

Norfolk Vanguard Offshore Wind Farm

Statement of Common Ground

Historic England

Applicant: Norfolk Vanguard Limited
Document Reference: REP1 – SOCG – 8.1

Date: January 2019
Author: Royal HaskoningDHV

Photo: Kentish Flats Offshore Wind Farm



Date	Issue No.	Remarks / Reason for Issue	Author	Checked	Approved
10/09/2018	00	First draft for Internal review	ST	JA	JA
27/09/2018	01D	First draft for Norfolk Vanguard Limited review	ST	JA	JA
10/10/2018	02D	Second draft for Norfolk Vanguard Limited review	ST	JA	JA
17/10/2018	03D	Third draft for Norfolk Vanguard Limited review	ST	JA	JA
03/12/2018	04D	Submission for deadline 1	ST	GK	GK

Table of Contents

1	Introduction	1
1.1	The Development	1
1.2	Consultation with Historic England.....	2
2	Statement of Common Ground	3
2.1	Offshore Archaeology and Cultural Heritage	3
2.2	Onshore Archaeology and Cultural Heritage.....	8
2.3	Landscape and Visual Impact Assessment (LVIA)	13

Glossary

ADBA	Archaeological Desk Based Assessment
CIA	Cumulative Impact Assessment
CRS	Cable Relay Station
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EPP	Evidence Plan Process
ES	Environmental Statement
ETG	Expert Topic Group
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
OLEMS	Outline Landscape and Environmental Management Strategy
OWF	Offshore Wind Farm
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
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 construction and maintenance 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	A compound containing electrical equipment to enable connection to the

substation	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 Historic England 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 Historic England on the SoCG is currently outstanding and the Applicant will continue to engage with Historic England to progress this SoCG.
2. This SoCG comprises an agreement log which has been structured to reflect topics of interest to Historic England on the Norfolk Vanguard DCO application (hereafter ‘the Application’). Topic specific matters agreed, not agreed and actions to resolve between Historic England 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 Historic England

7. This section briefly summarises the consultation that the Applicant has had with Historic England. 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 Historic England 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, Historic England provided comments on the Preliminary Environmental Information Report (PEIR) by way of an email and letter dated 11th December 2017.
10. Further to the statutory Section 42 consultation, several meetings were held with Historic England 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 consultation on the project progresses. Historic England submitted a Relevant Representation to the Planning Inspectorate on the 14th September 2018.

2 STATEMENT OF COMMON GROUND

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

2.1 Offshore Archaeology and Cultural Heritage

13. The project has the potential to impact upon offshore archaeology and cultural heritage. Chapter 17 of the Environmental Statement (ES), (document reference 6.1.17 of the Application), provides an assessment of the significance of these impacts.
14. Table 1 provides an overview of meetings and correspondence undertaken with Historic England regarding offshore archaeology and cultural heritage.
15. Table 2 provides areas of agreement and disagreement regarding offshore archaeology and cultural heritage.
16. Further details on the Evidence Plan for offshore archaeology and cultural heritage can be found in Appendix 9.23 and Appendix 25.7 of the Consultation Report (document reference 5.1 of the Application).

Table 1 Summary of Consultation with Historic England regarding offshore archaeology and cultural heritage

Date	Contact Type	Topic
Pre-Application		
26 th January 2016	Meeting	Introduction to the project and Evidence Plan Process (EPP).
4 th March 2016	Email to Historic England	Provision of the Site Investigation Survey – Archaeology Position Paper
11 th March 2016	Letter to Historic England	Formal launch of Norfolk Vanguard.
21 st March 2016	Letter from Historic England	Feedback on the Site Investigation Survey – Archaeology Position Paper and discussions from the January 2016 meeting
6 th October 2016	Email to Historic England	Update on offshore survey and vibrocore analysis.
4 th November 2016	Email to Historic England	Draft Terms of Reference of EPP for review.
11 th November 2016	Email from Historic England	Feedback on the Terms of Reference and proposed approach for the EPP

