



SCOTTISHPOWER
RENEWABLES



East Anglia ONE North and East Anglia TWO Offshore Windfarms

Statement of Common Ground

Natural England (Offshore Ornithology)

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited

Document Reference: ExA.SoCG-15.D8.V2

SPR Reference: EA1N_EA2-GEN-CON-REP-IBR-000872

Date: 25th March 2021

Revision: Version 02

Author: Royal HaskoningDHV

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



Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
001	02/11/2020	[REDACTED]	[REDACTED]	[REDACTED]
002	25/03/2021	[REDACTED]	[REDACTED]	[REDACTED]

Description of Revisions			
Rev	Page	Section	Description
001	n/a	n/a	First draft for submission at Deadline 1
002	n/a	n/a	Final signed version for submission at Deadline 8



Table of Contents

1	Introduction	7
1.1	Background	7
1.2	The Development	7
1.3	Summary of Agreements, Disagreements and Outstanding Issues	9
2	Statement of Common Ground	10
2.1	Offshore Ornithology	10
3	Signatures	38



Glossary of Acronyms

APP	Application Document
DCO	Development Consent Order
DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
ES	Environmental Statement
ETG	Expert Topic Group
ExA	Examining Authority
HDD	Horizontal Directional Drill
HRA	Habitats Regulations Assessment
MHWS	Mean High Water Springs
MMO	Marine Management Organisation
NE	Natural England
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
RSPB	Royal Society for the Protection of Birds
SLVIA	Seascape, Landscape and Visual Amenity
SoCG	Statement of Common Ground
SPA	Special Protected Area



Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
Cable sealing end compound	A compound which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Cable sealing end (with circuit breaker) compound	A compound (which includes a circuit breaker) which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Construction consolidation sites	Compounds associated with the onshore works which may include elements such as hard standings, lay down and storage areas for construction materials and equipment, areas for vehicular parking, welfare facilities, wheel washing facilities, workshop facilities and temporary fencing or other means of enclosure.
Construction operation and maintenance platform	A fixed offshore structure required for construction, operation, and maintenance personnel and activities.
Development area	The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order).
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 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 TWO / ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
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.
HDD temporary working area	Temporary compounds which will contain laydown, storage and work areas for HDD drilling works.
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.



Jointing bay	Underground structures constructed at intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Link boxes	Underground chambers within the onshore cable route housing electrical earthing links.
Meteorological mast	An offshore structure which contains metrological instruments used for wind data acquisition.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.
Marking buoys	Buoys to delineate spatial features / restrictions within the offshore development area.
Monitoring buoys	Buoys to monitor <i>in situ</i> condition within the windfarm, for example wave and metocean conditions.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Natura 2000 site	A site forming part of the network of sites made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive.
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 infrastructure	The transmission assets required to export generated electricity to shore. This includes inter-array cables from the wind turbines to the offshore electrical platforms, offshore electrical platforms, platform link cables and export cables from the offshore electrical platforms to the landfall.



Offshore electrical platform	A fixed structure located within the windfarm area, containing electrical equipment to aggregate the power from the wind turbines 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 infrastructure	All of the offshore infrastructure including wind turbines, platforms, and cables.
Offshore platform	A collective term for the construction, operation and maintenance platform and the offshore electrical platforms.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.
Onshore cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO / East Anglia ONE North project from landfall to the connection to the national electricity grid.
Onshore preparation works	Activities to be undertaken prior to formal commencement of onshore construction such as pre-planting of landscaping works, archaeological investigations, environmental and engineering surveys, diversion and laying of services, and highway alterations.
Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO / East Anglia ONE North project.
Platform link cable	Electrical cable which links one or more offshore platforms. These cables will include fibre optic cables.
Safety zones	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.
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.
Transmission DML	The deemed marine licence in respect of the transmission assets set out within Schedule 14 of the draft DCO.



1 Introduction

1.1 Background

1. This Statement of Common Ground (SoCG) has been prepared between East Anglia TWO Limited, East Anglia ONE North Limited (the Applicants) and Natural England (NE). 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 the 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 NE is involved in on the Applications. Topic specific matters agreed or not agreed between the Applicants and NE are included within this SoCG.
4. The table(s) presented below represent the SoCG with the Applicants and NE in respect of offshore ornithology.
5. Throughout the SoCG the phrase “Agreed” identifies any point of agreement between the Applicants and NE. The phrase “Not Agreed” identifies any point that is not agreed between the Applicant and NE.
6. The matters considered within this SoCG apply only to NE’s statutory remit regarding offshore ornithology, which covers designated sites for nature conservation within England. The content of this SoCG is therefore limited to such matters.

