

Norfolk Vanguard Offshore Wind Farm

Statement of Common Ground

Breckland Council



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Photo: Kentish Flats Offshore Wind Farm

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Glossary

ADBA	Archaeological Desk Based Assessment
AMP	Access Management Plan
CIA	Cumulative Impact Assessment
CoCP	Code of Construction Practice
CWS	County Wildlife Sites
DCO	Development Consent Order
EcIA	Ecological Impact Assessment
EIA	Environmental Impact Assessment
EMP	Ecological Management Plan
ES	Environmental Statement
ETG	Expert Topic Group
GCN	Great crested newt
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
HDD	Horizontal Directional Drilling
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LiDAR	Light Detection and Ranging
LVIA	Landscape and Visual Impact Assessment
MMP	Materials Management Plan
MSA	Mineral Safeguarding Areas
OCoCP	Outline Code of Construction Practice
OWF	Offshore Wind Farm
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
SPZ	Source Protection Zones
TMP	Traffic Management Plan
TP	Travel Plan
WSI	Written Scheme of Investigation

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. 100 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 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.
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 High Voltage Direct Current (HVDC) to High Voltage Alternating Current (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	Temporary areas required for trenchless crossing works (e.g. HDD).

1 INTRODUCTION

1. This Statement of Common Ground (SoCG) has been prepared between Breckland 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'). Detailed input from Breckland District Council on the SoCG is currently outstanding and the Applicant will continue to engage with Breckland District Council to progress this SoCG.
2. This SoCG comprises an agreement log which has been structured to reflect topics of interest to Breckland Council on the Norfolk Vanguard DCO application (hereafter 'the Application'). Topic specific matters agreed, not agreed and actions to resolve between Breckland Council 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. 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 Breckland Council

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

1.2.1 Pre-Application

8. The Applicant has engaged with Breckland Council 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, Breckland Council provided comments on the Preliminary Environmental Information Report (PEIR) by way of two emails dated 11th December 2017 and two letters dated 13th and 14th December 2017.
10. Further to the statutory Section 42 consultation, several meetings were held with Breckland Council 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) and Appendices 25.1 – 25.9 (post-Section 42) of the Consultation Report (document reference 5.1 of the Application).

1.2.2 Post-Application

11. This is a live document that is being updated as the project progresses. The original draft was produced prior to the publishing of the Relevant Representations. As Relevant Representations are received, the document will be updated.

2 STATEMENT OF COMMON GROUND

12. Within the sections and tables below, the different topics and areas of agreement and disagreement between Breckland Council and the Applicant are set out.

2.1 Project-wide considerations

13. Table 1 provides areas of agreement and disagreement for project-wide considerations.

Table 1 Project-wide considerations

Norfolk Vanguard Limited position	Breckland Council position	Final position
Policy and legislation		
The legislation adopted for Norfolk Vanguard is relevant and interpreted appropriately.		
<p>The principle of commercial scale renewable energy developments is supported, and will be permitted unless environmental impacts outweigh social, economic and environmental benefits.</p> <p>This was noted in Breckland Councils PEIR response in December 2017.</p>	Agreed	It is agreed that both parties support renewable energy projects in principle and the project accords with national targets and objectives for renewable energy.
Site selection		
The principles adopted in undertaking the site selection (Chapter 4 Site Selection and Assessment of Alternatives) for Norfolk Vanguard are appropriate and robust.		
The search areas used for the site selection process and the methodology used for refining these areas is considered robust and appropriate.		
The methodology adopted for selecting and assessing the onshore project substation location options, including the final option, is considered robust and appropriate.		
Health Impact Assessment (HIA)		
The methodology adopted for the HIA (Chapter 27 Human Health) is appropriate and robust, and the outcome of the assessment is suitable.		

2.2 Ground Conditions and Contamination

14. The project has the potential to impact upon ground conditions and contamination. Chapter 19 of the Environmental Statement (ES), (document reference 6.1.19 of the Application), provides an assessment of the significance of these impacts.
15. Table 2 provides an overview of meetings and correspondence undertaken with Breckland Council regarding ground conditions and contamination.
16. Table 3 provides areas of agreement and disagreement regarding ground conditions and contamination.
17. Further details on the Evidence Plan for ground conditions and contamination can be found in Appendix 9.20 and Appendix 25.2 of the Consultation Report (document reference 5.1 of the Application).