Date	Contact Type	Topic
25 th January 2017	Email to Historic England	Provision of method statements.
1 st February 2017	Evidence Plan Process Expert Topic Group Meeting	Project introduction, development of site selection, project design and approach to Environmental Impact Assessment (EIA), Happisburgh, geophysical and geotechnical survey update.
2 nd February 2017	Feedback form returned via email from Historic England	Feedback on offshore archaeology method statement.
22 nd June 2017	Email to Historic England	Provision of Offshore Archaeology Technical Report (Appendix 17.1 of the ES).
6 th July 2017	Meeting	Project update, initial assessment results in the draft PEIR.
24 th July 2017	Letter delivered via email from Historic England	Comments on Offshore Archaeology Technical Report (Appendix 17.1 of the ES).
11 th November 2017	Letter from Historic England	Regarding participation in the Evidence Plan Process
28 th November 2017	Letter to Historic England	Response to Comments on Offshore Archaeology Technical Report
11 th December 2017	Letter delivered via email from Historic England	Comments on the PEIR
8 th March 2018	Meeting	Project update, PEIR comments,
Post-Application		
14 th September 2018	Relevant Representation from Historic England	Registration to participate in the examination and initial feedback on the DCO application

Table 2 Offshore archaeology and cultural heritage

Topic	Norfolk Vanguard Limited position	Historic England position	Final position
Environmental Impact Assessment			
Existing Environment	Sufficient survey data has been collected to inform the assessment.		It is agreed by both parties that sufficient survey data has been collected to undertake the assessment.
	The analysis of the offshore geophysical data is appropriate.		It is agreed by both parties that the approach to data analysis is appropriate.
	The analysis and recommendations for the offshore geotechnical samples is appropriate.		It is agreed by both parties that the approach to data analysis is appropriate.
Assessment methodology	The impact assessment methodologies used for the assessment provide an appropriate approach to assessing potential impacts of the project.		It is agreed by both parties that the impact assessment methodologies used in the Environmental Impact Assessment (EIA) are appropriate.
	The worst-case scenario presented in the assessment is appropriate.		It is agreed by both parties that the worst-case scenario presented in the ES is appropriate for this project.
	The assessment adequately characterises the baseline environment in terms of offshore archaeology and cultural heritage.		It is agreed by both parties that the ES adequately characterises the baseline environment.

Topic	Norfolk Vanguard Limited position	Historic England position	Final position
	The scope of the Marine Archaeological Technical Report (Appendix 17.1 of the ES) is appropriate to inform the assessment.		It is agreed by both parties that the Marine Archaeological Technical Report is appropriate to inform the assessment.
	The methodology adopted for the Cumulative Impact Assessment (CIA) and projects assessed for cumulative impacts with Norfolk Vanguard is appropriate.		It is agreed by both parties that the CIA methodologies used in the EIA are appropriate.
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 offshore archaeology and cultural heritage are non-significant in EIA terms.		Both parties are agreed that the impact assessment is appropriate
	The assessment of cumulative effects is appropriate and, assuming the inclusion of the mitigation described, cumulative impacts on offshore archaeology and cultural heritage are non-significant in EIA terms.		It is agreed by both parties that the cumulative assessment is appropriate.
Approach to mitigation	A pre-construction and construction Archaeological Written Scheme of Investigation (WSI) (Offshore) (to be based on the outline WSI, document reference 8.6) has been provided.		It is agreed by both parties that the cumulative assessment is appropriate.
	The embedded mitigation presented in section 17.7.2 of ES Chapter 17 is appropriate.		It is agreed by both parties that the proposed mitigation will result in non-significant impacts.

Topic	Norfolk Vanguard Limited position	Historic England position	Final position
	The Outline WSI (Offshore) includes provision for information sharing, data management and archiving. This is secured through the DCO and DML Schedule 9 and 10, Part 4, Requirement 14 (1) (h) and will be finalised in the final detailed WSI (Offshore). The mitigation strategy will therefore include analysis programmes, within defined time periods, to accepted professional standards with publication and access through public archives.		Both parties agree that that information and data collected for the project the leads to an increase in knowledge and understanding through appropriate analysis and data sharing.
Draft Development Consent Order (DCO)			
Wording of Requirement(s)	Part 4 of Schedules 9, 10, 11 and 12 of the draft DCO appropriately reflects the commitments made in the ES. This includes Condition 14(1)(h) for Schedules 9 and 10 and Condition 9(1)(h) for Schedules 11 and 12 which states that the archaeological written scheme of investigation (offshore) must be agreed with the MMO in consultation with the statutory historic body.		Both parties agree that all mitigation measures, as included in the outline archaeological Written Schemes of Investigations (WSIs), are secured through the draft Development Consent Order (DCO).