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 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 the 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 Agreements, Disagreements and Outstanding Issues

10. **Table 1.1** provides a summary of the matters agreed and not agreed between the Applicants and NE for each of the relevant SoCG topic areas. For further information see the detailed agreement **Table 2.2**.

Table 1.1 Summary of Agreed, Not Agreed and Outstanding Matters

Agreed, Not Agreed or In Discussion
<p>EIA</p> <p>All matters are Agreed except the following which are Not Agreed:</p> <ul style="list-style-type: none"> • Conclusions for cumulative collision risk for kittiwake, gannet and great black-backed gull (GBBG); • Conclusions for cumulative displacement for guillemot, razorbill, gannet and red-throated diver (RTD); • Conclusions for cumulative collision risk plus displacement for gannet <p>Refer to Table 2.2 for further detail.</p>
<p>Information to Support Appropriate Assessment Report</p> <p>All matters are Agreed except the following which are Not Agreed:</p> <ul style="list-style-type: none"> • Conclusion of no AEol on the RTD qualifying feature of the OTE SPA at the project alone level for East Anglia 1N on the basis of displacement • The methods for determining AEol on red-throated diver (RTD); • Extent of Outer Thames Estuary (OTE) Special Protection Area (SPA) buffer mitigation; • Conclusion of no AEol at the in-combination level for the following sites and species; <ul style="list-style-type: none"> ○ Lesser black-backed gull (LBBG) qualifying feature of the Alde-Ore Estuary SPA on the basis of collisions. ○ Kittiwake qualifying feature of the Flamborough and Filey Coast (FFC) SPA on the basis of collisions. ○ Gannet qualifying feature of the FFC SPA on the basis of collisions. ○ Guillemot qualifying feature of the FFC SPA on the basis of displacement. ○ Razorbill qualifying feature of the FFC SPA on the basis of displacement. ○ Seabird assemblage feature of the FFC SPA on the basis of impacts to the qualifying features listed above ○ RTD qualifying feature of the OTE SPA on the basis of displacement (both projects). <p>Refer to Table 2.2 for further detail.</p>



2 Statement of Common Ground

11. A summary of the consultation undertaken to date with NE and the matters agreed or not agreed between the Applicants and NE (based on discussions and information exchanged between the Applicants and NE during the pre-application and examination phases of the applications) are set out below for each of the SoCG topic areas.

2.1 Offshore Ornithology

12. Each project has the potential to impact upon Offshore Ornithology. **Chapter 12 Offshore Ornithology** of the ES (APP-060) provides an assessment of the significance of these impacts.
13. **Table 2.1** provides an overview of consultation undertaken with NE regarding Offshore Ornithology. Further details on the stakeholder engagement process for Offshore Ornithology can be found in the Consultation Report (APP-029).
14. **Table 2.2** presents the matters agreed or not agreed with NE in relation to Offshore Ornithology.

Table 2.1 Summary of consultation with NE regarding Offshore Ornithology

Date	Contact Type	Topic
Pre-Application		
19 April 2017	Meeting	Expert Topic Group 1 – agreement sought on survey and assessment methodology, modelling and impacts to be assessed in the EIA.
9 th August 2017	Briefing Note	Agreement Sought: Formal note sent to all ETG stakeholders seeking agreement on cable route, data collection strategy and the approach to EIA.
27 th February 2018	Briefing Note	Agreement Sought: Formal note sent to all ETG stakeholders outlining minor changes to the cable corridor. Stakeholders to review and confirm they are satisfied with amendments.
6 th March 2018	Meeting	Expert Topic Group 2 – Agreement sought: sufficiency of Band Model Option 2 data alongside BTO flight height data, nocturnal activity evidence and scoping out of impacts.
6 th March 2018	Meeting	Expert Topic Group 2 – agreement sought on: use of British Trust for Ornithology (BTO) flight height data and Band Model Option 2; evidence-based nocturnal activity factors; impacts to be scoped out of the EIA.
16 th January 2019	Meeting	Expert Topic Group 3 – Agreement sought: Amendment to the red line boundary / site reduction and operational



