



Hornsea Project Four

Statement of Common Ground between Hornsea Project Four, the Holderness Fishing Industry Group and the National Federation of Fisherman's Organisations

Deadline 3, Date: 21 April 2022

Document Reference: G1.21

Revision: 02

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G1.21
Revision 02

Revision History

Date	Revision	Reason for issue
08 March 2022	01	First draft for review and submission at Deadline 1.
21 April 2022	02	Second draft for update and submission at Deadline 3.

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Glossary

Term	Definition
The Applicant	Orsted Hornsea Project Four Limited
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
DCO	Development Consent Order
EIA	Environmental Impact Assessment
HFIG	Holderness Fishing Industry Group
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NFFO	National Federation of Fisherman's Organisations
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
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'), the Holderness Fishing Industry Group (HFIG) and the National Federation of Fisherman's Organisations (NFFO) to set out the areas of agreement and disagreement between the three 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 and interest to the HFIG and the NFFO in the marine environment seaward of Mean High Water Springs (MHWS).
- 1.1.1.3 The need for a SoCG between the Applicant, the HFIG and the NFFO is set out within the Rule 6 letter issued by the Planning Inspectorate (PINS) on 24 January 2022.
- 1.1.1.4 It is the intention that this document will facilitate further discussions between the Applicant, the HFIG and the NFFO and will provide the Examining Authority (ExA) with a clear overview of the level of common ground between all parties. This SoCG will be updated as discussions progress during the examination process.

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 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 Logs; and
 - [Section 4](#): Summary.

1.3 Application elements under the Holderness Fishing Industry Group and the National Federation of Fisherman's Organisations remits

- 1.3.1.1 The elements of Hornsea Four which may affect the interests of the HFIG and the NFFO 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 ([C1.1: Draft DCO including Draft DML](#)).
- 1.3.1.2 This SoCG focuses on specific issues relating to commercial fishing which have been raised during consultation undertaken in respect of Hornsea Four by the HFIG and the NFFO. In line

with the information provided by the HFIG and the NFFO in their Relevant Representations (PINS Reference AS-025 and PINS Reference AS-026, respectively), key areas of outstanding concern and therefore taken forward for consideration in the SoCG, include:

- Fish and Shellfish Ecology; and
- Commercial Fisheries.

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.

1.4.1.2 Key maximum design scenarios and assumptions for Hornsea Four offshore wind farm in relation to commercial fisheries are summarised below and described in full in [Volume A2, Chapter 6: Commercial Fisheries](#):

- **Hornsea Four array area:**
 - 110 with GBS Wind Turbine Generators (WTG) type foundations;
 - 70 suction caisson jacket (WTG type) foundations;
 - Minimum turbine spacing of 810 m;
 - Nine offshore substations and one accommodation platform;
 - 500 m exclusion zones around construction activities;
 - 50 m exclusion zones around incomplete structures;
 - 600 km length array cables and 90 km length interconnector cables;
 - Roaming 500 m safe passing distance for mobile installation vessels, which may, in exceptional circumstances, be increased to 1,000 m dependant on the nature of the installation works.
- **Hornsea Four offshore export cable corridor**
 - Three HVAC booster stations;
 - 500 m exclusion zones around construction activities;
 - 50 m exclusion zones around incomplete structures;

- o 654 km length export cables;
- o Roaming 500 m safe passing distance for mobile installation vessels, which may, in exceptional circumstances, be increased to 1,000 m dependant on the nature of the installation works.

2 Consultation

2.1 Summary of consultation with the Holderness Fishing Industry Group and the National Federation of Fisherman’s Organisations

2.1.1.1 **Table 1** below summarises the consultation that the Applicant has undertaken with the HFIG and the NFFO 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 HFIG and the NFFO.

Date	Form of consultation	Statutory/Non Statutory	Summary
10 July 2018	Meeting	Non-Statutory	Hornsea Project One Offshore Wind Farm, Hornsea Project Two Offshore Wind Farm & Hornsea Four project update meeting – Hornsea Four update meeting 1: Concern raised over details of fishing patterns and sensitivity of the fleet.
19 September 2018	Meeting	Non-Statutory	Hornsea Project One, Hornsea Project Two & Hornsea Four project update meeting – Hornsea Four update meeting 2: Concern raised regarding cumulative impact of Hornsea Project One and Hornsea Project Two
24 January 2019	Meeting	Non-Statutory	Hornsea Project One, Hornsea Project Two & Hornsea Four project update meeting – Hornsea Four update meeting 3: Discussion around construction timings and specific locations of construction activities for Hornsea One and Two and forthcoming Hornsea Four surveys.
16 April 2019	Meeting	Non-Statutory	Hornsea Project One, Hornsea Project Two & Hornsea Four project update meeting – Hornsea Four update meeting 4: Discussion around phasing of gear clearance to facilitate Hornsea Four surveys.
02 May 2019	Meeting	Non-Statutory	Hornsea Project One, Hornsea Project Two & Hornsea Four project update meeting – Hornsea Four update meeting 5: Discussion of timings of gear clearance and key areas of commercial fisheries activity.
20 August 2019	Meeting	Non-Statutory	Hornsea Project One, Hornsea Project Two & Hornsea Four project update meeting – Hornsea Four update meeting 6: Review of the previous year and discussion of timings of gear clearance and key areas of commercial fisheries activity for the upcoming 2020 surveys.
20 September 2019	Section 42 Response	Statutory	Section 42 Response A concern was raised regarding the Hornsea Four array area being in an area where the offshore fleet targets predominately edible crab with smaller catches of lobster. The pitfalls of using

