



Hornsea Project Four

Statement of Common Ground between Hornsea Project Four and Historic England

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Revision History

Date	Version	Reason for issue
20/08/2020	i	Initial draft for Historic England Review
25/09/2020	ii	Updated draft issued to Historic England after SoCG meeting. Submitted again on 10/12/2021 to Historic England for comment.
18/02/2022	iii	Updated following receipt of Historic England's comments on 25/01/2022 and issued alongside draft onshore Relevant Representation responses.
08/03/2022	01	Submitted at Deadline 1 awaiting positions from Historic England.
10/05/2022	02	Submitted at Deadline 4 with input from Historic England.

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Table of Contents

1	Introduction.....	5
1.1	Reason for this document.....	5
1.2	Approach to SoCG.....	5
1.3	Application elements under Historic England’s remit.....	6
1.4	Overview of Hornsea Four	6
2	Agreement Logs	6
2.1	Overview	6
3	Onshore Historic Environment	7
3.1	Summary of consultation with Historic England.....	7
3.2	Onshore Agreement Log.....	9
4	Marine Archaeology	15
4.1	Summary of consultation with Historic England.....	15
4.2	Offshore Agreement Log.....	17

List of Tables

Table 1: Summary of pre-application consultation with Historic England.....	7
Table 2: Agreement Log: Onshore Historic Environment.....	10
Table 3: Summary of pre-application consultation with Historic England.....	15
Table 4: Agreement Log: Marine Archaeology.	19

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.
Likely Significant Effect	Terminology used within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in relation to what is required to be described within Environmental Statements.
Orsted Hornsea Project Four Ltd	The Applicant for the proposed Hornsea Project Four Offshore Wind Farm Development Consent Order (DCO).

Acronyms

Acronym	Definition
DMLs	Deemed Marine Licences
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
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
PINS	The Planning Inspectorate
SoCG	Statement of Common Ground
WSI	Written Scheme of Investigation

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 Historic 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 the topics of the Onshore Historic Environment ([Section 3](#)) and Marine Archaeology ([Section 4](#)). The Onshore Historic Environment comprises each relevant component of the application landward of Mean High Water Springs (MHWS) and Marine Archaeology comprises each relevant component of the application seaward of MHWS.
- 1.1.1.3 The need for a SoCG between the Applicant and Historic England is set out within the Rule 6 letter issued by the Planning Inspectorate (PINS) on 24 January 2022¹.
- 1.1.1.4 Following detailed discussions undertaken through the Evidence Plan Process, the Applicant and Historic England have sought to progress a SoCG. It is the intention that this document will provide PINS with a clear overview of the level of common ground between both parties. This document will facilitate further discussions between the Applicant and Historic England and the SoCG will be updated as discussions progress prior to and during the project 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 application for development consent. The Impacts Register ([Volume A4, Annex 5.1: Impacts Register \(APP-049\)](#)) 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 3](#): Onshore Historic Environment;
 - [Section 3.1](#): Summary of consultation with Historic England;
 - [Section 3.2](#): Agreement Log;
 - [Section 4](#): Marine Archaeology;
 - [Section 4.1](#): Summary of consultation with Historic England;
 - [Section 4.2](#): Agreement Log.

¹ [EN010098-000901-Hornsea 4 Rule 6 letter.pdf \(planninginspectorate.gov.uk\)](#)

1.3 Application elements under Historic England’s remit

1.3.1.1 The elements of Hornsea Four which may affect the interests of Historic 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 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 Agreement Logs

2.1 Overview

2.1.1.1 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](#)).

2.1.1.2 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 1](#) below is used within the ‘position’ column of the following sections of this document.

Table 1: Position Status Key.

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

Position Status	Position Colour Coding
The matter is not agreed between the parties, however the outcome of the approach taken by either the Applicant or Historic England is not considered to result in a material impact to the assessment conclusions.	
Not Agreed – material impact The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or Historic England is considered to result in a materially different impact 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 Historic England).	Ongoing point of discussion

3 Onshore Historic Environment

3.1 Summary of consultation with Historic England

3.1.1.1 **Table 2** below summarises the consultation that the Applicant has undertaken with Historic England during the pre-application phase for each relevant component of the application (as identified in **paragraph 1.3.1.1**) landward of MHWS.