Date	Contact Type	Topic
		windfarm displacement impacts, EA1 piling during EA1N surveys, site specific surveys in cable corridor, Auk mortality, nocturnal activity factors and Lesser Black-Backed Gull.
20 th June 2019	Meeting	Expert Topic Group 4 – Agreement sought: absence of significant operational windfarm array displacement risk given increased distance of EA2 from the Outer Thames Estuary (OTE) SPA; absence of site specific surveys in cable corridor not an issue given the Irwin 2019 report; presentation of various collision and displacement mortality estimates based on a range of mortality, avoidance, displacement and nocturnal activity rates.
Post-Application		
19 th February 2020	Meeting	SoCG meeting one
28 th July 2020	Meeting / Workshop	Workshop with multiple stakeholders to discuss the key issues relating to offshore ornithology.
07 th October 2020	Meeting	SoCG meeting two
22 nd October 2020	Meeting / Workshop	Workshop with multiple stakeholders to discuss the key issues relating to offshore ornithology.
7 th December 2020	Meeting / Workshop	Workshop with multiple stakeholders to discuss RTD assessment.
10 th March 2021	Meeting	Meeting to discuss HRA derogation compensation options.
22 nd March 2021	Meeting	Meeting to discuss SoCG



Statement of Common Ground

Natural England: 25th March 2021

Table 2.2 Offshore Ornithology

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
Environmental Impact Assessment (EIA) (Existing Environment; Methodology and Project-Along Conclusions)						
NE-001	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the approach to survey data collection.
NE-002		The methods and techniques used to analyse offshore ornithological data are appropriate for characterising bird distributions and estimating populations.	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the approach to data analysis techniques.
NE-003		The use of generic seabird flight height estimates in Collision Risk Modelling (CRM) is appropriate given the survey contractors statement that heights estimated from digital aerial surveys are inaccurate.	Agreed	Agreed	Agreed	This is reflected in NE's Risks and Issues Log submitted at Deadline 1
NE-004		The method used to assign unidentified birds to species is appropriate.	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the approach to the



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
NE-005		The methods used to define the relevant months for seabird breeding seasons in the assessment, presenting both the full breeding seasons as advised by NE, and the Applicant's preferred migration-free breeding months, are appropriate.	Agreed	Agreed	There is agreement that this matter is closed.	assignment of unidentified birds to species. Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the approach to the definition of seabird breeding seasons.
NE-006	Assessment Methodology (General)	Appropriate legislation, planning policy and guidance relevant to offshore ornithology has been used.	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the legislation, planning policy and guidance relevant to offshore ornithology.
NE-007		The list of offshore ornithology receptors and the potential impacts on them assessed are appropriate for all phases of development.	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the list of offshore ornithology receptors and the potential impacts on them to be assessed.
NE-008		The methods for determining impact significance on all non	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
		RTD offshore ornithological receptors is appropriate.				which agreed the methods for determining impact significance on offshore ornithological receptors.
NE-009		The methods for determining impact significance on RTD is appropriate.	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the methods for determining impact significance on offshore ornithological receptors.
NE-0010		The worst case scenario (except for RTD) used in the assessment for offshore ornithology is appropriate.	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the approach to the use of the worst case scenario.
NE-0011		The characterisation of receptor sensitivity is appropriate except for RTD.	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the approach to the use of the worst case scenario.
NE-0012	Assessment Methodology (Construction Impact Methods)	The methods used to estimate impacts during construction, including cable laying operations, based on mean density estimates and presenting both NE's preferred rates and the Applicant's evidence based rates (for	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the approach to the methods to be used to estimate impacts during construction.

Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
NE-0013	Assessment Methodology (Operation Impact Methods)	displacement and mortality) are appropriate. For all species except RTD which remain under discussion. Methods used to assess operational displacement presented in the ES for gannet, guillemot and razorbill are appropriate, using both the Applicant's preferred mortality and displacement rates and NE's preferred rates.	Agreed	Agreed	There is agreement that this matter is closed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the methods to be used to assess operational displacement in the ES for gannet, guillemot and razorbill.
NE-0014		Methods used to assess operational displacement impacts on RTD are appropriate, using both the Applicant's preferred mortality and displacement rates and NE's preferred rates.	Agreed	Agreed	Agreed	
NE-0015		The method for assessing seabird collision risk is appropriate: using Band option 2, presenting results for mean seabird density (and 95% c.i.), NE recommended species-	Agreed	Agreed	Agreed	



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
		specific avoidance rates (+/- 2 SD), British Trust for Ornithology (BTO) flight height estimates (and 95% c.i.) and NE recommended nocturnal activity rates. The Applicants additionally presented evidence-based nocturnal factors for gannet. The Marine Scotland Science (MSS) stochastic CRM (sCRM) implementation of the Band (2012) model is still being refined. In the meantime, use of the deterministic model is appropriate.				
NE-0016		Methods for assessing indirect effect are appropriate.	Agreed	Agreed	It is agreed that this matter is closed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the methods to be used to assess indirect effects.
NE-0017	Assessment Conclusions (construction)	The magnitude of effects and conclusions on significance resulting from impacts on razorbill and guillemot during	Agreed	Agreed	It is agreed that this matter is closed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the magnitude of effects conclusions.



