



# Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

Draft Statement of Common Ground:  
Ministry of Defence

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| Prepared by:  |                      |
| <b>Osprey Consulting Services Ltd</b>   |                      |
| Approved by:  | Date:                |
| <b>Tom Morris, Equinor</b>  | <b>February 2023</b> |



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## Glossary of Acronyms

|      |   |
|------|---|
| ADR  | Air Defence Radar                               |
| ATC  | Air Traffic Control                             |
| CAP  | Civil Aviation Publication                      |
| CAS  | Controlled Airspace                             |
| CIA  | Cumulative Impact Assessment                    |
| DCO  | Development Consent Order                       |
| DEL  | Dudgeon Extension Limited                       |
| DEP  | Dudgeon Offshore Wind Farm Extension Project    |
| DIO  | Defence Infrastructure Organisation             |
| EIA  | Environmental Impact Assessment                 |
| EPP  | Evidence Plan Process                           |
| ES   | Environmental Statement                         |
| km   | Kilometre                                       |
| MOD  | Ministry of Defence                             |
| NPS  | National Policy Statement                       |
| PEIR | Preliminary Environmental Information Report    |
| PSR  | Primary Surveillance Radar                      |
| RAF  | Royal Air Force                                 |
| SEP  | Sheringham Offshore Wind Farm Extension Project |
| SNC  | South Norfolk Council                           |
| SoCG | Statement of Common Ground                      |
| UK   | United Kingdom                                  |
| WAM  | Wide Area Multilateralism                       |

## Glossary of Terms

|   |   |
|---|---|
| Dudgeon Offshore Wind Farm Extension Project (DEP)          | The Dudgeon Offshore Wind Farm Extension onshore and offshore sites including all onshore and offshore infrastructure.  |
| DEP offshore site   | The Dudgeon Offshore Wind Farm Extension consisting of the DEP wind farm site, interlink cable corridors and offshore export cable corridor (up to mean high water springs).  |
| DEP North array area  | The wind farm site area of the DEP offshore site located to the north of the existing Dudgeon Offshore Wind Farm  |
| DEP South array area  | The wind farm site area of the DEP offshore site located to the south of the existing Dudgeon Offshore Wind Farm  |
| DEP wind farm site  | The offshore area of DEP within which wind turbines, infield cables and offshore substation platform/s will be located and the adjacent Offshore Temporary Works Area. This is also the collective term for the DEP North and South array areas.  |
| Evidence Plan Process (EPP)                                 | A voluntary consultation process with specialist stakeholders to agree the approach, and information to support, the EIA and HRA for certain topics.  |
| Expert Topic Group (ETG)                                    | A forum for targeted engagement with regulators and interested stakeholders through the EPP.  |
| Offshore substation platform (OSP)                          | A fixed structure located within the wind farm site/s, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.  |
| Offshore Temporary Works Area                               | An Offshore Temporary Works Area within the offshore Order Limits in which vessels are permitted to carry out activities during construction, operation and decommissioning encompassing a 200m buffer around the wind farm sites and a 750m buffer around the offshore cable corridors. No permanent infrastructure would be installed within the Offshore Temporary Works Area. |
| Order Limits  | The area subject to the application for development consent, including all permanent and temporary works for SEP and DEP.   |
| Sheringham Shoal Offshore Wind Farm Extension Project (SEP) | The Sheringham Shoal Offshore Wind Farm Extension onshore and offshore sites including all onshore and offshore infrastructure.   |

|                    |   |
|--------------------|---|
| SEP offshore site  | Sheringham Shoal Offshore Wind Farm Extension consisting of the SEP wind farm site and offshore export cable corridor (up to mean high water springs).  |
| SEP wind farm site | The offshore area of SEP within which wind turbines, infield cables and offshore substation platform/s will be located and the adjacent Offshore Temporary Works Area.  |
| Study area         | Area where potential impacts from the project could occur, as defined for each individual Environmental Impact Assessment (EIA) topic.  |
| The Applicant      | Equinor New Energy Limited. As the owners of SEP and DEP, Scira Extension Limited and Dudgeon Extension Limited are the named undertakers that have the benefit of the DCO. References in this document to obligations on, or commitments by, 'the Applicant' are given on behalf of SEL and DEL as the undertakers of SEP and DEP. |

