



Hornsea Project Four

Statement of Common Ground between Hornsea Project Four and The UK Chamber of Shipping

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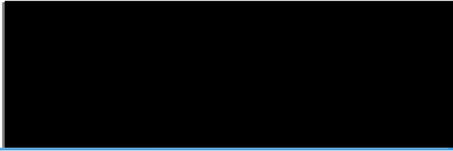
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Revision History

Date	Revision	Reason for issue
08 March 2022	01	First draft for review.
22 March 2022	02	For ongoing discussion.
20 June 2022	03	Third draft for submission at Deadline 5.
10 August 2022	04	Fourth and final document for issue at Deadline 7.

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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
CoS	Chamber of Shipping
DCO	Development Consent Order
DMLs	Deemed Marine Licences
EIA	Environmental Impact Assessment
ES	Environmental Statement
FSA	Formal Safety Assessment
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LSE	Likely Significant Effect
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
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 Chamber of Shipping (COS) 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 COS 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 Chamber of Shipping 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 and the COS 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 (LSE) are included within the individual topic assessments of the Environmental Statement (ES).
- 1.2.1.2 The structure of this SoCG is as follows:
- [Section 1](#): Introduction;
 - [Section 2](#): Consultation; and
 - [Section 3](#): Agreement Log.

1.3 Application elements under The Chamber of Shipping's remit

- 1.3.1.1 The elements of Hornsea Four which may affect the interests of the COS 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 covers technical topics of the DCO application of relevance to the COS comprising:

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

1.4 Overview of Hornsea Four

1.4.1.1 Hornsea Four is an offshore wind farm which will be located approximately 65 kilometres 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 Chamber of Shipping

2.1.1.1 **Table 1** below summarises the consultation that the Applicant has undertaken with the COS 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 UK COS.

Date	Form of consultation	Statutory/Non Statutory	Summary
27/06/2019	Hazard Workshop	Statutory	Hornsea Four Hazard Workshop 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,

Date	Form of consultation	Statutory/Non Statutory	Summary
			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.
23/09/2019	Section 42 response	Statutory	<p>Consultation Response</p> <p>Noted that other operators besides DFDS Seaways should be consulted on navigational risk challenges and commercial risks exist which are cumulative in nature. Highlighted deviation of routes northwards towards Dogger Bank as possible safety risk, particularly in adverse weather. Expressed navigational safety concerns over the potential planned single line of orientation, advocating for two. Should a single line of orientation layout be sought, must ensure that the Maritime and Coastguard Agency (MCA) and Trinity House are content with the safety justification..</p> <p>Highlighted transboundary effects, in particular for RoRo services, and the need for international consultation.</p> <p>Highlighted a gap between Hornsea Four and Hornsea Project Two as a mitigation measure.</p>
07/11/2019	Consultation meeting	Non Statutory	<p>Consultation Response</p> <p>Given the volume of consultation ongoing a joint meeting with stakeholders is suggested as beneficial.</p> <p>Noted that DFDS Seaways has raised the creation of a gap between Hornsea Four and Hornsea Project Two as a potential mitigation measure.</p> <p>Highlighted the potential for increased route distances leading to increased fuel consumption and emissions as well as affects on schedules which could have a negative impact on the wider economy and supply chain.</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 gap between Hornsea Four and Hornsea Project Two. Hornsea Four (through its consultant Anatec) summarised the relevant stakeholder feedback from the Consultation Section 42 but focused on the</p>

Date	Form of consultation	Statutory/Non Statutory	Summary
			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 gap, summarised the Formal Safety Assessment (FSA) and 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 gap 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.
05/06/2020	Email correspondence	Non Statutory	Strongly support the inclusion of a gap between Hornsea Four and Hornsea Project Two, noting that adverse anticipated future case routeing shown for regular routes are removed or minimised from the perspective of commercial effect.
06/07/2020	Email correspondence	Non Statutory	Following confirmation from Orsted that a gap would be included in the updated DCO, CoS issued strong support for the updated position.
24/02/2022	Consultation meeting	Non Statutory	SoCG between Hornsea Project Four and CoS discussed and updated.