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

Date	Form of consultation	Statutory/Non Statutory	Summary
11/09/2018	Meeting	Non Statutory	Hornsea Four - Historic Environment Evidence Plan Technical Panel meeting #1 Meeting to introduce Hornsea Four, the consenting programme, evidence plan process and the proportionate approach to EIA. An overview of historic environment work undertaken to date was provided, including scoping and approach to baseline. Assessment methodology, route planning and site selection was also discussed.
15/10/2018	Consultation	Statutory	Hornsea Four Offshore Wind Farm Scoping Report
12/11/2018	Consultation response	Statutory	Scoping Opinion – Consultation Response from Historic England Providing comments on the Scoping Report.
16/01/2019	Meeting	Non Statutory	Hornsea Four - Historic Environment Evidence Plan Technical Panel meeting #2 Meeting to provide Hornsea Four update, recap of the EIA scoping report and approach to EIA proportionality. Route planning and site selection was discussed in relation to historic environment assets. Scoping opinions received were discussed, and necessary next steps, including survey

Date	Form of consultation	Statutory/Non Statutory	Summary
			and assessment work. Confirmation of the approach to assessment in respect of temporary logistics compounds, onshore substation ZTVs, and non-designated assets. Discussion regarding the WWII defences within the landfall search area in addition to effects on below-ground assets from changes to drainage patterns.
17/04/2019 to 17/06/2019	Email correspondence	Non statutory	Due to Historic England's absence during the third historic Environment Technical Panel, emails were exchanged regarding the position paper and slide deck. Discussions included PEIR assessment scope and survey land access.
06/06/2019	Meeting	Non-Statutory	<p>Hornsea Four – Project Update Meeting</p> <p>The purpose of this meeting was to discuss how to improve engagement between Historic England and Hornsea Four, provide further detail regarding the archaeological programme of works, including timings, and how proportionality is being applied in practical terms.</p>
13/08/2019	Consultation	Statutory	<p>Hornsea Four PEIR</p> <p>Published for statutory Section 42 consultation.</p>
20/09/2019	Consultation response	Statutory	<p>Historic England letter response to PEIR</p> <p>Providing comments on the PEIR.</p>
14/11/2019	Meeting	Non Statutory	<p>Hornsea Four Historic Environment Evidence Plan Technical Panel meeting #4</p> <p>Meeting to provide a Hornsea Four update and updates on ongoing baseline surveys. Section 42 comments received were discussed (including the provision of necessary further information or evidence, and /or the Applicant's proposed response). Consensus was sought on the proposed approach to ES (impacts to be covered in detail in the ES chapter) and what additional evidence or information is required.</p>
11/02/2020	Email correspondence	Non statutory	Email correspondence regarding the Minutes of Evidence Plan Technical meeting #4, and methodology for the approach to assessment of 'indirect impacts'.
13/03/2020 to 27/04/2020	Draft Document	Non Statutory	<p>Draft Outline Onshore Written Scheme of investigation</p> <p>Draft document provided for review and comment. Subsequent email correspondence from Historic England regarding comments and responses. A memo was prepared by the Applicant to respond to comments raised by Historic England on the draft WSI.</p>
25/11/2020	Draft Documents	Non Statutory	<p>Issue of draft documents for review and comment::</p> <ul style="list-style-type: none"> A3.5: Historic Environment ES Chapter;

Date	Form of consultation	Statutory/Non Statutory	Summary
			<ul style="list-style-type: none"> A6.5.1: Historic Environment Desk Based Assessment (A and B); A6.5.2: Aerial Photo and Lidar Report (A, B and C) A6.5.3: Priority Archaeological Geophysical Report; A6.5.4: Geoarchaeological DBA Report; F2.10 Outline Onshore Written Scheme of Investigation (accounting for comments previously provided); and Hornsea Four Impacts and Effects Register Historic Environment tab.
08/12/2020	Review Comments	Non Statutory	Historic England's review comments on draft documents issued on 25/11/2020.
26/05/2021 To 17/08/2021	Position Paper	Non Statutory	Notification of delayed DCO submission and issue of Baseline Validity Position paper, setting out approach to baseline for Historic Environment. Agreements obtained from Historic England on approach on 17/08/2021.

3.2 Onshore Agreement Log

3.2.1.1 **Table 3** sets out the level of agreement between the parties for the Onshore Historic Environment, for each relevant component of the application (as identified in **paragraph 1.3.1.1**) landward of MHWS. In order to easily identify whether a matter is 'agreed', 'not agreed' – no material impact', 'not agreed – material impact' or 'ongoing point of discussion', a colour coding system of green, orange, red and yellow is used respectively within the 'position' column.

