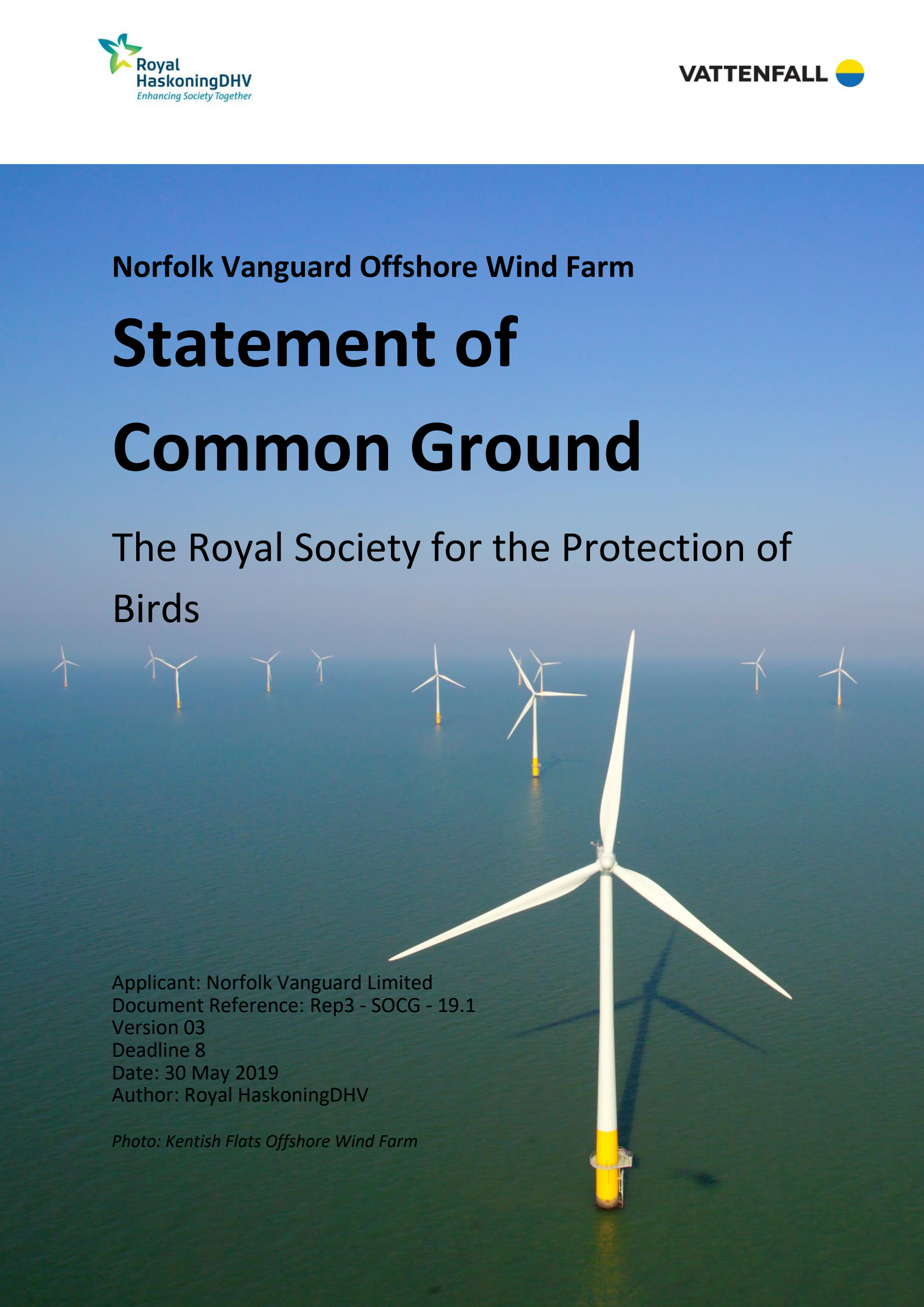


Norfolk Vanguard Offshore Wind Farm

Statement of Common Ground

The Royal Society for the Protection of
Birds



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

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Glossary

DCO	Development Consent Order
ES	Environmental Statement
ETG	Expert Topic Group
HRA	Habitats Regulations Assessment
HDD	Horizontal Directional Drilling
LiDAR	Light Detection and Ranging
MMO	Marine Management Organisation
NV	Norfolk Vanguard
OWF	Offshore Wind Farm
PEIR	Preliminary Environmental Information Report
pSPA	Proposed Special Protection Area
RSPB	Royal Society for the Protection of Birds
SPA	Special Protection Area
SoCG	Statement of Common Ground

Terminology

Array cables	Cables which link the wind turbines and the offshore electrical platform.
Landfall	Where the offshore cables come ashore at Happisburgh South.
Mobilisation area	Areas approx. 100 x 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 400kV 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 45 m 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 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 (e.g. HDD)	Temporary areas required for trenchless crossing works.

