

Norfolk Vanguard Offshore Wind Farm

Statement of Common Ground

Breckland Council



Applicant: Norfolk Vanguard Limited
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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
EclA	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 Council on the SoCG is currently outstanding and the Applicant will continue to engage with Breckland 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. Meetings between the Applicant and Breckland Council took place on 22 February and 8 March 2019. Following this a number of topics have been removed from this updated draft SoCG. The topics that have been removed are water resources and flood risk, onshore ecology and ornithology, traffic and transport and onshore archaeology and cultural heritage, with these matters deferred to Norfolk County Council.
12. This is a live document that will continue to be updated as the examination progresses.

2 STATEMENT OF COMMON GROUND

13. 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

14. 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.	Under discussion	
The principle of commercial scale renewable energy developments is supported, and will be permitted unless environmental impacts outweigh social, economic and environmental benefits. This was noted in Breckland Councils PEIR response in December 2017.	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.	Agreed	It is agreed by both parties that the principles adopted for undertaking site selection were 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.	Agreed	It is agreed by both parties that the search area and methodology used were appropriate and robust.
The methodology adopted for selecting and assessing the onshore project substation location options, including the final option, is considered robust and appropriate.	Agreed	It is agreed by both parties that methodology adopted for selecting and assessing the onshore project substation options were appropriate and robust.
Health Impact Assessment (HIA)		

Norfolk Vanguard Limited position	Breckland Council position	Final position
<p>The methodology adopted for the HIA (Chapter 27 Human Health) is appropriate and robust, and the outcome of the assessment is suitable.</p>	<p>Agreed</p>	<p>It is agreed by both parties that the HIA methodology was appropriate and robust.</p>

2.2 Ground Conditions and Contamination

15. 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.
16. Table 2 provides an overview of meetings and correspondence undertaken with Breckland Council regarding ground conditions and contamination.
17. Table 3 provides areas of agreement and disagreement regarding ground conditions and contamination.
18. 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		
22 nd February 2019	Call	Meeting to progress outstanding items within the draft SoCG ahead of Deadline 4.
8 th March 2019	Call	Call to progress outstanding items within the draft SoCG ahead of Deadline 4.

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.	Under discussion	
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.	Under discussion	
Assessment findings	The assessment adequately characterises the baseline environment in terms of ground conditions and contamination.	Under discussion	
	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.	Under discussion	
	Based on reporting produced at the time by the Royal Air Force and the Environment Agency a plane crash in 1996 that occurred in an agricultural field near Necton was remediated to the satisfaction of the Environment Agency. The field returned to agricultural use, which currently places this site as a low risk.	Under discussion	
	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.	Under discussion	
Approach to mitigation	The provision of a Materials Management Plan (MMP) is considered suitable to mitigate impacts on Mineral Safeguarding Areas (MSA).	Under discussion	

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
	<p>A Contaminated Land and Groundwater Plan for dealing with contamination will be produced post-consent. The plan will follow the Model Procedures for the Management of Land Contamination (CLR11) (Environment Agency, 2004) for evaluating the risk of contamination.</p> <p>The written scheme for dealing with contamination will follow the CLR11 and will set out the approach for all known sites of potential contamination and would include:</p> <ul style="list-style-type: none"> • Preliminary risk assessment based on conceptual model and identification of further investigation, where required, e.g. Site Investigation; • Generic or detailed quantitative risk assessment informed by intrusive Site Investigations; • Extent, scale and nature of any contamination; • An assessment of the potential risks to human health based on the proposed construction activities and future use of the site, i.e. potential effects on crops, livestock, groundwater, surface water, etc.; and • Appraisal of remediation options, where required. <p>Any site investigations would be designed to take into account the information identified within the preliminary risk assessment and would be undertaken by appropriately qualified specialists.</p> <p>The written scheme for the management of contamination of any land and groundwater will be submitted and approved by the local authority in consultation with the Environment Agency. This is secured through Requirement 20 of the draft DCO.</p>	<p>Under discussion</p>	

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
	Given the impacts of the project, the mitigation proposed for ground conditions and contamination is considered appropriate and adequate.	Under discussion	
	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.	Under discussion	
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.	Under discussion	

2.3 Land Use and Agriculture

19. 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.
20. Table 4 provides an overview of meetings and correspondence undertaken with Breckland Council regarding land use and agriculture.
21. Table 5 provides areas of agreement and disagreement regarding land use and agriculture.
22. 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 4 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		
22 nd February 2019	Call	Call to progress outstanding items within the draft SoCG ahead of Deadline 4.
8 th March 2019	Call	Call to progress outstanding items within the draft SoCG ahead of Deadline 4.