Table 3: Agreement Log: Onshore Historic Environment.

ID	Hornsea Four's Position	Historic England's Position	Position Summary
<i>EIA – Policy and planning</i>			
G1.14: 1.1	Volume A3, Chapter 5: Historic Environment (APP-029) has identified all relevant plans and policies and appropriate consideration has been given to them in the assessment.	Historic England consider that this is a matter that can only be determined by the Examination Authority, and therefore not a matter for Historic England. However, we will continue to provide advice on policy as it relates to the historic environment	Ongoing point of discussion
<i>EIA – Baseline Environment</i>			
G1.14: 1.2	The ES provides sufficient information to characterise the areas within which Hornsea Four will be located relevant to Historic Environment in Section 5.7, Volume A3, Chapter 5: Historic Environment (APP-029) and accompanying technical annexes, to inform the EIA.	It is the judgement of Historic England that we do not identify any major issues with regard to harm to the significance of designated heritage places, or to nationally important but non-designated heritage places onshore. However, we consider that some technical aspects of the assessment process have an impact on the methodology employed to define the impact of the proposal. We consider that limited aspects of the scheme can be conditioned further in order to provide greater clarity. Specifically this relates to the need to secure an appropriate works methodology to secure the protection of the Sanctuary Stone, Beverley (NHLE 1012589), and its setting during the works process; the adoption of best practice guidance on the assessment of setting in relation to the OnSS, Cottingham; and the application of archaeological science techniques in line with current best practice as identified in the published Historic England guidance. All of these matters remain under discussion with the applicant.	Ongoing point of discussion
<i>EIA – Assessment Methodology</i>			
G1.14: 1.3	The study areas identified in Section 5.5 of Volume A3, Chapter 5: Historic Environment (APP-029) , are appropriate.	We consider that the study areas have been adequately identified and can be agreed.	Agreed
G1.14: 1.4	The maximum design scenarios identified and outlined, where relevant, for each impact in Section 5.9 of Volume A3, Chapter 5: Historic Environment (APP-029) , and in the 'Historic Environment' tab of Volume A4, Annex 5.1: Impacts Register (APP-049) , represent the maximum project parameters for assessment.	Our position is as stated in our Written Representation (paras 9.1 to 9.8 inclusive). The Written Scheme of Investigation (WSI, PINS document ref F2:10) must reference and seek to apply the published best practice guidance on the use and application of archaeological science techniques at the most appropriate and	Ongoing point of discussion

ID	Hornsea Four's Position	Historic England's Position	Position Summary
		<p>beneficial stages of excavation and post-excavation assessment and analysis. An additional item identified in our response to the Ex Auth questions (Questions HE1.6 and HE 1.9) is the need to identify and apply an appropriate methodology to ensure the safety of the Sanctuary Stone, Beverley (NHLE 1012589), and its setting during the construction phase. We note that the applicant has stated (Applicants response to written questions HE 1.9) that the Outline Code of Construction Practice (CoCP) is to be updated at Deadline 4 to address our concerns. This is clearly a welcome change and we will review the text when it is available, and would request that when agreed, this amendment is secured in the DCO itself.</p>	
<p>G1.14: 1.5</p>	<p>The potential impacts identified in Table 5.6 and Section 5.11 of Volume A3, Chapter 5: Historic Environment (APP-029), and in the 'Historic Environment' tab of Volume A4, Annex 5.1: Impacts Register (APP-049), represent a comprehensive list of the potential impacts.</p>	<p>We do not agree that the potential impacts have been assessed and identified. Our principal area of concern is as identified in our 'PINS Registration and Relevant Representation Form' and the answer to the Ex Auth question LV1.2 'Representative Viewpoints'. The applicant has presented a series of images limited to views from existing access points and PROW locations. The published guidance on setting, the appreciation of setting and its contribution to significance, makes it clear that it is not restricted to public access and PROW sites. Therefore, the applicant does not appear to have followed the current published best practice guidance on setting.</p>	<p>Ongoing point of discussion</p>
<p>G1.14: 1.6</p>	<p>The methodologies used in Section 5.10 of Volume A3, Chapter 5: Historic Environment (APP-029) are appropriate for assessing the potential impacts of Hornsea Four.</p>	<p>Historic England considers that the methodology used to assess the impact of the OnSS on the historic environment does not follow the published best practice guidance on the assessment of setting and harm Historic England <i>The Setting of Heritage Assets</i> Historic Environment Good Practice Advice in Planning Note 3 (2nd ed) 2017). The assessment of impact submitted by the applicant refers to public access and PROW locations, whereas the published setting guidance states that the assessment of setting does not rely on public access.</p>	<p>Ongoing point of discussion</p>

