



Hornsea Project Four

Statement of Common Ground between Hornsea Project Four and The Wildlife Trusts

Deadline 1, Date: 08 March 2022

Document Reference: G1.19

Revision: 01

Prepared GoBe Consultants Ltd. 16 February 2021
Checked Hannah Towner-Roethe, 08 March 2022
Accepted David King, Orsted, 08 March 2022
Approved Julian Carolan, Orsted, 08 March 2022

G1.19
Revision 01

Revision History

Date	Version	Reason for issue
16/02/21	A	First draft for review.
08/03/22	01	Updated draft for submission at deadline 1.
	02	

Signatories

Signed	[Insert signature]
Name	
Position	
For	The Wildlife Trusts

Signed	[Insert signature]
Name	
Position	
For	Orsted Hornsea Project Four Limited

Table of Contents

1	Introduction	5
1.1	Reason for this document.....	5
1.2	Approach to SoCG.....	5
1.3	Application elements under The Wildlife Trust’s remit.....	6
1.4	Overview of Hornsea Four	6
2	Consultation	7
2.1	Summary of consultation with The Wildlife Trusts	7
3	Agreement Log	8
3.2	Marine Mammals.....	10

List of Tables

Table 1: Summary of pre-application consultation with The Wildlife Trusts.	7
Table 3: Agreement Log: Marine Mammals	10

Glossary

Term	Definition
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Projects (NSIP).
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, and connection to the electricity transmission network. Hereafter referred to as Hornsea Four.

Acronyms

Acronym	Definition
DMLs	Deemed Marine Licences
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement

Acronym	Definition
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LSE	Likely Significant Effect
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground

1 Introduction

1.1 Reason for this document

- 1.1.1.1 This Statement of Common Ground (SoCG) has been prepared between Orsted Hornsea Project Four Limited ('the Applicant') and The Wildlife Trusts to set out the areas of agreement and disagreement between the two parties in relation to the proposed Development Consent Order (DCO) application for the Hornsea Project Four offshore wind farm (hereafter referred to as 'Hornsea Four').
- 1.1.1.2 This SoCG covers all topics of relevance to The Wildlife Trusts in the marine environment seaward of Mean High Water Springs (MHWS).
- 1.1.1.3 The need for a SoCG between the Applicant and The Wildlife Trusts is set out within the Rule 6 letter issued by the Planning Inspectorate (PINS) on 24 January 2022.
- 1.1.1.4 Hornsea Four issued a draft SoCG to The Wildlife Trusts on 16 February 2021. Following receipt of the draft SoCG, due to resourcing issues, The Wildlife Trusts confirmed a preference to pursue a more strategic approach to address their overarching concerns. It is understood that their overarching strategic concerns relate to underwater noise management, benthic ecology, mitigation, compensation and monitoring.
- 1.1.1.5 Hornsea Four's position is that all strategic concerns are also Hornsea Four specific concerns. It is therefore Hornsea Four's intention to work with the wider Ørsted group and The Wildlife Trusts to draft a SoCG from a strategic perspective utilising the attached draft SoCG template due to the clear overlap between strategic concerns and Hornsea Four concerns. An updated SoCG will hopefully be submitted into deadline 3. This will allow the parties further time to collaborate.

1.2 Approach to SoCG

- 1.2.1.1 The Applicant took the decision at an early stage to adopt a proportionate approach to Environmental Impact Assessment (EIA) for Hornsea Four which is detailed and integrated throughout the application for development consent. The Impacts Register ([Volume A4, Annex 5.1: Impacts Register](#)) is a key tool that details all potential impacts identified for Hornsea Four and sets the scope of the EIA at various stages of the project (Scoping, Preliminary Environmental Information Report (PEIR) and DCO). In line with the Applicant's approach to proportionality, only Likely Significant Effects (LSE) are included within the individual topic assessments of the Environmental Statement (ES).
- 1.2.1.2 The structure of this SoCG is as follows:
- [Section 1](#): Introduction;
 - [Section 2](#): Consultation;
 - [Section 3](#): Agreement Log; and
 - [Section 1.1](#): Summary.

1.3 Application elements under The Wildlife Trust's remit

1.3.1.1 The elements of Hornsea Four which may affect the interests of The Wildlife Trusts are Work Numbers 1 to 5, covering the intertidal (seaward of MHWS) and offshore works. These are detailed in Part 1 (Authorised Development) of Schedule 1 (Authorised Project) of the draft DCO ([Volume C1.1: Draft DCO](#)).

1.3.1.2 This SoCG covers technical topics of the DCO application of relevance to The Wildlife Trusts comprising:

- Draft DCO and Deemed Marine Licences;
- Marine Mammals; and
- SPA compensation
- Benthic and Intertidal Ecology.

