From:	nectoncommunitycentre@gmail.com
To:	Norfolk Vanguard
Cc:	[redacted]
Subject:	Statement of common ground
Date:	09 January 2019 08:17:07
Attachments:	Vattenfall S o C G.pdf

Sirs

Please find attached the document completed by Necton Parish Council and agreed by all at the council meeting of Jan 7th.

Regards

James
James Howard BSc

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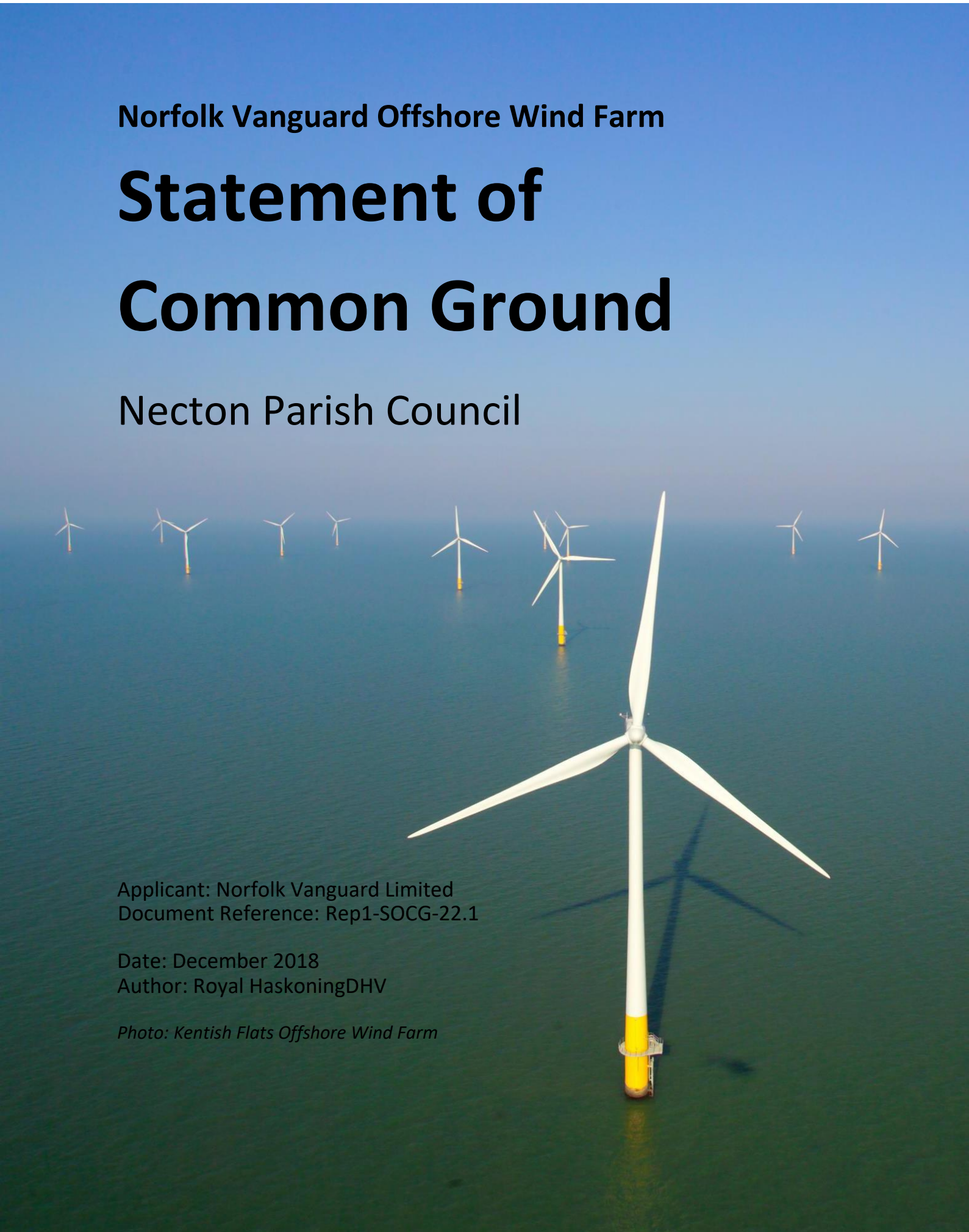
Norfolk Vanguard Offshore Wind Farm