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
	impacts, razorbill and guillemot)	construction are correctly identified and predicted. No impacts of greater than minor adverse significance are predicted.				
NE-0018	Assessment Conclusions (construction impacts in respect of export cable installation, red-throated diver)	The magnitude of effects and conclusions on significance resulting from impacts on red-throated diver from cable installation vessel displacement at the project-alone level are correctly identified and predicted.	Agreed	Agreed	Not agreed	NE already considers there to be an AEoI from the operational windfarms. Furthermore, NE is increasingly becoming concerned in relation to disturbance and/or displacement of red-throated divers from a more persistent presence of OWF-related vessels. In this context of increasing vessel activity, we consider that a 'worst case scenario' of 110 days of cable installation during the period that red-throated diver are likely to be most sensitive (1st November to 1st March inclusive) could make a meaningful contribution to in-combination effects on the SPA. This gives further weight to the need for a seasonal restriction for cable installation

Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
NE-0019	Assessment Conclusions (operation impacts)	The magnitude of effects and conclusions on significance resulting from displacement impacts on guillemot, razorbill and gannet during operation are correctly identified and predicted. No impacts of greater than minor adverse significance are predicted.	Agreed	Agreed	Agreed	
NE-0020	Assessment Conclusions (red-throated diver operational displacement)	The magnitude of effects and conclusions on significance resulting from displacement impacts on RTD during operation of the Projects are correctly identified and predicted.	Agreed	Agreed	Agreed	None
NE-0021	Operation Impacts (collision risk)	Using option 2 of the Band collision model, with NE's preferred input parameters and model methods, the magnitude of effects and conclusions on significance resulting from collision impacts for seabirds during operation are correctly identified and predicted. No impacts of	Agreed	Agreed	Agreed	



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
		greater than minor adverse significance are predicted for all species.				
NE-0022	Assessment Conclusions (operation impacts)	The magnitude of effects and conclusions on significance resulting from indirect effects during operation are correctly identified and predicted. No impacts of greater than minor adverse significance are predicted.	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the methods to be used to assess indirect effects.
NE-0023	Assessment Conclusions (decommissioning impacts)	The magnitude of effects and conclusions on significance resulting from impacts during decommissioning are correctly identified and predicted. No impacts of greater than minor adverse significance are predicted.	Agreed	Agreed	Agreed	NE agree that decommissioning impacts are likely to be no worse than those during construction. However, NE notes that further consultation will be required (at the time decommissioning is being planned) to ensure potential impacts are minimised.
EIA Cumulative Impact Assessment (CIA)						
NE-0024	Cumulative Assessment	The plans and projects considered within the CIA are appropriate.	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the plans and projects to be considered in the



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
NE-0025	Assessment Conclusions	The magnitude of effects and conclusions on significance resulting from cumulative displacement impacts on razorbill and guillemot during operation are correctly identified and predicted and no impacts of greater than negligible adverse significance are predicted.	Agreed	Agreed	Not agreed	<p>cumulative collision risk assessment.</p> <p>Agreed to use the Norfolk Boreas Deadline 8 position (with Thanet Extension removed) as commonly agreed suite of plans and projects.</p> <p>Applicants' position is that there would be no significant cumulative impact.</p> <p>Applicants' position is that there would be no significant cumulative impact.</p> <p>NE position is that they have been unable to rule out a significant adverse effect for cumulative operational impacts on guillemot and razorbill.</p>
NE-0026	Assessment Conclusions	The magnitude of effects and conclusions on significance resulting from cumulative displacement impacts on gannet during operation are correctly identified and	Agreed	Agreed	Not agreed	None



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
		predicted and no impacts of greater than negligible adverse significance are predicted.				
NE-0027	Assessment Conclusions	The magnitude of effects and conclusions on significance resulting from cumulative displacement plus collision impacts on gannet during operation are correctly identified and predicted and no impacts of greater than negligible adverse significance are predicted.	Agreed	Agreed	Not agreed	Applicants' position is that there would be no significant cumulative impact. NE position is that it is unable to rule out a significant adverse effect for cumulative operational impacts on gannet irrespective of whether Hornsea 3, Hornsea 4 and Norfolk Vanguard projects are included
NE-0028		The magnitude of effects and conclusions on significance resulting from cumulative displacement impacts on RTD during operation of the Projects are correctly identified and predicted.	Agreed	Agreed	Not agreed	Applicants' position is that there would be no significant cumulative impact. NE position is that they have been unable to rule out a significant adverse effect for cumulative operational impacts on RTD
NE-0029		Using the Band collision model option 2, with NE's preferred input parameters	Agreed	Agreed	Not agreed	Applicants' position is that there would be no significant cumulative impact.



