



# Hornsea Project Four

## Statement of Common Ground between Hornsea Project Four and Natural England: Offshore and Intertidal Ornithology

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## Revision History

| Date       | Version | Reason for issue                         |
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|            |         |  |

## Signatories

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## 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. |
| Orsted Hornsea Project Four Ltd         | The Applicant for the proposed Hornsea Project Four Offshore Wind Farm Development Consent Order (DCO).   |

## Acronyms

| Acronym | Definition                                    |
|---------|---|
| AEol    | Adverse Effect on Integrity                   |
| CRM     | Collision Risk Modelling                      |
| DMLs    | Deemed Marine Licences                        |
| DCO     | Development Consent Order                     |
| ECC     | Export Cable Corridor                         |
| EIA     | <i>Environmental Impact Assessment</i>        |
| EP      | <i>Evidence Plan</i>                          |
| ES      | Environmental Statement                       |
| FFC     | Flamborough and Filey Coast                   |
| HRA     | Habitats Regulations Assessment               |
| HVAC    | High Voltage Alternating Current              |
| HVDC    | High Voltage Direct Current                   |
| LAT     | Lowest Astronomical Tide                      |
| LSE     | Likely Significant Effect                     |
| MDS     | Maximum Design Scenario                       |
| MHWS    | Mean High Water Springs                       |
| MLWS    | Mean Low Water Springs                        |
| MMO     | Marine Management Organisation                |
| NSIP    | Nationally Significant Infrastructure Project |
| PEIR    | Preliminary Environmental Information Report  |
| PINS    | The Planning Inspectorate                     |
| PVA     | Population Viability Analysis                 |
| RIAA    | Report to Inform Appropriate Assessment       |
| RR      | Relevant Representation                       |
| SNCB    | Statutory Nature Conservation Body            |

| Acronym | Definition                 |
|---------|----------------------------|
| SoCG    | Statement of Common Ground |
| SPA     | Special Protection Area    |

## 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 Natural England 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 offshore and intertidal ornithology matters only. Separate SoCGs have been prepared with Natural England on further relevant topics as set out in [Table 1](#) below.

**Table 1: Summary of all SoCGs sought with Natural England.**

| SoCG's sought with Natural England   | Document Reference |
|--|--------------------|
| SoCG between Hornsea Project Four and Natural England: Other Offshore Matters      | G1.10              |
| SoCG between Hornsea Project Four and Natural England: Onshore Matters             | F3.5               |
| SoCG between Hornsea Project Four and Natural England: Derogation and Compensation | F3.4               |

- 1.1.1.3 The need for a SoCG between the Applicant and Natural England is set out within the Rule 6 letter that was issued by the Planning Inspectorate (PINS) on 24<sup>th</sup> January 2022.
- 1.1.1.4 Following detailed discussions undertaken through the Evidence Plan (EP) Process, the Applicant and Natural England have sought to progress a SoCG. It is the intention that this document will provide the PINS with a clear overview of the level of common ground between both parties at Deadline 1 of the Hornsea Four DCO Examination. This document will facilitate further discussions between the Applicant and Natural England and the SoCG will be updated as discussions progress during the Hornsea Four DCO examination.

### 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 DCO application. The Impacts Register (see [Volume A4: Annex 5.1](#)) 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 Applicants approach to proportionality, only Likely Significant Effects (LSE) are included within the individual topic assessments within the relevant chapters of the Environmental Statement (ES). This SoCG seeks to set out the agreements reached with Natural England on the proportionate approach to EIA in addition to other matters such as (but not limited to) the adequacy of baseline data collection, the assessment methodology and conclusions reached ([Section 3.7](#)).
- 1.2.1.2 The structure of this SoCG is as follows:

- [Section 1](#): Introduction;

- [Section 2](#): Consultation;
- [Section 3](#): Agreement Logs; and
- [Section 4](#): Summary.

## 1.3 Application elements under Natural England’s remit

1.3.1.1 The elements of Hornsea Four which may affect the interests of Natural England are Work Numbers 1 to 10, covering both onshore 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](#)).

## 1.4 Overview of Hornsea Four

1.4.1.1 Hornsea Four is an offshore wind farm which 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 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 Mean High Water Springs (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 Natural England

2.1.1.1 [Table 2](#) below summarises the consultation that the Applicant has undertaken with Natural England relevant to offshore and intertidal ornithology during the pre-application phase.

