

Norfolk Vanguard Offshore Wind Farm

Statement of Common Ground

Anglian Water

Applicant: Norfolk Vanguard Limited
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Photo: Kentish Flats Offshore Wind Farm



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Glossary

DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
EPP	Evidence Plan Process
ETG	Expert Topic Group
HDD	Horizontal Directional Drilling
OWF	Offshore Wind Farm
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
SPZ	Source Protection Zone
WFD	Water Framework Directive

Terminology

Array cables	Cables which link the wind turbines and the offshore electrical platform.
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 near 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 Anglian Water 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 Anglian Water on the Norfolk Vanguard DCO application (hereafter 'the Application'). Topic specific matters agreed, not agreed and actions to resolve between Anglian Water and the Applicant are included.
3. The Applicant has had regard to the Guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this SoCG. 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

4. 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 (APP-329). 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.
5. 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.
6. 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 Anglian Water

7. This section briefly summarises the consultation that the Applicant has had with Anglian Water. For further information on the consultation process please see the Consultation Report (document reference 5.1 of the Application APP-043).

1.2.1 Pre-Application

8. The Applicant has engaged with Anglian Water on the project during the pre-Application process, both in terms of informal non-statutory engagement and formal consultation carried out pursuant to Section 42 of the Planning Act 2008.
9. During formal (Section 42) consultation, Anglian Water provided comments on the Preliminary Environmental Information Report (PEIR) by way of a letter dated 11th December 2017.
10. Further to the statutory Section 42 consultation, several meetings were held with Anglian Water through the Evidence Plan Process. These are detailed throughout the SoCG and minutes of the meetings are provided in Appendices 9.15 – 9.26 (pre-Section 42) (APP-079 to APP-089 and Appendices 25.1 – 25.9 (post-Section 42) (APP-174 to APP-182) of the Consultation Report (document reference 5.1 of the Application).

1.2.2 Post-Application

11. There has been continued engagement between the Applicant and Anglian Water confirming the wording of the proposed Protective Provisions. This is a live document that is being updated as the project progresses.

2 STATEMENT OF COMMON GROUND

12. Within the sections and tables below the different topics for areas of agreement and disagreement between Anglian Water and the Applicant are set out.

2.1 Water Resources and Flood Risk, including Anglian Water Assets

13. The project has the potential to impact upon water resources and flood risk. Chapter 20 Water Resources and Flood Risk of the Environmental Statement (ES), (document reference 6.1.20 of the Application, APP-344), provides an assessment of the significance of these impacts.
14. Table 1 provides an overview of meetings and correspondence undertaken with Anglian Water regarding water resources and flood risk.
15. Table 2 provides an overview of meetings and correspondence undertaken with Anglian Water regarding protective provisions.
16. Table 3 provides areas of agreement and disagreement regarding water resources and flood risk.
17. Further details on the Evidence Plan for water resources and flood risk can be found in Appendix 9.20 (APP-083) and Appendix 25.2 (APP-175) of the Consultation Report (document reference 5.1 of the Application).

Table 1 Summary of Consultation with Anglian Water regarding water resources and flood risk

Date	Contact Type	Topic
Pre-Application		
1 st January 2017	Email from the Applicant	Provision of Water Resources and Flood Risk and Onshore Ground Conditions Method Statements (provided in Appendix 9.8 of the Consultation Report APP-071).
25 th January 2017	Water Quality, Water Framework Directive (WFD), Flood Risk, Land Quality and Geology Scoping Expert Topic Group (ETG) Meeting	Project introduction, development of site selection and project design, and approach to Environmental Impact Assessment (EIA) (minutes provided in Appendix 9.20 of the Consultation Report APP-083).
8 th September 2017	Onshore Water Resources, Flood Risk, Ground Conditions and Contamination pre-Preliminary Environmental Information (PEI) ETG Meeting	Project update and overview of results to date (minutes provided in Appendix 9.20 of the Consultation Report APP-083).
27 th October 2017	Email from Anglian Water	Provision of a schedule of Anglian Waters assets potentially affected by the proposed development.

Date	Contact Type	Topic
11 th December 2017	Email from Anglian Water	PEIR feedback.
23 th January 2018	Onshore Water Resources, Flood Risk, Ground Conditions and Contamination ETG meeting – PEI Responses	PEIR comments and approach to updating assessments (minutes provided in Appendix 25.2 of the Consultation Report APP-175).
22 nd March 2018	Evidence Plan Process (EPP) Meeting - Water Resources	Meeting to discuss crossing of Groundwater Source Protection Zones (SPZ's), including the North Walsham and Dilham Canal (minutes provided in Appendix 25.2 of the Consultation Report APP-175).
Post-Application		
16 th September 2018	Relevant Representation	Initial feedback on the DCO application

Table 2 Summary of Consultation with Anglian Water regarding protective provisions