1 INTRODUCTION

1. This Statement of Common Ground (SoCG) has been prepared with the Royal Society for the Protection of Birds (the RSPB) 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'). This SoCG comprises an agreement log which has been structured to reflect topics of interest to the RSPB on the Norfolk Vanguard DCO application (hereafter 'the Application'). Topic specific matters agreed, not agreed and actions to resolve between the RSPB and the Applicant are included.
2. 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 60 km to the onshore project substation and grid connection point near 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 the RSPB

6. This section briefly summarises the consultation that the Applicant has had with the RSPB. 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 RSPB 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 RSPB provided comments on the Preliminary Environmental Information Report (PEIR) by way of a letter dated 11th December 2017.
9. Further to the statutory Section 42 consultation, several meetings were held with the RSPB through the Evidence Plan Process.
10. Table 1 provides an overview of meetings and correspondence undertaken with the RSPB. 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. As part of the pre-examination process, the RSPB submitted a Relevant Representation to the Planning Inspectorate on the 14th September 2018.

12. Further submissions were submitted by the RSPB at Deadline 1^{1,2}, Deadline 2³, Deadline 4⁴, Deadline 6⁵ and Deadline 7⁶.
13. This SoCG represents the final position of the parties for submission at Deadline 8 in accordance with the Rule 8 requirements.

¹ Written Representations for the Royal Society for the Protection of Birds Submitted for Deadline 1 16 January 2019 Planning Act 2008 (as amended) In the matter of: Application by Norfolk Vanguard Limited for an Order Granting Development Consent for the Norfolk Vanguard Offshore Wind Farm Planning Inspectorate Ref: EN010079 Registration Identification Ref: 20012785

² RSPB Response Submitted for Deadline 1: 16th January 2019 Response to the Examining Authority's First Written Questions

³ RSPB Response Submitted for Deadline 2: 30th January 2019 Comments on Applicant's Response to Written Questions

⁴ RSPB Response Submitted for Deadline 4: 13th March 2019 Response to the Examining Authority's Second Written Questions

⁵ RSPB Response Submitted for Deadline 6: 5th April 2019 RSPB written summary of oral case from the environmental Issue Specific Hearing on 27th March

⁶ Re: Application by Norfolk Vanguard Limited for an Order Granting Development Consent for the Norfolk Vanguard Offshore Wind Farm RSPB Response Submitted for Deadline 7: 2nd May 2019

2 STATEMENT OF COMMON GROUND

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

2.1 Offshore Ornithology

15. The project has the potential to impact upon Offshore Ornithology. Chapter 13 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 provides an overview of meetings and correspondence undertaken with the RSPB regarding Offshore Ornithology.

17. Table 2 provides areas of agreement (common ground) and disagreement regarding Offshore Ornithology.

18. Minutes of Evidence Plan meetings can be found in Appendix 9.17 and Appendix 25.8 of the Consultation Report (document reference 5.1 of the Application).

Table 1 Summary of Consultation with the RSPB in relation to Offshore Ornithology

Date	Contact Type	Topic
Pre-Application		
11 th March 2016	Letter from the Applicant	Formal launch of Norfolk Vanguard.
16 th March 2016	Project Introduction meeting	Introduction to strategy for northern half of zone; data sources; approach to assessment; potential mitigation.
3 rd February 2017	Email from the Applicant	Provision of the Offshore Ornithology Method Statement (Appendix 9.14 of the Consultation Report).
15 th February 2017	ETG meeting	Discussion on the approach to EIA
21 st March 2017	Email from the RSPB	RSPB feedback on Offshore Ornithology Method Statement and provision of information.
26 th June 2017	Email from the Applicant	Offshore HRA Screening (Appendix 5.1 of the HRA (document 5.3)) provided for information.
7 th September 2017	Email from the Applicant	Provision of draft offshore ornithology PEIR Chapter 13.
6 th October 2017	ETG meeting	Discussion of comments on the draft PEIR chapter
11 th December 2017	PEIR response from the RSPB	Comments on the PEIR chapter