**Table 2: Summary of pre-application consultation with Natural England.**

| Date       | Form of consultation | Statutory/Non Statutory | Summary                            |
|------------|----------------------|-------------------------|------------------------------------|
| 07/08/2018 | Meeting              | Non Statutory           | <b>EP Steering Group Meeting 1</b> |

| Date       | Form of consultation | Statutory/Non Statutory | Summary  |
|------------|----------------------|-------------------------|--|
|            |                      |                         | Introduction to the proposed project and project teams and summary, reflections, agreement and sign off on the Terms of Reference.   |
| 13/09/2018 | Meeting              | Non Statutory           | <b>Offshore and Intertidal Ornithology Technical Panel Meeting 1</b><br>Introduction to the project; introduction to the Technical Panel, the EEP process and the proportionate approach to EIA; and discussion on key position papers.  |
| 15/10/2018 | Consultation         | Statutory               | <b>Hornsea Four Scoping Report</b>   |
| 26/11/2018 | Consultation         | Statutory               | <b>Scoping Opinion</b><br>Consultation response on the Scoping Report from Natural England.  |
| 12/12/2018 | Meeting              | Non Statutory           | <b>EP Steering Group Meeting 2</b><br>Update on the project development activities. Review of the Scoping Opinion responses and discussion on the next steps in relation to seeking agreement with key stakeholders on the data to be included in the PEIR and ES.   |
| 17/12/2018 | Meeting              | Non Statutory           | <b>Offshore and Intertidal Ornithology Technical Panel Meeting 2</b><br>Project updates; review of scoping responses; and discussion of next steps in relation to seeking agreement with stakeholders on the data to be included in the PEIR and ES.   |
| 07/02/2019 | Meeting              | Non Statutory           | <b>Developable Area Approach (DAA) 1</b><br>Presentation/discussion on Hornsea Four's development aspirations and discussion on ornithological constraints and potential reduction of the Agreement for Lease (AfL) area in line with key potential consent risks.   |
| 10/04/2019 | Meeting              | Non Statutory           | <b>Offshore and Intertidal Ornithology Technical Panel Meeting 3</b><br>Project updates; discussion on the proportionate approach to EIA; review of responses received through the Scoping Opinion and Habitats Regulations Assessment (HRA) Screening Report consultation; discussion on next steps in relation to seeking agreement with key stakeholders on the data sources for baseline characterisation; and discussion on the next steps to agree appropriate methods for estimating potential impacts for the PEIR and ES. |
| 11/06/2019 | Meeting              | Non Statutory           | <b>Offshore and Intertidal Ornithology Technical Panel Meeting 4</b><br>Project updates; discussion of the scope of the PEIR and ES chapters; further discussion relating to agreement of baseline data and assessment methodology for Collision Risk Modelling (CRM) and displacement analysis; and summary of key areas of agreement and disagreement between the Applicant and Technical Panel members.   |



