



Hornsea Project Four

Statement of Common Ground between Hornsea Project Four and National Highways

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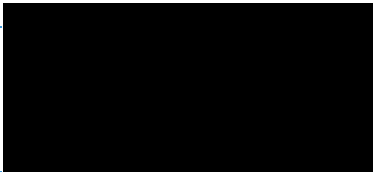
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Revision History

Date	Version	Reason for issue
10/08/2021	A	1 st draft for National Highways with proposed areas of agreements
22/09/2021	B	2 nd draft for DCO application submission
13/01/2023	02	Updated version following request from BEIS to provided with signatures.

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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
CEA	Cumulative Effects Assessment
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
ECC	Export Cable Corridor
EIA	Environmental Impact Assessment
ES	Environmental Statement
ExA	Examining Authority
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LSE	Likely Significant Effect
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
SoCG	Statement of Common Ground
SRN	Strategic Road Network
OnSS	Onshore substation
PEIR	Preliminary Environmental Information Report
UK	United Kingdom

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 National Highways 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 onshore topic of Traffic and Transport only.

1.1.1.3 It is the intention that this document will facilitate further discussions between the Applicant and National Highways and will provide the Examining Authority (ExA) with a clear overview of the level of common ground between both parties. This document 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 Applicants 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;
- [Section 3](#): Agreement Log;
- [Section 4](#): Summary.

1.3 Application elements under National Highways remit

1.3.1.1 The elements of Hornsea Four which may affect the interests of National Highways are work numbers 6 to 10, onshore; however, it is noted that no element of the project falls within the jurisdiction of National Highways, only associated traffic movements. These are detailed in Part 1 (Authorised Development) of Schedule 1 (Authorised Project) of the draft DCO ([Volume C1.1: Draft DCO including Draft DML](#)).

1.4 Overview of Hornsea Four

1.4.1.1 Hornsea Four is an offshore wind farm which will be located approximately 69 km offshore the East Riding of Yorkshire in the Southern North Sea and will be the fourth project to be

developed in the former Hornsea Zone. Hornsea Four will include both offshore and onshore infrastructure and consists of:

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

2.1.1.1 **Table 1** summarises the consultation that the Applicant has undertaken with National Highways (noting that consultation was largely undertaken under national Highway's previous name, Highways England) during the pre-application phase. In addition, a number of Position Statements and draft documents (including the impacts Register) have been issued throughout the pre-application stage of Hornsea Four, for review and comment.

Table 1: Summary of pre-application consultation with the Highways England (now National Highways).

Date	Form of consultation	Statutory/Non Statutory	Summary
15/10/2018	Consultation	Statutory	Hornsea Project Four Offshore Wind Farm Scoping Report
13/08/2019	Consultation	Statutory	Hornsea Project Four PEIR Published for statutory Section 42 consultation.
5/09/2019	Meeting	Non-statutory	Meeting held between the Applicant and Highways England (now National Highways) to discuss and agree on the approach to assessment, cumulative effect assessment, abnormal indivisible loads, and other general areas associated with traffic and transport.
15/04/2020	Draft documents	Non-statutory	An early draft of the outline Construction Traffic Management Plan was shared by the Applicant with National Highways for review and comments.
18/12/2020	Draft documents	Non-statutory	The draft Outline Construction Traffic Management Plan (updated to account for previous comments provided by stakeholders), Traffic and Transport ES Chapter and accompanying technical annex were shared with National Highways for review and comment. Furthermore, the draft Impacts Register (traffic and transport tab) and Commitments Register were also shared. Comments were received from national Highways and subsequently incorporated into the final outline Construction Traffic Management Plan for DCO application submission.
15/01/2021	Email	Non-statutory	National Highways comments / feedback on the draft documents submitted for review by the Applicant on 18/12/2020.
19/02/2021	Email	Non-statutory	Responses from the Applicant to comments provided by National Highways on 15/02/2021, on draft documents issued by the Applicant on 18/12/2020.
19/05/2021	Email		National Highways response and overall approval of comments / responses provided by the Applicant on 19/02/2021.

3 Onshore Agreement Log

3.1 Overview

3.1.1.1 The following sections of this SoCG set out the level of agreement between the parties for the relevant onshore topic (as identified in [paragraph 1.1.1.2](#)).

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](#) is used within the 'position' column of the following sections of this document.

3.1.1.3 The following section of this SoCG summaries the level of agreement between Hornsea Four and National Highways on all relevant matters landward of MHWS.

Table 2: 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 The matter is not agreed between the parties, however the outcome of the approach taken by either the Applicant or National Highways is not considered to result in a material impact 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 or National Highways 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 National Highways).	Ongoing point of discussion