Date	Contact Type	Topic
22 nd February 2018	Email from the Applicant	Provision of draft Norfolk Vanguard Information to Support Habitats Regulations Assessment (HRA) (document 5.3).
23 rd March 2018	Email from the RSPB	RSPB's comments on the HRA.
26 th March 2018	Offshore Ornithology HRA Conference Call	Project update and comments on HRA for Offshore Ornithology
Post-Application		
14 th September 2018	Relevant Representation	RSPB's initial feedback on the DCO application.
11 th December 2018	Email from the RSPB	RSPB comments on the draft SoCG
10 th January 2019	Email from the RSPB	RSPB comments on the draft SoCG
16 th January 2019	Written submission to PINS	RSPB Written Representation RSPB Responses to Examiners First Written Questions
30 th January 2019	Written submission to PINS	RSPB Comments on the Applicant's Responses to Written Questions
13 th March 2019	Written submission to PINS	RSPB Response to the Examining Authority's Second Written Questions
27 th March 2019	Meeting prior to Issue Specific Hearing 4	Discussion of offshore ornithology assessment status and next steps in run up to submissions at Deadline 6.
2 nd April 2019	Conference Call (with Natural England)	Follow up on impact assessment updates and discussion of next steps
15 th April 2019	Receipt of RSPB's review of Deadline 6 submission.	Consideration of updated ornithology assessments
2 nd May 2019	Receipt of RSPB's review of Deadline 7 submission.	Consideration of updated ornithology assessments

Table 2 Offshore ornithology

Topic	Norfolk Vanguard Limited position	RSPB position	Final position
Consultation			
Consultation	The RSPB has been adequately consulted regarding Offshore ornithology to date.	Agreed	Agreed
Environmental Impact Assessment			
Existing Environment	Survey data collected for Norfolk Vanguard (and East Anglia FOUR, now NV East) for the characterisation of offshore ornithology are suitable for the assessment. Survey times were submitted at Deadline 4 (ExA; Further WQApp3.1; 10.D4.6).	Agreed	Agreed
	The methods and techniques used to analyse offshore ornithological data are appropriate for characterising bird distributions and estimating populations.	Agreed	Agreed
	The method used to determine flight heights is appropriate. Generic flight height data (Johnston et al. 2014, with corrigendum) will be used due to data reliability concerns raised by aerial surveyor.	Agreed	Agreed.
	The method used to assign unidentified birds to species is appropriate.	Agreed	Agreed
	Following further discussion with Natural England and the RSPB, additional assessment has been presented for gannet, kittiwake and lesser black-backed gull using the extended breeding seasons. For other species, the use of migration-free breeding months to define seabird seasons is appropriate.	Agreed	Agreed
Assessment methodology			
General	Appropriate legislation, planning policy and guidance relevant to offshore ornithology has been used.	Agreed	Agreed
	The list of potential impacts on offshore ornithology assessed is appropriate	Agreed	Agreed
	The methods for determining impact significance on offshore ornithological receptors is appropriate.	Agreed	Agreed
	The worst case scenarios used in the assessment for offshore ornithology are appropriate.	Agreed	Agreed
	Differences between single and two phased approaches to construction are trivial in terms of ornithology impacts.	Agreed	Agreed
	The characterisation of receptor sensitivity is appropriate.	Agreed	Agreed

Topic	Norfolk Vanguard Limited position	RSPB position	Final position
Construction impact methods	The lists of potential construction impacts and ornithology receptors assessed are appropriate.	Agreed	Agreed
	The methods used to estimate impacts during construction, including cable laying operations are appropriate.	Agreed	Agreed
Operation impact methods	The sources of operational impact assessed are appropriate.	Agreed	Agreed
	The lists of ornithology receptors assessed for each impact are appropriate.	Agreed	Agreed
	Methods for assessing operational displacement are appropriate.	Agreed	Agreed
	Methods for assessing population scale collision impacts are appropriate: use of Band collision risk model (CRM) options 1 and 2. Upper and lower estimates included to present variation due to nocturnal activity rates, proportions at collision height, avoidance rates and seabird densities.	Agreed with respect to use of Band model options 1 and 2 Not agreed with respect to the breeding season gannet avoidance rate (The RSPB recommends that the gannet avoidance rate should be 98% in the breeding season).	Agreed with respect to use of Band model options 1 and 2 Not agreed with respect to the breeding season gannet avoidance rate (The RSPB recommends that the gannet avoidance rate should be 98% in the breeding season).
	Methods for assessing barrier impacts are appropriate.	Agreed	Agreed
	Methods for assessing indirect impacts are appropriate.	Agreed	Agreed
Impact assessment findings – project alone			
Construction impacts	The magnitude of impacts and conclusions on significance resulting from the construction phase are correctly identified and predicted. No impacts of greater than minor significance are predicted.	Agreed (for EIA on basis of recommended displacement/mortality rates)	Agreed (subject to noted caveat)