| Date       | Form of consultation  | Statutory/Non Statutory | Summary  |
|------------|-----------------------|-------------------------|--|
| 25/06/2019 | Meeting               | Non Statutory           | <b>EP Steering Group Meeting 3</b><br>Update on project information, local information events, onshore and offshore Technical Panels and non-Evidence Plan consultation.   |
| 13/08/2019 | Consultation          | Statutory               | <b>Hornsea Four PEIR</b><br>Published for statutory Section 42 consultation.   |
| 23/09/2019 | Consultation response | Statutory               | <b>Natural England letter response to PEIR</b><br>Providing comments on the PEIR.  |
| 29/10/2019 | Meeting               | Non Statutory           | <b>Offshore and Intertidal Ornithology Technical Panel Meeting 5</b><br>Project updates and updates to the project programme; review of Section 42 responses; next steps to agree the key species and assessment methods for the assessment of displacement and disturbance; and discussion on Population Viability Analysis (PVA) tools.  |
| 06/11/2019 | Meeting               | Non Statutory           | <b>EP Steering Group Meeting 4</b><br>Update on project information and overview of the programme to DCO application. Update to Terms of Reference to reflect Historic England joining Steering Group. Updates to the Impacts Register and Commitments Register. Discussion on the Draft DCO and Deemed Marine Licences (DMLs).  |
| 12/11/2019 | Meeting               | Non Statutory           | <b>Offshore and Intertidal Ornithology Technical Panel Meeting 6</b><br>Review of impact assessment methodology including values used to define value, sensitivity and importance, and the use of a matrix approach to determine significance; approach to the cumulative assessment including key data sources for displacement analysis and CRM; and discussion on barrier effects and approach to the lighting impact assessment. |
| 26/11/2019 | Meeting               | Non Statutory           | <b>Offshore and Intertidal Ornithology Technical Panel Meeting 7</b><br>Discussion on designated sites screened in for assessment, and defining the designated features and assemblages of those sites screened in for assessment; and updates on species-specific work undertaken to inform the EIA.  |
| 27/02/2020 | Meeting               | Non Statutory           | <b>Offshore and Intertidal Ornithology Technical Panel Meeting 8</b><br>Project updates; discussions over additional camera analysis, CRM, cumulative effects assessment and species densities; and updates to foraging ranges based on the Woodward et al (2019) paper.   |
| 16/03/2020 | Meeting               | Non Statutory           | <b>EP Steering Group Meeting 5</b><br>Review of draft ES documents by the relevant Technical Panels. Overview of planned seabed investigations. Project updates and updates to the Impacts Register, Commitments Register, Draft DCO and DMLs.   |
| 21/04/2020 | Meeting               | Non Statutory           | <b>Offshore and Intertidal Ornithology Technical Panel Meeting 9</b>   |

| Date       | Form of consultation | Statutory/Non Statutory | Summary   |
|------------|----------------------|-------------------------|---|
|            |                      |                         | Project updates and programme; additional camera analysis; species-specific data to inform populations and densities; and data sources for intertidal ornithology.  |
| 09/06/2020 | Meeting              | Non Statutory           | <p><b>Offshore and Intertidal Ornithology Technical Panel Meeting 10</b></p> <p>Project updates, programme and derogation update; CRM and PVA assessments; and productivity , Mortality Rates and Seabird Populations.</p>  |
| 15/06/2020 | Meeting              | Non Statutory           | <p><b>Offshore and Intertidal Ornithology Technical Panel Meeting 11</b></p> <p>Presentation of revised offshore ornithology data, following changes to the Hornsea Four Order Limits; presentation of results from CRM and PVA workstreams; discussion on other ongoing offshore wind farm examinations; and apportionment methodology for the Report to Inform Appropriate Assessment (RIAA).</p> |
| 19/10/2020 | Meeting              | Non Statutory           | <p><b>Offshore and Intertidal Ornithology Technical Panel Meeting 12</b></p> <p>Discussion on CRM and displacement assessments; discussion on the potential for Adverse Effect on Integrity (AEoI) with respect to gannet and razorbill; and discussion on securing agreement on the ornithological baseline data characterisation.</p>   |
| 21/10/2020 | Meeting              | Non Statutory           | <p><b>EP Steering Group Meeting 6</b></p> <p>Review of draft ES documents by the relevant Technical Panels. Project updates on change to Hornsea Four Order Limits. DCO application submission programme, SoCGs and Project Seabird and Derogation. Overview of Design Vision Statement and planned seabed investigations.</p>  |
| 23/11/2020 | Meeting              | Non Statutory           | <p><b>Offshore and Intertidal Ornithology Technical Panel Meeting 13</b></p> <p>Review of Baseline and MRSea ES deliverables; discussion on the cumulative and in-combination totals for other offshore wind farms; and presentation of updated PVA modelling results.</p>  |
| 04/03/2021 | Meeting              | Non Statutory           | <p><b>Offshore and Intertidal Ornithology Technical Panel Meeting 14</b></p> <p>Project updates including the reduction in the developable area and the change to the project programme; discussion on the auk habituation and displacement report and associated feedback; discussion on guillemot conclusions on AEoI; and discussion on potential mitigation options.</p>                        |
| 15/03/2021 | Meeting              | Non Statutory           | <p><b>Developable Area Approach (DAA) 3</b></p> <p>Further site reduction to reduce the potential impacts upon the guillemot and razorbill. The AfL reduction was subsequently formalised as an Order limits change.</p>  |

