



Hornsea Project Four

Statement of Common Ground between Hornsea Project Four and the Maritime Coastguard Agency

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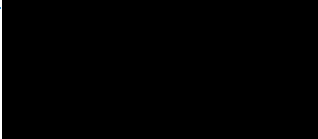
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Revision History

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21 April 2022	02	Second draft issued into Examination at Deadline 3. For ongoing discussion.
20 June 2022	03	Third draft issued into Examination at Deadline 5.
27 July 2022	04	Final document for submission at Deadline 6.

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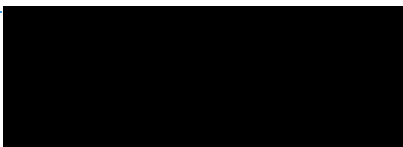
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Glossary

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.

Acronyms

Acronym	Definition
DCO	Development Consent Order
DMLs	Deemed Marine Licences
EIA	Environmental Impact Assessment
ES	Environmental Statement
EXa	Examining Authority
FSA	Formal Safety Assessment
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
Km	Kilometres
MCA	Maritime and Coastguard Agency
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NRA	Navigation Risk Assessment
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
SEZ	Structures Exclusion Zone
SLoO	Single Line of Orientation
SoCG	Statement of Common Ground

1 Introduction

1.1 Reason for this document

- 1.1.1.1 This Statement of Common Ground (SoCG) has been prepared between Orsted Hornsea Project Four Limited ('the Applicant') and The Maritime & Coastguard Agency (MCA) to set out the areas of agreement and disagreement between the two parties in relation to the proposed Development Consent Order (DCO) application for the Hornsea Project Four offshore wind farm (hereafter referred to as 'Hornsea Four').
- 1.1.1.2 This SoCG covers all topics of relevance to the MCA in the marine environment seaward of Mean High Water Springs (MHWS).
- 1.1.1.3 The need for a SoCG between the Applicant and the MCA is anticipated to be set out within the Rule 6 letter to be issued by the Planning Inspectorate (PINS) post-application of the Hornsea Four DCO.
- 1.1.1.4 It is the intention that this document will facilitate further discussions between the Applicant and the MCA and will provide the Examining Authority (ExA) with a clear overview of the level of common ground between both parties. This document the SoCG will be updated throughout the application 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 Log; and
 - [Section 0](#): Summary.

1.3 Application elements under The Maritime & Coastguard Agency's remit

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

1.3.1.2 This SoCG covers technical topics of the DCO application of relevance to the MCA comprising:

- Draft DCO and Deemed Marine Licences; and
- Shipping & Navigation

1.3.1.3 It is agreed that, whilst the MCA retains an interest in the following areas with respect to the provisions set out in the DCO and DMLs, the MCA has made little or no comment in relation to the technical assessments associated with the following topics and as such, agreement logs have not been presented for these topics:

- Commercial Fisheries;
- Aviation, Military and Communications; and
- Infrastructure and Other Users.

1.4 Overview of Hornsea Four

1.4.1.1 Hornsea Four is an offshore wind farm which will be located approximately 65 kilometres (km) offshore the East Riding of Yorkshire in the Southern North Sea and will be the fourth project to be developed in the former Hornsea Zone. Hornsea Four will include both offshore and onshore infrastructure and consists of:

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

2 Consultation

2.1 Summary of consultation with The Maritime & Coastguard Agency

2.1.1.1 **Table 1** below summarises the consultation that the Applicant has undertaken with the MCA for each relevant component of the application (as identified in paragraph 1.3.1.1) seaward of MHWS.

Table 1: Summary of consultation with the MCA.

Date	Form of consultation	Statutory/Non Statutory	Summary
02/08/2018	Meeting	Non Statutory	<p>Hornsea Four Introductory Meeting</p> <p>Introduction to Hornsea Four and introduction to consenting strategy and approach to proportionality. Overview of geophysical surveys and discussion on project's position paper outlining the proposed geophysical strategy. Overview Marine traffic survey approach. Agreement on future engagement, method of incorporating meeting minutes and Statements of Common Ground.</p>
27/11/2018	Meeting	Non Statutory	<p>Hornsea Four Scoping Meeting</p> <p>Discussion on MCA's and Trinity House's response to the scoping report. Discussion on cumulative/in-combination impact assessment. Overview of the Applicant's Developable Area Approach. Introduction to the Applicant's Draft Layout Principles.</p>
23/05/2019	Meeting	Non Statutory	<p>Hornsea Four Update Meeting</p> <p>Overview of the Applicant's proportionate approach to EIA, Impacts and Effects Register and Commitment Register. Discussion on the suitability of scoping out marine navigation and communication aspects. Overview of the Applicant's Developable Area Approach and accompanying survey work. Overview of red line boundary provided. Discussion regarding the Applicant's layout principles wording and definitions.</p>
27/06/2019	Hazard Workshop	Statutory	<p>Hornsea Four Hazard Workshop</p> <p>Hazard Workshop to identify concerns and risks relating to shipping and navigation as a result of Hornsea Four. Overview of the project: timelines, infrastructure under consideration, proportionality, location of project including HVAC booster station, other projects in the area and orientation. Discussion on above topics, Oil and Gas traffic, commercial vessels and fishing & recreational vessels.</p>
25/11/2019	Meeting	Non Statutory	<p>Hornsea Four Update Meeting</p> <p>Overview of programme and consultation. Assurance that consultation can continue past DCO submission, including with DFDS Seaways, if issues not resolved. MCA & Trinity House Section 42 response discussed. The Applicant confirmed that the impact assessment will be revised with updated inputs including the vessel traffic surveys and based on available information. The Applicant made clear that commercial discussions</p>