Statement of Common Ground

Necton Parish Council



Applicant: Norfolk Vanguard Limited
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Date: December 2018
Author: Royal HaskoningDHV

Photo: Kentish Flats Offshore Wind Farm

Date	Issue No.	Remarks / Reason for Issue	Author	Checked	Approved
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Glossary

CoCP	Code of Construction Practice
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
LVIA	Landscape and Visual Impact Assessment
OCoCP	Outline Code of Construction Practice
OLEMS	Outline Landscape and Environmental Management Strategy
OWF	Offshore Wind Farm
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground

Terminology

Landfall	Where the offshore cables come ashore at Happisburgh South
Mobilisation area	Areas approx. 100m x 100m used as access points to the running track for duct installation. Required to store equipment and provide welfare facilities. Located adjacent to the onshore cable route, accessible from local highways network suitable for the delivery of heavy and oversized materials and equipment.
National Grid overhead line modifications	The works to be undertaken to complete the necessary modification to the existing 400kV overhead lines
Necton National Grid substation	The existing 400kV substation at Necton, which will be the grid connection location for Norfolk Vanguard
Offshore accommodation platform	A fixed structure (if required) providing accommodation for offshore personnel. An accommodation vessel may be used instead
Offshore cable corridor	The area where the offshore export cables would be located.
Offshore electrical platform	A fixed structure located within the wind farm 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 bring electricity from the offshore electrical platform to the landfall.
Onshore cable route	The 45m easement which will contain the buried export cables as well as the temporary running track, topsoil storage and excavated material during construction.
Onshore project substation	A compound containing electrical equipment to enable connection to the National Grid. The substation will convert the exported power from HVDC to HVAC, to 400kV (grid voltage). This also contains equipment to help maintain stable grid voltage.
The OWF sites	The two distinct offshore wind farm areas, Norfolk Vanguard East and Norfolk Vanguard West.
Trenchless crossing zone (e.g. HDD)	Temporary areas required for trenchless crossing works.

1 INTRODUCTION

1. This Statement of Common Ground (SoCG) has been prepared between Necton Parish Council and Norfolk Vanguard Limited (hereafter the Applicant) to set out the areas of agreement and disagreement in relation to the Development Consent Order (DCO) application for the Norfolk Vanguard Offshore Wind Farm (hereafter 'the project').

2. This SoCG comprises an agreement log which has been structured to reflect topics of interest to Necton Parish Council on the Norfolk Vanguard DCO application (hereafter 'the Application'). Points that are not agreed will be the subject of ongoing discussion wherever possible to resolve, or refine the extent of disagreement between the parties.

1.1 The Development

3. The Application is for the development of the Norfolk Vanguard Offshore Wind Farm (OWF) and associated infrastructure. The OWF comprises two distinct areas, Norfolk Vanguard (NV) East and NV West ('the OWF sites'), which are located in the southern North Sea, approximately 70km and 47km from the nearest point of the Norfolk coast respectively. The location of the OWF sites is shown in Chapter 5 Project Description Figure 5.1 of the Application. The OWF would be connected to the shore by offshore export cables installed within the offshore cable corridor from the OWF sites to a landfall point at Happisburgh South, Norfolk. From there, onshore cables would transport power over approximately 60km to the onshore project substation and grid connection point near Necton, Norfolk.

