



SCOTTISHPOWER
RENEWABLES

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Draft Statement of Common Ground Maritime and Coastguard Agency (MCA)

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited
Document Reference: ExA.SoCG-7.D5.V3
SPR Reference: EA1N_EA2-GEN-CON-REP-IBR-000882

Date: 03rd February 2021
Revision: 003
Author: Royal HaskoningDHV

Applicable to **East Anglia ONE North** and **East Anglia TWO**



Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
001	08/06/2020	Paolo Pizzolla	Lesley Jamieson / Ian MacKay	Rich Morris
002	13/01/2021	Paolo Pizzolla	Lesley Jamieson / Ian MacKay	Rich Morris
003	03/02/2021	Paolo Pizzolla	Lesley Jamieson / Ian MacKay	Rich Morris

Description of Revisions			
Rev	Page	Section	Description
001	n/a	n/a	Draft for June 11 th submission
002	n/a	n/a	Second draft for submission at Deadline 4
003	n/a	n/a	Third draft for submission at Deadline 5



Table of Contents

1	Introduction	1
1.1	Background	1
1.2	The Development	1
1.3	Summary of Agreed, Not Agreed and Outstanding Matters	2
2	Statement of Common Ground	4
2.1	Shipping and Navigation	4
3	Signatures	11
4	Appendices	12
4.1	Appendix 1. Applicants response to MCA Deadline 4 Comments on DCO and DMLs	12

DRAFT



Glossary of Acronyms

DCO	Development Consent Order
DML	Deemed Marine Licence
DTS	Distributed Temperature Sensing
EIA	Environmental Impact Assessment
ES	Environmental Statement
ETG	Expert Topic Group
MHWS	Mean High Water Springs
MCA	Maritime and Coastguard Agency
MMO	Marine Management Organisation
NRA	Navigational Risk Assessment
PINS	Planning Inspectorate
SoCG	Statement of Common Ground
WTG	Wind Turbine Generator

DRAFT



Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
Construction, operation and maintenance platform	A fixed offshore structure required for construction, operation, and maintenance personnel and activities.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO / East Anglia ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
Evidence Plan Process	A voluntary consultation process with specialist stakeholders to agree the approach to the EIA and the information required to support HRA.
Generation Deemed Marine Licence (DML)	The deemed marine licence in respect of the generation assets set out within Schedule 13 of the draft DCO.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
Inter-array cables	Offshore cables which link the wind turbines to each other and the offshore electrical platforms, these cables will include fibre optic cables.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land and connect to the onshore cables.
Offshore cable corridor	This is the area which will contain the offshore export cables between offshore electrical platforms and landfall.
Offshore development area	The East Anglia TWO / East Anglia ONE North windfarm site and offshore cable corridor (up to Mean High Water Springs).
Offshore electrical platform	A fixed structure located within the windfarm area, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the offshore electrical platforms to the landfall. These cables will include fibre optic cables.
Offshore platforms	A collective term for the construction, operation and maintenance platform and the offshore electrical platforms.
Platform link cable	Electrical cable which links one or more offshore platforms, these cables will include fibre optic cables.
Safety zone	A marine area declared for the purposes of safety around a renewable energy installation or works / construction area under the Energy Act 2004.



Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.
Transmission DML	The deemed marine licence in respect of the transmission assets set out within Schedule 14 of the draft DCO.

DRAFT



1 Introduction

1.1 Background

1. This Statement of Common Ground (SoCG) has been prepared by East Anglia TWO Limited, East Anglia ONE North Limited (the Applicants) and the Maritime and Coastguard Agency (MCA). It identifies areas of the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the Applications) where matters are agreed or not agreed between parties.
2. The Applicants have had regard to the guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this SoCG.
3. This SoCG has been structured to reflect topics of interest to MCA on the Applications. Topic specific matters agreed, not agreed and actions to resolve between the Applicants and MCA are included within this SoCG.
4. Throughout the SoCG the phrase “Agreed” identifies any point of agreement between the Applicants and MCA.
5. The phrase “Not Agreed” identifies any point that is not yet agreed between the Applicants and MCA. Points that are not yet agreed will be the subject of ongoing discussion between the Applicants and MCA to reach agreement on the point wherever possible or refine the extent of disagreement between parties. The notes column of the SoCG tables provides commentary on these matters.
6. The tables in **section 2.1** are based upon discussions and information exchanged between the Applicants and MCA during the pre-application and examination phases of the application regarding **Shipping and Navigation**.