| Date       | Form of consultation | Statutory/Non Statutory | Summary   |
|------------|----------------------|-------------------------|---|
| 29/07/2021 | Meeting              | Non Statutory           | <b>EP Steering Group Meeting 7</b><br>Project updates on change to DCO application submission programme, SoCGs and non-statutory compensation consultation. Overview of geophysical and geotechnical investigations.  |
| 17/08/2021 | Meeting              | Non Statutory           | <b>Outline Marine Monitoring Plan Meeting</b><br>To discuss consultee comments on the Outline Marine Monitoring Plan document provided for consultation to Natural England and the Marine Management Organisation (MMO) in consultation with Cefas.   |
| 18/08/2021 | Meeting              | Non Statutory           | <b>Offshore and Intertidal Ornithology Technical Panel Meeting 15</b><br>Project updates including the reduction in the developable area and the change to the project programme; discussion on the auk habituation and displacement report and associated feedback; discussion on guillemot conclusions on AEol; and discussion on potential mitigation options. |
| 17/02/2022 | Meeting              | Non Statutory           | <b>Hornsea Four Ornithology and Compensation SOCG meeting</b><br>Project update on MRSea baseline comments received from CREEM and Natural England in Relevant Representation and Written Representation.   |
| 20/04/2022 | Meeting              | Non Statutory           | <b>MRSea Baseline Sensitivity – Gannet</b><br>Meeting to present the agreed MRSea methodology and results for the updated MRSea baseline characterisation model outputs for gannet.   |

## 3 Agreement Logs

### 3.1 Overview

3.1.1.1 The following sections of this SoCG set out the level of agreement between the 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

3.1.1.3 **Table 3** below is used within the 'position' column of the following sections of this document.

**Table 3: Position Status Key.**

| Position Status  | Position Colour Coding          |
|--|---------------------------------|
| <b>Agreed</b><br>The matter is considered to be agreed between the parties | Agreed                          |
| <b>Not Agreed – no material impact</b>                                     | 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 or Natural England is not considered to result in a material impact to the assessment conclusions.</p>   |                                     |
| <p><b>Not Agreed – material impact</b><br/>                     The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or Natural England is considered to result in a materially different impact to the assessment conclusions.</p> | <p>Not Agreed – material impact</p> |
| <p><b>Ongoing point of discussion</b><br/>                     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 Natural England).</p>                              | <p>Ongoing point of discussion</p>  |

## 3.2 Offshore and Intertidal Ornithology

Table 4: Agreement Log – Offshore and Intertidal Ornithology.

| ID                                     | Topic                | Hornsea Fours Position   | Natural England’s Position   | Position Summary                              |
|--|----------------------|--|--|---|
| <b>Environmental Impact Assessment</b> |                      |  |  |   |
| NE-ORN-OFF-01                          | Baseline Environment | Sufficient survey data (24 months of site-specific aerial digital survey data) has been collected to define the baseline to inform the assessment.   | Sufficient survey data (24 months of site-specific aerial digital survey data) has been collected to define the baseline to inform the assessment. | Agreed<br>Evidence Plan (EP) Log: OFF-ORN-1.8 |
| NE-ORN-OFF-02                          |                      | The reliance of aerial digital survey data from two cameras (approximately 10% coverage of the survey area) is a sufficient survey dataset that is appropriate to inform the assessment.   | Natural England agree that using 2 cameras rather than 4 does not significantly change the results of baseline data for this Project.              | Agreed<br>EP Log: OFF-ORN-1.19                |
| NE-ORN-OFF-03                          |                      | The aerial digital video survey methodology implemented for the offshore ornithological surveys is appropriate for characterising the baseline.  | The aerial digital video survey methodology implemented for the offshore ornithological surveys is appropriate for characterising the baseline.    | Agreed<br>EP Log: OFF-ORN-1.8                 |
| NE-ORN-OFF-04                          |                      | The methods and techniques used to analyse offshore ornithological data are appropriate for characterising bird distributions and estimating populations, attribution and apportionment of unidentified birds, correction of availability bias and consideration of biological seasons   | Natural England have outstanding concerns with the methods used to analyse the baseline data.  | Ongoing point of discussion                   |
| NE-ORN-OFF-05                          |                      | Through consultation with Natural England prior to the PEIR and following their Section 42 responses a method was developed and agreed to estimate red-throated diver densities within the Hornsea Four Export Cable Corridor. This included a ‘benchmark’ approach being applied to seabird densities from the predicted density maps and the underlying dataset of the SeaMaST | Natural England agree with the approach applied to estimate red-throated diver densities.  | Agreed<br>EP Log: OFF-ORN-1.11 and 2.25       |