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
		(see above) and methods, combined with like for like figures for other projects (as far as possible given the information available), the magnitude of effects and conclusions on significance resulting from cumulative collision impacts for seabirds during operation are correctly identified and predicted for kittiwake, gannet and great black-backed gull (GBBG).				NE position is that for EIA they have been unable to rule out a significant adverse effect for cumulative operational impacts on kittiwake, gannet and great black backed gull.
NE-0030		Using the Band collision model option 2, with NE's preferred input parameters (see above) and methods, combined with like for like figures for other projects (as far as possible given the information available), the magnitude of effects and conclusions on significance resulting from cumulative collision impacts for seabirds during operation are correctly identified and predicted for	Agreed	Agreed	Not agreed	Applicants' position is that there would be no significant cumulative impact. NE position is that it is unable to rule out a significant adverse impact when the Hornsea 3, Hornsea 4 and Norfolk Vanguard projects are included in the cumulative totals. However, NE consider no significant adverse impact when they are excluded.

Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
NE-0031		<p>lesser black-backed gull (LBBG).</p> <p>Using the Band collision model option 2, with NE's preferred input parameters (see above) and methods, combined with like for like figures for other projects (as far as possible given the information available), the magnitude of effects and conclusions on significance resulting from cumulative collision impacts for seabirds during operation are correctly identified and predicted for herring gull.</p>	Agreed	Agreed	Agreed	None
NE-0032	Mitigation (collision risk)	An increase in air-draft from 22m to 24m over mean high water springs (MHWS) proposed by the Applicant since submission of the Application is appropriate to mitigation to reduce potential	Agreed	Agreed	Agreed the matter is closed	<p>The Applicants have provided the rationale for the extent of draught height mitigation within the Offshore Commitments document (REP3-073).</p> <p>NE recognise that the draught height increase presented reduces the impact. It is considered that</p>



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
		impacts upon ornithological receptors.				further draught height increases could be achieved and would further reduce the impact, but NE acknowledges that the Applicants' view that this is likely to affect project viability.
Information to Support Appropriate Assessment Report and Displacement of RTD in the Outer Thames Estuary SPA Assessment						
NE-0033		The methods for determining AEol on RTD are appropriate.	Agreed	Agreed	Not agreed	Displacement of RTD in the Outer Thames Estuary SPA assessment was submitted to the examination at REP3-049, REP5-025, REP6-019 and deadline 8 (document reference ExA.AS-10.D8.V4). NE has provided comments on the methodology within REP1-172, REP4-087, REP6-113 and REP7-072. These should be considered as final positions on the matter
NE-0034	Mitigation (RTD displacement)	A buffer mitigation commitment of 2km between the East Anglia ONE North	Agreed	Agreed	Not agreed	The Applicants have provided the rationale for the extent of buffer mitigation within the Offshore



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
		project and the OTE SPA is appropriate given the constraints described in REP3-052 and the ecological consequences of displacement described in document reference ExA.AS-10.D8.V4.				Commitments document (REP3-073) and have provided a Best Practice Protocol for Minimising Disturbance to RTD (REP7-046) NE advises that the 2km buffer does not mitigate for the likely extent of displacement effects (between 7km and 11.5km) to an acceptable level that would avoid an alone AEol.
NE-0035	Screening of likely significant effect (LSE)	The approach to HRA screening is appropriate	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the methods to be used to screen LSE.
NE-0036		The following sites and species should be screened in for further assessment: <ul style="list-style-type: none"> Alde-Ore Estuary Special Protection Area (SPA) (lesser black-backed gull); Flamborough and Filey Coast (FFC) SPA (gannet, 	Agreed	Agreed	Agreed	Discussed at Evidence Plan meetings as outlined in Table 2.1 which agreed the European Sites and species to be screened in for further assessment.

Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
		<p>Kittiwake, guillemot, razorbill and the seabird assemblage);</p> <ul style="list-style-type: none"> Greater Wash SPA (red-throated diver and little gull); and OTE SPA (non-breeding red-throated diver). Breydon Water SPA and Ramsar Site Broadland SPA and Ramsar Site North Norfolk Coast SPA and Ramsar Site 				
NE-0037	Assessment Conclusions (Alde-Ore Estuary SPA, project-alone)	Conclusion at the project-alone level of no AEol for the lesser black-backed gull (LBBG) population at Alde-Ore Estuary SPA on the basis of collisions is appropriate.	Agreed	Agreed	Agreed	None
NE-0038	Assessment Conclusions (Alde-Ore)	Conclusion of no AEol for lesser black-backed gull population at Alde-Ore Estuary SPA is appropriate,	Agreed	Agreed	Not agreed	Applicants' position is that there would be no in-combination AEol. NE consider that the 1.6 (0.38-3.67) birds per annum at EA2



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
	Estuary SPA, in-combination)	on the basis of collisions for the Projects in-combination with other plans and projects.				and 0.3 (0-0.87) per annum at EA1N will not result in an AEol alone. However, because the Projects contribute 3.6% of the total in-combination total of 52.7 LBBG mortalities per annum from the Alde-Ore Estuary SPA, NE consider that it is not possible to rule out AEol of this feature due to in-combination collision mortality.
NE-0039	Assessment Conclusions (FFC SPA, gannet project-alone)	Conclusion of no AEol for the gannet population at FFC SPA is appropriate on the basis of the predicted collisions, displacement and these impacts combined for the project alone.	Agreed	Agreed	Agreed	None
NE-0040	Assessment Conclusions (FFC SPA, gannet in-combination)	Conclusion of no AEol for gannet population at FFC SPA is appropriate on the basis of collisions, displacement and these impacts combined for the Projects in-combination with other plans and projects.	Agreed	Agreed	Not agreed	Applicants' position is that there would be no in-combination AEol. NE position is that no AEol cannot be excluded when Hornsea Project Three and Hornsea Project Four are included. NE acknowledge that updated information from Hornsea

Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
NE-0041	Assessment Conclusions (FFC SPA, kittiwake project-alone)	Conclusion of no AEoI alone for kittiwake population at FFC SPA is appropriate on the basis of the predicted collisions for the project alone.	Agreed	Agreed	Agreed	None
NE-0042	Assessment Conclusions (FFC SPA, kittiwake in-combination)	Conclusion of no AEoI for kittiwake population at FFC SPA is appropriate on the basis of collisions for the Projects in-combination with other plans and projects.	Agreed	Agreed	Not agreed	Applicants' position is that there would be no in-combination AEoI. NE advice is that an AEoI in-combination cannot be excluded.
NE-0043	Assessment Conclusions (FFC SPA, razorbill project-alone)	Conclusion of no AEoI for razorbill population at FFC SPA is appropriate on the basis of displacement impacts for the project alone.	Agreed	Agreed	Agreed	None
NE-0044	Assessment Conclusions (FFC SPA,	Conclusion of no AEoI for razorbill population at FFC SPA is appropriate on the basis displacement impacts	Agreed	Agreed	Not agreed	Applicants' position is that there would be no in-combination AEoI.



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
	razorbill in-combination)	for the Projects in-combination with other plans and projects.				NE advice is that there is no AEol when Hornsea Project Three and Hornsea Project Four are excluded, but an AEol cannot be ruled out when they are included.
NE-0045	Assessment Conclusions (FFC SPA, guillemot project-alone)	Conclusion of no AEol for guillemot population at FFC SPA is appropriate on the basis of displacement impacts for the project alone.	Agreed	Agreed	Agreed	None
NE-0046	Assessment Conclusions (FFC SPA, guillemot in-combination)	Conclusion of no AEol for guillemot population at FFC SPA is appropriate on the basis of displacement impacts for the Projects in-combination with other plans and projects.	Agreed	Agreed	Not agreed	Applicants' position is that there would be no in-combination AEol. NE position is that there is no AEol when Hornsea Project Three and Hornsea Project Four are excluded, but an AEol cannot be ruled out when they are included.
NE-0047	Construction Assessment Conclusions in respect of export cable installation (OTE SPA, red-	Conclusion of no AEol for the red-throated diver population at the OTE SPA is appropriate on the basis of project vessel movement displacement impacts for the project alone during construction.	Agreed	Agreed	Not Agreed.	NE already considers there to be an AEol from the operational windfarms. Furthermore, NE is increasingly becoming concerned in relation to disturbance and/or displacement of red-throated divers from a more persistent presence of