2.2 Onshore Archaeology and Cultural Heritage

17. The project has the potential to impact upon onshore archaeology and cultural heritage. Chapter 28 of the ES, (document reference 6.1.28 of the Application), provides an assessment of the significance of these impacts.
18. Table 3 provides an overview of meetings and correspondence undertaken with Historic England regarding onshore archaeology and cultural heritage.
19. Table 4 provides areas of agreement and disagreement regarding onshore archaeology and cultural heritage.
20. 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 3 Summary of Consultation with Historic England regarding onshore archaeology and cultural heritage

Date	Contact Type	Topic
Pre-Application		
26 th January 2016	Meeting	Introduction to the project and EPP.
11 th March 2016	Letter	Formal launch of Norfolk Vanguard
25 th January 2017	Email to Historic England	Provision of method statements
1 st February 2017	Meeting	Project introduction, development of site selection, project design and approach to EIA.
21 st March 2017	Email from Historic England	Feedback on geophysical and geotechnical survey methodology.
25 th April 2017	Email to Historic England	Circulation of viewpoint locations for Landscape and Visual Impact Assessment (LVIA) and cultural heritage assessment.
21 st June 2017	Email from Historic England	Comments on onshore site investigation methodology
30 th June 2017	Email to Historic England	Provision of WSI for monitoring of groundworks.
19 th July 2017	Meeting	Project update and Initial assessment results in the draft PEIR.
11 th August 2017	Email to Historic England	Provision of substation and Cable Relay Station (CRS) viewpoint locations for comment.

Date	Contact Type	Topic
10 th October 2017	Email to Historic England	Update on geo-archaeological assessment following acquisition of geophysical and geotechnical data.
11 th December 2017	Letter delivered via email from Historic England	Comments on the PEIR
24 th January 2018	Meeting	Assessment results, approach to mitigation, PEIR feedback
Post-Application		
14 th September 2018	Relevant Representation from Historic England	Registration to participate in the examination and initial feedback on the DCO application

Table 4 Onshore archaeology and cultural heritage

Topic	Norfolk Vanguard Limited position	Historic England position	Final position
Environmental Impact Assessment			
Policy and Legislation	The legislation adopted for Norfolk Vanguard is relevant and interpreted appropriately, including consideration of the historic environment in line with National Policy Statement: Renewable Energy Infrastructure (EN-3).		It is agreed by both parties that appropriate legislation has been considered.
Existing Environment	Sufficient survey data (extent) has been collected to inform the assessment. This was agreed after the Expert Topic Group (ETG) meeting in February 2017.		It is agreed by both parties that sufficient survey data have been collected to undertake the assessment.
	It is accepted that outstanding geophysical surveys (scheme-wide) can be undertaken post-consent. This was agreed after the ETG meeting in February 2017.		It is agreed by both parties that the approach to survey data collection is appropriate to undertake the assessment.
	The approach to the selection of priority geophysical survey areas was appropriate and sufficient to inform the assessment of impacts. This was agreed after the ETG meeting in July 2017.		It is agreed by both parties that the approach to survey data collection is appropriate to undertake the assessment.
	Heritage setting viewpoint locations are representative and appropriate.		It is agreed by both parties that setting viewpoint locations are representative and appropriate.

Topic	Norfolk Vanguard Limited position	Historic England position	Final position
	Archaeological trial trenching is not required to inform the assessment of impacts pre-application. Further evaluation will be completed post-consent. This was agreed after the ETG meeting in February 2017.		It is agreed by both parties that the approach to survey data collection is appropriate to undertake the assessment.
Assessment methodology	The impact assessment methodologies used for the assessment provide an appropriate approach to assessing potential impacts of the project. This was agreed after the ETG meeting in February 2017.		It is agreed by both parties that the impact assessment methodologies used in the EIA are appropriate.
	The worst-case scenario presented in the assessment is appropriate. This was agreed after the ETG meeting in February 2017.		It is agreed by both parties that the worst-case scenario presented in the ES is appropriate for this project.
	The assessment adequately characterises the baseline environment in terms of onshore archaeology and cultural heritage, This was agreed after the ETG meeting in July 2017.		It is agreed by both parties that the ES adequately characterises the baseline environment.
	The scope of the Archaeological Desk Based Assessment (ADBA) is appropriate to inform the assessment. This was agreed after the ETG meeting in February 2017.		It is agreed by both parties that the ADBA is appropriate to inform the assessment.
	The methodology adopted for the CIA and projects assessed for cumulative impacts with Norfolk Vanguard is appropriate. This was discussed and agreed via email communications in March 2018.		It is agreed by both parties that the CIA methodologies used in the EIA are appropriate.
Assessment findings	The assessment of impacts for construction, operation and decommissioning presented is appropriate.		

