

Norfolk Vanguard Offshore Wind Farm

# Statement of Common Ground

National Federation of Fishermen's  
Organisations (NFFO) and National  
Association of Producer Organisations  
in Dutch Demersal Fisheries (VisNED)

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



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## Glossary

DCO	Development Consent Order
DML	Deemed Marine Licence
ES	Environmental Statement
FLO	Fisheries Liaison Officer
FLOWW	Fisheries Liaison Offshore Wind and Wet
HDD	Horizontal Directional Drilling
LiDAR	Light Detection and Ranging
NFFO	National Federation of Fishermen's Organisations
NV East	Norfolk Vanguard East
NV West	Norfolk Vanguard West
OWF	Offshore Wind Farm
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
VisNed	National Association of Producer Organisations in Dutch Demersal Fisheries

## 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 100 m 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 400 kV overhead lines.
Necton National Grid substation	The existing 400 kV substation at Necton, which will be the grid connection location for Norfolk Vanguard.
Offshore accommodation platform	A fixed structure (if required) providing accommodation for offshore personnel. An accommodation vessel may be used instead.
Offshore cable corridor	The area where the offshore export cables would be located.
Offshore electrical platform	A fixed structure located within the wind farm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which bring electricity from the offshore electrical platform to the landfall.
Onshore cable route	The 45m easement which will contain the buried export cables as well as the temporary running track, topsoil storage and excavated material during

	construction.
Onshore project substation	A compound containing electrical equipment to enable connection to the National Grid. The substation will convert the exported power from HVDC to HVAC, to 400 kV (grid voltage). This also contains equipment to help maintain stable grid voltage.

## 1 INTRODUCTION

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1. This Statement of Common Ground (SoCG) has been prepared with the National Federation of Fishermen's Organisations (NFFO) and VisNed and Norfolk Vanguard Limited (hereafter 'the Applicant') to set out the areas of agreement and disagreement in relation to the Development Consent Order (DCO) application for the Norfolk Vanguard Offshore Wind Farm (hereafter 'the project').
2. This SoCG comprises an agreement log which has been structured to reflect topics of interest to the NFFO and VisNED on the Norfolk Vanguard DCO application (hereafter 'the Application'). Topic specific matters agreed, not agreed and actions to resolve between the NFFO and VisNED and the Applicant are included. Points that are not agreed will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

### 1.1 The Development

3. The Application is for the development of the Norfolk Vanguard Offshore Wind Farm (OWF) and associated infrastructure. The OWF comprises two distinct areas, Norfolk Vanguard (NV) East and NV West ('the OWF sites'), which are located in the southern North Sea, approximately 70 km and 47 km 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 at Necton, Norfolk.
4. Once built, Norfolk Vanguard would have an export capacity of up to 1800 MW, with the offshore components comprising:
  - Wind turbines;
  - Offshore electrical platforms;
  - Accommodation platforms;
  - Met masts;
  - Measuring equipment (LiDAR and wave buoys);
  - Array cables;
  - Interconnector cables; and
  - Export cables.
5. The key onshore components of the project are as follows:
  - Landfall;

- Onshore cable route, accesses, trenchless crossing technique (e.g. Horizontal Directional Drilling (HDD)) zones and mobilisation areas;
- Onshore project substation; and
- Extension to the existing Necton National Grid substation and overhead line modifications.

## **1.2 Consultation with NFFO and VisNed**

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

### **1.2.1 Pre-Application**

7. The Applicant has engaged with the NFFO and VisNed 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.
8. During formal (Section 42) consultation, the NFFO provided comments on the Preliminary Environmental Information Report (PEIR) by way of a letter dated 11<sup>th</sup> December 2017. No comments in relation to the PEIR were received from VisNed.
9. Further to the statutory Section 42 consultation, several meetings were held with the NFFO and VisNed.
10. Table 1 and Table 2 provide an overview of meetings and correspondence undertaken with the NFFO and VisNED, respectively. 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**

#### **1.2.2.1 NFFO**

11. As noted in the relevant representation sent by the NFFO on 10<sup>th</sup> August 2018, the NFFO intends to pursue a statement of common ground with the Applicant, which together with the Applicant's documentation will then inform any detailed representation they wish to make.
12. A meeting was held on 16<sup>th</sup> November 2018 between the Applicant and the NFFO to discuss the draft SoCG.