Date	Form of consultation	Statutory/Non Statutory	Summary
			Vessel Monitoring System (VMS) data combined with the North East Inshore Fisheries and Conservation Authority (NE IFCA) sightings leading to underestimations of fleet size and vessels working in the area was also raised.
24 September 2019	Section 42 Response	Statutory	Section 42 Response Raised several concerns regarding applying Magnitude Criteria, missing activities from the construction phase assessment, the worst-case scenario presented for the operation and maintenance phase and associated wording, the impact of cables on businesses, missing measures from the cumulative effects assessment, and co-existence issues, for which several commitments were suggested to address this.
20 November 2019	Meeting	Non-Statutory	Hornsea Four Update Meeting Presentation on updates on Hornsea Four since the Preliminary Environmental Impact Report (PEIR), and discussion around the Section 42 comments, effects on potting vessels, industry perception on the importance of the offshore areas for brown crab, and clarity on safety zones, manned platforms, and maintenance regimes.
6 December 2019	Meeting	Non-Statutory	Hornsea Project One, Hornsea Project Two, Hornsea Project Three & Hornsea Four project update meeting – Hornsea Four update meeting 7: Outlined reduced survey scope for 2020 and reviewing commercial fisheries strategy.
27 August 2020	Email	Non-Statutory	Hornsea Four Update Provision of details on the change to Order Limits from PEIR to DCO for Hornsea Four array area, including presentation of change to baseline characterisation and confirmation of no material change to impact assessment findings.
20 November 2020	Meeting	Non-Statutory	Hornsea Four Lessons Learned A presentation reviewing lessons learned from activities in 2020. Brief introduction of 2021 survey schedule.
18 August 2021	Meeting	Non-Statutory	Hornsea Four Lessons Learned A presentation reviewing the survey timeline between November 2020 – May 2021, and lessons learnt. Review of 2022 survey schedule and fisheries strategy. Informed of HOW04 Seabird compensation ideas and asked for input.
14 January 2022	Meeting	Non-Statutory	HFIG ECRF and Hornsea 4 Update Presentation from HFIG on ECRF projects, an update on the HOW04 2022 survey programme and fisheries strategy. Note that HFIG and NFFO had not made relevant representations
28 January 2022	Meeting	Non-Statutory	HFIG and Ørsted relationship review session Meeting reviewing future plans of HFIG. Outlining consent and examination process. Directing HFIG to the PINS website
04 February 2022	Meeting	Non-Statutory	HFIG and Ørsted relationship review session Meeting reviewing future plans of HFIG and Ørsted working relationship. Explanation of SoCC.

Date	Form of consultation	Statutory/Non Statutory	Summary
21 February 2022	Meeting	Non-Statutory	HFIG SOCG

3 Agreement Logs

3.1 Overview

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 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 ¹ to the assessment conclusions.	Not Agreed – no material impact
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 ² to the assessment conclusions.	Not Agreed – material impact
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).	Ongoing point of discussion

¹ No material impact: the parties agree with the category of impact significance concluded in the ES.

² Material impact: the parties do not agree with the category of impact significance concluded in the ES.

3.2 Fish & Shellfish Ecology

Table 3: NFFO Agreement Log: Fish & Shellfish Ecology.