Topic	Norfolk Vanguard Limited position	Historic England position	Final position
	The assessment of cumulative effects is appropriate.		
	There are limited views of the onshore project substation. This has been agreed through the Relevant Representation (September 2018).		Both parties agree that the heritage settings assessment shows there are limited views of the onshore project substation.
Approach to mitigation	The provision of a pre-construction and construction Archaeological Written Scheme of Investigation (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. This was agreed after the ETG meeting in February 2017 and in the Relevant Representation (September 2018).		It is agreed by both parties that the provision of a WSI is considered suitable.
	The mitigation proposed for potential impacts on buried and above-ground archaeological remains is appropriate.		Both parties agree that proposed mitigation is appropriate.
Draft Development Consent Order (DCO)			
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.		Both parties agree that all mitigation measures, as included in the outline archaeological Written Schemes of Investigations (WSIs), are secured through the draft DCO through Requirement 23.

2.3 Landscape and Visual Impact Assessment (LVIA)

21. The project has the potential to impact upon landscape and visual amenity. Chapter 29 of the ES, (document reference 6.1.29 of the application), provides an assessment of the significance of these impacts.
22. Table 5 provides an overview of meetings and correspondence undertaken with Historic England regarding the LVIA.
23. Table 6 provides areas of agreement and disagreement regarding LVIA.
24. 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 5 Summary of Consultation with Historic England regarding LVIA

Date	Contact Type	Topic
Pre-Application		
11 th December 2017	Letter from Historic England delivered via email	Comments on the PEIR
24 th January 2018	Meeting	Assessment results, approach to mitigation, PEIR feedback
Post-Application		
14 th September 2018	Relevant Representation from Historic England	Registration to participate in the examination and initial feedback on the DCO application

Table 6 Landscape and visual impact assessment

Topic	Norfolk Vanguard Limited position	Historic England position	Final position
Environmental Impact Assessment			
Policy and Legislation	The legislation adopted for Norfolk Vanguard is relevant and interpreted appropriately, including consideration of the historic environment in line with National Policy Statement: Renewable Energy Infrastructure (EN-3).		It is agreed by both parties that appropriate legislation has been considered.
Existing Environment	Sufficient survey data has been collected to inform the assessment. This was discussed and agreed during the ETG meetings in January 2018.		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 January 2018.		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 and agreed in October 2016, is appropriate.		It is agreed by both parties that the LVIA effects assessed are appropriate.
	Cultural heritage viewpoint locations are considered appropriate.		It is agreed by both parties that viewpoint locations are appropriate and sufficient.
	The impact assessment methodologies used are those agreed and remain appropriate for assessing potential impacts. This was agreed through the Relevant Representation (September 2018).		Both parties agree that the methodologies for the impact assessment are appropriate.

Topic	Norfolk Vanguard Limited position	Historic England position	Final position
	The cumulative assessment methodology is considered appropriate		
	The worst case scenario presented in the assessment is appropriate.		
Assessment findings	The assessment adequately characterises the visual baseline.		It is agreed by both parties that the baseline is adequately characterised.
	The assessment of effects for construction, operation and decommissioning presented is appropriate.		
	The photovisualisations are a fair reflection of the potential visibility of the above ground infrastructure from the agreed receptors.		It is agreed by both parties that the photovisualisations are representative and appropriate.
	There are limited views of the onshore project substation. This has been agreed through the Relevant Representation (September 2018).		Both parties agree that the heritage settings assessment shows there are limited views of the onshore project substation.
Approach to mitigation	Photomontages showing mitigation planting at 5 and 15 years are available.		Both parties agree that the mitigation planting shown in the photomontages is representative and appropriate.
	The mitigation proposed for LVIA are Presented and accepted		It is agreed by both parties that viewpoint locations are appropriate and sufficient.

Topic	Norfolk Vanguard Limited position	Historic England position	Final position
	All mitigation measures required are outlined in sufficient detail within the Outline Landscape and Environmental Management Strategy (OLEMS).		Both parties agree that the methodologies for the impact assessment are appropriate.
Draft Development Consent Order (DCO)			
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.		

The undersigned agree to the provisions within this SOCG

Signed	
Printed Name	
Position	
On behalf of	Historic England
Date	

Signed	R Sherwood
Printed Name	Rebecca Sherwood
Position	Norfolk Vanguard Consents Manager
On behalf of	Norfolk Vanguard Ltd (the Applicant)
Date	10/01/19