1.2 The Development

7. The key offshore components of each project will comprise:
 - Offshore wind turbines and their associated foundations;
 - Offshore platforms - up to four offshore electrical platforms and their associated foundations supporting some of the windfarm’s electrical equipment, and up to one construction, operation and maintenance platform and associated foundations that may cater for personnel and activities required during the construction phase and operation and maintenance of the windfarm;
 - Sub-sea cables between the wind turbines and between wind turbines and offshore electrical platforms (inter-array), between separate offshore



- platforms (platform link cables) and between offshore electrical platforms and the landfall (export cables);
- Scour protection around foundations and on inter-array, platform link and export sub-sea cables as required; and
 - Potential for one meteorological mast (met mast) and its associated foundations for monitoring wind speeds during the operational phase of the windfarm.
8. The key onshore components of each project will comprise:
- The landfall site with up to two transition bays to connect the onshore and offshore cables;
 - Up to six onshore cables, up to two fibre optic cables and up to two distributed temperature sensing (DTS) cables installed underground (some or all of which may be installed in ducts) and associated jointing bays installed underground;
 - Onshore substation; and
 - Electrical cable connection between onshore substation and National Grid substation.
9. National Grid infrastructure will also be required to connect each project to the national electricity grid. Key components of the National Grid infrastructure which is common to both projects will comprise:
- National Grid substation;
 - Cable sealing end compounds and a cable sealing end (with circuit breaker) compound; and
 - Realignment of the existing overhead lines; including the reconstruction or replacement of up to three existing overhead pylons in proximity to the National Grid substation and the addition of up to one new pylon in close proximity to existing overhead pylons.

1.3 Summary of Agreed, Not Agreed and Outstanding Matters

10. **Table 1.1** provides a summary of the matters agreed, not agreed and those which are outstanding between the Applicants and the MCA for each of the relevant receptor topics. For further information on agreements that are outstanding / under discussion and for which the Applicants and the MCA are working to address within the examination period, see the detailed agreement **Table 2.2**.



Table 1.1 Summary of Areas Agreed, Not Agreed or those which are Outstanding for Receptor Topic Areas Raised by MCA

Topic	Agreed, Disagreed or Outstanding
Shipping and Navigation	Outstanding
Development Consent Order	Agreed (subject to MCA review of the updated draft DCO submitted at Deadline 5).

DRAFT



2 Statement of Common Ground

11. The areas of agreement and disagreement between the Applicants and the MCA are set out below.

2.1 Shipping and Navigation

12. Each project has the potential to impact upon shipping and navigation. **Chapter 14 Shipping and Navigation** of the Environmental Statement (ES) (APP-062) provides an assessment of the significance of these impacts.
13. **Table 2.1** provides an overview of meetings and correspondence undertaken with the MCA regarding shipping and navigation.
14. **Table 2.2** provides areas of agreement and disagreement with the MCA regarding shipping and navigation.
15. Further details on the stakeholder engagement process for shipping and navigation can be found in the Consultation Report (APP-029).

Table 2.1 Summary of Consultation with MCA regarding Shipping and Navigation

Date	Contact Type	Topic
Pre-Application		
17 th February 2016	Meeting	Meeting to discuss proposed approach to marine traffic survey, wind turbine layout and cable corridors.
7 th April 2017	Letter	De-scoping of potential impacts on electro-magnetic navigation systems and the approach to collecting new and use of existing data to inform the NRA and EIA.
27 th February 2018	Briefing Note	Briefing note outlining minor changes to the offshore export cable corridor
4 th April 2018	Meeting	Project update and scoping response meeting
7 th March 2019	Briefing Note	Agreement sought on need for additional hazard workshop following East Anglia TWO reverting to a maximum of 75 x 250m turbines plus platforms and met mast.
Post-Application		
18 th February 2020	Meeting	Meeting to discuss agreements in SoCG
12 th March 2020	Meeting	Second meeting to discuss agreements in SoCG.
21 st May 2020	Meeting	Third meeting to discuss agreements in SoCG.