Table 2 Summary of Consultation with Breckland Council regarding ground conditions and contamination

Date	Contact Type	Topic
Pre-Application		
25 th January 2017	Email	Method statement, project updates and approach to the assessment (methodology, impacts, data collection etc).
14 th December 2017	Email from Breckland Council	PEIR feedback.
4 th April 2018	Email	Request for confirmation of projects to be included in the Cumulative Impact Assessment (CIA).
Post-Application		

Table 3 Statement of Common Ground - ground conditions and contamination

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Existing Environment	Sufficient survey data has been collected to undertake the assessment.		
Assessment methodology	The impact assessment methodologies used (as proposed in the Evidence Plan method statement provided in January 2017) for the Environmental Impact Assessment (EIA) represent an appropriate approach to assessing potential impacts of the project.	Agreed	It is agreed by both parties that the methodologies presented in January 2017 for the impact assessment are appropriate.
	The worst-case scenario presented in the assessment is appropriate.		
Assessment findings	The assessment adequately characterises the baseline environment in terms of ground conditions and contamination.		
	The assessment of impacts for construction, operation and decommissioning presented is appropriate and, assuming the inclusion of the embedded mitigation described, impacts on ground conditions and contamination are likely to be non-significant in EIA terms.		
	The assessment of cumulative impacts is appropriate and, assuming the inclusion of the embedded mitigation described, cumulative impacts on ground conditions and contamination are likely to be non-significant in EIA terms.		
Approach to mitigation	The provision of a Materials Management Plan (MMP) is considered suitable to mitigate impacts on Mineral Safeguarding Areas (MSA).		
	Given the impacts of the project, the mitigation proposed for ground conditions and contamination is considered appropriate and adequate.		

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
	The approach to mitigating potential impacts on Source Protection Zones (SPZ) at trenchless crossings, including undertaking pre-construction ground investigations and hydrogeological risk assessments is considered appropriate.		
Wording of Requirement(s)	The wording of Requirement 20 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts associated with ground conditions and contamination are considered appropriate and adequate.		

2.3 Water Resources and Flood Risk

18. The project has the potential to impact upon water resources and flood risk. Chapter 20 of the ES (document reference 6.1 of the Application) provides an assessment of the significance of these impacts.
19. Table 4 provides an overview of meetings and correspondence undertaken with Breckland Council regarding water resources and flood risk.
20. Table 5 provides areas of agreement and disagreement regarding water resources and flood risk.
21. Further details on the Evidence Plan for water resources and flood risk can be found in Appendix 9.20 and Appendix 25.2 of the Consultation Report (document reference 5.1 of the Application).

Table 4 Summary of Consultation with Breckland Council

Date	Contact Type	Topic
Pre-Application		
14 th December 2017	Letter	PEIR feedback
4 th April 2018	Email	Request for confirmation of projects to be included in the CIA.
Post-Application		

Table 5 Statement of Common Ground - water resources and flood risk

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Existing Environment	Sufficient survey data has been collected to inform the assessment.		
Assessment methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project. This was discussed in the Expert Topic Group meeting in January 2017, where concerns were raised over the methodology by the Environment Agency. This led to a revision of the methodology.	Agreed	Both parties agree that the revised methodology is suitable for the assessment.
	The worst-case scenario presented in the assessment is appropriate.		
Assessment findings	The ES adequately characterises the baseline environment in terms of water resources and flood risk.		
	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.		
	The assessment of cumulative impacts is consistent with the agreed methodologies.		
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.		
	The mitigation proposed for water resources is appropriate and adequate.		

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
	The mitigation proposed for managing flood risk is appropriate and adequate.		
Wording of Requirement(s)	The wording of Requirement 20 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts to water resources and flood risk are considered appropriate and adequate.		

2.4 Land Use and Agriculture

22. The project has the potential to impact upon land use and agriculture. Chapter 21 of the ES, (document reference 6.1.21 of the Application), provides an assessment of the significance of these impacts.
23. Table 6 provides an overview of meetings and correspondence undertaken with Breckland Council regarding land use and agriculture.
24. Table 7 provides areas of agreement and disagreement regarding land use and agriculture.
25. Further details on the Evidence Plan for land use and agriculture can be found in Appendix 9.18 and Appendix 25.3 of the Consultation Report (document reference 5.1 of the Application).