#### **1.2.2.2 VisNed**

13. Relevant representations have not been submitted by VisNed.



## 2 STATEMENT OF COMMON GROUND

14. Within the sections and tables below, the different topics and areas of agreement and disagreement between the NFFO and VisNed and the Applicant are set out.

### 2.1 Commercial Fisheries

15. The project has the potential to impact upon Commercial Fisheries. Chapter 14 of the Norfolk Vanguard Environmental Statement (ES) (document reference 6.1 of the Application) provides an assessment of the significance of these impacts.
16. Table 1 and Table 2 provide an overview of meetings and correspondence undertaken with the NFFO and VisNed regarding Commercial Fisheries.
17. Table 3 provides areas of agreement (common ground) and disagreement regarding Commercial Fisheries.

**Table 1 Summary of Consultation with the NFFO**

Date	Contact Type	Topic
<b>Pre-Application</b>		
22 <sup>nd</sup> June 2016	Meeting	Introduction to the project.
5 <sup>th</sup> April 2017	Meeting	Fishing activity of Anglo-Dutch vessels in areas relevant to the project.
11 <sup>th</sup> December 2017	PEIR response	Response from the NFFO to the PEIR.
<b>Post-Application</b>		
10 <sup>th</sup> August 2018	Relevant representation	NFFO intention to pursue a statement of common ground with the Applicant.
16 <sup>th</sup> November 2018	Meeting	Meeting to discuss key NFFO/VisNed concerns and key areas of agreement/disagreement to help inform the SoCG.



**Table 2 Summary of Consultation with VisNed**

Date	Contact Type	Topic
<b>Pre-Application</b>		
14 <sup>th</sup> February 2017	Meeting	Dutch fishing activity in the Southern North Sea and specifically in areas relevant to the project.
22 <sup>nd</sup> May 2017	email	Request for details of German registered but Dutch owned beam trawlers which may work in the Southern North Sea.
<b>Post-Application</b>		
31 <sup>st</sup> October 2018	email	VisNed confirmation that they are happy for the NFFO to speak on their behalf with regards to the SoCGs.

**Table 3 Commercial Fisheries**

Topic	Norfolk Vanguard Limited position	NFFO and VisNed position	Final position
<b>Environmental Impact Assessment</b>			
Existing Environment	The commercial fisheries baseline identified in relation to Dutch fishermen has been derived from available sources and this provides a reasonable representation of fishing activity by both UK and Dutch owned and operated commercial fishing vessels in areas relevant to the project.	NFFO and VisNed are not in a position to confirm whether sufficient data has been collated in order to characterise the baseline environment. However, we acknowledge that the baseline characterisation provides a practical basis for undertaking the EIA.	Both parties agree that the baseline characterisation provides a practical basis for undertaking the EIA.
Assessment methodology	The general methodologies used are suitable and appropriate for the undertaking of the commercial fisheries EIA.	While the assessment undertaken is typical of a fisheries EIA, the NFFO and VisNed consider that the methodology does not provide a transparent assessment of compatibility of fishing activities taking place within the vicinity of the wind farm as we noted in our response to the PEIR consultation.  In addition, the definitions used under sensitivity lack specificity over what constitutes limited, moderate and extensive operational range and dependence upon the number of fishing grounds. This reduces the confidence we can have in the assessment findings.	Not agreed.
	The list of potential impacts on Commercial Fisheries assessed is appropriate.	Agreed.	Both parties agree that the list of impacts included in the assessment