1.4 Overview of Hornsea Four

1.4.1.1 Hornsea Four is an offshore wind farm which will be located approximately 65 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 and consists of:

- **Hornsea Four array area:** This is where the offshore wind generating station will be located which will include the turbines, array cables, offshore accommodation platforms and a range of offshore substations as well as offshore interconnector cables and export cables;
- **Hornsea Four offshore export cable corridor:** This is where the permanent offshore electrical infrastructure (offshore export cables, as well as the High Voltage Alternating Current (HVAC) booster station (if required), will be located;
- **Hornsea Four intertidal area:** This is the area between MHWS and Mean Low Water Springs (MLWS) through which all of the offshore export cables will be installed;
- **Hornsea Four onshore export cable corridor:** This is where the permanent onshore electrical cable infrastructure will be located; and
- **Hornsea Four onshore substation including energy balancing infrastructure:** This is where the permanent onshore electrical substation infrastructure (onshore High Voltage Direct Current (HVDC) converter/HVAC substation, energy balancing infrastructure and connections to the National Grid) will be located.

2 Consultation

2.1 Summary of consultation with The Wildlife Trusts

2.1.1.1 **Table 1** below summarises the consultation that the Applicant has undertaken with The Wildlife Trusts during the pre-application phase for each relevant component of the application (as identified in paragraph 1.3.1.1) seaward of MHWS.

Table 1: Summary of pre-application consultation with The Wildlife Trusts.

Date	Form of consultation	Statutory/Non Statutory	Summary
13/09/2018	Meeting	Non Statutory	Hornsea Four Evidence Plan Technical Panel Meeting 1 and 2 <ul style="list-style-type: none"> • Introduction to the project; • Introduction to the Technical Panel, the EP process and the proportionate approach to EIA; and • Discussion on key position papers.
14/01/2019	Meeting	Non Statutory	Marine Mammals Technical Panel Meeting 3 <ul style="list-style-type: none"> • Project updates; • Review of responses received during the Scoping process; and • Discuss the next steps in relation to seeking agreement with stakeholders on the data and information to be included in the PEIR and ES.
30/04/2019	Meeting	Non Statutory	Marine Mammals Technical Panel Meeting 4 <ul style="list-style-type: none"> • Project updates; • The proportionate approach to EIA; • Review of responses received on the Scoping Report; • Comments on the Noise modelling methodology; • RIAA; and • Biodiversity net gain.
26/06/2019	Meeting	Non Statutory	Marine Mammals Technical Panel Meeting 5 <ul style="list-style-type: none"> • Project updates; • Discuss the scope of the PEIR and ES; • Review of the impacts register; and • Discussion on next steps to seeking agreement with stakeholders on the data and information to be included in the PEIR and ES.
06/11/2019	Meeting	Non Statutory	Marine Mammals Technical Panel Meeting 6 <ul style="list-style-type: none"> • Data collection and description of the baseline environment and the inclusion of bottlenose dolphin in the baseline; • Impact assessment methodology in response to Section 42 comments regarding simultaneous piling,

Date	Form of consultation	Statutory/Non Statutory	Summary
			ramp-up hammer energy scenarios and Unexploded Ordnance (UXO); and <ul style="list-style-type: none"> • RIAA.
17/12/2019	Meeting	Non Statutory	Marine Mammals Technical Panel Meeting 7 <ul style="list-style-type: none"> • Project and programme updates; and • Updates to the Impacts Register.
04/06/2020	Meeting	Non Statutory	Marine Mammals Technical Panel Meeting 8 <ul style="list-style-type: none"> • Discussion on the draft ES documents (Technical Report, Outline Site Integrity Plan and Outline Marine Mammal Mitigation Protocol) that were provided for review prior to the meeting; • Presentation of updated HRA screening for marine mammals; • Discussion on the approach to the UXO assessment; and • Presentation of grey seal information that will form part of the RIAA.
29/07/2021	Meeting	Non Statutory	Evidence Plan Steering Group Meeting 7 <ul style="list-style-type: none"> • Project updates on change to DCO application submission programme, SoCGs and non-statutory compensation consultation. • Overview of geophysical and geotechnical investigations.
03/08/2021	Workshop	Non Statutory	Compensation Workshop 4

3 Agreement Log

3.1.1.1 The following sections of this SoCG set out the level of agreement between all parties for each relevant component of the application (as identified in [paragraph 1.3.1.1](#)) seaward of MHWS.

3.1.1.2 In order to easily identify whether a matter is 'agreed', 'not agreed' or an 'ongoing point of discussion', the colour coding system set out in [Table 2](#) below is used within the 'position' column of the following sections of this document.

Table 2: Position Status Key.