Table 6 Summary of Consultation with Breckland Council regarding land use and agriculture

Date	Contact Type	Topic
Pre-Application		
14 th January 2017	Email to Breckland Council	Provision of Land Use method statement
24 th January 2017	Meeting	Method statement, project introduction, development of site selection and project design, approach to EIA
14 th December 2017	Email from Breckland Council	PEIR feedback.
4 th April 2018	Email	Request for confirmation of projects to be included in the CIA.
Post-Application		

Table 7 Statement of Common Ground - land use and agriculture

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Existing Environment	Sufficient survey data has been collected to undertake the assessment		
Assessment methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	Both parties agree the methodology for the impact assessment is suitable.
	The worst-case scenario presented in the assessment, is appropriate		
	The ES adequately characterises the baseline environment in terms of land use and agriculture.		
Assessment findings	The assessment of impacts for construction, operation and decommissioning presented is appropriate and, assuming the inclusion of the embedded mitigation described, impacts on land use and agriculture are likely to be non-significant in EIA terms.		
	The assessment of cumulative impacts is appropriate and, assuming the inclusion of the embedded mitigation described, cumulative impacts on land use and agriculture are likely to be non-significant in EIA terms.		
Approach to mitigation	The mitigation proposed for land use and agriculture are considered appropriate and adequate.		

2.5 Onshore Ecology and Onshore Ornithology

26. The project has the potential to impact upon onshore ecology and onshore ornithology. Chapter 22 and 23 of the ES, (document reference 6.1.22 and 6.1.23 of the Application), provides an assessment of the significance of these impacts.
27. Table 8 provides an overview of meetings and correspondence undertaken with Breckland Council regarding onshore ecology and onshore ornithology.
28. Table 9 provides areas of agreement and disagreement regarding onshore ecology and onshore ornithology.
29. Further details on the Evidence Plan for onshore ecology and onshore ornithology can be found in Appendix 9.19 and Appendix 25.1 of the Consultation Report (document reference 5.1 of the Application).

Table 8 Summary of Consultation with Breckland Council regarding onshore ecology and onshore ornithology

Date	Contact Type	Topic
Pre-Application		
14 th January 2017	Email	Provision of Onshore Ecology and Onshore Ornithology method statement
24 th January 2017	Meeting	Onshore Ecology and Ornithology Scoping Expert Topic Group Meeting
14 th December 2017	Letter	PEIR feedback
4 th April 2018	Email	Request for confirmation of projects to be included in the CIA.
Post-Application		

Table 9 Statement of Common Ground - onshore ecology and onshore ornithology

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Survey methodology	Survey methodologies for Phase 1 Habitat Surveys are appropriate and sufficient.	Agreed	Both parties agree the methodology for Phase 1 surveys are suitable.
	Survey methodologies for Phase 2 Surveys are appropriate and sufficient.	Agreed	Both parties agree the methodology for Phase 2 surveys are suitable.
Existing Environment	Survey data collected for Norfolk Vanguard for the characterisation of onshore ecology and onshore ornithology are suitable for the assessment.		
	The ES adequately characterises the baseline environment in terms of onshore ecology and onshore ornithology.		
Assessment methodology	Appropriate legislation, planning policy and guidance relevant to ecology and ornithology has been considered for the project (listed in section 22.2 and 23.2 in Chapter 22 Onshore Ecology and Chapter 23 Onshore Ornithology respectively).		
	The list of potential impacts on onshore ecology and onshore ornithology assessed is appropriate		
	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.		
	The worst-case scenario presented in the ES, is appropriate for the project.		
Assessment findings	The assessment of impacts for construction, operation and decommissioning presented is appropriate.		
	The assessment of cumulative impacts is appropriate.		

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Approach to mitigation	All mitigation measures required are outlined in the Outline Code of Construction Practice (OCoCP) and Outline Landscape and Environmental Management Strategy (OLEMS).		
	The use of trenchless crossing techniques at County Wildlife Sites (CWS) is acceptable subject to detailed design.		
	The provision of an Ecological Management Plan (EMP) (based on the OLEMS submitted with the DCO application, document reference 8.7) is considered suitable to ensure potential impacts identified in the Ecological Impact Assessment (EclA) are reduced to a non-significant level.		
	The mitigation proposed for bats is appropriate and proportionate.		
	The mitigation proposed for great crested newts (GCN) is appropriate and proportionate (as outlined in the draft GCN mitigation licence).		
Screening of Likely Significant Effects (LSE)	The methodology and sites screened in for the HRA as presented in Appendix 5.2 of the Information to Support HRA report (Application document 5.3) are considered appropriate, considering sites within 5km of onshore infrastructure.		
	The approach to HRA screening is appropriate. The following sites are screened in for further assessment: <ul style="list-style-type: none"> • River Wensum; • Paston Great Barn; and • Norfolk Valley Fens. 		
Assessment of Adverse Effect on Integrity	The approach to the assessment is appropriate.		