Topic	Norfolk Vanguard Limited position	NFFO and VisNed position	Final position
			on commercial fisheries is appropriate.
	The approach to the assessment of safety risks presented in Chapter 14, Section 14.7.4.3 and Section 14.7.5.3 is appropriate and takes account of relevant risks for fishing vessels, including interactions between fishing vessels and gear and project infrastructure including cables	<p>Disagree. It is not clear what assumptions have been adopted regarding fishing in the vicinity of the project turbine arrays for the safety assessment.</p> <p>There is presently insufficient evidence that the risk to fishing vessels under the worst case scenario has been appropriately assessed. The worst case scenario is not sufficiently defined to assess the risk to fishing activities and therefore determine the appropriateness of mitigation measures.</p>	Not agreed.
	<p>The worst case scenario presented in Chapter 14 Commercial Fisheries, Table 14.16. considers, amongst other factors, the minimum spacing between turbines (680 m) and the use of floating foundations (tension leg platforms with up to 12 anchor lines and an angle of mooring up to 30 degrees).</p> <p>The identified worst case scenario is considered appropriate as it takes account of the project design parameters with the greatest potential to have an impact on commercial fisheries.</p>	<p>NFFO and VisNed agrees that the project design parameters identified for assessment in Chapter 14, Commercial Fisheries, Table 14.16 are those with the greatest potential to result in impacts on commercial fisheries.</p> <p>However, the identified worst case scenario is insufficiently defined as, for a given water depth, it does not identify how far anchor lines will extend beyond the floating platforms. It is not clear, therefore, what the safe fishable distance from a turbine is in the worst case scenario in order to ensure no fishing gear interaction with the project infrastructure. This is critical to</p>	The two parties do not agree that the project design parameters identified as worst case scenario in Chapter 14 have been adequately defined.

Topic	Norfolk Vanguard Limited position	NFFO and VisNed position	Final position
		<p>assessing Impact 2: Access to fishing grounds and Impact 3: Safety issues for fishing vessels.</p> <p>Based on the information provide we estimate that the worst case scenario using 200 x 9MW turbines on tension leg platforms with 12 anchor lines (or 20m in length) and mooring up to 30 degrees and 45m floating structures based on a minimum turbine distance of 680m and applying a 50m safety zone from the anchors will translate to a theoretical fishable clearance of 500m between turbines.</p> <p>We note that the Ch 14 of ES does not specify how safety zones would be applied to the infrastructure. We have assumed in our calculation that it would be applied to each of the anchor foundations as well as the turbine structure itself which would be significantly larger than a 50m safety zone around the centre point of the structure. If the latter is applied (as indicated in chapter 15 p 36 where the safety zone is applied to surface infrastructure) we note that it would barely cover the extent of the mooring anchors. We question therefore</p>	

Topic	Norfolk Vanguard Limited position	NFFO and VisNed position	Final position
		<p>whether in both assessments (Navigation and impacts to fishing activities) the appropriate application of safety zones have been applied.</p> <p>It is highly unlikely that under such circumstances described above that any existing commercial fishing activities would take places within the array area.</p> <p>We note that following the PEIR consultation an assumption of exclusion has been incorporated into the assessment.</p> <p>We note that under these circumstances the relevance of measures to reduce safety risk and promote coexistence will vary depending upon the actual project plan selected within the Rochdale envelope provisions.</p>	
Assessment findings	<p>The impact significance conclusions for Norfolk Vanguard alone in respect of loss of fishing grounds, displacement and safety issues are appropriate.</p> <p>In respect of loss of fishing grounds and displacement, the assessment concluded that the significance of the impact on Dutch beam trawlers (for both Dutch and UK registered vessels) is of minor significance for the construction, operation</p>	<p>NFFO and VisNed do not agree that the significance of the impact would be minor in respect of loss of grounds and displacement during the operation and maintenance phase if the current worst case scenario is considered (floating foundations and 680 m minimum spacing) as NFFO/VisNed' view is that beam trawlers would not be able to fish safely within the OWF sites and</p>	Not agreed.