4. Once built, Norfolk Vanguard would have an export capacity of up to 1800MW, with the offshore components comprising:

- Wind turbines;
- Offshore electrical platforms;
- Accommodation platforms;
- Met masts;
- Measuring equipment (LiDAR and wave buoys);
- Array cables;
- Interconnector cables; and
- Export cables.

5. The key onshore components of the project are as follows:

- Landfall;
- Onshore cable route, accesses, trenchless crossing technique (e.g. Horizontal Directional Drilling (HDD)) zones and mobilisation areas;

- Onshore project substation; and
- Extension to the existing Necton National Grid substation and overhead line modifications.

1.2 Consultation with Necton Parish Council

6. Table 1 contains the consultation that has taken place with Necton Parish Council to date.

7. Necton Parish Council provided a relevant representation to the Planning Inspectorate on 5th September 2018, outlining the concerns of the Parish Council. The following sections outline the specific matters that have been agreed as well as those which have not yet been resolved.

Table 1 Consultation with Necton Parish Council to date

Date	Contact Type	Topic
Pre-Application		
21st October 2016	Meeting ahead of first drop-in	General introduction to the project
24th March 2017	Meeting ahead of first drop-in	Project update
7th July 2017	Meeting with Parish Clerk	Project update
14th June 2017	Presentation at Necton Parish Council meeting	Project update
19th July 2017	Onshore project substation workshop	EIA process, siting of onshore project substations, mitigation
20th July 2017	Onshore project substation drop-in	Sharing feedback from the onshore project substation workshop with wider community
8th September 2017	Meeting (with George Freeman MP and Highways England)	Project update, discussion on local opportunities, access off A47
10th November 2017	Meeting ahead of drop-in exhibition (Statutory Consultation)	Project update and discussion about community benefit ideas (from PC)
23rd February 2018	Meeting convened by George Freeman MP, with Necton Parish Council and Ward Members for District and County Councils	Project update; discussion regarding onshore project substation location; community benefit
5th March 2018	Presentation to Necton Parish Council	Project update
Post-Application		
5th September 2018	Letter from Necton Parish Council	Relevant representation on the DCO application.

2 STATEMENT OF COMMON GROUND

2.1 Key Issues Post-Submission

8. Necton Parish Council submitted a relevant representation to the Planning Inspectorate on a number of topics. The specific issues highlighted in this representation have been set out in the table below to provide an understanding of the current position of both parties. The final column identifies the final position of the parties.

Table 2 Key issues raised in the relevant representation

Norfolk Vanguard Limited Position	Necton Parish Council Position	Final Position
Project Description		
Major accidents and disasters are considered in section 5.6 in Chapter 5 Project Description of the Environmental Statement (ES) (document reference 6.1.5). The risk of substation fires is historically low; however, substation fires can impact the supply of electricity and create a localised fire hazard. The highest appropriate levels of fire protection and resilience will therefore be specified for the onshore project substation to minimise fire risks. The energy sector has some of the highest health and safety requirements and these standards will be incorporated into substation design.	Inadequate measures against field fire risk to substations.	The local fire service is part time and struggles to staff appliances during the day, therefore any emergency incident would attract a delayed response. As time and speed of attack are vital in successful firefighting, any fire could quickly take hold
When mitigating the risk of terrorism, the risk itself must be reasonably foreseeable. No terrorism attack has ever occurred to a substation on UK soil and, on this basis, it is reasonable to say that the risk of terrorism is low. Beyond this, the design and operation of substations are regulated and controlled to the highest health and safety standards; and operators are required to develop emergency response plans and crisis management procedures as part of that regulatory process.	This major project (the biggest of its kind in the world + Dudgeon) is an attractive target for terrorists; the nearby woodland makes this site difficult to defend.	There are few local police available to monitor suspicious activities, also Necton village has become subjected to vandalism and this could spill over to the proposed site
A summary of the context and work carried out by National Grid and Vattenfall Wind Power Ltd to select an appropriate location to connect Norfolk Vanguard is provided in 'A strategic approach to selecting a grid connection point' (DCO document: Pre-ExA; OCP Report; 9.2). This document outlines the National Grid connection offer process, location identification process and subsequent offer made by National Grid for a connection point at the existing Necton National Grid substation. This document provides a robust explanation of the process that led to National Grid making a Grid Offer of Necton.	Vattenfall incorrectly state there no other suitable connection sites.	This whole area has been woefully addressed by Vattenfall. The Parish Council has suggested alternatives to that selected, with all the evidence pointing to Vattenfall having a predetermined site, which is the highest point around and will make the site visible not only for Necton residents, but many other local villages. It was Necton Parish council who had to insist that national Grid became involved in discussions as it appears that Vattenfall ignored the National Grid sub station in their entirety during the early part of discussions and consultations.