ID	Hornsea Four's Position	Historic England's Position	Position Summary
<i>EIA – Assessment Conclusions</i>			
G1.14: 1.7	The conclusion that no LSE was identified at Scoping (or during subsequent correspondence with Historic England) for impacts HE-D-7, HE-D-8, HE-D-9 and HE-D-10 (all impacts during decommissioning) resulted in these potential impacts being 'Scoped out' or 'not considered in detail' in the PEIR and ES. This is appropriate.	Historic England considers that this is appropriate for the decommissioning phase.	Agreed
G1.14: 1.8	The conclusion that no LSE was identified at PEIR for impacts HE-C-2, HE-C-4, HE-O-5 and HE-O-6 (all 'indirect' impacts) resulted in these potential impacts being 'not considered in detail in the ES' and are instead considered further in Volume A6, Annex 5.1: Historic Environment Desk Based Assessment (APP-116 and APP-117) . This is appropriate.	Historic England and the applicant disagree about the use of the word 'significance'. The applicant refers to 'likely significant effects (LSE)' whereas Historic England considers, following the NPPF and <i>Conservation Principles</i> (Historic England 2008) that the key issue is the impact of a proposal on the significance of an asset. This distinction in terminology has an impact on assessment methodology and the conclusions drawn. Whilst Historic England is comfortable with the vast majority of the scheme and its degree of impact on the historic environment, we consider that the assessment of the impact of the OnSS may be lacking, for the reason identified at G1.14:1.6 above.	Ongoing point of discussion
G1.14: 1.9	The assessment of potential effects on Historic Environment in Volume A3, Chapter 5: Historic Environment (APP-029) is appropriate and proportionate and identifies the likely significant effects from Hornsea Four.	As above, G1.14:1.8.	Ongoing point of discussion
G1.14: 1.10	The conclusions of the CEA on Historic Environment presented in Section 5.12 and inter-related effects in Section 5.14 of Volume A3, Chapter 5: Historic Environment (APP-029) , are appropriate.	As above G1.14:1.5; G1.14: 1.6 and G1.14: 1.8 and G1.14:1.814). We consider that the particular use of 'significance' ('Likely Significant Effect') as adopted by the applicant has had an impact on methodology. This is specifically the case with regard to the assessment of the impact of the OnSS on the historic environment. The visualisations presented by the applicant are drawn from public access and PROW locations. The published best practice guidance on setting and harm identifies that setting and the appreciation of setting is not restricted to public access sand PROW locations.	Ongoing point of discussion

ID	Hornsea Four's Position	Historic England's Position	Position Summary
<i>Draft DCO / Outline Management Plans / Mitigation and Monitoring</i>			
G1.14: 1.11	The measures described in F2.10: Outline Written Scheme of Investigation for Onshore Archaeology (APP-245) are appropriate and adequately mitigate likely significant effects identified in Volume A3, Chapter 5: Historic Environment (APP-029) .	We consider that document F2.10 does not fully reference or reflect the published guidance on archaeological science as it should be applied at the stages of excavation and post excavation assessment and analysis. The detail of our concern is set out in para 9 of our Written Representation to the Ex Auth. We consider that the resolution of this item is straightforward, and can be addressed by the resubmission of a more explicit WSI. However, we note that Requirement 16	Ongoing point of discussion
G1.14: 1.12	Requirement 16 of the draft DCO (C1.1: Draft DCO (APP-203)) is sufficient to secure the mitigation measures described in F2.10: Outline Written Scheme of Investigation for Onshore Archaeology (APP-245) .	As above G1.14:1.11	Ongoing point of discussion
G1.14: 1.13	In addition to the onshore WSI (APP-245), the measures set out in F2.2: Outline Code of Construction Practice (APP-237) are appropriate and adequately mitigate likely significant effects identified in Volume A3, Chapter 5: Historic Environment (APP-029) and in the 'Historic Environment' tab of Volume A4, Annex 5.1: Impacts Register (APP-049) . This document will form the basis of the detailed CoCP secured under Requirement 17 of the draft DCO (C1.1: Draft DCO (APP-203)).	With regard to this matter our single area of concern is as expressed in our Answers to Ex Auth question HE 1.6. This refers to the arrangements for the protection of the significance of the Sanctuary Stone, Beverley, and its setting, during the construction process. We can confirm that we are in active discussion with the applicant to ensure that additional measures are identified and clearly stated in the CoCP and delivered as part of the DCO.	Ongoing point of discussion
G1.14: 1.14	The design of the OnSS, as presented in F2.13: Outline Design Plan (APP-248) is considered appropriate and reflects good quality design standards for the onshore aboveground infrastructure.	HE considers that there are limited design options for the OnSS; it is a utilitarian structure for a utilitarian purpose. Our only reservation about the structure is as stated in our response to Ex Auth Question LV1.2 'Representative Viewpoints' and stated above at G1.14: 1.5. We consider that the assessment of setting and impacts has not followed the published guidance on setting and the assessment of setting. It may be the case that the applicant has captured the mages showing the relationship between the proposed structure and the heritage assets form locations other than public access and PRoW locations, but has not presented them. However, it may be the case that those images were not captured, and therefore	Ongoing point of discussion