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	<p>and maintenance and decommissioning phase of the project.</p> <p>In respect of safety issues the assessment concluded impacts would be within acceptable limits.</p>	<p>therefore the operational phase would result in a long terms loss of fishing grounds.</p> <p>With regards to safety there is presently insufficient evidence that the risk to fishing vessels under the worst case scenario has been appropriately assessed.</p> <p>Consequently, it is not clear how the conclusion that under the present proposal safety issues for fishing vessels have been determined to be within acceptable limits.</p> <p>Based on our own assumptions about what the worst case scenarios constitutes, NFFO and VisNed note that the use of floating foundations (tension leg platforms with up to 12 anchor lines and an angle of mooring up to 30 degrees) with a minimum spacing of 680m would effectively preclude fishing activities within the site. This scenario should be removed to promote coexistence with the fishing industry and other marine sectors.</p> <p>NFFO and VisNed note, however, that under alternative scenarios, in which fixed foundations and a preferred spacing of 2</p>	

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		<p>km+, some level of fishing activity would co-exist.</p> <p>In response to the worst case scenario resulting in the loss of access to fishing grounds during the construction and operational phases of the project in line with FLOWW best practice guidelines disruption arrangements should be agreed to recompense for lost access to a core traditional fishing ground.</p>	
		<p>NFFO and VisNed are concerned that the scope of Rochdale Envelope and specifically inclusion of floating wind as the worst case scenario as defined in the assessment is too broad for decision-makers to determine appropriate licensing arrangements for the project.</p> <p>We consider the safety regime operating under a floating platform scenario compared to fixed foundation will likely need to be significantly different. This is presently inadequately addressed in the ES.</p> <p>It also creates significant uncertainty over the level of coexistence that may be possible for other marine sectors and appropriate mitigation for the different</p>	



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		<p>approaches. For the fishing industry the floating wind scenario under the worst case scenario introduces the likelihood that most fishing types will be unable to take place in the vicinity of the site. Yet under a fixed foundation scenario with adequate turbine spacing's (e.g. 2km plus) it is likely that a level for fishing activity could co-exist with the project.</p> <p>We consider that for these reasons, the worst case scenario that would effectively preclude fishing activities within the vicinity of the site should be removed or restricted to a design and layout that that is more likely to be compatible with existing fisheries.</p>	
Cumulative Impact Assessment (CIA)	<p>The cumulative methodology is considered appropriate.</p> <p>Existing proposals and developments are considered to represent part of the existing environment within which commercial fishing activity currently occurs and to which commercial fishing interests have already adapted. Including existing projects in the assessment would therefore represent double counting of their effect.</p>	<p>Existing plans and projects are not factored into the assessment and are assumed to form part of the baseline. We consider this will disguise impacts already being carried by impacted parts of the fleet as the assessment assumes fishing businesses have perfectly adapted to previous impacts without cost. This results in a "shifting baseline syndrome" similar to that which is attributed to environmental change as reference points change from one project application to the next; there is no "review mirror" in the assessment.</p>	Not agreed.

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	The assessment considers a comprehensive range of offshore wind farm developments at different stages in the planning process, as well as dredging areas and MPAs.	The CIA lacks transparent data analysis to support its conclusions. There is also no evidence that proposed fisheries measures associated with the marine protected areas have been included in the CIA. Management measures for many sites in the southern North Sea are now sufficiently progressed to be included in the CIA in our view.	
	The cumulative assessment conclusions in respect of loss of grounds, displacement and safety issues are appropriate.	The qualitative nature of the sensitivity and magnitude criteria means that the CIA needs to clearly evidence its analysis in order to draw conclusions on the significance of impacts to fleets so that we are able to consider the validity of the conclusions in more detail.  We disagree that in the case of safety issues that the same factors and obligations would apply to other projects/ activities that would negate the potential for cumulative effects occurring (Ch14, p87, para 281). This presupposes that those measures removes the safety risk. In our view each project, irrespective of measures applied, will incrementally increase risk to a fleet overall.  Other projects proposal in the East Anglia Zone represent a significant overlay with one of the most heavily fished areas for the Dutch beam trawl fleet. The Norfolk Boreas	Not agreed.