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
	throated diver project-alone)					OWF-related vessels. In this context of increasing vessel activity, we consider that a 'worst case scenario' of 110 days of cable installation during the period that red-throated diver are likely to be most sensitive (1st November to 1st March inclusive) could make a meaningful contribution to in-combination effects on the SPA. This gives further weight to the need for a seasonal restriction for cable installation
NE-0048	Construction Assessment Conclusions (OTE SPA, red-throated diver in-combination)	Conclusion of no AEoI for the red-throated diver population at the OTE SPA is appropriate on the basis of displacement impacts during construction for the Projects in-combination with other plans and projects.	Agreed	Agreed	Not agreed.	NE already considers there to be an AEoI from operational windfarms.
NE-0049	EA1N Operation Assessment Conclusions (OTE SPA, red-	Conclusion of no AEoI for the red-throated diver population at the OTE SPA is appropriate on the basis of displacement	Agreed	Agreed	Not Agreed	Displacement of RTD in the Outer Thames Estuary SPA assessment was submitted to the examination at REP3-049, REP5-025, REP6-



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
	throated diver project-alone)	impacts during the operational phase for EA1N alone.				019 and deadline 8 (document reference ExA.AS-10.D8.V4). NE has provided comments on the methodology within REP1-172, REP4-087, REP6-113 and REP7-072.
NE-0050	EA2 Operation Assessment Conclusions (OTE SPA, red-throated diver project-alone)	Conclusion of no AEol for the red-throated diver population at the OTE SPA is appropriate on the basis of displacement impacts during the operational phase for EA2 alone.	Agreed	Agreed	Agreed	
NE-0051	EA1N Operation Assessment Conclusions (OTE SPA, red-throated diver in-combination)	Conclusion of no AEol for the red-throated diver population at the OTE SPA is appropriate on the basis of displacement impacts during operation for the Projects in-combination with other plans and projects.	Agreed	Agreed	Not agreed. Natural England advises an AEol in-combination.	Positions as per at ID NE-0049 of this table.
NE-0052	EA2 Operation Assessment Conclusions (OTE SPA, red-	Conclusion of no AEol for the red-throated diver population at the OTE SPA is appropriate on the basis of displacement impacts during operation for	Agreed	Agreed	Not agreed.	NE considers there is already an AEol from operational windfarms. Whilst EA2 affects a much smaller area of the SPA than EA1N, given that there is still potential for EA2 to



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
	throated diver in-combination)	the Projects in-combination with other plans and projects.				cause displacement within the SPA, NE considers it would contribute to an in-combination AEOL. Regarding the potential impact of East Anglia TWO, the Applicants have updated section 5.2 of the Displacement of Red-throated Divers in the Outer Thames Estuary SPA assessment (document reference ExA.AS-10.D8.V4) at Deadline 8 to include an assessment of the project alone impact using NE's recommended approach as previously described in section 2, Row 4 of Applicants' Comments on Natural England's Deadline 6 Submissions (REP7-053).
NE-0053	Assessment Conclusions (Greater Wash SPA, red-throated diver project alone)	Conclusion of no AEOL for the red-throated diver population at the Greater Wash SPA is appropriate on the basis of barrier effects and collision risk to migrating individuals for the project alone during operation.	Agreed	Agreed	Agreed	None

Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
NE-0054	Assessment Conclusions (Greater Wash SPA, red-throated diver in-combination)	Conclusion of no AEoI for the red-throated diver population at the Greater Wash SPA is appropriate on the basis of barrier effects and collision risk to migrating individuals for the Projects in-combination with other plans and projects during operation.	Agreed	Agreed	Agreed	None
NE-0055	Assessment Conclusions (Greater Wash SPA, little gull project alone)	Conclusion of no AEoI for the little gull population at the Greater Wash SPA is appropriate on the basis of displacement impacts for the project alone during operation.	Agreed	Agreed	Agreed	None
NE-0056	Assessment Conclusions (Greater Wash SPA, little gull in-combination)	Conclusion of no AEoI for the little gull population at the Greater Wash SPA is appropriate on the basis of displacement impacts during operation for the Projects in-combination with other plans and projects.	Agreed	Agreed	Agreed	None
NE-0057	Assessment Conclusions	Conclusion of no AEoI for the little gull population at the	Agreed	Agreed	Agreed	None



Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
NE-0058	Greater Wash SPA, little gull project alone) Assessment Conclusions (Greater Wash SPA, little gull in-combination)	Greater Wash SPA is appropriate on the basis of collision risk for the project alone during operation. Conclusion of no AEoI for the little gull population at the Greater Wash SPA is appropriate on the basis of collision risk during operation for the Projects in-combination with other plans and projects.	Agreed	Agreed	Agreed	None
Monitoring						
NE-0059	Monitoring	N/A	Agreed	Agreed	Agreed pending NE review of the updated IPMP at Deadline 8	The Applicants updated the IPMP at Deadline 6 (REP6-016) to include provision for monitoring of collision risk and displacement of RTD. NE provided minor comments on the IPMP at Deadline 7 (REP7-074) to which the Applicants have responded in the Applicants' Comments on NE Deadline 7 submissions (document reference ExA.AS-17.D8.V1) and updated