Date	Form of consultation	Statutory/Non Statutory	Summary
			ongoing with DFDS Seaways. Commercial impacts will be assessed in the ES chapter but will not be discussed in the NRA.
26/02/2020	Meeting	Non Statutory	<p>Hornsea Four Update Meeting</p> <p>Hornsea Four agreed to issue the updated NRA and draft ES documents to the MCA for review. Hornsea Four received comments on the draft Layout Principles from MCA and Trinity House. The Applicant confirmed that a further meeting could be arranged if there were any issues with the updated Layout Principles. The Statement of Common Ground process was discussed. Hornsea Four provided an update on the commercial shipping engagement. MCA highlighted that their primary focus was safety of navigation. Hornsea Four presented other constraints in the array area incl. ornithology, O&G infrastructure and geological ground conditions. The Applicant is considering the viability of separating Hornsea Four and Hornsea Project Two based on commitments that are potentially required. MCA was encouraged by the potential for a separation between Hornsea Project Two and Project Four being considered. Anatec presented slides on the proposed methodology for assessment of a separation distance. Hornsea Four plan to undertake an additional risk assessment to determine what distance the closest point between the structures contained within Hornsea Two and Hornsea Four should be. This risk assessment may then form the basis of an updated NRA. MCA suggested that the PIANC and MGN guidance might be useful for this risk assessment.</p>
28/05/2020	Hazard Workshop	Statutory	<p>Hornsea Four Second Hazard Workshop</p> <p>The focus of this workshop was to present to external stakeholders the potential for inclusion of a Structures Exclusion Zone (SEZ) within the Hornsea Four array. Hornsea Four (through its consultant Anatec) summarised the relevant stakeholder feedback from the Section 42 consultation but focused on the shipping and navigation receptors. Hornsea Four (through its consultant Anatec) covered non safety related impacts including the wording of the commercial impacts, outlined the process and what the mitigation was for alleviating stakeholder commercial concerns. Hornsea Four (through its consultant Anatec) provided an overview of the proposed SEZ, summarised the FSA and</p>

Date	Form of consultation	Statutory/Non Statutory	Summary
			<p>hazard log ranking. Hornsea Four (through its consultant Anatec) gave an overview of the navigational features within and in proximity to Hornsea Four including oil and gas infrastructure, other offshore wind farm developments and subsea pipelines and provided details of the vessel traffic data. The topic of ensuring the SEZ is Safe for Navigation was discussed. Hornsea Four (through its consultant Anatec) listed the hazards identified in the hazard log produced following the first Hazard Workshop, any changes based on any changes required due to updates were discussed.</p>
17/06/2020	Meeting	Non Statutory	<p>Hornsea Four Update Meeting An opportunity to discuss the SEZ proposal as presented at the recent Hazard Workshop, draft Layout Principles, comments on NRA version one and statement of common ground next steps.</p>
31/07/2020	Email Correspondence	Statutory	<p>Updates Required to NRA MCA outlined expectations following inclusion of gap including updated hazard log, updated NRA, assurance that relevant stakeholders are accepting of the gap width.</p>
18/01/2022	Meeting	Non Statutory	<p>Consultation on new offshore nesting structure site selection An overview of the proposed locations for an offshore nesting structure was provided as well as an overview of the Shipping & Navigation review of the locations undertaken by Anatec.</p> <p>Also discussed lighting and marking requirements for the potential structure. HOW04 will ensure the MCA is engaged with on this topic as the designs progress.</p>