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		<p>project also proposes to include floating wind within its design envelope which we anticipate would exclude all types of fishing activity from the area of the array. On this basis, and without further evidence, we cannot recognise a conclusion that the significance of impact due to loss or restricted access applying to the project operational phase represents minor-adverse for the Dutch beam trawl and seine net fisheries, UK beam trawl, and minor local inshore vessels. Indeed, the equivalent CIA recently completed for the Hornsea 3 offshore wind farm project classifies impact significance as moderate adverse which is significant in EIA terms.</p> <p>There is the potential for displacement due to construction works and once operational for the displacement of the offshore fleets onto fishing grounds targeted by the inshore fleet which is considered not to be likely in the assessment Ch 14, para 327). The fact that the fishing industry has endeavoured to agree seasonal spatial restrictions for the Dutch demersal fleet on inshore grounds is evidence that there would be a real risk of pressure on those grounds increasing which may be compounded by closures resulting from conservation measures and restrictions from other wind farms.</p>	

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<b>Mitigation and Management</b>			
Mitigation and Management	<p>A Fisheries Liaison and Co-Existence Plan will be produced post-consent in consultation with stakeholders and in accordance with the Fisheries Liaison Offshore Wind and Wet (FLOWW) best practice guidance.</p> <p>Note that an Outline Fisheries Liaison and Co-existence Plan is being prepared, following the request from the NFFO, and will be submitted during the examination process.</p>	<p>NFFO and VisNed welcome the production of Fisheries Liaison and Coexistence plan that is secured via the DCO/DML. In our view this plan should be developed in outline pre consent in order to provide clarity over its provisions.</p> <p>In addition to measures outlined elsewhere in this SoCG it should include other operational management arrangements such as provisions for gear clearance and disruption settlements, navigation corridors and protocols, gear snagging protocols and processes for attributable claims, and retrieval of displaced static gears from safety zones.</p>	Both parties agree that the Fisheries Liaison and Co-existence Plan will be developed post-consent and an outline plan during the examination process.
	<p>Fishing vessels will not be able operate within construction safety zones. The Applicant will endeavour to minimise exclusion of fishing during the construction phase where practicable and safe to do so and would ensure appropriate communication channels are established with the fisheries stakeholders.</p> <p>In addition, adequate protocols for the relocation of static gear will be included in the Fisheries Liaison and Co-Existence Plan.</p>	<p>NFFO and VisNed expects that appropriate communication will be made to the fishing industry well in advance of initiating construction safety zones. Any areas where static gear fisheries take place should have appropriate protocols established and laid down the fisheries coexistence plan (and evidenced pre-consent) in order to facilitate any necessary relocation of gear.</p>	<p>Both parties agree that appropriate communication will be made to the fishing industry in advance of initiating construction safety zones.</p> <p>Provisions for this will be made in the Fisheries Liaison and Co-Existence Plan, including protocols for the relocation of static gear.</p>

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	<p>In order to minimise potential interference with fishing activity (e.g. snagging risk) to as far as reasonably practicable, cables will be buried where possible to at least 1 m and protected where cable burial is not feasible.</p> <p>An Outline Scour Protection and Cable Protection Management Plan (Document 8.16) was provided with the Application. A cable burial risk assessment will be undertaken post consent, in consultation with stakeholders.</p> <p>Post-lay and burial inspection surveys will be undertaken In addition to burial status, these will identify potential presence of construction related seabed obstacles and, where necessary, appropriate and practicable, rectification works would be undertaken.</p> <p>A Fisheries Liaison and Co-Existence Plan will be produced post-consent in consultation with stakeholders and in accordance with the Fisheries Liaison Offshore Wind and Wet (FLOWW) best practice guidance. This will include provisions to mitigate snagging risks.</p> <p>In addition, an Outline Fisheries and Co-Existence Plan is being prepared, following the request from the NFFO, and will be submitted during the examination process.</p>	<p>Reburial approaches or back filling where appropriate should be considered before electing to apply cable protection measures. Where cable protection is necessary the approach should be considered so that it minimises the potential for snagging risks. The approach should be consulted on with the fishing industry.</p> <p>Any cable protection measures should be designed so as not to present a snagging risk.</p> <p>Additional measures to mitigate gear snagging risk should include:</p> <ul style="list-style-type: none"> <li>• The cable burial plan should be consulted on with the fishing industry</li> <li>• The results of post burial inspection surveys should be communicated to the regulator/fishing industry.</li> <li>• The cable burial risk assessment should comprise an assessment of cable exposure risk as well as risk to other marine users. It should be reappraised at appropriate intervals during the operational phase of the project</li> <li>• The cable burial risk assessment should be linked to an appropriate cables survey/monitoring regime.</li> </ul>	Not agreed.