ID	Hornsea Four Position	NFFO Position	Position Summary
Environmental Impact Assessment			
NFFO -FSE-01	The assessment has identified all appropriate plans and policies relevant to fish ecology and has given due regard to them within the assessment (see Section 3.3 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Agreed. All appropriate plans and policies relevant to fish ecology and were given due regard at the point of application.	Agreed
NFFO -FSE-02	The assessment has identified all appropriate plans and policies relevant to shellfish ecology and has given due regard to them within the assessment (see Section 3.3 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Ongoing point of discussion. NFFO to check.	Ongoing point of discussion
NFFO -FSE-03	Sufficient data has been collated to appropriately characterise the fish ecology baseline environment for the purposes of informing the EIA (see Section 3.6 and 3.7 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Disagreed. The data collection fails to appropriately characterise the fish ecology baseline for informing the EIA. Concerned with the age of data used.	Not Agreed – no material impact
NFFO -FSE-04	Sufficient data has been collated to appropriately characterise the shellfish ecology baseline environment for the purposes of informing the EIA (see Section 3.6 and 3.7 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Disagreed. The data collection fails to appropriately characterise the shellfish ecology baseline for informing the EIA. Concerned with the data collection methods used.	Not Agreed – material impact
NFFO -FSE-05	The potential impacts identified in Section 3.11 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015) represent a comprehensive list of potential impacts on fish ecology from Hornsea Four.	Agreed. The potential impacts identified for fish ecology are appropriate.	Agreed
NFFO -FSE-06	The potential impacts identified in Section 3.11 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015) represent a comprehensive list of potential impacts on shellfish ecology from Hornsea Four.	Agreed. The potential impacts identified for shellfish ecology are appropriate.	Agreed
NFFO -FSE-07	The impact assessment methodology described in Section 3.10 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015) used for	Disagreed. The EIA methodology inappropriately assigns weight to non-site specific data. NFFO to check.	Not Agreed – no material impact

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ID	Hornsea Four Position	NFFO Position	Position Summary
	the EIA provide an appropriate approach to assessing potential impacts of Hornsea Four on fish ecology.		
NFFO -FSE- 08	The impact assessment methodology described in Section 3.10 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015) used for the EIA provide an appropriate approach to assessing potential impacts of Hornsea Four on shellfish ecology.	Disagreed. The EIA methodology inappropriately assigns weight to non-site specific data. NFFO to check.	Not Agreed – material impact
NFFO -FSE- 09	The maximum design scenarios (MDS) presented in Section 3.9 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015) are appropriate in relation to fish ecology.	Agreed.	Agreed
NFFO -FSE- 10	The maximum design scenarios (MDS) presented in Section 3.9 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015) are appropriate in relation to shellfish ecology.	Agreed.	Agreed
NFFO -FSE- 11	The conclusions of the assessment of impacts for construction, operation and decommissioning are agreed in relation to fish ecology (see Section 3.15 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Disagreed: Disagreement on the data that has fed into assessment (see NFFO-FSE-03) and therefore can't agree with the conclusions drawn from that the baseline. However, more complete baseline is unlikely to alter the outcome of the assessments.	Not Agreed – no material impact
NFFO -FSE- 12	The conclusions of the assessment of impacts for construction, operation and decommissioning are agreed in relation to shellfish ecology (see Section 3.15 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Disagreed: Disagreement on the data that has fed into assessment (see NFFO-FSE-04) and therefore can't agree with the conclusions drawn from that the baseline. It is not possible to ascertain whether an appropriate baseline would alter the outcome of assessments.	Not Agreed – material impact
NFFO -FSE- 13	The conclusions of the assessment of cumulative impacts are agreed in relation to fish ecology (see Section 3.15 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Disagreed: Disagreement on the data that has fed into the cumulative assessment (see NFFO-FSE-03) and therefore can't agree with the conclusions drawn from that the baseline. However, more complete baseline is unlikely to alter the outcome of the assessments. Agreement that all relevant projects have been considered in the cumulative assessment.	Not Agreed – no material impact
NFFO -FSE- 14	The conclusions of the assessment of cumulative impacts are agreed in relation to shellfish ecology (see Section 3.15 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Disagreed: Disagreement on the data that has fed into the cumulative assessment (see NFFO-FSE-04) and therefore can't agree with the conclusions drawn from that the baseline. It is not possible to ascertain whether an appropriate baseline would alter the outcome of assessments.	Not Agreed – material impact