Date	Contact Type	Topic
7 th January 2021	Meeting	Fourth meeting to discuss agreements in SoCG.
28 th January 2021	Meeting	Fifth meeting to discuss agreements in SoCG.

DRAFT



Table 2.2 Shipping and Navigation

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	MCA position	Notes
Environmental Impact Assessment						
MCA -101	Existing Environment	Sufficient vessel traffic survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	None
		Sufficient hydrographic survey data has been collected to inform the assessment.	In discussion	In discussion	In discussion	Hydrographic data has been submitted to the hydrographic team at the MCA. Initial checks have been undertaken, which did not suggest significant issues, however, full checks are still to be undertaken (currently on hold due to Covid-19). 'Agreement status' is therefore recorded as 'in discussion' subject to completion of full checks. The full checks are anticipated to be completed for Deadline 6 and confirmed through an update to the SoCG submitted at that deadline. Should the data checks be delayed beyond this, the MCA are content for the checks to be confirmed post consent.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	MCA position	Notes
MCA -102	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	Agreed	Agreed	None
		The Navigation Risk Assessment (NRA) for the Project has been undertaken as per requirements set out in the Marine Guidance Note (MGN) 543 – Offshore Renewable Energy Installations (OREIs) Guidance on UK navigational Practice Safety and Emergency	Agreed	Agreed	Agreed	None
		The worst case scenario presented in the assessment is appropriate.	Agreed	Agreed	Agreed	None
MCA -103	Assessment Conclusions	The assessment is appropriate and has reached accepted results.	Agreed	Agreed	Agreed	None
		The assessment of cumulative impacts has reached accepted results.	Agreed	Agreed	Agreed	None
MCA -104	Mitigation	Given the impacts of the project, the proposed mitigation outlined in the Schedule of Mitigation Offshore (APP-574) and section 14.3.3 of ES Chapter 14 Shipping and Navigation (APP-052) is appropriate.	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	MCA position	Notes
Draft Development Consent Order (DCO)						
MCA -105	Wording of DCO Requirements and DML Conditions(s)	<p>The wording of the following requirements and conditions pertaining to shipping and navigation are appropriate and adequate:</p> <ul style="list-style-type: none"> Condition 17(1)(a) of the Generation DML and Condition 13(1)(a) of the Transmission DML with reference to the development of a Design Plan to optimise the foundation type and installation method to the site conditions; Conditions 11 and 12 of the Generation DML and Conditions 7 and 8 provided of the Transmission DML with reference to aids to navigation; Condition 17(1)(i) of the Generation DML and Condition 13(1)(i) of the Transmission DML with reference to the aids to navigation management plan; Condition 18(5) of the Generation DML and Condition 14(5) of the Transmission DML with reference to taking into account and addressing MCA recommendations in MGN543 and its annexes; 	Agreed	Agreed	Agreed subject to review of the Draft DCO submitted at Deadline 5.	<p>The MCA has reviewed the updated Draft DCO submitted at Deadline 3 (REP3-011) and has confirmed satisfaction with the changes that were agreed to be made but requested several further changes. The Applicants and the MCA have agreed the position with regard to the requested changes (see Appendix 4.1). These will be reflected in the Draft DCO submitted at Deadline 5.</p> <p>MCA-105 is therefore Agreed subject to review of the updated Draft DCO submitted at Deadline 5..</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	MCA position	Notes
		<ul style="list-style-type: none"> Requirement 2(1)(e) within DCO Schedule 1 Part 3 with reference to air clearance height of no less than 24 metres from MHWS. Condition 17(1)(d)(ii)(bb) of the Generation DML and Condition 13(1)(d)(ii)(bb) of the Transmission DML with reference to the cable laying plan Condition 10 of the Generation DML and Condition 6 of the Transmission DML with reference to notifications and inspections; Conditions 21 and 22 of the Generation DML and Conditions 17 and 18 of the Transmission DML with reference to construction and post construction traffic monitoring; Requirement 10 within DCO Schedule 1, Part 3 with reference to the decommissioning programme and Paragraph 3(1)(a) of Schedule 16 with reference to Appeals and the rights given to the Applicant to appeal a decision on the decommissioning plan. Condition 20 of the Generation DML and Condition 16 of the Transmission DML with 				