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
- 3.1.1.3 **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 UK Chamber of Shipping).</p>	Ongoing point of discussion

3.2 Shipping & Navigation

Table 3: Agreement Log: Shipping & Navigation

ID	Hornsea Four Position	COS Position	Position Summary
Consultation			
1	The UK CoS has been adequately consulted regarding shipping and navigation to date and is satisfied at the outcomes of consultation with UK CoS member operators.	The UK CoS agrees with this statement.	Agreed
Baseline Environment and Methodology			
2	Marine traffic surveys - The marine traffic survey data collection is as per Marine Guidance Note (MGN) 543 and therefore suitable for the assessment. This includes data collected for both the array area and the offshore HVAC booster station search area.	The UK CoS agrees with this statement.	Agreed
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 of the ES which includes the NRA	The UK CoS disagreed in S42 response to PEIR, however is now broadly content with ES based off discussion with UK CoS member operators and navigational stakeholders.	Agreed
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. This includes modelling of base case plus future case and adverse weather routeing as well as consultation on impacts with regular operators identified within the area	Agree although have a preference for the future case assessment to consider traffic increases greater than 10%, and larger vessel sizes.	Agreed
Environmental Impact Assessment			
5	Identification of in Isolation Impacts - The potential impacts identified within Chapter 7: Shipping and Navigation of the ES represent a comprehensive list of	The UK CoS agrees with this statement.	Agreed

	potential effects on shipping and navigation from the project.		
6	Significance of in Isolation Impacts – Based on the information provided within the NRA and Chapter 7: Shipping and Navigation it is agreed that the in isolation 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) are implemented.	The UK CoS is strongly supportive of the mitigation measures proposed for implementation but reserves final agreement as to whether the in isolation impacts are ALARP but finds them tolerable.	Not Agreed – no material impact
7	Identification and Significance of Cumulative Impacts Based on the information provided within the NRA and Chapter 7: Shipping and Navigation of the ES it is agreed that cumulative impacts, including main route deviations caused by the project cumulatively, are unlikely to be significant on the understanding that appropriate mitigation measures (as noted in the Chapter 7: Shipping and Navigation) are implemented.	The UK CoS disagreed in its S42 response to PEIR on the cumulative impacts.. The UK CoS is strongly supportive of the mitigation measures proposed for implementation but reserves final agreement as to whether the in cumulative impacts are ALARP but finds them tolerable.	Not Agreed – no material impact
8	Decommissioning Plan – A decommissioning plan will be developed and will give consideration to the scenario where upon decommissioning and completion of removal operations, an obstruction which may be considered a danger to safe navigation if left on site. Such an obstruction may require marking until such time as it is either removed or no longer considered a danger to navigation.	Upon decommissioning, the UK CoS calls for full decommissioning and removal of all infrastructure from the site, including all turbines, topsides, inter-array cables and interconnector, and foundations to a safe depth below the seabed. This enables the Chamber’s desire to maintain navigational safety, return seabed to its original state, and not hinder or encumber future activity or development.	Agreed
Worst Case and Development Boundary			
9	Worst Case Assessment – An assessment of the worst-case parameters has been undertaken within the NRA and Chapter 7: Shipping and Navigation. This worst case includes and assessment of a Single Line of Orientation (SLOO) layout.	The UK CoS strongly favours two lines of orientation for the layout of the OWF, whilst recognising that SLOO can be accepted following consultation and approval (through a safety justification) with the MCA.	Agreed

10	Changes to Development Boundary – The development boundaries have been amended to the satisfaction of commercial shipping operators (represented by the COS) and have been assessed within the NRA and ES.	As per email correspondence (05/06/2020) the UK CoS strongly supports the inclusion of a gap between Hornsea Four and Hornsea Project Two for mitigation of negative commercial effects to shipping	Agreed
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