Position Status	Position Colour Coding
Agreed The matter is considered to be agreed between all parties	Agreed
Not Agreed – no material impact	Not Agreed – no material impact

Position Status	Position Colour Coding
<p>The matter is not agreed between the parties, however the outcome of the approach taken by either the Applicant, the HFIG or the NFFO is not considered to result in a material impact to the assessment conclusions.</p>	
<p>Not Agreed – material impact The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant, the HFIG or the NFFO is considered to result in a materially different impact to the assessment conclusions.</p>	Not Agreed – material impact
<p>Ongoing point of discussion The matter is neither ‘agreed’ nor ‘not agreed’ and is a matter where further discussion is required between the parties (e.g. where documents are yet to be shared with the HFIG and/or the NFFO).</p>	Ongoing point of discussion

3.2 Marine Mammals

Table 3: Agreement Log: Marine Mammals

ID	Hornsea Four Position	TWT Position	Position Summary
<i>EIA – Data Collection and Description of Baseline Environment</i>			
TWT-001	Existing and site-specific survey data is sufficient to inform the assessment.	See OFF-MM-1.3.	Agreed
<i>EIA – Impact Assessment Methodology</i>			
TWT-002	The impact assessment methodologies used for the EIA (excluding UXO assessment) provide an appropriate approach to assessing potential impacts of Hornsea Four.		Ongoing point of discussion
TWT-003	The impact assessment methodologies used for the UXO assessment provide an appropriate approach to assessing potential impacts of Hornsea Four.	TWT disagree with the approach to the UXO assessment and consider that the UXO clearance and associated mitigation must be included in the DCO Application (OFF-MM-2.9).	Not agreed
TWT-004	The maximum design scenario presented in the assessment is appropriate.		Ongoing point of discussion
<i>EIA - Assessment Conclusions</i>			
TWT-005	The conclusions of the assessment of impacts (project alone) for construction (excluding UXO clearance), operation and decommissioning are agreed.		Ongoing point of discussion
TWT-006	The conclusions of the assessment of UXO clearance impacts (project alone) for construction are agreed.	See OFF-MM-2.9.	Not agreed
TWT-007	The conclusions of the assessment of cumulative impacts are agreed.		Ongoing point of discussion

ID	Hornsea Four Position	TWT Position	Position Summary
<i>EIA - Mitigation</i>			
TWT-008	Given the impacts of the project, the proposed mitigation outlined in F2.5: Outline Marine Mammal Mitigation Protocol and F2.11: Outline Site Integrity Plan and the Hornsea Four commitments in Volume A4, Annex 5.2: Commitments Register is appropriate.		Ongoing point of discussion
<i>Report to Inform Appropriate Assessment</i>			
TWT-009	Existing and site-specific survey data is sufficient to inform the RIAA.		Ongoing point of discussion
TWT-010	The impact assessment methodologies used for the RIAA provide an appropriate approach to assessing potential impacts of Hornsea Four.		Ongoing point of discussion
TWT-011	Project-alone assessment: The conclusions of the assessment of impacts for construction, operation and decommissioning are agreed.		Ongoing point of discussion
TWT-012	In-combination assessment: The conclusions of the in-combination assessment are agreed.		Ongoing point of discussion

ID	Hornsea Four Position	TWT Position	Position Summary
<i>Wording of DCO Requirements and Deemed Marine Licence (DML) Condition(s)</i>			
TWT-013	<p>The wording of the following requirements and conditions pertaining to marine mammals are appropriate and adequate:</p> <p><u>DCO Schedules 11 & 12, Part 2 - Condition 13(1)(g): Marine Mammal Mitigation Protocol</u></p> <p>“In the event that driven or part-driven pile foundations are proposed to be used, a piling marine mammal mitigation protocol, in accordance with the outline marine mammal mitigation protocol, the intention of which is to prevent injury to marine mammals, including details of soft start procedures with specified duration periods following current best practice as advised by the relevant statutory nature conservation bodies.”</p> <p><u>DCO Schedules 11 & 12, Part 2 - Condition 13(1)(j): Site Integrity Plan</u></p> <p>“In the event that driven or part-driven pile foundations are proposed to be used, the licensed activities, or any stage of those activities must not commence until a site integrity plan which accords with the principles set out in the outline Hornsea Four Site Integrity Plan has been submitted to the MMO and the MMO is satisfied that the plan provides such mitigation as is necessary to avoid adversely affecting the integrity (within the meaning of the 2017 Regulations) of a relevant site, to the extent that harbour porpoise are a protected feature of that site.”</p> <p><u>DCO Schedule 11, Part 2, Condition 18(2)(a) and DCO Schedule 12, Part 2, Condition 18(2)(b): Construction Monitoring</u></p> <p>“Where piled foundations are to be employed, unless otherwise agreed by the MMO in writing, details of proposed monitoring of the noise generated by the installation of the first six monopile foundations to be constructed collectively under this licence and the licence granted under Schedule 11/Schedule 12 of the Order.”</p>		<p>Ongoing point of discussion</p>
<i>Other Matters As Required</i>			
TWT-014			