		Vattenfall were offered Top Farm as an alternative site for the converter Halls at Necton. When challenged on why they chose the current site given a viable alternative was available, their response was "It's Necton or nothing." This is not an open-minded or even reasonable approach to finding a suitable site for connection to the National Grid network. An available alternative to the Necton site, Top Farm, was not considered or even investigated, although it had been offered to Vattenfall. Therefore compulsory purchase should not be allowed in the Necton area following this DCO application.
Ground Conditions and Contamination		
The onshore cable route between the onshore project substation and the existing Necton National Grid substation avoids any known designated and undesignated heritage assets. There is a single undesignated site to the north of the cable route in this location – refer to Figure 28.2 of ES Chapter 28 Onshore Archaeology and Cultural Heritage (DCO document 6.1). The alignment of the cable route completely avoids this undesignated site. In addition, a Written Scheme of Investigation (WSI) will be produced in advance of each phase of the onshore works to ensure that any potential impacts to known and unknown buried archaeology are appropriately mitigated. A draft WSI has been provided as part of the DCO application (DCO document 8.5). Wit regards the plane crash site - based on the existing land use, the proposed duct installation depths (1.5m), the evidence of a remediation exercise following the crash and that the site is not classified as a	Insufficient space exists for the development between protected archaeology and radioactive risk from the 1996 Danish air force F16 crash site.	The ground contamination remediation in 1996/7 was to a plough depth (less than 1 metre) because the land use was only arable. Vattenfall will be digging to a much lower depth and therefore their statement that 'the risk of encountering contamination is low' is an unacceptable understatement. Very little of the plane was recovered so there is a high risk that contamination will be encountered. Radioactive substances and carbon fibre contaminants were identified as present in 1996 and neither will have degraded over time. Remediation standards at the time of the crash were not as

		rigorous as those that would be applied today and the risks from exposure to burned carbon fibre strands from composites were not as well understood then as they are today either. Vattenfall appear to have used an incorrect location for the contamination. The impact point is on the edge of Vanguard and the contamination covers 1 sq mile, stretching across the complete site selected for the converter halls from Necton Wood to Ivy Todd Road. The Vanguard infrastructure is situated within the area of contamination. During the build process, the whole site will be affected by any contamination remaining in the ground. Vattenfall have therefore selected a high-risk site for the Vanguard infrastructure at Necton when a suitable low-risk alternative site has been identified. Information on the existence and nature of the land contamination was only obtained under the Freedom of Information Act and was not available for consideration when the Contaminated Land (England) Regulations 2006 came into force. It may well have been designated a Special Site had anyone been aware of the contamination. The contamination is now being taken seriously and there is an epidemiology study currently underway by Public Health to

		understand whether the health of residents was adversely affected by the contamination from the crash. The Parish Council believe a thorough investigation into the nature and extent of any current contamination and measures to ensure safe working both for the health of local residents and those involved in the construction should be identified and agreed in advance of any consent for development of this historically contaminated site. The Parish Council has asked to be fully consulted on all proposed safe working practices at the PINS public meeting on 10th December 2018 in Kings Lynn. We note the MOD opposes this project, due in part to the deployment of the new F35 squadrons to Marham RAF base, which is close by to Necton. The UK Defence incorporates the new F35 abilities to defend us and provide attack facilities for overseas missions.