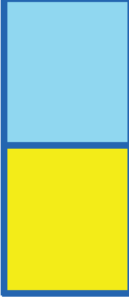
Statement of Common Ground
Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
						the IPMP at Deadline 8 to address the points raised by NE in (REP7-074).
Draft Development Consent Order (DCO)						
NE-0060	Wording of Requirement(s)	<p>The wording of the following conditions pertaining to ornithology are appropriate and adequate:</p> <p>Condition 17(1)(c) of the generation DML and Condition 13(1)(c) of the transmission DML with reference to the development of a monitoring plan.</p> <p>Condition 17(1)(e)(vi) of the generation DML and Condition 13(1)(e)(vi) of the transmission DML with reference to the project environmental management plan and procedures to minimise disturbance to red-throated diver.</p>	Agreed	Agreed	Agreed	<p>The Applicants updated Conditions 20 and 22 of the Generation DML and Conditions 16 and 18 of the Transmission DMLs to make provision for pre-construction and post-construction ornithological monitoring.</p>

Statement of Common Ground

Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
		Condition 20(2)(d) of the generation DML and Condition 16(2)(d) of the transmission DML with reference to pre-construction ornithological monitoring. Condition 22(2)(e) of the generation DML and Condition 18(2)(e) of the transmission DML with reference to post-construction ornithological monitoring. Requirement 10 provided within DCO Schedule 1, Part 3 with reference to a decommissioning programme.				
Other Matters as Required						
NE-0061	Best-Practice Protocol for Minimising Disturbance On RTD	The best-practice protocol for minimising transient vessel and helicopter disturbance on RTD is appropriate	Agreed	Agreed	Agreed subject to NE review of the updated document submitted at Deadline 8 and notwithstanding compensation measures	The Applicants submitted a Best-Practice Protocol for Minimising Disturbance on RTD at Deadline 3 (REP3-074) and Deadline 7 (REP7-046).



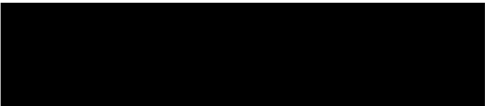

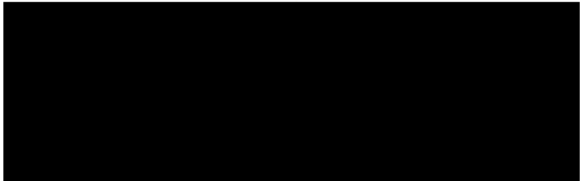
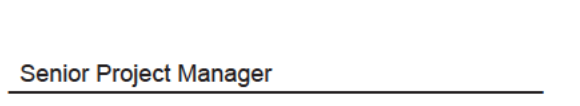
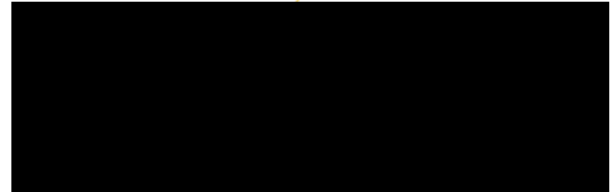
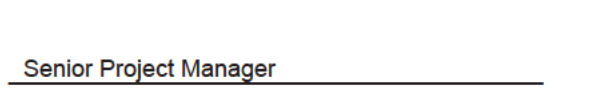
Statement of Common Ground
 Natural England: 25th March 2021

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	NE position	Notes
						proposed which are not considered within this SoCG.



3 Signatures

15. The above Statement of Common Ground is agreed between the Applicant and NE on the day specified below.

Signed:	
Print Name:	
Job Title:	Natural England Senior Responsible Officers for EA1N and EA2
Date:	25 th March 2021
Duly authorised for and on behalf of Natural England	
Signed:	
Print Name:	
Job Title:	<u>Senior Project Manager</u>
Date:	<u>25th March 2021</u>
Duly authorised for and on behalf of EAST ANGLIA TWO LIMITED	
Signed:	
Print Name:	
Job Title:	<u>Senior Project Manager</u>
Date:	<u>25th March 2021</u>
Duly authorised for and on behalf of EAST ANGLIA ONE NORTH LIMITED	