ID	Hornsea Four's Position	Historic England's Position	Position Summary
		the assessment of setting and impact has not followed the best practice guidance. We would therefore wish to see additional images so we can consider further the design and mitigation associated with the OnSS.	
G1.14: 1.15	The measures set out in F2.8: Outline Landscape Management Plan (APP-243) and F2.13: Outline Design Pan (APP-248) are appropriate and adequately mitigate effects identified in Volume A3, Chapter 5: Historic Environment (APP-029) and Volume A6, Annex 5.1: Historic Environment Desk Based Assessment (APP-116 and APP-117) , where possible.	HE does not agree that the measures are appropriate. As stated above (G1.14: 1.5 and G1.14: 1.14), we would therefore wish to see additional images so we can consider further the design and mitigation associated with the OnSS.	Ongoing point of discussion

4 Marine Archaeology

4.1 Summary of consultation with Historic England

4.1.1.1 **Table 4** below summarises the consultation that the Applicant has undertaken with the Historic England Marine Planning Unit responsible for the offshore zone during the pre-application phase for each relevant component of the application (as identified in [paragraph 1.3.1.1](#)) seaward of MHWS.

Table 4: Summary of pre-application consultation with Historic England.

Date	Form of consultation	Statutory/Non Statutory	Summary
08/10/2018	Consultation	Statutory	Hornsea Four Offshore Wind Farm Scoping Report Submitted to Historic England for consultation.
12/11/2018	Consultation	Statutory	Scoping Opinion Response from Historic England to Hornsea Four Scoping Report.
18/12/2018	Meeting	Non-Statutory	Hornsea Four – Marine Archaeology Evidence Plan Technical Panel meeting #1 Meeting to introduce Hornsea Four, the consenting programme, route planning and site selection and provide an overview of the Evidence Plan process. The meeting aimed to explain the proportionate approach that is being adopted for Hornsea Four and review responses received from Historic England during the Scoping process.
06/06/2019	Meeting	Non-Statutory	Hornsea Four – Project Update Meeting The purpose of this meeting was to discuss how to improve engagement between Historic England and Hornsea Four, provide further detail regarding the archaeological programme of works, including timings, and how proportionality is being applied in practical terms.
20/09/2019	Consultation	Statutory	Section 42 consultation response Historic England provided comment on the relevant PEIR documents and draft DCO/Deemed Marine Licences (DMLs).
13/11/2019	Meeting	Non-Statutory	Hornsea Four – Marine Archaeology Evidence Plan Technical Panel meeting #2 Meeting to discuss Historic England’s Section 42 response and provide an update on the project, in particular changes made to the route position and site selection since the PEIR submission.
12/02/2020	Meeting	Non-Statutory	Historic England Workshop Workshop held between the Applicant and Historic England to illustrate the key interactions between site investigations and marine archaeology. Topics included