| ID                   | Topic                            | Hornsea Fours Position   | Natural England's Position  | Position Summary               |
|----------------------|----------------------------------|--|---|--------------------------------|
|                      |                                  | project (Seabird Mapping and Sensitivity Tool) described in Bradbury et al. (2014) as the most appropriate dataset for this purpose  |   |                                |
| <b>NE-ORN-OFF-06</b> |                                  | The little gull population estimate <sup>1</sup> detailed in Appendix C of <b>Volume A5, Annex 5.5: Offshore Ornithology Migratory Birds Report</b> is appropriate to inform the assessment.           | The little gull population estimate <sup>2</sup> detailed in Appendix C of <b>Volume A5, Annex 5.5: Offshore Ornithology Migratory Birds Report</b> is appropriate to inform the assessment.  | Agreed<br>EP Log: OFF-ORN-1.17 |
| <b>NE-ORN-OFF-07</b> |                                  | The data sources detailed in Table 1 of <b>Volume A5, Annex 5.1: Offshore and Intertidal Ornithology Baseline Characterisation Report</b> are appropriate to inform the assessment.                    | Natural England consider the data sources outlined to be appropriate.   | Agreed<br>EP Log: OFF-ORN-1.18 |
| <b>NE-ORN-OFF-08</b> |                                  | The migratory seabird and non-seabird population estimates detailed in Appendix A of <b>Volume A5, Annex 5.5: Offshore Ornithology Migratory Birds Report</b> is appropriate to inform the assessment. |   |                                |
| <b>NE-ORN-OFF-08</b> | Assessment Methodology (General) | The list of offshore and intertidal ornithology receptors and the potential impacts on them assessed are appropriate for all phases of development.  | Natural England generally agree with the impact pathways identified and assessed, but do not consider that indirect and barrier effects have been adequately assessed for some relevant receptors (gannet, kittiwake, guillemot, razorbill and puffin). | Ongoing point of discussion    |
| <b>NE-ORN-OFF-09</b> |                                  | The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of Hornsea Four.   | Natural England have outstanding concerns relating to the collision risk modelling and displacement impact assessment methodologies.  | Ongoing point of discussion    |

<sup>1</sup>Proposed estimate of the autumn migration BDMPS for use in assessments of OWFs occurring in English waters of the North Sea is 30,500 individuals. Note that in the manner of Furness (2015) only a single value is given.

<sup>2</sup>Proposed estimate of the autumn migration BDMPS for use in assessments of OWFs occurring in English waters of the North Sea is 30,500 individuals. Note that in the manner of Furness (2015) only a single value is given.

| ID            | Topic   | Hornsea Fours Position  | Natural England's Position   | Position Summary                       |
|---------------|---|---|--|--|
| NE-ORN-OFF-10 |   | The maximum design scenarios (MDS) for impacts on offshore and intertidal receptors is clearly defined and are representative of the likely Worst Case Scenarios (WCS) and appropriate to be used in the assessment.  | Natural England consider the maximum design scenarios for impacts on offshore and intertidal ornithology receptors to be clearly defined and are representative of the likely Worst Case Scenarios (WCS) to be used in the assessment.   | Agreed<br>Relevant Representation (RR) |
| NE-ORN-OFF-11 |   | The characterisation of receptor sensitivity is appropriate.  | The characterisation of receptor sensitivity is appropriate  | Agreed                                 |
| NE-ORN-OFF-12 | Assessment Methodology (Construction Impacts) | The methods of assessing disturbance and displacement during construction activities within the array area and 2 km buffer (being treated as half the predicted values of the operational and maintenance phase) is appropriate for the purposes of assessing the risks of displacement of gannet, guillemot, razorbill and puffin in relation to Hornsea Four. | Natural England have outstanding concerns with how this methodology has been applied.  | Not agreed – Material Impact           |
| NE-ORN-OFF-13 |   | The methods of assessing disturbance and displacement during construction activities within the ECC (associated with export cable laying), within an area out to 2 km from cable laying vessel, is appropriate for the purposes of assessing the risks of displacement of red-throated diver in relation to Hornsea Four.                                       | Based on further submissions at Deadline 2, the methods of assessing disturbance and displacement during construction activities within the ECC (associated with export cable laying), within an area out to 2 km from cable laying vessel, are appropriate for the purposes of assessing the risks of displacement of red-throated diver in relation to Hornsea Four. | Agreed                                 |
| NE-ORN-OFF-14 | Assessment Methodology (Operation Impacts)    | The methods of assessing disturbance and displacement during the operation and maintenance phase for gannet of between 60-80% is appropriate for the purposes of assessing the risks in relation to Hornsea Four.   | Natural England agrees that a displacement rate of 60-80% should be assessed for gannet. We consider this should be used and/or presented for all seasons, which is not the Applicant's chosen approach.   | Not agreed – Material impact           |
| NE-ORN-OFF-15 |   | The methods of assessing displacement consequent mortality during the operation and   | Natural England consider a mortality rate of 1-10% should be used for displacement assessments.  | Not agreed – Material Impact           |