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
	The conclusions of no adverse effect on site integrity in the Information to Support HRA report (document 5.3) are appropriate.		
Wording of Requirement(s)	Requirement 24 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts to onshore ecology and ornithology are considered appropriate and adequate.		

2.6 Traffic and Transport

30. The project has the potential to impact upon traffic and transport. Chapter 24 of the ES (document reference 6.1 of the Application) provides an assessment of the significance of these impacts.
31. Table 10 provides an overview of meetings and correspondence undertaken with Breckland Council regarding traffic and transport.
32. Table 11 provides areas of agreement and disagreement regarding traffic and transport.
33. Further details on the Evidence Plan for traffic and transport can be found in Appendix 9.21 and Appendix 25.5 of the Consultation Report (document reference 5.1 of the Application).

Table 10 Summary of Consultation with Breckland Council regarding traffic and transport

Date	Contact Type	Topic
Pre-Application		
14 th January 2017	Email	Provision of the Traffic and Transport, Air Quality and Noise Method Statements.
25 th January 2017	Meeting	Traffic & Transport, Air Quality and Noise Scoping Expert Topic Group Meeting
14 th December 2017	Letter	PEIR feedback
4 th April 2018	Email	Request for confirmation of projects to be included in the CIA.
Post-Application		

Table 11 Statement of Common Ground - traffic and transport

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Existing Environment	Sufficient survey data (extent/duration) has been collected to inform the characterisation of the baseline environment.		
Assessment methodology	The impact assessment methodologies used for the assessment represent an appropriate approach to assessing potential impacts.		
	The assessment adequately defines the realistic worst-case scenario (RWCS) for traffic demand.		
	The assessment adequately defines the realistic worst-case scenario for employee distribution.		
	The assessment adequately characterises the baseline environment in terms of traffic and transport.		
Assessment findings	The assessment of impacts for construction, operation and decommissioning presented adheres to the agreed assessment methodology.		
Approach to mitigation	The production of an enhanced Traffic Management Plan (TMP), Travel Plan (TP) and Access Management Plan (AMP) (based on the outline documents submitted with the DCO application, document reference 8.8, 8.9 and 8.10) provides sufficient mitigation for potential impacts on traffic and transport.		
	Significant residual impacts for Norfolk Vanguard alone are predicted at a single link - Link 69 (Little London Road). The mitigation proposed at this location is considered appropriate and proportionate.		

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
	<p>Additional proposals have been provided in relation to the A47(T) permanent access to the onshore project substation. The proposals are satisfactory with regard to safety, driver delay and do not obstruct future plans for dualling the A47(T). This was discussed in PEIR feedback in December 2017 and agreed by Breckland Council in principle, subject to consultation and agreement with Highways England and Norfolk County Council.</p>	<p>Agreed</p>	<p>It is agreed by both parties that subject to agreement by Highways England and Norfolk County Council, the additional proposals for the A47 are satisfactory.</p>
<p>Wording of Requirement(s)</p>	<p>The wording of Requirement 21 and 22 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts to traffic and transport are considered appropriate and adequate.</p>		

2.7 Noise and Vibration

34. The project has the potential to impact upon noise and vibration. Chapter 25 of the ES (document reference 6.1 of the Application) provides an assessment of the significance of these impacts.
35. Table 12 provides an overview of meetings and correspondence undertaken with Breckland Council regarding noise and vibration.
36. Table 13 provides areas of agreement and disagreement regarding noise and vibration.
37. Further details on the Evidence Plan for noise and vibration can be found in Appendix 9.25 and Appendix 25.10 of the Consultation Report (document reference 5.1 of the Application).