Date	Form of consultation	Statutory/Non Statutory	Summary
			the ground model, archaeological interactions with geotechnical surveys and archaeological interpretation of geophysical surveys.
25/03/2020	Email to Historic England	Non-Statutory	<p>Hornsea Four Method statement for geoarchaeological work</p> <p>Shared method statement for geotechnical core collection, retention, storage, and stage 1 and 2 geoarchaeological assessment with Historic England ahead of planned Geotechnical 1A survey campaign.</p>
08/04/2020	Consultation	Non-Statutory	<p>Hornsea Four – Updated Outline Marine Written Scheme of Investigation (WSI)</p> <p>Updated Outline WSI, following PEIR submission and receipt of Section 42 responses, shared with Historic England for review.</p>
15/04/2020	Letter via email from Historic England	Non-Statutory	<p>Historic England response to Hornsea Four method statement for geoarchaeological work</p> <p>Historic England reviewed and provided comment on the collection, retention, and stage 1 and 2 analysis method statement.</p>
05/05/2020	Letter via email from Historic England	Non-Statutory	<p>Historic England response to updated Outline Marine WSI</p> <p>Historic England reviewed and provided comment on the Outline WSI, which had been updated following the PEIR submission and receipt of Historic England’s Section 42 response.</p>
12/05/2020	Meeting	Non-Statutory	<p>Hornsea Four – Marine Archaeology Evidence Plan Technical Panel meeting #3</p> <p>Meeting following Historic England’s review of the Outline Marine WSI, to discuss how the Outline WSI will be updated to address Historic England’s suggested changes.</p>
29/01/2021	Consultation on draft DCO documents	Non-Statutory	Historic England confirmed that they were aware of the approach adopted by Hornsea Four, but that any formal comments will be subject to the appropriate baseline assessment and the securement of mitigation measures within a draft Commitments Register.
July 2019 – DCO Application submission	Regular offshore update meetings	Non-Statutory	Regular catch-up meetings to keep Historic England updated on how Hornsea Four is progressing, including ongoing surveys, marine archaeology deliverables and timescales for submission.

4.2 Offshore Agreement Log

4.2.1.1 **Table 5** below sets out the level of agreement between the parties for Marine Archaeology, for each relevant component of the application (as identified in paragraph 1.3.1.1) seaward of MHWS. In order to easily identify whether a matter is 'agreed', 'not agreed' – no material impact', 'not agreed – material impact or an 'ongoing point of discussion', a colour coding system of green, orange, red and yellow is used respectively within the 'position' column.

Table 5: Agreement Log: Marine Archaeology.

ID	Hornsea Four's Position	Historic England's Position	Position Summary
<i>EIA – Policy and Planning</i>			
G1.14: 2.1	Volume A2, Chapter 9: Marine Archaeology has identified all relevant plans and policies and appropriate consideration has been given to them in the assessment.	Historic England consider that this is a matter that can only be determined by the Examination Authority	Not agreed – no material impact
<i>Proportionate Approach</i>			
G1.14: 2.2	Historic England have no objection to Hornsea Four's proportionate approach to the EIA, subject to the appropriate securement through the DCO and DMLs of the commitments and mitigation measures that support any "scoped out" impacts (see Co46, Co140, Co166, Co167, Co181, and Co201 Volume A4, Annex 5.2: Commitments Register).	It is not a matter for Historic England to 'object' to the decision made by the Applicant to define and apply an 'appropriate approach to the EIA'. It is the advisory role of Historic England to determine whether the Applicant has identified risks to either the known or unknown historic environment as may exist within the proposed development area and the viability of mitigation measures proposed and how they can be delivered effectively. We acknowledge that the draft DCO includes measures to deliver mitigation, and that the accompanying 'commitments' summarise how the mitigation measures are to be delivered	Ongoing point of Discussion
G1.14: 2.3	The Hornsea Four DCO Application considers Likely Significant Effects (LSE), utilising terminology used within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in relation to what is required to be described within Environmental Statements. Historic England note that in heritage terms, the key factor is the "impact on the significance of heritage assets", not necessarily "significant effect". It is agreed that these differences are not considered to have a material impact to the assessment conclusions.	Historic England has stated on a number of occasions that we disagree with the terminology used and interpretation of the concept of 'significance'. It is our view that proposed developments have the potential to cause harm to the significance of heritage assets. The applicant takes the position that they are assessing the possibility of a proposal having 'significant effects'. This difference in perspective is to be stated clearly by the Applicant.	Ongoing point of Discussion
<i>Scoping Assessment</i>			
G1.14: 2.4	The conclusion that no LSE was identified at Scoping for impacts MA-C-1, MA-C-2, MA-C-3, MA-C-6, MA-D-10 resulted in these potential impacts being 'Scoped out' of further assessment in the PEIR and ES. Based on	The approach advocated by the Applicant is applicable to the characterisation completed to date for this proposed development and the acknowledgement by the Applicant that at the time of (draft) DCO submission for examination that there is an absence of complete geophysical survey data coverage and that geoarchaeological	Ongoing point of Discussion

