

Norfolk Vanguard Offshore Wind Farm

Statement of Common Ground

Broadland District Council

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



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Glossary

CIA	Cumulative Impact Assessment
CoCP	Code of Construction Practice
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
ETG	Expert Topic Group
HIA	Health Impact 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
OCoCP	Outline Code of Construction Practice
OWF	Offshore Wind Farm
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground

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 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 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 by Norfolk Vanguard Limited (hereafter the Applicant) to set out the areas of agreement and disagreement with Broadland District Council in relation to the Development Consent Order (DCO) application for the Norfolk Vanguard Offshore Wind Farm (hereafter 'the project') based on consultation to date. Detailed input from Broadland District Council on the SoCG is currently outstanding and the Applicant will continue to engage with Broadland District Council to progress this SoCG.
2. This SoCG comprises an agreement log which has been structured to reflect topics of interest to Broadland District Council on the Norfolk Vanguard DCO application (hereafter 'the Application'). Topic specific matters agreed, not agreed and actions to resolve between Broadland District 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 Broadland District Council

7. This section briefly summarises the consultation that the Applicant has had with Broadland District 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 Broadland District 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, Broadland District Council 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 Broadland District 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 Broadland District Council and the Applicant are set out.
13. Feedback on the PEIR (11th December 2017) from Broadland District Council stated that:
 - *“Norfolk County Council is the Highway Authority for the District and it is noted that the comments of the Highway Authority are included in the consultation response of Norfolk County Council...”*
 - *“...In addition to the highways issues, the District Council has agreed that Norfolk County Council will provide comments on behalf of the District Council in respect of ecology and nature conservation, archaeology, public rights of way and flood risk. The responses in these respects are included in the consultation response of Norfolk County Council.”*
14. Therefore, this SoCG does not consider the topics of traffic and transport, onshore ecology and ornithology, onshore archaeology and cultural heritage, ground conditions and contamination, water resources and flood risk and tourism and recreation, and instead focuses on the topics of noise and vibration, landscape and visual impacts and socio economics.

2.1 Project-wide considerations

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

Table 1 Project-wide considerations

Norfolk Vanguard Limited position	Broadland District Council position	Final position
Policy and legislation		
The legislation adopted for Norfolk Vanguard is relevant and interpreted appropriately.		
The principle of offshore renewable energy is supported, and will be permitted unless environmental impacts outweigh social, economic and environmental benefits. This was noted in Broadland District Council’s PEIR response in December 2017.	Agreed	It is agreed that both parties support offshore renewable energy projects in principle.
Traffic and transport		

Norfolk Vanguard Limited position	Broadland District Council position	Final position
Although deferring to Norfolk County Council on the topic of traffic and transport, it is agreed with Broadland District Council that the traffic assessment methodology and findings are appropriate in relation to potential cumulative impacts at the Hornsea Project Three crossing.		
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.		
Cumulative Impact Assessment (CIA)		
The cumulative impact assessment considering Norfolk Boreas and the Hornsea Project Three Offshore Wind Farm is suitable.		
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 Noise and Vibration

16. 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.
17. Table 2 provides an overview of meetings and correspondence undertaken with Broadland District Council regarding noise and vibration.
18. Table 3 provides areas of agreement and disagreement regarding noise and vibration.
19. 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 2 Summary of Consultation with Broadland District Council regarding noise and vibration

Date	Contact Type	Topic
Pre-Application		
14 th January 2017	Email	Provision of the Noise and Vibration Method Statement.
25 th January 2017	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection etc).
19 th March 2017	Email	Provision of the proposed locations for the onshore noise and vibration monitoring survey.
29 th March 2017	Email	Provision of the proposed locations for the onshore noise and vibration monitoring survey.
31 st March 2017	Email from Broadland District Council	Approval of the proposed locations for the onshore noise and vibration monitoring survey.
11 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 3 Statement of Common Ground - noise and vibration

Topic	Norfolk Vanguard Limited position	Broadland District Council position	Final position
Existing Environment	Sufficient survey data (extent/duration) has been collected in appropriate locations to characterise the noise environment to undertake the assessment. This was agreed via email communications from Broadland District Council in March 2017.	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	The impact assessment methodologies used for the assessment represent an appropriate approach to assessing potential impacts.		
	The worst-case scenario presented in the assessment is appropriate.		
	The assessments adequately characterise the baseline environment in terms of noise and vibration.		
Assessment findings	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.		
	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.		
Approach to mitigation	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.		

Topic	Norfolk Vanguard Limited position	Broadland District Council position	Final position
Wording of Requirement(s)	The wording of Requirements 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.		

2.3 Landscape and Visual Impact Assessment

20. 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.
21. Table 4 provides an overview of meetings and correspondence undertaken with Broadland District Council regarding the landscape and visual impact assessment (LVIA).
22. Table 5 provides areas of agreement and disagreement regarding the LVIA.
23. 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 4 Summary of Consultation with Broadland District Council regarding LVIA

Date	Contact Type	Topic
Pre-Application		
14 th January 2017	Email	Provision of the Landscape Method Statement.
25 th April 2017	Email	Circulation of viewpoint locations for the LVIA and Cultural Heritage Assessment.
19 th July 2017	Meeting	PEI ETG meeting – project update and results overview.
11 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 - LVIA

Topic	Norfolk Vanguard Limited position	Broadland District 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 Expert Topic Group meeting in July 2017.	Agreed	It is agreed by both parties that sufficient survey data has been collected to undertake the assessment.
	The methodology and viewpoints selected are representative and appropriate. This was discussed and agreed during the Expert Topic Group meeting in July 2017.	Agreed	It is agreed by both parties that representative and appropriate viewpoints have been collected to undertake the assessment.
Assessment methodology	The list of potential LVIA effects assessed as proposed in the Evidence Plan method statement provided in October 2016 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 Expert Topic Group meeting in July 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 Expert Topic Group 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.		
Assessment findings	The assessment adequately characterises the visual baseline.	Agreed	It is agreed by both parties that the baseline is suitably established.

Topic	Norfolk Vanguard Limited position	Broadland District Council position	Final position
	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.		
	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 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.		

2.4 Socio-economics

24. The project has the potential to impact upon socio-economics. Chapter 31 of the ES, (document reference 6.1.31 of the Application), provides an assessment of the significance of these impacts.
25. Table 6 provides an overview of meetings and correspondence undertaken with Broadland District Council regarding socio-economics.
26. Table 7 provides areas of agreement and disagreement regarding socio-economics.
27. Further details on the Evidence Plan for socio-economics can be found in Appendix 9.21 of the Consultation Report (document reference 5.1 of the Application).

Table 6 Summary of Consultation with Broadland District Council regarding socio-economics

Date	Contact Type	Topic
Pre-Application		
14 th January 2017	Email	Provision of the Socio-Economics Method Statement.
11 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 7 Statement of Common Ground - socio-economics

Topic	Norfolk Vanguard Limited position	Broadland District 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 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 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 socio-economics are likely to be non-significant in EIA terms.		
Approach to mitigation	Given the impacts of the project, the mitigation proposed for socio-economics are considered appropriate and adequate.		
Wording of Requirement(s)	The wording of the Requirements provided within the draft DCO (and supporting certified documents) for the mitigation of impacts to socio-economics are considered appropriate and adequate.		

The undersigned agree to the provisions within this SOCG

Signed	
Printed Name	
Position	
On behalf of	Broadland District Council
Date	

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