| ID            | Topic | Hornsea Fours Position  | Natural England's Position   | Position Summary             |
|---------------|-------|---|--|------------------------------|
|               |       | maintenance phase for gannet of up to 1% is appropriate for the purposes of assessing the risks in relation to Hornsea Four.  |  |                              |
| NE-ORN-OFF-16 |       | The methods of assessing disturbance and displacement during the operation and maintenance phase for auk species (guillemot, razorbill and puffin) of 50% is appropriate for the purposes of assessing the risks in relation to Hornsea Four.           | Natural England do not agree with the use of a 50% displacement rate for auks. We advise that 30-70% is used.  | Not agreed – Material impact |
| NE-ORN-OFF-17 |       | The methods of assessing displacement consequent mortality during the operation and maintenance phase for auk species (guillemot, razorbill and puffin) of up to 1% is appropriate for the purposes of assessing the risks in relation to Hornsea Four. | Natural England do not agree with the use of a 1% mortality rate for auks. We advise that 1-10% is used.   | Not agreed – Material impact |
| NE-ORN-OFF-18 |       | The methods of assessing collision risk for key seabirds including gannet, kittiwake, great black-backed gull, lesser black-backed gull and herring gull are appropriate and have been applied accurately.  | Natural England have some outstanding concerns regarding the application of the collision risk methodology.  | Ongoing point of discussion  |
| NE-ORN-OFF-19 |       | The methods of assessing collision risk on migratory seabirds and non-seabirds are appropriate and have been applied accurately.  | The methods of assessing collision risk on migratory seabirds and non-seabirds are appropriate and have been applied accurately.                                     | Agreed                       |
| NE-ORN-OFF-20 |       | The methods of assessing indirect effects are appropriate and have been applied accurately.   | Natural England do not consider that indirect effects have been adequately assessed in relation to prey availability.  | Ongoing point of discussion  |
| NE-ORN-OFF-21 |       | The methods of assessing barrier effects are appropriate and have been applied accurately.  | Natural England do not consider that barrier effects have been adequately assessed for some relevant receptors (gannet, kittiwake, guillemot, razorbill and puffin). | Ongoing point of discussion  |