## 1 Introduction

### 1.1 Background

1. This draft Statement of Common Ground (SoCG) has been prepared by Equinor New Energy Limited (the Applicant) and the UK Ministry of Defence (MOD). It identifies areas of the Sheringham Shoal Offshore Wind Farm Extension Project (SEP) and Dudgeon Offshore Wind Farm Extension Project (DEP) Development Consent Order (DCO) application (the Application) where matters are agreed, not agreed or that remain under discussion between the parties.
2. The Applicant has had regard to the Planning Act 2008: Guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this draft SoCG.
3. This draft SoCG has been structured to reflect topics of the Application which are of interest to the MOD. The applicable matters considered within this draft SoCG apply to the MOD's statutory remit which includes safeguarding of defence assets.
4. **Table 1** presents the topics included in the draft SoCG with the Applicant and MOD.

*Table 1: Topics included in the draft SoCG*

| Topic/Chapter     | Reference | Evidence Plan Process (EPP) (Yes/No) |
|-------------------|-----------|--------------------------------------|
| Offshore Aviation | APP 030   | No                                   |

5. Further detail of those topics included in the EPP can be found in the **Consultation Report Appendices** (APP-030).
6. Topic specific matters agreed, not agreed and matters that remain under discussion between the Applicant and the MOD are included within this draft SoCG. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicant and the MOD to reach agreement wherever possible, or to refine the extent of disagreement between parties. The notes column of the draft SoCG tables provides commentary on these matters.
7. Throughout the draft SoCG the phrase "Agreed" identifies any point of agreement between the Applicant and the MOD. The phrase "Not Agreed" identifies any point that is not agreed between the Applicant and the MOD.

### 1.2 Consultation with MOD

8. The Applicant has engaged with the MOD on the Projects during the pre-Application process, both in terms of informal non-statutory engagement and statutory consultation carried out pursuant to Section 42 of the Planning Act 2008.
9. During the statutory Section 42 consultation, the MOD provided comments on the Preliminary Environmental Information Report (PEIR) by way of a letter dated 9<sup>th</sup> June 2021.
10. Further to this, two meetings were held with the MOD Defence Infrastructure Organisation (DIO) (MoD Safeguarding is administered by the DIO Safeguarding

Team<sup>1</sup>) through the EPP. These are detailed throughout the SoCG and minutes of the meetings are provided as Appendices to the Consultation Report (APP-030).

### 1.3 Summary of 'Agreed', 'Not Agreed' and 'In Discussion' Matters

11. In order to easily identify whether a matter is 'agreed', 'not agreed' or 'in discussion', the colour coding system set out in **Table 2** has been used.
12. Details on specific matters that are 'agreed', 'not agreed' or 'in discussion' between the Applicant and the MOD are presented in **Table 4**.

*Table 2: Position status key*

| Position Status   | Position Colour Coding          |
|---|---------------------------------|
| <b>Agreed</b><br>The matter is considered to be agreed between the parties.   | Agreed                          |
| <b>Not Agreed – no material impact</b><br>The matter is not agreed between the parties; however, the outcome of the approach taken by either the Applicant or the MOD is not considered to result in a material impact to the assessment conclusions and the matter is considered to be closed for the purposes of this SoCG. | Not Agreed – no material impact |
| <b>Not Agreed – material impact</b><br>The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or the MOD is considered to result in a materially different impact to the assessment conclusions.  | Not Agreed – material impact    |
| <b>In discussion</b><br>The matter is neither 'agreed' nor 'not agreed' and is a matter where further discussion is required between the parties (e.g. where documents are yet to be shared with the MOD).  | In discussion                   |

## 2 Statement of Common Ground

13. A summary of the consultation undertaken to date with the MOD and the matters agreed, in discussion or not agreed (based on discussions and information exchanged between the Applicant and the MOD during the pre-application and examination phases of the Application) are set out below for each of the draft SoCG topic areas.

