

National Infrastructure Directorate
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Orsted Hornsea Project Four Limited
Development Consent Order (DCO) Application for Hornsea Project Four
Offshore Windfarm
Application Reference: EN010098

31 March 2023

Response to Request for Information

Our ref. EN010098

Dear Mr Johansson

Please accept this cover letter and supporting documents on behalf of the Applicant, in response to the Request For Information (RFI) letter made available via the Planning Inspectorate website, dated 03 March 2023.

Protective Provisions – the Applicant and bp

3. Noted

4. The Applicant has included a joint position statement with bp at [G11.2](#) accompanying this letter which includes an agreed draft of protective provisions at [G11.3](#) to cater for the scenario requested by the Secretary of State, without prejudice to the parties' respective positions on the requirement for, and the merits of, the protective provisions submitted by each of them into Examination. The scenario requested by the Secretary of State is one whereby development consent is granted over the entirety of the Hornsea Four array, including the exclusion area, subject to the protective provisions. The protective provisions would be included for the protection of the carbon dioxide appraisal and storage licensee, unless otherwise agreed between the Applicant and the licensee, given that BP Exploration Operating Company Limited notified the Applicant during the pre-application, application and Examination process that it proposes to install infrastructure within the exclusion area.

Protective Provisions – the Applicant and Bridge

5. N/A

6. N/A

7. The Applicant notes the request that Bridge informs the SoS in the event they are awarded a licence in the 33rd oil and gas licensing round. The draft NPS EN-3 issued on 30th March 2023 supports the approach taken by the Applicant to undertake an assessment with reference to potential impacts upon activities for

which a licence *has been issued* by government. The Applicant also notes that the focus in the draft NPS EN-3 is upon co-existence with existing offshore infrastructure and other uses. The Kumatage development remains highly speculative not least because Bridge have not been issued a licence but also because they do not have a funding partner. The Applicant's proposed protective provisions have therefore already gone further than required by existing and draft policy.

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Protective Provisions with NEO – the Applicant and NEO

8. Noted

9. NEO has confirmed the coordinates for the centre of the Babbage platform as 383265 Easting, 5981086 Northing using the coordinate system ED50 UTM 31N.

Protective Provisions with Harbour Energy – the Applicant and the Civil Aviation Authority

10. The SoS is directed to the additional explanatory text below relating to **G11.4 and the Totality of impacts of the Protective Provisions** for the Applicants understanding of the proposed new guidance to be issued by the Civil Aviation Authority.

Totality of impact of protective provisions on Hornsea Project Four – the Applicant

11. Please refer to **G11.4 Totality of impact of Protective Provisions on Hornsea Four** submitted alongside this letter

In the context of this question the Applicant has reviewed the Applicants proposed protective provisions for the benefit of NEO further to the publication of the draft NPS EN-3 on 30th March 2023. The Applicant remains confident that the Applicants proposed protective provisions comply with the draft policy in respect of the assessment upon NEO's Babbage platform, which is 2.3nm from the array and is cyclically manned (approximately 1 week per month). The Applicant has agreed a helicopter access buffer of 2.7nm with Perenco for their 24/7 manned Ravenspurn platform as referred in the Schedule of Side Agreements **REP8-008**. This distance of 2.7nm is therefore considered more than sufficient for safe operations to continue to and from the Babbage platform.

The Applicant would also like to supplement the submissions as set out in the Totality of Impacts document **G11.4** and specifically refer to the scenarios as set out in that document for the benefit of Harbour Energy. Scenario 4 was Harbour Energy's position at the end of Examination. The Applicant's view is that Harbour Energy's revised position as set out in Scenarios 5 to 8 is simply a mechanism to extract as much commercial leverage as possible and bears little relation to their position at the end of Examination. Harbour has sought to tie scenarios 5 to 8 to the helicopter operators working-group focusing upon possible changes to the CAA guidance. The Applicants helicopter operators CHC and UNI-FLY who participated in this working group state

that these discussions relate to the parameters for flying in Visual Meteorological Conditions (VMC) and do not translate into buffer distances.

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Furthermore, Harbour refer to their helicopter operator, Bristow and their internal policy which prevents Bristow from flying within offshore windfarms without significant buffer distances. This conflicts with the Applicants understanding particularly as Bristow has recently been approved as a helicopter operator for Orsted's operational North Sea windfarms. This will involve daily flights in AW139 and AW169 helicopters to the offshore substations, including Hornsea 1 and Hornsea 2 where the distance from the centre of the offshore substation to the tip of the closest wind turbine blade is 914m [REP8-018](#). The Applicant would expect Bristow to fly to Hornsea Four in due course, should the project go ahead.

Draft NPS EN-3 has not amended the existing wording in the current NPS EN-3 which refers to the need to satisfy the SoS that the site design minimises economic loss to other offshore industries. The SoS is referred to [REP8-015](#) which sets out a robust argument based upon the current, publicly available data on the Johnston field. In summary, there is very limited further extraction potential from the field. Based on assessments undertaken by the Applicant of the publicly available data, the field may have ceased production or even decommissioned before the start of construction at Hornsea Project Four and in any case will be undertaking a decommissioning programme for only a few months.

Discussions between the Applicant and Harbour Energy prior to Examination were focused on ensuring a safe and collaborative approach to the decommissioning of the two wellheads and pipeline, should decommissioning of those assets happen during or after the construction of the proposed Hornsea Four wind farm. It is the Applicant's view that there is a very real scenario whereby, should the SoS impose any of the five Harbour preferred protective provisions, a significant area of the Hornsea Four array would be rendered sterilised even though the wellheads and pipeline may have been decommissioned prior to the construction of the wind farm. The Applicant has always expressed a willingness to co-operate with Harbour Energy by proposing reasonable protective provisions which will serve to allow for safe and timely decommissioning of Harbour's assets should that take place either during or after Hornsea Four construction.

Maps and Tables Showing Locations of Protected Site – the Applicant

12. Noted

13. Please refer to [B2.2 Report to Inform Appropriate Assessment Part 2](#) (a clean and tracked version) submitted alongside this letter. The SoS should note one additional correction to Figure A2 and A4 which is the removal of the Northumberland Marine SPA. This was originally included in error as Natural England confirmed that the HRA screening assessed the relevant SPAs (Farne Islands and Coquet Island) separately and they considered that it was not necessary to also assess the Northumberland Marine SPA. The SoS is referred to page 28 of [APP-168](#).

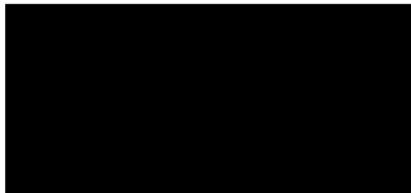
A total of 5 documents have been submitted alongside this letter to support the responses to the Request for Information.

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Applicant Document Reference	Document Title
G11.2	Hornsea Project Four and bp Joint Position Statement
G11.3	Without Prejudice Protective Provisions for the Carbon Dioxide Appraisal and Storage Licensee
G11.4	Totality of impact of Protective Provisions on Hornsea Project Four
B2.2	Report to Inform Appropriate Assessment Part 2 (clean)
B2.2	Report to Inform Appropriate Assessment Part 2 (tracked)

We are grateful for your consideration of the above.

Yours sincerely
Orsted Hornsea Project Four Ltd.



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