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ID	Hornsea Four Position	NFFO Position	Position Summary
		Agreement that all relevant projects have been considered in the cumulative assessment.	
NFFO -FSE- 15	<p>Given the impacts of the project, the following proposed Commitments outlined in Volume A4, Annex 5.2: Commitments Register (APP-050) are appropriate in relation to fish ecology:</p> <ul style="list-style-type: none"> • Co2 (avoidance of protected/designated sites); • Co44 (avoidance of Holderness Inshore MCZ); • Co45 (avoidance of Holderness Offshore MCZ); • Co83 (cable burial); • Co85 (no more than 2 simultaneous piles); • Co110 (piling Marine Mammal Mitigation Protocol); • Co111 (construction project environmental management and monitoring plan); • Co113 (decommissioning Marine Mammal Mitigation Protocol); • Co181 (offshore decommissioning plan); • Co190 (seasonal piling restriction for herring); and • Co201 (maximum of 110 Gravity Base Structure (GBS) foundations). 	Agreed insofar as within the remit and technical experience of the NFFO.	Agreed
NFFO -FSE- 16	<p>Given the impacts of the project, the following proposed Commitments outlined in Volume A4, Annex 5.2: Commitments Register (APP-050) are appropriate in relation to shellfish ecology:</p> <ul style="list-style-type: none"> • Co2 (avoidance of protected/designated sites); • Co44 (avoidance of Holderness Inshore MCZ); • Co45 (avoidance of Holderness Offshore MCZ); • Co83 (cable burial); • Co85 (no more than 2 simultaneous piles); • Co110 (piling Marine Mammal Mitigation Protocol); • Co111 (construction project environmental management and monitoring plan); • Co113 (decommissioning Marine Mammal Mitigation Protocol); • Co181 (offshore decommissioning plan); • Co190 (seasonal piling restriction for herring); and 	Agreed insofar as within the remit and technical experience of the NFFO.	Agreed

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ID	Hornsea Four Position	NFFO Position	Position Summary
	<ul style="list-style-type: none"> Co201 (maximum of 110 Gravity Base Structure (GBS) foundations). 		
Other Matters			
NFFO -FSE- 17	The monitoring relevant to fish ecology, set out in Section 3.5 of F2.7: Outline Marine Monitoring Plan (APP-242) is appropriate.	Ongoing point of discussion. Particle Size Analysis monitoring welcomed but monitoring also need to include population modelling of herring and sandeel to make the PSA monitoring more meaningful.	Ongoing point of discussion
NFFO -FSE- 18	The monitoring relevant to shellfish ecology, set out in Section 3.5 of F2.7: Outline Marine Monitoring Plan (APP-242) is appropriate.	Disagreed. No shellfish monitoring proposed. Due to issues with the shellfish baseline (see NFFO-FSE-04), NFFO consider that a monitoring programme in relation to crab is required.	Not Agreed – material impact

Table 4: HFIG Agreement Log: Fish & Shellfish Ecology.

ID	Hornsea Four Position	HFIG Position	Position Summary
Environmental Impact Assessment			
HFIG-FSE-01	The assessment has identified all appropriate plans and policies relevant to fish ecology and has given due regard to them within the assessment (see Section 3.3 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Agreed. All appropriate plans and policies relevant to fish ecology and were given due regard at the point of application.	Agreed
HFIG-FSE-02	The assessment has identified all appropriate plans and policies relevant to shellfish ecology and has given due regard to them within the assessment (see Section 3.3 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Agreed. All appropriate plans and policies relevant to fish ecology and were given due regard at the point of application.	Agreed
HFIG-FSE-03	Sufficient data has been collated to appropriately characterise the fish ecology baseline environment for the purposes of informing the EIA (see Section 3.6 and 3.7 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Disagreed. The data collection fails to appropriately characterise the fish ecology baseline for informing the EIA. Concerned with the age of data used.	Not Agreed – no material impact
HFIG-FSE-04	Sufficient data has been collated to appropriately characterise the shellfish ecology baseline environment for the purposes of informing the EIA (see Section 3.6 and 3.7 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Disagreed. The data collection fails to appropriately characterise the shellfish ecology baseline for informing the EIA. Concerned with the data collection methods used.	Not Agreed – material impact
HFIG-FSE-05	The potential impacts identified in Section 3.11 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015) represent a comprehensive list of potential impacts on fish ecology from Hornsea Four.	Agreed. The potential impacts identified for fish ecology are appropriate.	Agreed
HFIG-FSE-06	The potential impacts identified in Section 3.11 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015) represent a comprehensive list of potential impacts on shellfish ecology from Hornsea Four.	Agreed. The potential impacts identified for shellfish ecology are appropriate.	Agreed
HFIG-FSE-07	The impact assessment methodology described in Section 3.10 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015) used for the EIA provide an appropriate approach to assessing potential impacts of Hornsea Four on fish ecology.	Disagreed. The EIA methodology inappropriately assigns weight to non site specific data. HFIG to check.	Not Agreed – no material impact