ID	Hornsea Four's Position	Historic England's Position	Position Summary
	evidence from adjacent projects, embedded mitigation is effective in reducing magnitude of impact to 'none' or 'negligible'. Full coverage high-resolution geophysical survey will enable micro-siting of the project design to ensure significant impacts do not occur. This is appropriate.	assessment was not completed. While it might be possible to draw on experience gained from other offshore wind farm development projects, it remains the case that other adjacent projects included impact as could occur due to construction and therefore the necessary mitigation measures were provided. We add that 'embedded' mitigation is only applicable to elements of the historic environment that might be of archaeological interest as are presently known to exist. The effectiveness of any subsequent high-resolution surveys conducted post-consent and pre-commencement will be the use of those data to inform adaptive mitigation strategies (i.e. avoidance by micro-siting) for elements of the historic environment that are presently unknown, so that the construction phase is adequately informed and designed to avoid harmful impact	
<i>Commitments</i>			
G1.14: 2.5	Historic England agree with the wording and appropriateness of commitments (Co46, Co140, Co166, Co167, Co181, and Co201) that relate to marine archaeology and the mechanisms within which they are secured within Volume C1, Chapter 1: Draft DCO including Draft DML (see Volume A4, Annex 5.2: Commitments Register).	We acknowledge the inclusion of a 'commitments register' that that they are described as providing 'primary', 'secondary' and 'tertiary' mitigation measures. We also acknowledged in our Written Representation that draft DML Schedule 15 (Documents to be certified) includes a 'commitments register'. We also acknowledge that the Applicant has confirmed how the 'commitments registered' is delivered through conditions included in the (draft) DMLs which provide for its delivery e.g. as necessary to inform any construction phase and therefore enabled pre-commencement	Ongoing point of Discussion
<i>Impacts and Effects Register</i>			
G1.14: 2.6	The potential impacts identified in Table 9.8 and 9.10 of Volume A2, Chapter 9: Marine Archaeology , and in the 'Marine Archaeology' tab of Volume A4, Annex 5.1: Impacts Register , represent a comprehensive list of the potential impacts.	We acknowledge the list of potential impacts produced and which reflect the archaeological analysis and interpretation of survey data as was available prior to the Applicant's DCO submission for examination (see also our position G1.14: 2.4	Ongoing point of Discussion
G1.14: 2.7	Historic England agree with the wording of impacts MA-O-7, MA-O-8 and MA-D-9 set out in in Table 9.10 of Volume A2, Chapter 9: Marine Archaeology , and in the 'Marine Archaeology' tab of Volume A4, Annex 5.1: Impacts Register .	We acknowledge that the listed impacts are applicable to the defined phases of this proposed project: operation and decommissioning and that impacts as may occur during construction are omitted (see our Written Representation, paragraph 4.9)	Ongoing point of Discussion

ID	Hornsea Four's Position	Historic England's Position	Position Summary
G1.14: 2.8	The maximum design scenarios identified and outlined, where relevant, for each impact in Table 9.10 of Volume A2, Chapter 9: Marine Archaeology , and in the 'Marine Archaeology' tab of Volume A4, Annex 5.1: Impacts Register , represent the maximum project parameters for assessment.	We acknowledge that the listed impacts are applicable to the defined phases of this proposed project: operation and decommissioning and that impacts as may occur during construction are omitted (see our Written Representation, paragraph 4.9). This is a matter requiring discussion in consideration of different wind turbine generator foundation designs as could be deployed within the proposed development area (see our Written Representation paragraph 4.13)	Ongoing point of Discussion
<i>EIA – Assessment Methodology</i>			
G1.14: 2.9	The methodologies used in Section 9.10 of Volume A2, Chapter 9: Marine Archaeology are appropriate for assessing potential impacts of Hornsea Four.	We acknowledge the detailing of the methodologies provided in the ES and we are aware that impacts as may occur during construction are omitted (see our Written Representation, paragraph 4.9)	Ongoing point of Discussion
G1.14: 2.10	The study areas identified in Section 9.5 of Volume A2, Chapter 9: Marine Archaeology , are appropriate.	We acknowledge the assessment of impacts as relevant to the defined study area	Agreed
<i>EIA – Baseline Environment</i>			
G1.14: 2.11	The baseline environment has been accurately characterised. Sufficient primary and secondary data has been collated to define the archaeological potential of the study area and further surveys will be undertaken, as secured by commitments 166 and 167 (see Volume A4, Annex 5.2: Commitments Register).	The characterisation presented reflects the utilisation of survey data available to the Applicant at the time of DCO submission and the acknowledgment that there is an absence of complete geophysical survey data coverage and that geoarchaeological assessment was not completed.	Ongoing point of Discussion
<i>EIA – Assessment Conclusions</i>			
G1.14: 2.12	The conclusions of the assessment of impacts for construction, operation and decommissioning presented are agreed and consistent with the agreed assessment methodologies.	The Applicant has listed impacts as applicable to the defined phases of this proposed project: operation and decommissioning and that impacts as may occur during construction are omitted (see our Written Representation, paragraph 4.9)	Ongoing point of Discussion
G1.14: 2.13	The conclusions of the assessment of cumulative impacts are agreed.	The conclusions offered will reflect the defined phases of this proposed project: operation and decommissioning and that impacts as may occur during construction are omitted (see our Written Representation, paragraph 4.9)	Ongoing point of Discussion
<i>Draft DCO / Outline Management Plans / Mitigation and Monitoring</i>			
G1.14: 2.14	The Outline Marine WSI is secured under Part 2, Condition 13(2) and 13(3) of DCO Schedules 11 and 12. Historic England agree the wording of these conditions are appropriate and adequate.	We are now aware that in Scheduled 11 and 12 Condition 13(2)(g) specific reference is made to The Crown Estate 'Offshore Renewables Protocol for Reporting Archaeological Discoveries' which we understand that The Crown Estate is no longer sponsoring. We therefore suggest that the text of these schedules is amended and	Ongoing point of Discussion