Table 12 Summary of Consultation with Breckland Council regarding noise and vibration

Date	Contact Type	Topic
Pre-Application		
14 th January 2017	Email	Provision of the Traffic and Transport, Air Quality and Noise Method Statements.
25 th January 2017	Meeting	Traffic & Transport, Air Quality and Noise Scoping Expert Topic Group Meeting
29 th March 2017	Email	Provision of the proposed locations for the onshore noise and vibration monitoring survey.
2 nd May 2017	Email	Acceptance of proposed approach to noise and vibration monitoring survey and locations
19 th July 2017	Meeting	Noise and Vibration Pre-PEI ETG Meeting: Project update and overview of results to date.
14 th September 2017	Meeting	Follow-up from July ETG meeting, to discuss potential noise condition at the onshore project substation for Norfolk Vanguard and to agree that BS4142 is the most appropriate approach for the substation.
11 th December 2017	Email	PEIR response: no concerns regarding noise and vibration
14 th December 2017	Letter	PEIR feedback
9 th March 2018	Email	Provision of the HVDC operational noise technical note.

Date	Contact Type	Topic
4 th April 2018	Email	Request for confirmation of projects to be included in the CIA.
17 th April 2018	Email	Response regarding the HVDC operational noise technical note.
Post-Application		

Table 13 Statement of Common Ground – noise and vibration

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Existing Environment	<p>Sufficient survey data (extent/duration) has been collected in appropriate locations to characterise the noise environment to undertake the assessment.</p> <p>This was agreed via email communications with Breckland in May 2017.</p>	Agreed	It is agreed by both parties that the noise and vibration monitoring survey collected sufficient data in appropriate locations to undertake the noise assessment.
Assessment methodology	<p>The impact assessment methodologies used for the assessment represent an appropriate approach to assessing potential impacts.</p> <p>This was agreed through the PEIR feedback in December 2017 and via email communications with Breckland in March 2018.</p>	Agreed	It is agreed by both parties that the impact assessment is appropriate.
	<p>The worst-case scenario presented in the assessment is appropriate.</p> <p>This was agreed through the PEIR feedback in December 2017 and via email communications with Breckland in March 2018.</p>	Agreed	It is agreed by both parties that the worst-case scenario is appropriate.
	<p>The assessments adequately characterise the baseline environment in terms of noise and vibration.</p> <p>This was agreed through the PEIR feedback in December 2017 and via email communications with Breckland in March 2018.</p>	Agreed	It is agreed by both parties that the baseline environment is appropriate.
Assessment findings	<p>The assessment of impacts for construction, operation and decommissioning presented is appropriate and, assuming the inclusion of the mitigation described, impacts from noise and vibration are non-significant in EIA terms.</p> <p>This was agreed through the PEIR feedback in December 2017 and via email communications with Breckland in March 2018.</p>	Agreed	It is agreed by both parties that the impact assessment is appropriate.
	<p>The assessment of cumulative effects is appropriate and, assuming the inclusion of the mitigation described, cumulative impacts from noise and vibration are non-significant in EIA terms.</p> <p>This was agreed through the PEIR feedback in December 2017 and via email communications with Breckland in March 2018.</p>	Agreed	It is agreed by both parties that the cumulative impact assessment is appropriate.

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Approach to mitigation	<p>The production of a Code of Construction Practice (CoCP), including a Construction Noise and Vibration Management Plan and Operational Noise Management Plan (based on the OCoCP, document reference 8.1) will provide sufficient mitigation for potential impacts on noise and vibration.</p> <p>This was agreed through the PEIR feedback in December 2017 and via email communications with Breckland in March 2018.</p>	Agreed	It is agreed by both parties that the OCoCP provides sufficient mitigation and the CoCP, to be approved by the relevant planning authority, will provide sufficient mitigation.
	<p>The mitigation proposed will ensure the noise rating level (defined by BS4142) from the operation of the substation shall not exceed 35dB L_{Aeq, (5 minutes)} at any time at a free field location immediately adjacent to any noise sensitive location, and will ensure that noise from the operation of the substation shall not exceed a limit value of 32dB L_{Leq (15 minutes)} in the 100Hz third octave band, at any time at a free field location immediately adjacent to any noise sensitive location.</p> <p>This was discussed and agreed via a Technical Note and further emails in March 2018 with Breckland Council.</p>	Agreed	It is agreed by both parties that the mitigation proposed will achieve the appropriate noise rating level at the substation.
Wording of Requirement(s)	<p>The wording of Requirement 20 and 27 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts associated with noise and vibration and air quality are considered appropriate and adequate:</p> <p><i>"27. – (1) The noise rating level for the use of Work No 8A must not exceed 35dB L_{Aeq (5 minutes)} at any time at a free field location immediately adjacent to any noise sensitive location.</i></p> <p><i>(2) The noise rating level for the use of Work No. 8A must not exceed 32 dB L_{Aeq (15 minutes)} in the 100Hz third octave band at any time at a free field location immediately adjacent to any noise sensitive location."</i></p>		

2.8 Air Quality

38. The project has the potential to impact upon air quality receptors. Chapter 26 of the ES, (document reference 6.1.26 of the application), provides an assessment of the significance of these impacts.
39. Table 14 provides an overview of meetings and correspondence undertaken with Breckland Council regarding air quality.
40. Table 15 provides areas of agreement and disagreement regarding air quality.

