a log of all commitments that have been suggested by the public and details of how Hornsea Four has considered them.

Following consultation on the PEIR, Hornsea Four have developed a number of 'Enhancement' commitments. 'Enhancement' commitments are clearly marked as such within the Commitment Register.

The Commitments Register is provided as an interactive searchable spreadsheet allowing the user to identify Commitments relevant to a particular receptor, project phase and to ensure that the Commitment is adequately secured.

## STEP 3 - Application Register

The Application Register lists all documents submitted as part of Hornsea Four's application for Development Consent. A key function of the Application Register is to present the relevant documents that secure the Applicant's commitments.

The Application Register provides several separate functions which are summarised here:

1. Provides a log of all documents, reports, plans and protocols submitted by Hornsea Four to support the application for Development Consent; and
2. Provides a clear reference of the documentation provided to secure the Commitments set out in the Commitments Register (see Step 2).

The Application Register is a live document which will also be used during the project examination phase, providing a clear record of additional documentation submitted to support the examination and a clear audit trail of subsequent versions of application documents.



## STEP 4 - ES Chapter and Technical Report

The ES Chapters provide an assessment (simple or detailed) of the LSEs. The Technical Reports provide a description of the baseline environment to inform the assessment in the ES Chapter.

The ES Chapter is the key document delivering proportionality for Hornsea Four, when read in conjunction with the Impacts Register (see Step 1), Commitments Register (see Step 2) and Application Registers (see Step 3). The ES Chapter provides several separate functions which are summarised here:

1. Summarises the Planning and Policy context;
2. Summarises the key consultation;
3. Defines the methodology and approach taken to characterise the baseline environment;
4. Sets the project basis for assessment by:
  - Detailing which impacts are 'not considered in detail' as there is no LSE; and
  - Details the Commitments that have been adopted to reduce or eliminate LSE.
5. Defines the MDS for those impacts for which an assessment is presented in the ES Chapter;
6. Presents the EIA methodology for all potential impacts and any deviations from the standard approach to EIA as set out in [Volume A1, Chapter 5: EIA Methodology](#);
7. Presents the impact assessment and where there is potential for LSE any proposed mitigation (Commitments);
8. Presents an assessment of cumulative, inter-related and transboundary effects; and
9. Tabulates the conclusion and summary of the assessments and any mitigations.

**Impacts that concluded in no LSE (post-mitigation) at EIA Scoping or PEIR are not considered in detail in ES chapters, subject to stakeholder agreement and no material project or methodology changes. All non-LSE (post-mitigation) are presented within the Impacts Register (see Step 1).**

The Technical Report supports and evidences the ES Chapter by providing details of the baseline data.

## Appendix A

### Simple and Detailed Assessments

For each of the impacts assessed within the ES either a ‘simple’ or ‘detailed’ approach to assessment has been taken forward. The approach relevant to each impact is set out within the Impacts Register (see Step 1) and the respective ES Chapters (see Step 4).

No fixed or firm view exists on the differences between these two types of assessment within the EIA community. For some technical disciplines there will be an obvious distinction between simple and detailed assessment approaches with well understood methods increasing in complexity. However, distinction between approaches is not always clear. **Table 2** is provided to summarise the key principles which guided the determination of whether a ‘simple’ or ‘detailed’ assessment was undertaken. It is not prescriptive but sets out several characteristics of each type of assessment.

**Table 2. Overview of the characteristics of a simple or detailed assessment.**

Characteristic of a Simple Assessment	Characteristic of a Detailed Assessment
Used to determine the impact of a source-pathway-receptor process where there is high certainty of its existence, how it operates and realistic lack of alternatives.	Used to determine the impact of a complex process with multiple linkages, outcomes and alternatives where greater uncertainty exists in environmental variables, processes and outcomes.
<b>Type of data</b> A simple assessment is based on the assembly of data and information that is readily available or, possibly through non-intrusive site survey (e.g. walkover) to confirm conclusions of desk-based studies.	<b>Type of data</b> Detailed assessments may require intrusive data gathering or sampling of the environment.
<b>Type of assessment</b> Assessment will be via well-established qualitative methodology, which may make use or generalisations or via less detailed quantitative methods (e.g. simple spreadsheet modelling)	<b>Type of assessment</b> Assessment is likely to incorporate one or more of the following: a novel or new approach; quantitative modelling techniques, finitely argued qualitative discussion where complex arguments are postulated.
<b>Risk of impact on consent</b> Simple assessments can be applied where the outputs sufficiently establish confidently that the forecast environmental effect would not be a fundamental issue in the decision-making process.	<b>Risk of impact on consent</b> The objective is to gain an in-depth appreciation of the beneficial and adverse environmental consequences of the project and to inform project decisions, since they are expected to be key issues in whether the project proceeds in its proposed configuration. Relevant stakeholder and statutory environmental body consultations on likely significant effects are important early in the project development process.
<b>Assessment length/detail</b>	<b>Assessment length/detail</b>

<b>Characteristic of a Simple Assessment</b>	<b>Characteristic of a Detailed Assessment</b>
Detailing of the assessment in the reporting document can be restricted to a small number of paragraphs, tables and figures.	Detailing of the assessment in the reporting documentation will consist of a number of logically set out paragraphs, tables and figures that may show and discuss complex details. A technical report may accompany such an assessment containing further, even more detailed workings.