ID	Hornsea Four's Position	Historic England's Position	Position Summary
		application of a scheme-specific procedure for reporting of any wreck or wreck material encountered is included	
G1.14: 2.15	<p>The wording of the following requirements and conditions pertaining to marine archaeology are appropriate and adequate:</p> <ul style="list-style-type: none"> • Part 2 - Condition 13(1(a) of DCO Schedules 11 and 12 with reference to a Design Plan; • Part 2 - Condition 13(1(c) of DCO Schedules 11 and 12 with reference to a Construction Method Statement; • Part 2 - Condition 13(1)(h) of DCO Schedules 11 and 12 with reference to a Cable Specification and Installation Plan; and • Part 1(6) of DCO Schedules 11 and 12 with reference to a decommissioning plan. 	<p>We offer the following comments:</p> <ol style="list-style-type: none"> 1. The 'design plan' seems to be primarily focused on habitats of principal importance and therefore a matter not of relevance to Historic England. 2. In our Written Representation, paragraph 10.1 we mention that any Construction Method Statement (CMS) could also include information derived from post-consent and pre-construction archaeological evaluation. 3. The 'cable specification and installation plan' is focused on safety of navigation factors vis. unburied or shallow buried cables and therefore not a matter of relevance to the role and responsibilities of Historic England. 4. The responsibility and approval of any decommissioning plan appears to rest with Secretary of State, as explained in Part 1(6), we therefore are not in a position to offer any comment regarding its appropriateness or adequacy 	Ongoing point of Discussion
G1.14: 2.16	Historic England agree that the Hornsea Four Outline Marine WSI (F2.4) provides appropriate mechanisms to ensure effective archaeological work is supported through a phased approach.	We acknowledge that a 'phased approach' is explained e.g. 'pre-construction' (see Outline Marine WSI paragraph 1.1.1.6). However, it is important to reconcile this approach with the detail of the 'commitments register' such that analysis and interpretation is conducted so that the design of any 'construction phase' is informed and guided by adaptive mitigation allowing for in-situ avoidance of presently unknown archaeological materials as could be discovered when the required high-resolution programme of survey data acquisition is commissioned	Ongoing point of Discussion
G1.14: 2.17	The Applicants approach to the archaeological watching brief is appropriate.	The format for a watching brief is described within the Outline Marine WSI (paragraph 7.5.1.8)	Agreed
G1.14: 2.18	The timescales for submission of the Method Statement to the Archaeological Curator and wider reporting are appropriate.	The Outline Marine WSI in Table 8 (Planned site-specific surveys) sets out a future programme of surveys up to and including Summer 2026. We appreciate that this timetable is likely to be amended. The statement made in Outline Marine WSI paragraph 6.3.1.1 states a timeframe in which return of comments are expected. It is recommended that receipt of all advice from Historic England should be subject to agreement.	Ongoing point of Discussion