Topic	Norfolk Vanguard Limited position	RSPB position	Final position
	<p>The ES considers construction, operation and decommissioning impacts in accordance with the requirements of the EIA Regulations and the approach to assessment was agreed as part of the Evidence Plan Process. Construction and decommissioning impacts are distinct from operational impacts so it is not appropriate to combine impacts in the way suggested by the RSPB. In any event, construction and decommissioning impacts are generally minor and short term, so the combined impact would not increase the significance assessed for operation alone. Note, this position also applies in subsequent rows where the RSPB have repeated this position.</p>	<p>Note that the RSPB considers that conclusions on significance for each receptor should consider the full range of impacts from the project as a whole during all stages of the project (i.e. construction, operation and decommissioning)</p> <p>Terminology regarding impact significance should be clear as to whether it relates to EIA or HRA procedures.</p>	
Operation impacts	<p>The magnitude of impacts and conclusions on significance resulting from displacement during operation are correctly identified and predicted. No impacts of greater than minor significance are predicted.</p> <p>However, as requested by Natural England the RSPB, an updated assessment was submitted at Deadline 2 (Appendix 3.1, document reference ExA; WQApp3.1; 10.D1.3 and Appendix 3.3, document reference ExA; WQApp3.3; 10.D1.3) which included a range of displacement and mortality rates as requested. This note concluded that using the Applicant's evidence based rates of displacement and mortality there would be no significant impacts from the project alone. If the highly precautionary rates preferred by Natural England and the RSPB are used then a moderate significant impact was predicted for red-throated diver for Norfolk Vanguard West and the combination of Norfolk Vanguard East and West.</p>	<p>Agree impact significance subject to use of recommended displacement/mortality rates (and subject to the caveat below). We do not agree that the NE/RSPB preferred parameters are "highly precautionary"; they are precautionary, but proportionate to the level of uncertainty involved. Conclusions on the significance for each receptor should consider the full range of impacts from the project as a whole during all stages of the project (i.e. construction, operation and decommissioning).</p>	<p>Agree impact significance (subject to noted caveat), but not agreed that NE/RSPB rates are "highly precautionary"</p>

Topic	Norfolk Vanguard Limited position	RSPB position	Final position
		Terminology regarding impact significance should be clear as to whether it relates to EIA or HRA procedures.	
	Following design revisions and mitigation to reduce collision risks (removal of the 9MW turbine, layout revisions and a 5m increase in draught height from Mean High Water Springs (MHWS)) the magnitude of impacts and conclusions on significance resulting from collision during operation are correctly identified and predicted. No impacts of greater than minor significance are predicted.	Agreed	Agreed.
	The magnitude of impacts and conclusions on significance resulting from barrier impacts during operation are correctly identified and predicted. No impacts of greater than minor significance are predicted.	Agreed (subject to the caveat below). Conclusions on the significance for each receptor should consider the full range of impacts from the project as a whole during all stages of the project (i.e. construction, operation and decommissioning). Terminology regarding impact significance should be clear as to whether it relates to EIA or HRA procedures.	Agreed (subject to noted caveat)
	The magnitude of impacts and conclusions on significance resulting from indirect impacts during operation are correctly identified and predicted. No impacts of greater than minor significance are predicted.	Agreed (subject to the caveat below) Conclusions on the significance for each receptor should consider the full range of impacts from the project as a whole during all stages of the project (i.e. construction,	Agreed