Table 14 Summary of Consultation with Breckland Council regarding air quality

Date	Contact Type	Topic
Pre-Application		
14 th January 2017	Email	Provision of the Traffic and Transport, Air Quality and Noise Method Statements.
25 th January 2017	Meeting	Traffic & Transport, Air Quality and Noise Scoping Expert Topic Group Meeting
11 th December 2017	Email from Breckland Council	PEIR feedback, no concerns regarding air quality.
4 th April 2018	Email	Request for confirmation of projects to be included in the CIA.
Post-Application		

Table 15 Statement of Common Ground – air quality

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Existing Environment	Sufficient survey data (extent/duration) has been collected to characterise the air quality environments to undertake the assessment. This was agreed through PEIR feedback in December 2017.	Agreed	It is agreed by both parties that the air quality data collection is appropriate to undertake the assessment.
Assessment methodology	The impact assessment methodologies used for the assessment represent an appropriate approach to assessing potential impacts. This was agreed through PEIR feedback in December 2017.	Agreed	It is agreed by both parties that the impact assessment is appropriate.
	The worst-case scenario presented in the assessment is appropriate. This was agreed through PEIR feedback in December 2017.	Agreed	It is agreed by both parties that the worst-case scenario is appropriate.
	The assessment adequately characterises the baseline environment in terms of air quality. This was agreed through PEIR feedback in December 2017.	Agreed	It is agreed by both parties that the baseline environment is appropriate.
Assessment findings	The assessment of impacts for construction, operation and decommissioning presented is appropriate and, assuming the inclusion of the mitigation described, impacts on air quality are non-significant in EIA terms. This was agreed through PEIR feedback in December 2017.	Agreed	It is agreed by both parties that the impact assessment is appropriate.
	The assessment of cumulative effects is appropriate and, assuming the inclusion of the mitigation described, cumulative impacts on air quality are non-significant in EIA terms. This was agreed through PEIR feedback in December 2017.	Agreed	It is agreed by both parties that the cumulative impact assessment is appropriate.
Approach to mitigation	The production of a CoCP, including an Air Quality Management Plan, (based on the outline CoCP, document reference 8.1) provides sufficient mitigation for potential impacts on air quality. This was agreed through PEIR feedback in December 2017.	Agreed	It is agreed by both parties that the CoCP provides sufficient mitigation.

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Wording of Requirement(s)	The wording of Requirement 20 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts on air quality are considered appropriate and adequate.		

2.9 Onshore Archaeology and Cultural Heritage

41. The project has the potential to impact upon onshore archaeology and cultural heritage. Chapter 28 of the ES (document reference 6.1 of the Application) provides an assessment of the significance of these impacts.
42. Table 16 provides an overview of meetings and correspondence undertaken with Breckland Council regarding onshore archaeology and cultural heritage.
43. Table 17 provides areas of agreement and disagreement regarding onshore archaeology and cultural heritage.
44. Further details on the Evidence Plan for onshore archaeology and cultural heritage can be found in Appendix 9.22 and Appendix 25.4 of the Consultation Report (document reference 5.1 of the Application).