Norfolk Vanguard Limited Position	Necton Parish Council Position	Final Position
"special site" under the Contaminated Land (England) Regulations 2006, the risk of encountering historic radioactive material at this crash site is considered low. Requirement 20 of the draft Development Consent Order (DCO) requires a Code of Construction Practice (CoCP) to be approved by the local planning authority ahead of each phase of the onshore construction works. Within the Outline CoCP submitted as part of the application (DCO doc. 8.1) the Applicant has set out the approach to assessing potential contaminated sites which would be undertaken post-consent. A written scheme (based on the Model Procedures for the management of land contamination, CLR11) for the management of contamination of any land and groundwater would be submitted and approved by the local authority in consultation with the Environment Agency and this would include further investigation of the site in accordance with "The Radioactively Contaminated Land Exposure Methodology" (CLR 13 and CLR14).		
Water Resources and Flood Risk		
A Flood Risk Assessment has been submitted as part of the application (ES Appendix 20.1). The approach to characterising the existing surface water and groundwater environment was agreed as part of an Expert Topic Group that included the Environment Agency and Norfolk County Council and Lead Local Flood Authority. The onshore project substation surface water drainage plan will have sufficient storage / attenuation volume to ensure that during a 1 in 100 year rainfall event, plus a 20% allowance for climate change, there will be no increase in surface water runoff from the site. An attenuation pond with a volume of 4,050m^3 (approximate dimensions of 58m x 58m x 1.2m) has been allowed for to provide sufficient attenuation to greenfield runoff rates into the closest watercourse or sewer connection. The final design of the surface water drainage plan will require approval from the Environment Agency and Norfolk County Council, which is secured through DCO Requirement 20. This commitment to the design and approval of the final surface water drainage plan at the onshore project substation is appropriate to mitigate potential flood risk impacts associated with the construction and operation of the project.	The proposed site is capped by a thick layer of impervious clay and run-off is taken by a small tributary (Wissey) that historically and regularly floods the road and nearby properties and blocks the 4" culvert. Necton Parish Council believes this is inadequately addressed.	Necton has a history of flooding, with the Norfolk County Councillor, Councillor Kiddle Morris being involving in drainage issues to ease this problem. It is not only water that residents have to endure, but effluent being forced into gardens throughout parts of the village. This is a disgusting event for residents to have to handle and the Parish Council do not believe Suitable considerations have been considered to prevent an increase in flooding caused by a huge industrial size complex on the very edge of the village.