3 Agreement Log

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
<p>Agreed The matter is considered to be agreed between all parties</p>	Agreed
<p>Not Agreed – no material impact The matter is not agreed between the parties, however the outcome of the approach taken by the Applicant is not considered to result in a material impact to the assessment conclusions.</p>	Not Agreed – no material impact
<p>Not Agreed – material impact The matter is not agreed between the parties and the outcome of the approach taken by the Applicant is considered to result in a materially different impact to the assessment conclusions.</p>	Not Agreed – material impact
<p>Ongoing point of discussion The matter is neither 'agreed' nor 'not agreed' and is a matter where further discussion is required between the parties (e.g. where documents are yet to be shared with the MCA).</p>	Ongoing point of discussion

3.2 Draft DCO and Deemed Marine Licences

Table 3: Agreement Log: Draft DCO and Deemed Marine Licences

ID	Hornsea Four Position	MCA Position	Position Summary
2.1	The wording of Conditions relevant to navigational safety within Schedule 11 and 12 of C1.1: Draft DCO including Draft DMLs (APP-203) are appropriate and adequate.	Agreed with statement.	Agreed

3.3 Shipping & Navigation

Table 4: Agreement Log: Shipping & Navigation

ID	Hornsea Four Position	MCA Position	Position Summary
Consultation			
3.1	The MCA has been adequately consulted regarding shipping and navigation to date and is satisfied with the outcomes of consultation with other stakeholders.	Agreed with statement.	Agreed

Baseline Environment and Methodology			
3.2	Marine Traffic Surveys - The marine traffic survey data collection is as per Marine Guidance Note (MGN) 543 and/or MGN 654 therefore suitable for the assessment. This includes data collected for both the array area and the offshore HVAC booster station search area.	Agreed with statement.	Agreed
3.3	Baseline environment - The Navigation Risk Assessment (NRA) and Environmental Statement (ES) adequately characterises the shipping and navigation baseline environment in Chapter 7: Shipping and Navigation (APP-019) of the ES which includes Annex 7.1 Navigational Risk Assessment (APP-081–APP-083) .	Agreed with statement.	Agreed
3.4	Assessment Methodology - Appropriate legislation, planning policy and guidance relevant to shipping and navigation has been used. The approach to the assessment of effects is deemed appropriate for the purposes of predicting changes to the baseline environment.	Agreed with statement.	Agreed
Environmental Impact Assessment			
3.5	Identification of In-Isolation Impacts - The potential hazards (impacts) identified within Chapter 7: Shipping and Navigation (APP-019) of the ES represent a comprehensive list of potential risks on shipping and navigation from the project.	Agreed with statement.	Agreed
3.6	Identification of Cumulative Impacts - Based on the information provided within Annex 7.1 Navigational Risk Assessment (APP-081–APP-083) and Chapter 7: Shipping and Navigation (APP-019) it is agreed that cumulative impacts, including main route deviations caused by the project cumulatively, are unlikely to be significant.	Agreed with statement.	Agreed
3.7	Identification of Appropriate Risk Controls - It is agreed that the hazards (impacts) for Hornsea Four are 'As Low As Reasonably Practicable' (ALARP) on the understanding that appropriate mitigation measures (as noted in the Chapter 7: Shipping and Navigation (APP-019)) are implemented.	Agreed with statement.	Agreed

Maximum Design Scenario and Development Boundary			
3.8	Worst Case Assessment - An assessment of the maximum design scenario (MDS) parameters has been undertaken within Annex 7.1 Navigational Risk Assessment (APP-081–APP-083) and Chapter 7: Shipping and Navigation (APP-019) .	Agreed with statement.	Agreed
3.9	Layout Principles - Layout principles detailed in Annex 4.7: Layout Principles (APP045) as submitted to the Examining Authority are agreed.	Agreed with statement. The latest agreed version is Rev 03 dated 15/6/22.	Agreed
3.10	Changes to Development Boundary – The development boundary was amended to satisfy navigational safety concerns raised by shipping and navigation stakeholders post Section 42 consultation and has been adequately assessed within Annex 7.1 Navigational Risk Assessment (APP-081–APP-083) and Chapter 7: Shipping and Navigation (APP-019) subject to application of appropriate risk controls.	Agreed with statement.	

Table 5: Agreement Log: Compensation – Offshore Artificial Nesting Structures

ID	Hornsea Four Position	MCA Position	Position Summary
4.1	The Applicant consulted with the MCA on 18/01/2022 regarding the proposed locations for an offshore artificial nesting structure to ascertain any risks pertaining to the MCA’s remit (see B2.7.2 Volume B2, Annex 7.2: Compensation measures for Flamborough and Filey Coast (FFC) Special Protection Area (SPA): Kittiwake Offshore Artificial Nesting Roadmap (Clean) Revision 02 (REP1-016)).	Agreed with statement. It is noted that the structures will be subject to separate marine licences if progressed. MCA is content for the specific requirements for navigation risk controls associated with offshore nesting platform structures to be considered then.	Agreed