| ID            | Topic                                       | Hornsea Fours Position  | Natural England's Position  | Position Summary            |
|---------------|---|---|---|-----------------------------|
| NE-ORN-OFF-22 | Assessment Methodology (Cumulative Impacts) | The plans and projects considered within the cumulative assessment are appropriate.   | Natural England agrees with the projects included within the cumulative assessment.   | Agreed                      |
| NE-ORN-OFF-23 | Assessment of cumulative displacement       | The abundance (displacement) values for all other plans and projects considered within the cumulative displacement assessment are appropriate for gannet and auk species (razorbill, guillemot and puffin).                           | Natural England note that some of the impact values do not match those currently advised by Natural England and that some of the total impacts presented do not accurately reflect the sum of the constituent projects. | Ongoing point of discussion |
| NE-ORN-OFF-24 | Assessment of cumulative collision risk     | The collision mortality values for all other plans and projects considered within the cumulative collision risk assessment are appropriate for gannet, kittiwake, great black-backed gull, lesser black-backed gull and herring gull. | Natural England note that some of the impact values do not match those currently advised by Natural England and that some of the total impacts presented do not accurately reflect the sum of the constituent projects. | Ongoing point of discussion |
| NE-ORN-OFF-25 | Outcomes of the EIA                         | The conclusions of the assessment of impacts for construction and decommissioning phases are appropriate and agreed that no impacts of greater than minor adverse significance are predicted.   | Natural England cannot confidently comment on conclusions drawn from the assessment due to outstanding concerns with the baseline data.   | Ongoing point of discussion |
| NE-ORN-OFF-26 |   | The conclusions of the assessment of impacts for operation and maintenance phases are appropriate and agreed that no impacts of greater than minor adverse significance are predicted.  | Natural England cannot confidently comment on conclusions drawn from the assessment due to outstanding concerns with the baseline data.   | Ongoing point of discussion |
| NE-ORN-OFF-27 |   | The conclusions of the assessment of cumulative construction and decommissioning impacts appropriate and agreed that no impacts of greater than minor adverse significance are predicted.   | Natural England cannot confidently comment on conclusions drawn from the assessment due to outstanding concerns with the baseline data.   | Ongoing point of discussion |

| ID   | Topic                | Hornsea Fours Position   | Natural England's Position   | Position Summary            |
|--|----------------------|--|--|-----------------------------|
| NE-ORN-OFF-28                                  |                      | The conclusions of the assessment of cumulative operation and maintenance impacts appropriate and agreed that no impacts of greater than minor adverse significance are predicted.   | Natural England cannot confidently comment on conclusions drawn from the assessment due to outstanding concerns with the baseline data.      | Ongoing point of discussion |
| NE-ORN-OFF-29                                  |                      | Given the impacts of the project, the proposed Commitments outlined in <a href="#">Volume A4, Annex 5.2: Commitments Register</a> are appropriate.   | Natural England expect to request further commitments are made in the commitment register as we progress through examination                 | Ongoing point of discussion |
| <b>Report to Inform Appropriate Assessment</b> |                      |  |  |                             |
| NE-ORN-OFF-30                                  | Screening            | The RIAA has identified all relevant features of the designated sites that may be sensitive to changes as a result of the proposed activities.   | Natural England have outstanding concerns regarding consideration of fulmar and razorbill at Farne Islands SPA.                              | Ongoing point of discussion |
| NE-ORN-OFF-31                                  |                      | The RIAA has identified all relevant transboundary designated sites that may be sensitive to changes as a result of the proposed activities.   | The RIAA has identified all relevant transboundary designated sites that may be sensitive to changes as a result of the proposed activities. | Agreed                      |
| NE-ORN-OFF-32                                  | Outcomes of the RIAA | Conclusion of no AEoI at any transboundary sites is appropriate, either alone or in-combination as a result of the proposed activities.  | Natural England cannot confidently comment on conclusions drawn from the assessment due to outstanding concerns with the baseline data.      | Ongoing point of discussion |
| NE-ORN-OFF-33                                  |                      | Conclusion of no AEoI at any sites is appropriate, either alone or in-combination as a result of the proposed activities (except at Flamborough and Filey Coast (FFC) Special Protection Area (SPA)).                            | Natural England cannot confidently comment on conclusions drawn from the assessment due to outstanding concerns with the baseline data.      | Ongoing point of discussion |
| NE-ORN-OFF-34                                  |                      | Conclusion of no AEoI at FFC SPA is appropriate in relation to Hornsea Four alone, for any relevant features (including designated features of gannet, kittiwake, guillemot, razorbill), as a result of the proposed activities. | Natural England cannot confidently comment on conclusions drawn from the assessment due to outstanding concerns with the baseline data.      | Ongoing point of discussion |
| NE-ORN-OFF-35                                  |                      | Conclusion of no AEoI at FFC SPA is appropriate in relation to Hornsea Four alone, for any relevant features (including named species within the designated seabird assemblage of herring gull                                   | Natural England cannot confidently comment on conclusions drawn from the assessment due to outstanding concerns with the baseline data.      | Ongoing point of discussion |