Norfolk Vanguard Limited Position	Necton Parish Council Position	Final Position
Land Use and Agriculture		
An assessment of impacts upon agricultural land is provided within Chapter 21 Land Use and Agriculture of the ES (DCO document 6.1.21) and the coverage of different agricultural land classification types is presented in Figure 21.4. Within Chapter 21 the threshold for the highest effects is identified as the permanent loss of 20ha of the Best and Most Versatile (BMV) Land – refer to Table 21.6. This threshold was defined using Natural England guidance. The assessment is therefore undertaken on the basis that the loss of more than 20ha of BMV land would represent the highest magnitude effect. The 2012 National Planning Policy Framework does not set a threshold for the permanent loss of BMV and instead sets out that BMV land is part of the intrinsic value of the countryside and that planning policies should contribute to the natural and local environment by recognising this. Neither the emerging Breckland Local Plan nor the Norfolk Strategic Planning Framework set any threshold for the permanent loss of BMV land. There will be permanent loss of agricultural land at the onshore project substation, which represents approximately 7.5ha (18.5 acres) of Grade 3 agricultural land. There will also be permanent loss of agricultural land at the National Grid substation extension, which represents approximately 3ha (7.4 acres) of Grade 3 agricultural land. The total area of land permanently taken out of production as a result of the proposal is therefore approximately 10ha (24.7 acres). Private agreements (or compensation in line with the compulsory purchase compensation code) will be sought between Norfolk Vanguard Limited and relevant landowners/occupiers. With this commitment in place the impacts associated with loss of agricultural land will be minimised.	Vattenfall admit the project will not comply with the Breckland Local Plan. The project lies on Grade 3 agricultural land so doesn't comply with the NP Planning Framework 2012, which requires the loss of more than 20 hectares (approx. 50 acres) of BMV to be avoided if possible. 140 acres plus of BMV will be lost from arable use when all infrastructure and landscaping is complete (includes Dudgeon).	The site chosen is by far the worst case scenario and Vattenfall have consistently refused to listen to views expressed by the Parish Council as to site location Our MP has taken a hands on approach and written to the Secretary of State on the whole matter of this project.
Onshore Ecology		
An Expert Topic Group was established for onshore ecology which included Natural England, Norfolk County Council, Breckland Council, Norfolk Wildlife Trust and the Environment Agency to discuss and agree the approach to ecological surveys and assessment, including agreeing the methodology for bat surveys and assessment. Bat surveys were undertaken throughout the onshore project area, where access was permitted and where features with potential to support roosting and foraging bats was identified. This is detailed	Two species of rare bats have been ignored.	The bat survey undertaken by Vattenfall at Necton does not comply with the requirement to survey at least once per month from March to May. Only one survey was undertaken in 2016 in Necton but it was carried out in June. Vattenfall have not therefore done suitable and sufficient

		bat surveys to date.

Norfolk Vanguard Limited Position	Necton Parish Council Position	Final Position
within Chapter 22 Onshore Ecology of the ES (document reference 6.1.22). Necton Wood was identified as a feature with good potential to support roosting and foraging bats, and a site survey was undertaken in 2016. The survey identified two bat species in the area: Barbastelle bats (recognised as rare); and Nathusius Pipistrelle bats (an uncommon species). The assessment presented within Chapter 22 Onshore Ecology was based on a precautionary approach: that the area is important for all bat species. A suite of mitigation measures for bat species is presented within the Outline Landscape and Ecological Management Strategy (OLEMS) – document reference 8.7 (DCO Requirement 24). This includes committing to undertaking surveys in any areas where access was previously denied; hedgerow management before, during and after construction to minimise impacts on commuting bats; avoiding mature tree in hedgerows; reinstating all hedgerows affected; and ensuring that mitigation planting is designed to replace and improve all ecological connections currently located within the onshore project substation footprint. With these measures in place potential impacts to roosting and foraging bats will be appropriately minimised.		
Noise and Vibration		
A detailed noise impact assessment (Chapter 25 Noise and Vibration of the ES, document reference 6.1.25) has been submitted as part of the DCO application. This included extensive noise modelling of the onshore project substation including cumulative noise assessments for when Dudgeon, Norfolk Vanguard and Norfolk Boreas are all in operation. The approach to operational noise modelling was discussed and agreed with the Environmental Health Officer at Breckland Council as part of a noise Expert Topic Group. Further details on the Evidence Plan for noise, vibration and air quality can be found in Appendix 9.25 and Appendix 25.10 of the Consultation Report (document reference 5.1 of the Application). The Applicant has committed to the same operational noise threshold imposed on the Dudgeon substation – 35dB LA_{eq}. This is secured through DCO Requirement 27. The commitment to maintain the operational noise levels of the onshore project substation to no higher than the operational Dudgeon substation will ensure that there will be no increase in the noise environment experienced at the nearest noise sensitive receptors.	Necton Parish Council does not believe the noise constraints required by statute can be met when the three substations (Dudgeon, Vanguard and Boreas) are working at full capacity. The elevation of the chosen site means noise mitigation measures will be difficult and expensive and an earth bank will not be built.	Necton Parish Council is committed to ensuring that the 'No Noise Creep' limits set down by Breckland Council will be enforced. The position of this huge infrastructure complex is unacceptably close to Necton residents when there is an alternative, unpopulated site suitable for connection to the National Grid further along the A47 towards Norwich. Therefore, there is a distinct possibility that the wind farms (Dudgeon, Vanguard and Boreas) will not be allowed to work at full capacity (maximum noise) if their connection to the

		National Grid is made at Necton.