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ID	Hornsea Four Position	HFIG Position	Position Summary
HFIG-FSE-08	The impact assessment methodology described in Section 3.10 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015) used for the EIA provide an appropriate approach to assessing potential impacts of Hornsea Four on shellfish ecology.	Disagreed. The EIA methodology inappropriately assigns weight to non site specific data. HFIG to check.	Not Agreed – material impact
HFIG-FSE-09	The maximum design scenarios (MDS) presented in Section 3.9 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015) are appropriate in relation to fish ecology.	Agreed.	Agreed
HFIG-FSE-10	The maximum design scenarios (MDS) presented in Section 3.9 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015) are appropriate in relation to shellfish ecology.	Agreed.	Agreed
HFIG-FSE-11	The conclusions of the assessment of impacts for construction, operation and decommissioning are agreed in relation to fish ecology (see Section 3.15 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Disagreed. Disagreement on the data that has fed into assessment (see HFIG-FSE-03) and therefore can't agree with the conclusions drawn from that the baseline. However, more complete baseline is unlikely to alter the outcome of the assessments.	Not Agreed – no material impact
HFIG-FSE-12	The conclusions of the assessment of impacts for construction, operation and decommissioning are agreed in relation to shellfish ecology (see Section 3.15 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Disagreed. Disagreement on the data that has fed into assessment (see HFIG-FSE-04) and therefore can't agree with the conclusions drawn from that the baseline. It is not possible to ascertain whether an appropriate baseline would alter the outcome of assessments.	Not Agreed – material impact
HFIG-FSE-13	The conclusions of the assessment of cumulative impacts are agreed in relation to fish ecology (see Section 3.15 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Disagreed. Disagreement on the data that has fed into the cumulative assessment (see HFIG-FSE-03) and therefore can't agree with the conclusions drawn from that the baseline. However, more complete baseline is unlikely to alter the outcome of the assessments. Agreement that all relevant projects have been considered in the cumulative assessment.	Not Agreed – no material impact
HFIG-FSE-14	The conclusions of the assessment of cumulative impacts are agreed in relation to shellfish ecology (see Section 3.15 of Volume A2, Chapter 3: Fish and Shellfish Ecology (APP-015)).	Disagreed. Disagreement on the data that has fed into the cumulative assessment (see HFIG-FSE-04) and therefore can't agree with the conclusions drawn from that the baseline. It is not possible to ascertain whether an appropriate baseline would alter the outcome of assessments. Agreement that all relevant projects have been considered in the cumulative assessment.	Not Agreed – material impact

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ID	Hornsea Four Position	HFIG Position	Position Summary
HFIG-FSE-15	<p>Given the impacts of the project, the following proposed Commitments outlined in Volume A4, Annex 5.2: Commitments Register (APP-050) are appropriate in relation to fish ecology:</p> <ul style="list-style-type: none"> • Co2 (avoidance of protected/designated sites); • Co44 (avoidance of Holderness Inshore MCZ); • Co45 (avoidance of Holderness Offshore MCZ); • Co83 (cable burial); • Co85 (no more than 2 simultaneous piles); • Co110 (piling Marine Mammal Mitigation Protocol); • Co111 (construction project environmental management and monitoring plan); • Co113 (decommissioning Marine Mammal Mitigation Protocol); • Co181 (offshore decommissioning plan); • Co190 (seasonal piling restriction for herring); and • Co201 (maximum of 110 Gravity Base Structure (GBS) foundations). 	Agreed. Insofar as within the remit and technical experience of the HFIG.	Agreed
HFIG-FSE-16	<p>Given the impacts of the project, the following proposed Commitments outlined in Volume A4, Annex 5.2: Commitments Register (APP-050) are appropriate in relation to shellfish ecology:</p> <ul style="list-style-type: none"> • Co2 (avoidance of protected/designated sites); • Co44 (avoidance of Holderness Inshore MCZ); • Co45 (avoidance of Holderness Offshore MCZ); • Co83 (cable burial); • Co85 (no more than 2 simultaneous piles); • Co110 (piling Marine Mammal Mitigation Protocol); • Co111 (construction project environmental management and monitoring plan); • Co113 (decommissioning Marine Mammal Mitigation Protocol); • Co181 (offshore decommissioning plan); • Co190 (seasonal piling restriction for herring); and • Co201 (maximum of 110 Gravity Base Structure (GBS) foundations). 	Agreed. Insofar as within the remit and technical experience of the HFIG.	Agreed

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ID	Hornsea Four Position	HFIG Position	Position Summary
Other Matters			
HFIG-FSE-17	The monitoring relevant to fish ecology, set out in Section 3.5 of F2.7: Outline Marine Monitoring Plan (APP-242) is appropriate.	Ongoing point of discussion. Particle Size Analysis monitoring welcomed but monitoring also need to include population modelling of herring and sandeel to make the PSA monitoring more meaningful.	Ongoing point of discussion
HFIG-FSE-18	The monitoring relevant to shellfish ecology, set out in Section 3.5 of F2.7: Outline Marine Monitoring Plan (APP-242) is appropriate.	Disagreed. No shellfish monitoring proposed. Due to issues with the shellfish baseline (see HFIG-FSE-04), HFIG consider that a monitoring programme in relation to crab is required.	Not Agreed – material impact

3.3 Commercial Fisheries

Table 5: NFFO Agreement Log: Commercial Fisheries.