### 2.1 Aviation and Radar

*Table 3: Summary of consultation with the MOD regarding Aviation and Radar*

| Date                          | Contact Type | Topic   |
|-------------------------------|--------------|---|
| <b>Pre-Application</b>        |              |   |
| 1 <sup>st</sup> November 2019 | Email        | <ul style="list-style-type: none"> <li>• Trimmingham Air Defence Radar (ADR)</li> </ul> |

<sup>1</sup> The DIO Safeguarding Team ensures operational facilities such as aerodromes, explosive stores, radar facilities and range areas are not compromised by either onshore or offshore development



| Date                          | Contact Type                | Topic   |
|-------------------------------|-----------------------------|---|
|                               |                             | <ul style="list-style-type: none"> <li>• RAF Coningsby Air Traffic Control (ATC) Primary Surveillance Radar (PSR)</li> <li>• Landfall/Onshore - Weybourne Transmitter</li> <li>• Landfall/Onshore - Bacton</li> <li>• Lighting and Charting</li> <li>• UXO</li> </ul>                         |
| 2 <sup>nd</sup> July 2021     | eMeeting                    | <ul style="list-style-type: none"> <li>• Trimingham ADR</li> <li>• RAF Coningsby ATC PSR</li> <li>• Weybourne Transmitter</li> </ul>  |
| 8 <sup>th</sup> February 2022 | eMeeting                    | <ul style="list-style-type: none"> <li>• Trimingham ADR</li> <li>Air Defence and Offshore Wind - Working Together Towards Net Zero Suspensive Conditions</li> <li>• RAF Coningsby ATC PSR</li> <li>• Weybourne Transmitter</li> <li>Wide Area Multilateration (WAM)</li> </ul>                |
| 10 <sup>th</sup> August 2022  | eMail from DIO Safeguarding | <ul style="list-style-type: none"> <li>• Trimingham ADR               <ul style="list-style-type: none"> <li>○ Once relocated to Neatishead, MOD assessment predicts detectability across all array areas.</li> </ul> </li> </ul>   |
| 19 <sup>th</sup> January 2023 | eMail                       | <ul style="list-style-type: none"> <li>• Trimingham &amp; Neatishead ADR</li> <li>• Weybourne Transmitter</li> </ul>  |
| <b>Post-Application</b>       |                             |   |
| 31 <sup>st</sup> January 2023 | eMeeting                    | <ul style="list-style-type: none"> <li>• SoCG template and timeframes</li> <li>• Weybourne MoD</li> <li>• ADR deployed at RRH Trimingham and RRH Neatishead</li> <li>• ADR mitigation proposal and DCO condition</li> <li>• Serco process</li> <li>• OWIC/MOD coexistence strategy</li> </ul> |



*Table 4: Topics agreed, in discussion or not agreed in relation to Aviation and Radar*

| ID                                  | The Applicant Position  | MOD Position   | Position Summary |
|-------------------------------------|---|--|------------------|
| <b>EIA – Policy and Planning</b>    |   |  |                  |
| 1                                   | <p>The assessment of potential impacts upon Aviation and Radar has been made with specific reference to the relevant National Policy Statements (NPS).</p> <p>In addition to the NPS, legislation, policy and guidance applicable to the assessment of Aviation and Radar includes The Air Navigation Order (ANO) 2016 and Regulations (updated 2021) (Civil Aviation Publication (CAP) 393 and other related / associated CAPs).</p>   | <p>The assessment of potential impacts upon Aviation and Radar has been made with specific reference to the relevant National Policy Statements (NPS).</p> <p>In addition to the NPS, legislation, policy and guidance applicable to the assessment of Aviation and Radar includes The Air Navigation Order (ANO) 2021 (Civil Aviation Publication (CAP) 393).</p> | Agreed           |
| <b>EIA – Baseline Environment</b>   |   |  |                  |
| 2                                   | <p>The airspace within, above and surrounding the DEP and SEP offshore sites is used by both military and civil registered aircraft which observe the airspace rules according to the classification of airspace they are operating in as follows:</p> <ul style="list-style-type: none"> <li>•</li> <li>• Development has potential to be visible to and impact on the operation of Air Defence Radar – RRH Trimmingham.</li> <li>• Development has potential to be visible to and impact on the operation of Air Traffic Radar – RAF Coningsby PSR.</li> <li>• Aviation safety – Requirement for lighting and charting.</li> <li>• UXO</li> </ul> | <p>The Applicant has recognised the principal defence issues that will be of relevance to the progression of the proposed development.</p>   | Agreed           |
| <b>EIA – Assessment Methodology</b> |   |  |                  |
| 3                                   | <p>Chapter 6 EIA Methodology provides a summary of the general impact assessment methodology applied to DEP and SEP. Chapter 17 confirms the methodology used to assess the potential impacts on Aviation and Radar, consistent with that presented in Section 1.6 of the Scoping Report.</p>   | <p>Chapter 6 EIA Methodology provides a summary of the general impact assessment methodology applied to DEP and SEP. Chapter 17 confirms the methodology used to assess the potential impacts on Aviation and Radar, consistent with that presented in Section 1.6 of the Scoping Report.</p>  | Agreed           |