Topic	Norfolk Vanguard Limited position	RSPB position	Final position
		operation and decommissioning). Terminology regarding impact significance should be clear as to whether it relates to EIA or HRA procedures.	
Decommissioning impacts	The magnitude of impacts and conclusions on significance resulting from decommissioning are correctly identified and predicted. No impacts of greater than minor significance are predicted.	Agreed. (subject to the caveat below) Conclusions on the significance for each receptor should consider the full range of impacts from the project as a whole during all stages of the project (i.e. construction, operation and decommissioning). Terminology regarding impact significance should be clear as to whether it relates to EIA or HRA procedures.	Agreed
Cumulative impact assessment			
Cumulative construction assessment	The plans and projects considered within the CIA are appropriate.	Agreed	Agreed
	The magnitude of impacts and conclusions on significance resulting from cumulative impacts during construction are correctly identified and predicted. No impacts of greater than minor significance are predicted.	Agreed.	Agreed.
Cumulative operation assessment	The plans and projects considered within the CIA are appropriate.	Agreed, with relevance to sites and species of concern to RSPB.	Agreed

Topic	Norfolk Vanguard Limited position	RSPB position	Final position
	<p>The magnitude of impact and conclusions on significance resulting from cumulative displacement impacts during operation for all species assessed (guillemot, razorbill, puffin and red-throated diver) are correctly identified and predicted. No impacts of greater than minor significance are predicted.</p> <p>However, as requested by Natural England and the RSPB, an updated assessment was submitted at Deadline 2 (Appendix 3.1, document reference ExA; WQApp3.1; 10.D1.3 and Appendix 3.3, document reference ExA; WQApp3.3; 10.D1.3) which included a range of displacement and mortality rates as requested. Using the evidence-based rates identified by the Applicant's reviews (included in the above notes), this note concluded there would be no significant impacts from the project cumulatively with other projects. If the highly precautionary rates preferred by Natural England and the RSPB are used, then a moderate significant impact was predicted for cumulative red-throated diver displacement.</p>	Not agreed. Based on the updated assessment provided at Deadline 2, we consider that these impacts are of moderate significance using the Natural England recommended displacement and mortality rates. We do not agree that the NE/RSPB preferred parameters are "highly precautionary"; they are precautionary, but proportionate to the level of uncertainty involved.	Not agreed
	Following design revisions and mitigation to reduce collision risks for the Project (removal of the 9MW turbine, layout revisions and a 5m increase in draught height from MHWS) the magnitude of impacts and conclusions on significance resulting from cumulative collisions during operation are correctly identified and predicted. No impacts of greater than minor significance are predicted.	<p>Not agreed</p> <p>Whilst the RSPB agrees that the proposed mitigation reduces the project's own contribution to cumulative collision risk, due to the level of impact already existing, it is not agreed that cumulative collision risk can be ruled out for kittiwake and great black-backed gull.</p>	Not agreed
Habitats Regulations Assessment (HRA)			
	The Approach to HRA Screening is appropriate.	Agreed	Agreed

Topic	Norfolk Vanguard Limited position	RSPB position	Final position
Screening of LSE	<p>The following sites and species have been screened in for further assessment:</p> <ul style="list-style-type: none"> • Alde-Ore Estuary SPA (lesser black-backed gull for collisions); • Flamborough and Filey Coast SPA (gannet and kittiwake for collisions and gannet, guillemot, razorbill and puffin for displacement); • Greater Wash SPA (red-throated diver for displacement and little gull for collisions); and • Outer Thames Estuary SPA (red-throated diver for displacement). 	Agreed.	Agreed.
Assessment	The approach to the determination of Adverse Effect on Integrity (AEol) is appropriate.	Agreed	Agreed
	Conclusion of no AEol for Alde-Ore Estuary SPA on the basis of Project alone collisions is appropriate in the context of the the reduction in predicted collisions following project mitigation (removal of the 9MW turbine, revised project layout and 5m increase in draught height from MHWS), and the outputs from updated PVA models	Agreed	Agreed
	Conclusion of no AEol for Alde-Ore Estuary on the basis of in-combination collisions, is appropriate in the context of the outputs from PVA models	<p>Not agreed</p> <p>Whilst the RSPB agrees that the proposed mitigation reduces the project's own contribution to in-combination collision risk, due to the level of impact, it is not agreed that there can be confidence in a conclusion of no AEol on the Alde-Ore Estuary SPA arising from in-combination collision risk to lesser black-backed gulls.</p>	Not agreed
	Conclusion of no AEol for gannet population at Flamborough and Filey Coast SPA due to Project alone collisions is appropriate following project mitigation to reduce collision risks (removal of the	Agreed	Agreed