Table 5 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	Under discussion	
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	Under discussion	
	The ES adequately characterises the baseline environment in terms of land use and agriculture.	Under discussion	
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.	Under discussion	
	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.	Under discussion	
Approach to mitigation	The mitigation proposed for land use and agriculture are considered appropriate and adequate.	Under discussion	

2.4 Noise and Vibration

23. 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.
24. Table 6 provides an overview of meetings and correspondence undertaken with Breckland Council regarding noise and vibration.
25. Table 7 provides areas of agreement and disagreement regarding noise and vibration.
26. 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 6 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		
22 nd February 2019	Call	Meeting to progress outstanding items within the draft SoCG ahead of Deadline 4.
8th March 2019	Call	Call to progress outstanding items within the draft SoCG ahead of Deadline 4.

Table 7 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_{Leq} (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>	Under discussion	

2.5 Air Quality

27. 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.
28. Table 8 provides an overview of meetings and correspondence undertaken with Breckland Council regarding air quality.
29. Table 9 provides areas of agreement and disagreement regarding air quality.

Table 8 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		
22 nd February 2019	Call	Meeting to progress outstanding items within the draft SoCG ahead of Deadline 4.
8th March 2019	Call	Call to progress outstanding items within the draft SoCG ahead of Deadline 4.

Table 9 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.	Under discussion	

2.6 Landscape and Visual Impact Assessment

30. 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.
31. Table 10 provides an overview of meetings and correspondence undertaken with Breckland Council regarding the landscape and visual impact assessment (LVIA).
32. Table 11 provides areas of agreement and disagreement regarding the LVIA.
33. 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 10 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		
22 nd February 2019	Call	Meeting to progress outstanding items within the draft SoCG ahead of Deadline 4.
8 th March 2019	Call	Call to progress outstanding items within the draft SoCG ahead of Deadline 4.

Table 11 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 20 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 20 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.

Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
	<p>Visual impacts associated with the landfall and cable installation are limited to the construction phase and an assessment of operational impacts was not required.</p> <p>This was discussed and agreed via the method statement provided and agreed via the Method Statement and during the ETG meeting in July 2017.</p> <p>Construction phase effects consider the time required for mitigation to fully take effect. For example where hedgerows are temporarily removed along the cable route, during construction, the time taken for reinstated hedgerows to establish and mature is taken into account within the residual impacts for construction.</p>	<p>Not agreed. Breckland Council accept that the most significant adverse effects are during construction. However, there are some sensitive crossings which will take a few years for vegetation to re-establish.</p>	<p>Under discussion.</p>
	<p>The worst-case scenario presented in the assessment is appropriate.</p>	<p>Agreed</p>	<p>It is agreed by both parties that the worst-case scenario presented in the assessment is appropriate.</p>
Assessment findings	<p>The assessment adequately characterises the visual baseline. This was agreed through PEIR feedback in December 2017.</p>	<p>Agreed</p>	<p>It is agreed by both parties that the baseline is suitably established.</p>
	<p>The assessment of effects for construction, operation and decommissioning presented is appropriate and adheres to the agreed methodology.</p>	<p>Agreed The assessment methodology, which has also been discussed and is recorded in Appendix 29.2 Consultation Responses, has been followed.</p>	<p>It is agreed by both parties that the assessment methodology has been followed.</p>
	<p>The photovisualisations are a fair reflection of the potential visibility of the above ground infrastructure from the agreed receptors.</p>	<p>Agreed Whilst the modelling has not been tested, the methodology and presentation is acceptable at operation.</p>	<p>It is agreed by both parties that the photovisualisations are acceptable.</p>