Date	Contact Type	Topic
Pre-Application		
17 th October 2017	Outgoing email	Applicant issued email to Anglian Water attaching letter correspondence which had been previously sent to them
20 th October 2017	Incoming email	Applicant receives email from Anglian Water, requesting a meeting and a copy of proposed protective provisions requesting to be included in the draft Book of Reference.
14 th December 2017	Conference call	For project overview, s42 process, initial discussions
7 th March 2018	Outgoing email	Applicant's solicitor sends email to Anglian Water's solicitor with comments on protective provisions.
7 th March 2018	Incoming email	Anglian Water's solicitor sends comment to Applicant's solicitor on protective provisions. Content with majority of changes. Wishes to discuss liability cap.
Post-Application		
2 nd July 2018	Outgoing email	Applicant's solicitor sends email to Anglian Water's solicitor. Confirming that Applicant happy to remove liability cap wording, but would instead like to include wording that Anglian Water must take reasonable steps to mitigate losses.
3 rd July 2018	Incoming email	Anglian Water's solicitor confirms to Applicant's solicitor that the protective provisions are now agreed.

Date	Contact Type	Topic
9 th August 2018	Incoming email	Applicant received incoming email from Anglian Water agent, Savills. Email is in regards to the Head of Terms received and the option that concerns a permanent right of access which may be required through Anglian Water's waterworks site at Cawston just off the B1145.
28 th August 2018	Outgoing email	Applicant issued email to Savills, supplying them with the land plans for wider route understanding.
25 th September 2018	Outgoing email	Applicant email Savills to chase previous email of 28 th August.
30 th November 2018	Outgoing email	Applicant email to Savills informing that rights over access are no longer required as the access has been removed from the Order limits.

Table 1 Statement of Common Ground - water resources and flood risk, including Anglian Water assets

Topic	Norfolk Vanguard Limited position	Anglian Water position	Final position
Environmental Impact Assessment			
Existing Environment	<p>Sufficient survey data has been collected to inform the assessment.</p> <p>This was discussed and agreed during the ETG meetings in January and September 2017.</p>	Agreed	It is agreed by both parties that sufficient survey data have been collected to undertake the assessment.
Assessment methodology	<p>The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.</p> <p>This was discussed in the ETG meeting in January 2017, where concerns were raised over the methodology by the Environment Agency. This led to a revision of the methodology.</p> <p>The updated methodology was discussed and agreed during the ETG meeting in September 2017.</p>	Agreed	It is agreed by both parties that the impact assessment methodologies used in the EIA are appropriate.
	<p>The worst case scenario presented in the assessment is appropriate.</p> <p>This was discussed and agreed during the ETG meeting in January 2018.</p>	Agreed	It is agreed by both parties that the worst-case scenario presented in the ES is appropriate for this project.
Assessment findings	<p>The ES adequately characterises the baseline environment in terms of water resources and flood risk.</p> <p>This was discussed and agreed during the ETG meeting in September 2017.</p>	Agreed	It is agreed by both parties that the ES adequately characterises the baseline environment.
	<p>The assessment of impacts for construction, operation and decommissioning presented are appropriate and consistent with the agreed assessment methodologies.</p>	Agreed	It is agreed by both parties that the ES adequately assesses impacts.

Topic	Norfolk Vanguard Limited position	Anglian Water position	Final position
	The assessment of cumulative impacts is appropriate and consistent with the agreed methodologies.	Agreed	It is agreed by both parties that the ES adequately assesses cumulative impacts.
Approach to mitigation	The proposed locations for trenchless crossing techniques are appropriate and will be explored further and details agreed at each location at detailed design stage. This was discussed and agreed during the ETG meeting in September 2017.	Agreed	It is agreed by both parties that the proposed trenchless crossing techniques are appropriate, subject to detailed design.
	The mitigation proposed for water resources is appropriate and adequate.	To be discussed	
	The mitigation proposed for managing flood risk is appropriate and adequate.	To be discussed	
Draft Development Consent Order (DCO)			
Wording of Requirement(s)	The wording of Schedule 16 Part 6 Protective Provisions For the Protection of Anglian Water Services Limited provided within the draft DCO for the mitigation of impacts to Anglian Water assets are considered appropriate and adequate.	Agreed	Protective Provisions are agreed.
Anglian Water assets			
Crossing points of assets and apparatus	Norfolk Vanguard Limited will, under the Protective Provisions for the Protection of Anglian Water Services Limited (Schedule 16 of the draft DCO, DCO document 3.1) agree in writing any construction works in relation to onshore cable route crossings with Anglian Water assets and apparatus.	To be discussed	

The undersigned agree to the provisions within this SOCG

Name	Stewart Patience
Position	Spatial Planning Manager
On behalf of	Anglian Water Services Ltd
Date	14 th January 2019

Name	Rebecca Sherwood
Position	Norfolk Vanguard Consents Manager
On behalf of	Norfolk Vanguard Ltd (the Applicant)
Date	14 th January 2019