Table 16 Summary of Consultation with Breckland Council regarding onshore archaeology and cultural heritage

Date	Contact Type	Topic
Pre-Application		
25 th April 2017	Email	Circulation of viewpoint locations for the LVIA and Cultural Heritage Assessment.
14 th December 2017	Email from Breckland Council	PEIR feedback.
4 th April 2018	Email	Request for confirmation of projects to be included in the CIA.
Post-Application		

Table 17 Statement of Common Ground - onshore archaeology and cultural heritage

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Existing Environment	Sufficient survey data (extent/duration) has been collected to inform the assessment.		
	It is accepted that outstanding geophysical surveys (scheme-wide) may be undertaken post-consent.		
	The approach to the selection of priority geophysical survey areas was appropriate and sufficient to inform the assessment of impacts.		
	Heritage setting viewpoint locations are representative and appropriate.		
	Archaeological trial trenching is not required to inform the assessment of impacts pre-application. Further evaluation will be completed post-consent.		
Assessment methodology	The impact assessment methodologies used for the assessment (DMRB Volume 11, Section 3, Part 2: Cultural Heritage) provide an appropriate approach to assessing potential impacts of the project.		
	The worst-case scenario presented in the assessment is appropriate.		
	The assessment adequately characterises the baseline environment in terms of onshore archaeology and cultural heritage, including the setting of designated heritage assets.		
	The scope of the Archaeological Desk Based Assessment (ADBA) is appropriate to inform the assessment.		

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Assessment findings	The assessment of impacts for construction, operation and decommissioning presented is appropriate and, assuming the inclusion of the mitigation described and commitment to further evaluation post-consent, impacts on onshore archaeology and cultural heritage are likely to be non-significant in EIA terms.		
	The assessment of cumulative effects is appropriate and, assuming the inclusion of the mitigation described, cumulative impacts on onshore archaeology and cultural heritage are likely to be non-significant in EIA terms.		
Approach to mitigation	The provision of a pre-construction and construction Archaeological WSI (Onshore) (to be based on the outline WSI, document reference 8.5) is considered suitable, with respect to Set-Piece Excavation (SPE); Strip, Map and Sample and archaeological monitoring/watching brief scenarios.		
	The mitigation proposed for potential impacts on buried and above-ground archaeological remains is appropriate.		
Wording of Requirement(s)	The wording of Requirement 23 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts to onshore archaeology and cultural heritage are considered appropriate and adequate.		

2.10 Landscape and Visual Impact Assessment

45. The project has the potential to impact upon landscape and visual receptors. Chapter 29 of the ES (document reference 6.1 of the Application) provides an assessment of the significance of these impacts.
46. Table 18 provides an overview of meetings and correspondence undertaken with Breckland Council regarding the landscape and visual impact assessment (LVIA).
47. Table 19 provides areas of agreement and disagreement regarding the LVIA.
48. Further details on the Evidence Plan for LVIA can be found in Appendix 9.18 and Appendix 25.3 of the Consultation Report (document reference 5.1 of the Application).

Table 18 Summary of Consultation with Breckland Council regarding LVIA

Date	Contact Type	Topic
Pre-Application		
14 th January 2017	Email	Provision of the Land Use, Socio-Economics and Tourism, and Health Impact Assessment Method Statements
24 th January 2017	Meeting	Method statement, project introduction, development of site selection and project design, approach to EIA
25 th April 2017	Email	Circulation of viewpoint locations for the LVIA and Cultural Heritage Assessment.
19 th July 2017	Meeting	Landscape and Visual Impacts Pre-PEI ETG Meeting: Project update and overview of results to date.
14 th December 2017	Email from Breckland Council	PEIR feedback.
24 th January 2018	Meeting	LVIA ETG meeting - PEIR comments and approach to updating assessments.
4 th April 2018	Email	Request for confirmation of projects to be included in the CIA.
Post-Application		

Table 19 Statement of Common Ground - LVIA

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Existing Environment	Sufficient survey data (extent/duration) has been collected to inform the assessment. This was discussed and agreed during the ETG meetings in July 2017, January 2018 and PEIR feedback in December 2017.	Agreed	It is agreed by both parties that sufficient survey data have been collected to undertake the assessment.
	The methodology and viewpoints selected are representative and appropriate. This was discussed and agreed during the ETG meetings in July 2017, January 2018 and PEIR feedback in December 2017.	Agreed	It is agreed by both parties that representative and appropriate viewpoints have been collected to undertake the assessment.
	Photomontages showing mitigation planting at 5 and 15 years are representative and appropriate. This was discussed and agreed at the ETG meeting in July 2017.	Agreed	It is agreed by both parties that mitigation planting at 5 and 15 years are representative and appropriate.
Assessment methodology	The list of potential LVIA effects assessed, as proposed in the Evidence Plan method statement provided and agreed in October 2016 and PEIR feedback in December 2017, is appropriate.	Agreed	It is agreed by both parties that LVIA effects assessed are appropriate.
	The impact assessment methodologies, including for cumulative effects, used are those agreed and remain appropriate for assessing potential impacts. This was discussed and agreed during the ETG meeting in July 2017, January 2018 and PEIR feedback in December 2017.	Agreed	It is agreed by both parties that the impact assessment methodologies used in the EIA are appropriate.
	Visual impacts associated with the landfall and cable installation are limited to the construction phase and an assessment of operational impacts was not required. This was discussed and agreed via the method statement provided and agreed via the Method Statement and during the ETG meeting in July 2017.	Agreed	It is agreed by both parties that the landfall and cable installation are subject to construction impacts only.
	The worst-case scenario presented in the assessment is appropriate.		