	<p>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.</p> <p>The mitigation planting presented on the photovisualisations is shown at 20 years. This is consistent for all viewpoints. The assessment presented in ES Chapter 29 Landscape and Visual Impact Assessment states the time at which impacts reduce from significant to not significant depending on the timeframe that mitigation planting would achieve the level of screening required (Table 29.12). After 20 years all residual impacts will have reduced to not-significant.</p> <p>The indicative design life of the operational onshore project substation is 30 years.</p>	<p>Not Agreed with respect to mitigation time frame.</p> <p>Significant effects have, however, been identified.</p> <p>At commencement of operations and for a substantial number of years, screen planting will not have established and grown sufficiently to reduce adverse visual effects where identified. It would be beneficial to show mitigation planting at say 5, 10 or 15 years. 20 years is stated for mitigation visualisations (note: operational life is 25 years) but is not clearly stated on the figures which would help. As VPs 6,9,10 and 11 demonstrate, even a modest lowering of the development platforms would assist in reducing adverse effects to a greater degree but there may be geo/hydrological reasons for not doing so. However, this is not</p>	<p>Under discussion</p>
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Topic	Norfolk Vanguard Limited position	Breckland Council position	Final position
		likely to influence the level of significance adverse effects.	
	The assessment of cumulative effects is appropriate and, assuming the inclusion of the mitigation described, cumulative effects would be mitigated over time.	Agreed	It is agreed by both parties that the projects and plans taken into consideration for the cumulative impact assessment is appropriate.
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.	Agreed, on the basis that the substation platform levels are accepted.	It is agreed by both parties that proposed woodland planting would mitigate localised effects over time.
	The mitigation proposed for LVIA are considered appropriate and adequate.	In broad terms the detailed mitigation shown would seem to accord with the local LCA strategy e.g. conserve and enhance hedgerows, species rich grassland. The habitat value of the attenuation pond in the onshore substation could be explored.	Under discussion
	All mitigation measures required are outlined in sufficient detail within the Outline Landscape and Environmental Management Strategy (OLEMS).	Under discussion	
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.	Under discussion	

2.7 Tourism, recreation and socio-economics

34. 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.
35. Table 12 provides an overview of meetings and correspondence undertaken with Breckland Council regarding tourism, recreation and socio-economics.
36. Table 13 provides areas of agreement and disagreement regarding tourism, recreation and socio-economics.
37. 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).

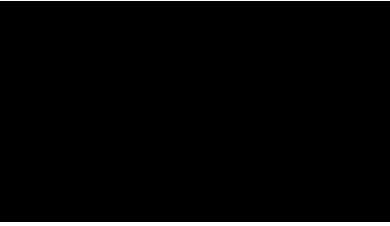
Table 12 Summary of Consultation with Breckland Council regarding tourism, recreation and socio-economics

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		
22 nd February 2019	Call	Meeting to progress outstanding items within the draft SoCG ahead of Deadline 4.
8 th March 2019	Call	Call to progress outstanding items within the draft SoCG ahead of Deadline 4.

Table 13 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	Under discussion	
Assessment methodology	The impact assessment methodologies used provide an appropriate approach to assessing potential impacts of the project.	Under discussion	
	The worst-case scenario presented in the assessments is appropriate.	Under discussion	
	The assessment adequately characterises the baseline environment in terms of tourism, recreation and socio-economics.	Under discussion	
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.	Under discussion	
	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.	Under discussion	
Approach to mitigation	Given the impacts of the project, the mitigation proposed for tourism, recreation and socio-economics are considered appropriate and adequate.	Under discussion	
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.	Under discussion	

The undersigned agree to the provisions within this SOCG

Signed	
Printed Name	Jon Berry
Position	Head of Development Management
On behalf of	Breckland Council
Date	13 TH MARCH 2019

Signed	R.Sherwood
Printed Name	Rebecca Sherwood
Position	Norfolk Vanguard Consents Manager
On behalf of	Norfolk Vanguard Ltd (the Applicant)
Date	13/03/2019