| ID  | Topic | Hornsea Fours Position   | Natural England's Position  | Position Summary            |
|---|-------|--|---|-----------------------------|
|   |       | and puffin and the seabird assemblage itself), as a result of the proposed activities.   |   |                             |
| NE-ORN-OFF-36                               |       | There is potential for an AEol on kittiwake at the FFC SPA from Hornsea Four in-combination with other projects.   | Natural England agrees that there is potential for an AEol on kittiwake at the FFC SPA from Hornsea Four in-combination with other projects.  | Agreed                      |
| NE-ORN-OFF-37                               |       | Conclusion of no AEol at FFC SPA is appropriate in relation to from Hornsea Four in-combination with other projects, for the designated features of gannet, , guillemot, razorbill , as a result of the proposed activities.   | Natural England cannot confidently comment on conclusions drawn from the assessment due to outstanding concerns with the baseline data. Further,  | Ongoing point of discussion |
| NE-ORN-OFF-38                               |       | Conclusion of an AEol at FFC SPA is appropriate in relation to from Hornsea Four in-combination with other projects, for the designated feature of kittiwake, as a result of the proposed activities.  | Natural England agrees that a conclusion of an AEol at FFC SPA is appropriate in relation to Hornsea Four in-combination with other projects, for the designated feature of kittiwake, as a result of the proposed activities. However, due to outstanding concerns with the baseline assessment the specific level of impact cannot yet be agreed. | Agreed                      |
| NE-ORN-OFF-39                               |       | Conclusion of no AEol at FFC SPA is appropriate in relation to from Hornsea Four in-combination with other projects, for named species within the designated seabird assemblage of herring gull and puffin and the seabird assemblage itself, as a result of the proposed activities.            | Natural England cannot confidently comment on conclusions drawn from the assessment due to outstanding concerns with the baseline data.   | Ongoing point of discussion |
| <b>Draft DCO and Deemed Marine Licences</b> |       |  |   |                             |
| NE-ORN-OFF-40                               |       | The wording of the following requirements and conditions pertaining to offshore and intertidal ornithology are appropriate and adequate: <ul style="list-style-type: none"> <li>Part 2 - Condition 13(1)(d)(v) of DCO Schedules 11 and 12 with reference to a Vessel Management Plan;</li> </ul> | Natural England expect to review and request additional amendments to the DCO as required as we move through examination.   | Ongoing point of discussion |

| ID                   | Topic | Hornsea Fours Position  | Natural England's Position | Position Summary |
|----------------------|-------|---|----------------------------|------------------|
|                      |       | <ul style="list-style-type: none"> <li>• Part 3 - DCO Requirement 2(2)(c) and DCO Schedule 11, Part 2 - Condition 1(2)(c) with reference to the lowest point of the rotating blade (42.43m Lowest Astronomical Tide (LAT));</li> <li>• Part 1(6) of DCO Schedules 11 and 12 with reference to a Decommissioning Programme; and</li> <li>• Part 3 - DCO Requirement 17 with reference to a Code of Construction Practice and Part 2 - Condition 13(1)(h) of DCO Schedule 12 with reference to a Cable Specification and Installation Plan (in relation to installation of offshore export cables at landfall); and</li> <li>• Part 2 - Condition 13(1)(k) of DCO Schedule 11 with reference to an Ornithological Monitoring Plan.</li> </ul> |                            |                  |
| <b>Other Matters</b> |       |   |                            |                  |
|                      |       |   |                            |                  |

### 3.3 Other Documents and Plans

Table 5: Agreement Log – Other Documents and Plans.

| ID  | Hornsea Fours Position  | Natural England's Position  | Position Summary            |
|---|---|---|-----------------------------|
| <b>Outline Ornithological Monitoring Plan</b> |   |   |                             |
| NE-ORN-OFF-41                                 | F2.19 Outline Ornithological Monitoring Plan provides an appropriate framework to agree monitoring with Statutory Nature Conservation Bodies (SNCBs) and the MMO prior to construction. | Natural England consider the initial outlines of monitoring objectives will likely need expanding upon to provide a robust monitoring framework | Ongoing point of discussion |

## 4 Summary

- 4.1.1.1 This SoCG has outlined the consultation that has taken place between the Applicant and Natural England during the pre-application and Examination phase (to date (see Revision History). The agreement logs present the position reached at the point of submission of this SoCG to PINS in relation to offshore and intertidal ornithology (at Deadline 1).
  
- 4.1.1.2 This SoCG will be updated as discussions progress and made available to PINS as requested through the DCO examination phas