ID	Hornsea Four Position	NFFO Position	Position Summary
Environmental Impact Assessment			
NFFO -CF-01	Sufficient data has been collated to appropriately characterise the baseline environment for the purposes of informing the EIA (see Section 6.6 and 6.7 of Volume A2, Chapter 6: Commercial Fisheries (APP-018)).	Ongoing point of discussion. NFFO suggest that gear scouting survey data could have been used. Limitations are understood but can't agree that baseline is appropriately characterised as data doesn't represent fleet.	Ongoing point of discussion
NFFO -CF-02	The potential impacts identified in Section 6.11 of Volume A2, Chapter 6: Commercial Fisheries (APP-018) represent a comprehensive list of potential impacts on commercial fisheries from Hornsea Four.	Agreed.	Agreed
NFFO -CF-03	The impact assessment methodology described in Section 6.10 of Volume A2, Chapter 6: Commercial Fisheries (APP-018) for the EIA provide an appropriate approach to assessing potential impacts of Hornsea Four.	Ongoing point of discussion. NFFO suggest that the definition of fleets should be broken down within potting industry depending on vessel size (e.g. under 10m fleet, over 10m fleet etc) although noting that there is not as much distinction within the mobile fleet.	Ongoing point of discussion
NFFO -CF-04	The MDS presented in Section 6.9 of Volume A2, Chapter 6: Commercial Fisheries (APP-018) is appropriate in relation to commercial fisheries.	Ongoing point of discussion. NFFO suggested clarifying the impact statement wordings in relation to snagging on exposed cables – suggested adding the following statement “ <i>and potential exposure of that infrastructure leading to gear snagging</i> ”.	Ongoing point of discussion
NFFO -CF-05	The conclusions of the assessment of impacts for construction, operation and decommissioning are agreed (see Section 6.11 and 6.15 of Volume A2, Chapter 6: Commercial Fisheries (APP-018)).	Agreed with the caveat that F2.9: Outline Fisheries Coexistence and Liaison Plan is updated to state that there will be a separate Fisheries Coexistence and Liaison Plan for the operations and maintenance phase.	Agreed
NFFO -CF-06	The conclusions of the assessment of cumulative impacts are agreed (see Section 6.15 of Volume A2, Chapter 6: Commercial Fisheries (APP-018)).	Agreed.	Agreed
NFFO -CF-07	Given the impacts of the project, the following proposed Commitments outlined in Volume A4, Annex 5.2: Commitments Register (APP-050) are appropriate:	Agreed.	Agreed

Hornsea 4



ID	Hornsea Four Position	NFFO Position	Position Summary
	<ul style="list-style-type: none"> • Co2 (avoidance of protected/designated sites); • Co81 (5% under keel clearance for scour protection); • Co83 (cable burial); • Co85 (no more than 2 simultaneous piles); • Co89 (Notices to Mariners and Kingfisher Bulletins); • Co90 (ongoing liaison via Fisheries Liaison Officer and Fishing Industry Representative); • Co93 (aids to navigation); • Co94 (notification of United Kingdom Hydrographic Office (UKHO)); • Co95 (fisheries coexistence and liaison plan); • Co99 (compliance with MGN654); • Co111 (construction project environmental management and monitoring plan); • Co139 (safety zones); • Co180 (FLOWW guidance); • Co181 (offshore decommissioning plan); • Co201 (maximum of 110 Gravity Base Structure (GBS) foundations). 		
Draft DCO and Deemed Marine Licences			
NFFO -CF- 08	<p>The wording of the following requirements and conditions pertaining to commercial fisheries are appropriate and adequate (see C.1.1 Development Consent Order (DCO) Volume C1 draft DCO including draft Deemed Marine Licence (DML) (APP-203)):</p> <ul style="list-style-type: none"> • Part 1(6) of DCO Schedules 11 and 12 with reference to a decommissioning plan; • Part 2 - Condition 7 of DCO Schedules 11 and 12 with reference to notifications and inspections; • Part 2 - Condition 8 of DCO Schedules 11 and 12 with reference to aids to navigation; • Part 2 - Condition 11(10) of DCO Schedules 11 and 12 with reference to dropped objects; • Part 2 - Condition 13(1(c) of DCO Schedules 11 and 12 with reference to a Construction Method Statement; 	To be discussed at next meeting.	Ongoing point of discussion