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		<ul style="list-style-type: none"> <li>Burial status results from monitoring should be communicated to the fishing industry.</li> <li>Reporting of dropped objects (secured by DCO/DML)</li> <li>Exposed cables should be protected by guard vessel until appropriate remedial measures can be completed.</li> <li>Remedial approaches should consider reburial in the first instance as a way of avoiding the needed for cable protection. Where cable protection is necessary the approach should be considered so that it minimises the potential for snagging risks. The approach should be consulted on with the fishing industry</li> <li>Post remediation surveys should be undertaken and communicated to the fishing industry to provide best assurance post works that no residual snagging risks remain.</li> </ul>	
	Suitable arrangements will be established for attributable gear damages and losses in line with standard procedures as outlined in FLOWW guidance.	Agreed.	Both parties agree that standard procedures as outlined in FLOWW guidance will be used to establish suitable arrangements for attributable gear damage.

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	Where cable protection options are necessary the location of these areas will be recorded via the Kingfisher Information Service of Seafish.	Agreed	Both parties agree that where cable protection is necessary the location of these areas will be recorded via the Kingfisher Information Service of Seafish.
	A protocol will be established for the safe recovery of any fishing gears lost or snagged within the project area and this will be noted in the Outline Fisheries Liaison and Co-Existence Plan. Further detail is expected to be captured at a later stage within the Fisheries Liaison and Co-existence Plan which will be produced post-consent.	Agreed	Both parties agree that a protocol should be established for the safe recovery of fishing gears lost or snagged.
	In the event that cables become unburied during the operational phase it is anticipated that this would be resolved through the methods described and communicated to the fishing industry through the use of a dedicated Fisheries Liaison Officer (FLO) and appropriate channels such as the Kingfisher Information Service of Seafish. Further detail is expected to be captured at a later stage within the Fisheries Liaison and Co-existence Plan which will be produced post-consent.	Identified cable exposures should be communicated to the fishing industry via NTM and Kingfisher and secured appropriately via the DML.	Not agreed: Both parties agree that in the event of cables becoming unburied during the operational phase, fisheries stakeholders would be informed through the FLO and appropriate channels such as the Kingfisher Information Services of Seafish. However, NFFO/VisNed wish to see the measure secured via the DML.
		We encourage the use of funding arrangements like the West of Morecombe Fisheries Fund as a mechanism to support fishing industry stakeholders affected by the project and provisioning of work opportunities (e.g. guard vessels or surveys	



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		for example) available to affected fisheries stakeholders as far as practically possible.	
		We encourage to support the adoption of the Fish Safe device by fishing vessels operating in the area – see <a href="http://www.fishsafe.eu/en/fishsafe-unit.aspx">http://www.fishsafe.eu/en/fishsafe-unit.aspx</a> . This technology, which combined with other safety elements above, provides automated means of integrating safety information into the navigational systems on fishing vessels that in turn provide a real-time warning of safety hazards in the wheel house. This will greatly promote safe working regime around the vicinity of the project and minimise the likelihood of incidents occurring in an area where there exists high levels of fishing activity.	
		We take the view that there should be no in-situ seabed hazards left in place following decommissioning and any infrastructure that remains buried in the seabed following an adequate assessment of the options should be subject to an ongoing monitoring regime with retained liability to address any emergent hazards.	The Applicant is not able to provide detailed information on decommissioning at this stage. Decommissioning will be subject to a separate licensing process, taking account of the latest scientific understanding and available guidance at that time.

**The undersigned agree to the provisions within this SOCG**

Signed	D Rodmell
Printed Name	Dale Rodmell
Position	Assistant Chief Executive (NFFO)
On behalf of	NFFO/VisNED
Date	9/01/2019

Signed	R Sherwood
Printed Name	Rebecca Sherwood
Position	Norfolk Vanguard Consents Manager
On behalf of	Norfolk Vanguard Ltd (the Applicant)
Date	10 January 2019