Norfolk Vanguard Limited Position	Necton Parish Council Position	Final Position
Tourism and Recreation		
An assessment of impacts upon tourism is provided within Chapter 30 Tourism and Recreation of the ES (document reference 6.1.30). The approach to the assessment was to identify key types of tourism assets within the study area and to define potential impacts on a sector basis. Potential impacts to the four holiday lets identified by Necton Parish Council are considered within section 30.7.6.2 within Chapter 30 Tourism and Recreation, which draws on the assessment findings set out in the noise chapter (Chapter 25 Noise and Vibration, document reference 6.1.25) and landscape and visual impact chapter (Chapter 29 Landscape and Visual Impact Assessment, document reference 6.1.29). The mitigation proposed for potential impacts to receptors within 1km of the onshore project substation and secured in the draft DCO (specifically operational noise to not exceed 35dB at the nearest noise sensitive receptors (DCO Requirement 27); and the landscape mitigation proposals at the onshore project substation secured through the Landscape Management Scheme (DCO Requirement 18)) are appropriate.	Four of the five holiday let/camping sites nearby have been ignored.	
Landscape and Visual Impact Assessment		
Screening woodland planting is proposed in key areas. This is shown on Figure 29.9 of Chapter 29 Landscape and Visual Impact Assessment of the ES (document reference 6.1.29). The extent of significant effects and significant cumulative effects at the onshore project substation and National Grid substation extension would be largely contained within the local landscape (within 1.2km), partly owing to existing woodland cover to the north and east and rising landform to the south. Effects on visual amenity would be limited largely owing to the enclosure of hedgerows along roads and around settlements. Significant effects have been identified in relation to road-users for a short section of the A47, an opening on Ivy Todd Road, and walkers on Lodge Lane. Post-construction mitigation in the form of landscape planting would mitigate these effects within 10, 20 and 25 years respectively, with the effects being gradually mitigated as planting grows. Once mitigated the effects would become beneficial as the mitigation planting would enhance local visual amenity.	Vattenfall state the development is too massive to be screened from view, and does not fit into the rural landscape.	The Vanguard project will have an unacceptably high impact on the dark rural landscape of Necton. The proposed buildings are out of proportion to the rural nature of the landscape. They are huge and will be placed on a high piece of ground close to a rural village where mitigation is not feasible. By their own admission, Vattenfall admit it cannot screen the site from Necton and local villages, so causing a permanent eyesore, unlike the cable route across the County, which within a year would return to natural looking habitat. An alternative, geographically isolated connection point to the National Grid

		is possible further along the pylon route towards Norwich, where the infrastructure would be hidden from view by the natural vegetation already in existence. National Grid have admitted that this is a viable connection point. Vattenfall should therefore not be allowed to build the substation complex on the selected high point at Necton where it is out of proportion to the rural nature of the area and can't be mitigated." Necton has a major access/egress traffic problem with the Tuns Road and A47 junction. We have offered to seed a piece of our land to Norfolk County Council for a left slip road to ease the egress route. Also our M.P. has convinced Highways England to conduct a study as to the possibility of a new roundabout being built at this junction.

The undersigned agree to the provisions within this SOCG

Signed	
Printed Name	David Matthews
Position	Chairman
On behalf of	Necton Parish Council
Date	8th January 2019

Signed	
Printed Name	Rebecca Sherwood
Position	Norfolk Vanguard Consents Manager
On behalf of	Norfolk Vanguard Ltd (the Applicant)
Date	