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Assessment findings	The assessment adequately characterises the visual baseline. This was agreed through PEIR feedback in December 2017.	Agreed	It is agreed by both parties that the baseline is suitably established.
	The assessment of effects for construction, operation and decommissioning presented is appropriate and adheres to the agreed methodology.		
	The photovisualisations are a fair reflection of the potential visibility of the above ground infrastructure from the agreed receptors.		
	During operation, significant visual effects are limited to road-users on a short section of the A47, an opening on Ivy Todd Road and walkers on Lodge Lane. Woodland planting would mitigate these localised effects over time.		
	The assessment of cumulative effects is appropriate and, assuming the inclusion of the mitigation described, cumulative effects would be mitigated over time.		
Approach to mitigation	The proposed woodland planting would mitigate localised effects over time for road-users on a short section of the A47, an opening on Ivy Todd Road and walkers on Lodge Lane.		
	The mitigation proposed for LVIA are considered appropriate and adequate.		
	All mitigation measures required are outlined in sufficient detail within the Outline Landscape and Environmental Management Strategy (OLEMS).		
Wording of Requirement(s)	The wording of Requirements 18 and 19 provided within the draft DCO (and supporting certified documents) for the mitigation of impacts in the LVIA are considered appropriate and adequate.		

2.11 Tourism, recreation and socio-economics

49. The project has the potential to impact upon tourism, recreation and socio-economics. Chapter 30 and 31 of the ES, (document reference 6.1.30 and 6.1.31 of the Application), provides an assessment of the significance of these impacts.
50. Table 20 provides an overview of meetings and correspondence undertaken with Breckland Council regarding tourism, recreation and socio-economics.
51. Table 21 provides areas of agreement and disagreement regarding tourism, recreation and socio-economics.
52. Further details on the Evidence Plan for tourism, recreation and socio-economics can be found in Appendix 9.21 of the Consultation Report (document reference 5.1 of the Application).

Table 20 Summary of Consultation with Breckland Council regarding tourism, recreation and socio-economics

Date	Contact Type	Topic
Pre-Application		
14 th January 2017	Email to Breckland Council	Provision of tourism and recreation and socio-economic method statement
24 th January 2017	Meeting	Method statement, project introduction, development of site selection and project design, approach to EIA
14 th December 2017	Email from Breckland Council	PEIR feedback.
4 th April 2018	Email	Request for confirmation of projects to be included in the CIA.
Post-Application		

Table 21 Statement of Common Ground - tourism, recreation and socio-economics

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
Existing Environment	Appropriate datasets have been presented to inform the assessments		
Assessment methodology	The impact assessment methodologies used provide an appropriate approach to assessing potential impacts of the project.		
	The worst-case scenario presented in the assessments is appropriate.		
	The assessment adequately characterises the baseline environment in terms of tourism, recreation and socio-economics.		
Assessment findings	The assessment of effects for construction, operation and decommissioning presented is appropriate and, assuming the inclusion of the mitigation described, impacts on tourism, recreation and socio-economics are likely to be non-significant in EIA terms.		
	The assessment of cumulative effects is appropriate and, assuming the inclusion of the mitigation described, cumulative impacts on tourism, recreation and socio-economics are likely to be non-significant in EIA terms.		
Approach to mitigation	Given the impacts of the project, the mitigation proposed for tourism, recreation and socio-economics are considered appropriate and adequate.		
Wording of Requirement(s)	Given the impacts of the project, the wording of the Requirements provided within the draft DCO (and supporting certified documents) for the mitigation of impacts to tourism, recreation and socio-economics are considered appropriate and adequate.		

The undersigned agree to the provisions within this SOCG

Signed	Jon Berry
Printed Name	Jon Berry
Position	Head of Development Management
On behalf of	Breckland Council
Date	15 January 2019

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