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	MCA position	Notes
		reference to Pre-construction monitoring and surveys.				
Other Matters as Required						
MCA -106	Arbitration		n/a	n/a	MCA defer to and support the MMOs position on arbitration.	None
MCA -107	Emergency response	<ul style="list-style-type: none"> A SAR Checklist will be completed post consent to ensure that the development, where applicable, complies with the requirements and recommendations. An ERCoP will need to be in place and agreed with the MCA prior to any offshore construction. 	Agreed	Agreed	Agreed	None
MCA -108	'Order Limits' GIS files	The Order Limits GIS files will be issued to MCA whenever they change	Agreed	Agreed	Agreed	None



3 Signatures

16. The above Statement of Common Ground is agreed between the Applicants and MCA on the day specified below.

Signed: _____

Print Name: _____

Job Title: _____

Date: _____

Duly authorised for and on behalf of MCA

Signed: _____

Print Name: _____

Job Title: _____

Date: _____

Duly authorised for and on behalf of EAST ANGLIA TWO LIMITED

Signed: _____

Print Name: _____

Job Title: _____

Date: _____

Duly authorised for and on behalf of EAST ANGLIA ONE NORTH LIMITED



4 Appendices

4.1 Appendix 1 Applicants response to MCA Deadline 4 Comments on DCO and DMLs

Condition	MCA Deadline 4 comments on DCO	Agreed position between MCA and the Applicants
Schedule 13, Part 2, condition 6(12) and Schedule 14, Part 2, condition 6(12) Notifications and Inspections	<p>Revised wording (amendments in red)</p> <p>In case of exposure of cables on or above the seabed, the undertaker must, within three days following identification of a cable exposure, notify mariners by issuing a notice to mariners and by informing Kingfisher Information Service of the location and extent of exposure.</p> <p>Copies of all notices must be provided to the MMO, MCA, Trinity House and the UKHO within five days.</p>	Agreed to amend conditions. The requested change will be reflected in the draft DCO submitted at Deadline 5.
Schedule 13, Part 2, condition 17(1) and Schedule 14, Part 2, condition 13(1)	<p>Revised wording (amendments in red)</p> <p>The licensed activities or any part of those activities must not commence until the following (as relevant to that part) have been submitted to the MMO for approval at least 6 months prior to the commencement of the authorised project except where otherwise stated</p>	Agreed that no change is required to DML condition Condition 18(2) of the generation DML 14(2) of the transmission DML states that: <i>“Each programme, statement, plan, protocol or scheme required to be approved under condition 17 must be submitted for approval at least six months prior to the intended commencement of licensed activities, except where otherwise stated or unless otherwise agreed in writing by the MMO.”</i>
Schedule 13, Part 2, condition 16 And Schedule 14, Part 2, condition 12 UXO Clearance	<p>Revised wording (amendments in red)</p> <p>No removal or detonation of UXO can take place until the following have been have been submitted to and approved in writing by the MMO in consultation with the relevant statutory nature conservation body and MCA —</p>	Agreed to amend conditions to include the MCA as a consultee in respect of the method statement for UXO clearance. The requested change will be reflected in the draft DCO submitted at Deadline 5.
Schedule 13, Part 2, condition 22 And	<p>Missing condition</p> <p>The undertaker must conduct a swath bathymetric survey to IHO Order 1a of the installed export cable route and provide</p>	Agreed to amend conditions. The following amendment will be made to Condition 22(2)(b) of the Generation DML and



Condition	MCA Deadline 4 comments on DCO	Agreed position between MCA and the Applicants
<p>Schedule 14, Part 2, condition 18 Post Construction</p>	<p>the data and Report of Survey to the MCA and UKHO. The MMO should be notified once this has been done, with a copy of the Report of Survey.</p>	<p>Condition 18(2)(b) of the Transmission DML in the draft DCO submitted at Deadline 5.</p> <p><i>“within twelve months of completion of the licensed activities, one swath-bathymetry survey, undertaken to IHO Order 1a standard that meets the requirements of MGN543 and its annexes, of a representative sample area of the part(s) of the Order limits in which construction works were carried out to assess any changes in bedform topography and such further monitoring or assessment as may be agreed to ensure that cables have been buried or protected.”</i></p>

DRAFT