3.2 Traffic and Transport

Table 3: Agreement Log: Traffic and Transport

ID	Statement on which agreement is sought	Position	Commentary
<i>Hornsea Four Design</i>			
G3.3: 1.1	The temporary construction access locations proposed by Hornsea Four during construction (identified on Figure 11 of Volume A6, Annex 7.1: Traffic and Transport) are appropriate.	Not Agreed – no material impact	Access locations are not directly taken from SRN and therefore are an issue for the Local Highway Authority.
<i>EIA – Policy and planning</i>			
G3.3: 1.2	Volume A3, Chapter 7: Traffic and Transport has identified all relevant plans and policies and appropriate consideration has been given to them in the assessment.	Agreed	Cir 02/2013 referenced
<i>EIA – Baseline Environment</i>			
G3.3: 1.3	The ES adequately defines the baseline environment relevant to Traffic and Transport in Volume A3, Chapter 7: Traffic and Transport , to inform the EIA.	Agreed	Scope of study area agreed through discussions
G3.3: 1.4	The future baseline identified in Volume A3, Chapter 7: Traffic and Transport is considered appropriate.	Not Agreed – no material impact	It was agreed that levels of operation was not necessary as impact would be controlled through CTMP and assessments would only be undertaken if necessary at this time. See paras 7.7.4.4 – 7.7.4.6 of Volume A3, Chapter 7.
<i>EIA – Assessment Methodology</i>			
G3.3: 1.5	The study area identified in Section 7.5 of Volume A3, Chapter 7: Traffic and Transport , is appropriate.	Agreed	Scope of study area agreed through discussions
G3.3: 1.6	The maximum design scenarios identified and outlined, where relevant, for each impact in Section 7.9 and Table 7.13 of Volume A3, Chapter 7: Traffic and Transport , and in the 'Traffic and Transport' tab of Volume A4, Annex 5.1: Impacts Register , represent the maximum project parameters for assessment. This represents the peak HGV, LCV and employee traffic generation for Hornsea Four.	Not Agreed – no material impact	For SRN junctions assessment has been deferred and impact can be controlled through the CTMP.
G3.3: 1.7	The potential impacts identified in Table 7.11 and Section 7.11 of Volume A3, Chapter 7: Traffic and Transport , and in the 'Traffic and Transport' tab of Volume A4, Annex 5.1: Impacts Register , represent a comprehensive list of the potential impacts.	Agreed	Potential for impact during construction identified with Chapter 7. Including control through CTMP.
G3.3: 1.8	The definitions for 'magnitude' and 'sensitivity', as outlined in Section 7.10 of Volume A3, Chapter 7: Traffic and Transport , are appropriate.	Agreed	Appropriate for ES purposes. Other assessment criteria relevant for traffic assessment however, the level of traffic

ID	Statement on which agreement is sought	Position	Commentary
			impact will be controlled through the CTMP.
G3.3: 1.9	The origin and distribution of HGV and LCV movements and employee traffic used to inform impact assessments in Volume A3, Chapter 7: Traffic and Transport , is appropriate and represents a Maximum Design Scenario.	Not Agreed – no material impact	As set out in para 7.7.4.4, there are a number of variables which are currently unknown which will impact on the level and distribution of traffic. In order to address this when more information is known, it will be assessed within the CTMP at a later date.
G3.3: 1.10	Consideration of the routing of Abnormal Indivisible Loads (AIL) associated with the OnSS is presented in Volume A6, Annex 7.1: Abnormal Load Report . The movement of AILs will be subject to separate agreement with the relevant highway authorities and police through the Electronic Service Delivery for Abnormal Loads system.	Agreed	Detailed consideration will need to be given at the time of AIL movements which will need to consider the current status of works at Castle Street.
<i>EIA – Assessment Conclusions</i>			
G3.3: 1.11	The conclusion is appropriate that no likely significant effect was identified at Scoping for impacts TT-C-1 (movement of offshore project components on road network), TT-O-10 (operation and maintenance) and TT-O-11 (decommissioning) and resulted in these potential impacts being ‘Scoped out’ of further assessment in the PEIR and ES.	Agreed	All impacts to be managed through CTMP
G3.3: 1.12	The assessments TT-C- 2 (driver delay (capacity)) and TT-C-12 (cumulative effects) are not considered in the ES as they will be addressed post-determination within the final CTMP, secured under Requirement 18 of the draft DCO (Volume C1.1: Draft DCO). This is considered appropriate.	Agreed	This is the key aspect for National Highways
G3.3: 1.13	The assessment of potential effects on the local highway network in Volume A3, Chapter 7: Traffic and Transport is appropriate and proportionate and identifies the likely significant effects from Hornsea Four.	Not Agreed – no material impact	This is an issued for the local highway authority and not National Highways
<i>Draft DCO / Outline Management Plans / Mitigation and Monitoring</i>			
G3.3: 1.14	The measures described in the oCTMP (which forms an appendix to F2.2: Outline Code of Construction Practice) are appropriate and adequately mitigate likely significant effects identified in Volume A3, Chapter 7: Traffic and Transport and in the ‘Traffic and Transport’ tab of Volume A4, Annex 5.1: Impacts Register . Further detail and site-specific measures will be agreed with National Highways insofar as the measures are relevant to matters within the	Agreed	Principle of a CTMP to control the impact of the development is agreed. Details will need to be agreed in the final CTMP once further details of staffing, routing and shift timing s are known.

ID	Statement on which agreement is sought	Position	Commentary
	jurisdiction of National highways, in the final CTMP secured under Requirement 18 of the draft DCO (Volume C1.1: Draft DCO)..		
G3.3: 1.15	The oCTMP (which forms an appendix to F2.2: Outline Code of Construction Practice) provides the adequate framework to secure necessary mitigation measures to facilitate the removal of impacts TT-C- 2 (driver delay (capacity)) and TT-C-12 (cumulative effects) from consideration in the EIA.	Agreed	High level scope agreed (see comments within CH2M review DevHU0016 TM002 dated 15 January 2021.
G3.3: 1.16	The monitoring procedures set out in the oCTMP (which forms an appendix to F2.2: Outline Code of Construction Practice) are appropriate and comprehensive.	Agreed	Additional / alternative monitoring may be required (depending on final details within CTMP). These can be agreed
G3.3: 1.17	The Applicant and National highways have discussed potential interaction between Hornsea Four and the Castle Street Highway Improvement Scheme. This has resulted in Hornsea Four amending the Abnormal Indivisible Load study to account for a potential overlap of construction.	Agreed	Ongoing discussions through the project will be required to ensure no issues arise.

4 Summary

4.1.1.1 This SoCG has outlined the consultation that has taken place between the Applicant and National Highways during the pre-application phase. The agreement logs present the position reached at the point of DCO application between Hornsea Four and National Highways in relation to relevant onshore matters.