Topic	Norfolk Vanguard Limited position	RSPB position	Final position
	9MW turbine, revised project layout and 5m increase in draught height from MHWS), and the predicted consequences from PVA.		
	Conclusion of no AEol for gannet population at Flamborough and Filey Coast SPA is appropriate on the basis of in-combination collisions and the predicted consequences from PVA.	Not agreed Whilst the RSPB agrees that the proposed mitigation reduces the project's own contribution to in-combination collision risk, due to the level of impact, it is not agreed that there can be confidence in a conclusion of no AEol on Flamborough and Filey Coast SPA arising from in-combination collision risk to gannets.	Not agreed
	Conclusion of no AEol for kittiwake population at Flamborough and Filey Coast SPA due to Project alone collisions is appropriate following project mitigation to reduce collision risks (removal of the 9MW turbine, revised project layout and 5m increase in draught height from MHWS), and the predicted consequences from PVA.	Agreed	Agreed

Topic	Norfolk Vanguard Limited position	RSPB position	Final position
	Conclusion of no AEol for kittiwake population at Flamborough and Filey Coast SPA is appropriate on the basis of in-combination collisions and the predicted consequences estimated from PVA.	Not agreed Whilst the RSPB agrees that the proposed mitigation reduces the project's own contribution to in-combination collision risk, due to the level of impact, it is not agreed that there can be confidence in a conclusion of no AEol on the Flamborough and Filey Coast SPA arising from in-combination collision risk to kittiwakes.	Not agreed
	Conclusion of no AEol for the red-throated diver population at the Greater Wash SPA is appropriate on the basis of in-combination construction and operation displacement (in relation to vessel movements).	Agreed	Agreed
	Conclusion of no AEol for the little gull population at the Greater Wash SPA is appropriate on basis of in-combination collisions (and including reduced collisions following removal of the 9MW turbine, the revised layout and 5m increase in draught height from MHWS).	Agreed	Agreed

Topic	Norfolk Vanguard Limited position	RSPB position	Final position
Mitigation and Management			
Mitigation and Management	Given the impacts of the project, the mitigation which has been put in place (removal of the 9MW turbine, the revised layout and 5m increase in draught height from MHWS) and proposed monitoring (to be developed through the Ornithological Monitoring Plan, in accordance with the In Principle Monitoring Plan (Application document 8.12)) are adequate.	Under discussion. The RSPB agrees that the Applicant has made significant progress with regard mitigation of the impacts of the project, however, consideration could be given to the modelling of a range of potential turbine heights. We note that monitoring, whilst welcome, is not mitigation.	Not agreed
	The In-Principle Monitoring Plan (IPMP) allows for both strategic and project level monitoring (although these need to be considered in relation to the relative magnitude of individual project scale impacts). Monitoring options will be agreed with the Marine Management Organisation (MMO) in consultation with relevant stakeholders in accordance with Condition 14(1)(l) of the generation Deemed Marine License (DMLs) (Schedule 9 and 10) which refer to the Ornithological Monitoring Plan.	Agreed that the IPMP allows for site specific monitoring if appropriate, but concerns remain that there appears to be a presumption against project level monitoring and that cumulative impact levels are under-rated in the description.	Agreed
	However, the Applicant also considers that in many instances studies for offshore wind farm effects on seabirds designed to reduce uncertainties and precaution in assessments need to be conducted at a strategic rather than project level. The Applicant is a key supporter of strategic monitoring initiatives and has a proven track record in this area (e.g. through the Scientific Research and Monitoring Programme for the European Offshore Wind Development Centre and involvement in the Offshore Renewables Joint Industry Programme (ORJIP)).	Agreed. The RSPB welcomes the Applicant's commitment to strategic level monitoring.	Agreed

The undersigned agree to the provisions within this SOCG

Signed	
Printed Name	Rosie Sutherland
Position	Head of Environmental Law
On behalf of	The Royal Society for the Protection of Birds
Date	30 th May 2019

Signed	R. Sherwood
Printed Name	Rebecca Sherwood
Position	Norfolk Vanguard Consents Manager
On behalf of	Norfolk Vanguard Ltd (the Applicant)
Date	30 th May 2019