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ID	Hornsea Four Position	NFFO Position	Position Summary
	<ul style="list-style-type: none"> Part 2 - Condition 13(1)(d) of DCO Schedules 11 and 12 with reference to a Construction Project Environmental Management and Monitoring Plan; Part 2 - Condition 13(1)(h) of DCO Schedules 11 and 12 with reference to a Cable Specification and Installation Plan; Part 2 - Condition 13(1)(i) of DCO Schedules 11 and 12 with reference to a Aid to Navigation Management Plan; and Part 2 - Condition 15 of DCO Schedules 11 and 12 with reference to Offshore Safety Management. 		
NFFO -CF- 09	<p>The commitment to producing a Fisheries Coexistence and Liaison Plan (see C.1.1 Development Consent Order (DCO) Volume C1 draft DCO including draft Deemed Marine Licence (DML) (APP-203)): Part 2 - Condition 13(7) of DCO Schedules 11 and 12), that must be submitted to and approved by the Marine Management Organisation (MMO) prior to the commencement of construction activities, is appropriate for describing the approach to liaison and consultation with the fishing industry throughout the lifetime of Hornsea Four. The final version of the FCLP will be produced in accordance with F2.9: Outline Fisheries Coexistence and Liaison Plan (APP-244).</p>	<p>Agreed with the caveat that F2.9: Outline Fisheries Coexistence and Liaison Plan is updated to state that there will be a separate Fisheries Coexistence and Liaison Plan for the operations and maintenance phase and to refer to the latest version of the FLOWW guidance.</p>	Agreed
Other Matters			
NFFO -CF- 10	<p>The measures identified within F2.9: Outline Fisheries Coexistence and Liaison Plan (APP-244) are appropriate for liaison and consultation with the fishing industry throughout the lifetime of Hornsea Four.</p>	To be discussed at next meeting.	Ongoing point of discussion
NFFO -CF- 11	<p>Geophysical surveys, as outlined in Section 3.2 of F2.7: Outline Marine Monitoring Plan (APP-242) are appropriate to confirm:</p> <ul style="list-style-type: none"> Cable burial success; Adequate protection of buried assets, foundations and crossings; and Presence of any dropped objects. <p>No other monitoring is required for commercial fisheries interests.</p>	To be discussed at next meeting.	Ongoing point of discussion

Hornsea 4



ID	Hornsea Four Position	NFFO Position	Position Summary
NFFO -CF- 12	Fishing activities have appropriately been considered in Volume A5, Annex 7.1: Navigational Risk Assessment (APP-081 – APP-083) .	To be discussed at next meeting.	Ongoing point of discussion

Table 6: HFIG Agreement Log: Commercial Fisheries.

ID	Hornsea Four Position	HFIG Position	Position Summary
Environmental Impact Assessment			
HFIG-CF-01	Sufficient data has been collated to appropriately characterise the baseline environment for the purposes of informing the EIA (see Section 6.6 and 6.7 of Volume A2, Chapter 6: Commercial Fisheries (APP-018)).	Ongoing point of discussion. HFIG suggest that gear scouting survey data could have been used. Limitations are understood but can't agree that baseline is appropriately characterised as data doesn't represent fleet.	Ongoing point of discussion
HFIG-CF-02	The potential impacts identified in Section 6.11 of Volume A2, Chapter 6: Commercial Fisheries (APP-018) represent a comprehensive list of potential impacts on commercial fisheries from Hornsea Four.	Agreed.	Agreed
HFIG-CF-03	The impact assessment methodology described in Section 6.10 of Volume A2, Chapter 6: Commercial Fisheries (APP-018) for the EIA provide an appropriate approach to assessing potential impacts of Hornsea Four.	Ongoing point of discussion. HFIG suggest that the definition of fleets should be broken down within potting industry depending on vessel size (e.g. under 10m fleet, over 10m fleet etc).	Ongoing point of discussion
HFIG-CF-04	The MDS presented in in Section 6.9 of Volume A2, Chapter 6: Commercial Fisheries (APP-018) is appropriate in relation to commercial fisheries.	HFIG suggested clarifying the impact statement wording in relation to gear conflict impacts although noted that the MDS is agreed.	Agreed
HFIG-CF-05	The conclusions of the assessment of impacts for construction, operation and decommissioning are agreed (see Section 6.15 of Volume A2, Chapter 6: Commercial Fisheries (APP-018)).	Agreed with the caveat that F2.9: Outline Fisheries Coexistence and Liaison Plan is updated to state that there will be a separate Fisheries Coexistence and Liaison Plan for the operations and maintenance phase.	Agreed
HFIG-CF-06	The conclusions of the assessment of cumulative impacts are agreed (see Section 6.15 of Volume A2, Chapter 6: Commercial Fisheries (APP-018)).	Agreed.	Agreed
HFIG-CF-07	Given the impacts of the project, the following proposed Commitments outlined in Volume A4, Annex 5.2: Commitments Register (APP-050) are appropriate: <ul style="list-style-type: none"> • Co2 (avoidance of protected/designated sites); • Co81 (5% under keel clearance for scour protection); • Co83 (cable burial); • Co85 (no more than 2 simultaneous piles); • Co89 (Notices to Mariners and Kingfisher Bulletins); 	Agreed.	Agreed