| ID  | The Applicant Position   | MOD Position  | Position Summary   |
|---|--|---|--|
| <b>EIA – Project-Alone Assessment Conclusions</b>           |  |   |  |
| 4   | Potential impacts on the following MOD receptors: <ul style="list-style-type: none"> <li>RAF Coningsby PSR</li> <li>Trimingham ADR / Neatishead ADR</li> <li>RAF Weybourne transmitter site</li> </ul>   | Potential impacts on the following MOD receptors: <ul style="list-style-type: none"> <li>RAF Coningsby PSR</li> <li>Trimingham ADR</li> <li>Neatishead ADR</li> <li>RAF Weybourne transmitter site</li> </ul> | Agreed   |
| <b>EIA – Cumulative Impact Assessment (CIA) Conclusions</b> |  |   |  |
| 5   | Potential cumulative impacts on the following MOD receptors: <ul style="list-style-type: none"> <li>Trimingham ADR</li> </ul> Neatishead ADR<br>Section 15.7 of the ES Chapter 15 – Aviation and Radar [APP-101] assess the Cumulative Impacts from the Project. |   | Agreed /<br>Not Agreed – no material impact<br>Not Agreed – material impact<br>In Discussion |
| <b>NSIP – Application</b>                                   |  |   |  |
| 6   | After communications with the MoD it is expected that the mitigation proposal will be submitted to the MOD for consideration and agreement by Deadline 3. This will look into the impacts on RRH Trimingham in more detail.                                      | Objects to the offshore element of the proposal on the grounds of the unacceptable impact that the development would have on air defence radar systems sited at RRH Trimingham.                               | In Discussion  |
| 7   | After communications with the MoD it is expected that the mitigation proposal will be submitted to the MOD for consideration and agreement by Deadline 3. This will look into the impacts on RRH Neatishead.in more detail.                                      | Objects to the offshore element of the proposal on the grounds of the unacceptable impact that the development would have on air defence radar systems sited at RRH Neatishead.                               | In Discussion  |
| 8   | Additional information has been provided to MoD. We don't believe there will be an impact on Weybourne.  | Following the submission of additional information an objection on the grounds of the unacceptable impact of the onshore element of the proposal on technical asset(s)  | Agreed   |



| ID  | The Applicant Position   | MOD Position  | Position Summary           |
|---|--|---|----------------------------|
|   |  | (communications equipment) sited at RAF Weybourne may now be withdrawn.   |                            |
| <b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b> |  |   |                            |
| 6   | Wording of Requirement 27 (Ministry of Defence surveillance operations) in Schedule 2 to the DCO   | The MOD requires that the developer submits an acceptable Air Defence radar mitigation proposal for MOD assessment. On receipt of any mitigation proposal, MOD will carry out assessments to determine acceptability or otherwise. Where a mitigation is found to be acceptable, formal discussions/acceptance of the requirement wording can take place. | Not agreed - In Discussion |
| 7   | Wording of Condition 10 (aviation safety) of the DMLs at Schedules 10 and 11, and condition 9 (aviation safety) of the DMLs at Schedules 12 and 13 | At this time MOD maintains an objection to the development and as such has not formally discussed or agreed the wording of the conditions applied to any Deemed Marine Licence. Should MOD be in a position to withdraw objections, formal discussions/acceptance of the requirement wording can take place.  | Not agreed - In Discussion |
| <b>Other Matters as Required</b>  |  |   |                            |
| 8   |  |   |                            |

### 3 Signatures

14. The above draft Statement of Common Ground is agreed between Equinor New Energy Limited and *Ministry of Defence* on the day specified below.

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of the **Ministry of Defence**

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of **Equinor New Energy Limited**



## References

Department for Communities and Local Government (2015) Planning Act 2008: Guidance for the examination of applications for development consent. [Online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418015/examinations\\_guidance-\\_\\_final\\_for\\_publication.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418015/examinations_guidance-__final_for_publication.pdf). Accessed 05/07/2022.