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ID	Hornsea Four Position	HFIG Position	Position Summary
	<ul style="list-style-type: none"> • Co90 (ongoing liaison via Fisheries Liaison Officer and Fishing Industry Representative); • Co93 (aids to navigation); • Co94 (notification of United Kingdom Hydrographic Office (UKHO)); • Co95 (fisheries coexistence and liaison plan); • Co99 (compliance with MGN654); • Co111 (construction project environmental management and monitoring plan); • Co139 (safety zones); • Co180 (FLOWW guidance); • Co181 (offshore decommissioning plan); • Co201 (maximum of 110 Gravity Base Structure (GBS) foundations). 		
Draft DCO and Deemed Marine Licences			
HFIG-CF-08	<p>The wording of the following requirements and conditions pertaining to commercial fisheries are appropriate and adequate (see C.1.1.1 Development Consent Order (DCO) Volume C1 draft DCO including draft Deemed Marine Licence (DML) (APP-203)):</p> <ul style="list-style-type: none"> • Part 1(6) of DCO Schedules 11 and 12 with reference to a decommissioning plan; • Part 2 - Condition 7 of DCO Schedules 11 and 12 with reference to notifications and inspections; • Part 2 - Condition 8 of DCO Schedules 11 and 12 with reference to aids to navigation; • Part 2 - Condition 11(10) of DCO Schedules 11 and 12 with reference to dropped objects; • Part 2 - Condition 13(1)(c) of DCO Schedules 11 and 12 with reference to a Construction Method Statement; • Part 2 - Condition 13(1)(d) of DCO Schedules 11 and 12 with reference to a Construction Project Environmental Management and Monitoring Plan; • Part 2 - Condition 13(1)(h) of DCO Schedules 11 and 12 with reference to a Cable Specification and Installation Plan; 	To be discussed at next meeting.	Ongoing point of discussion

Hornsea 4



ID	Hornsea Four Position	HFIG Position	Position Summary
	<ul style="list-style-type: none"> Part 2 - Condition 13(1)(i) of DCO Schedules 11 and 12 with reference to a Aid to Navigation Management Plan; and Part 2 - Condition 15 of DCO Schedules 11 and 12 with reference to Offshore Safety Management. 		
HFIG-CF-09	<p>The commitment to producing a Fisheries Coexistence and Liaison Plan (see C.1.1 Development Consent Order (DCO) Volume C1 draft DCO including draft Deemed Marine Licence (DML) (APP-203)): Part 2 - Condition 13(7) of DCO Schedules 11 and 12), that must be submitted to and approved by the Marine Management Organisation (MMO) prior to the commencement of construction activities, is appropriate for describing the approach to liaison and consultation with the fishing industry throughout the lifetime of Hornsea Four. The final version of the FCLP will be produced in accordance with F2.9: Outline Fisheries Coexistence and Liaison Plan (APP-244).</p>	<p>Agreed with the caveat that F2.9: Outline Fisheries Coexistence and Liaison Plan is updated to state that there will be a separate Fisheries Coexistence and Liaison Plan for the operations and maintenance phase and to refer to the latest version of the FLOWW guidance.</p>	Agreed
Other Matters			
HFIG-CF-10	<p>The measures identified within F2.9: Outline Fisheries Coexistence and Liaison Plan (APP-244) are appropriate for liaison and consultation with the fishing industry throughout the lifetime of Hornsea Four.</p>	To be discussed at next meeting.	Ongoing point of discussion
HFIG-CF-11	<p>Geophysical surveys, as outlined in Section 3.2 of F2.7: Outline Marine Monitoring Plan (APP-242) are appropriate to confirm:</p> <ul style="list-style-type: none"> Cable burial success; Adequate protection of buried assets, foundations and crossings; and Presence of any dropped objects. <p>No other monitoring is required for commercial fisheries interests.</p>	To be discussed at next meeting.	Ongoing point of discussion
HFIG-CF-12	<p>Fishing activities have appropriately been considered in Volume A5, Annex 7.1: Navigational Risk Assessment (APP-081 – APP-083).</p>	To be discussed at next meeting.	Ongoing point of discussion