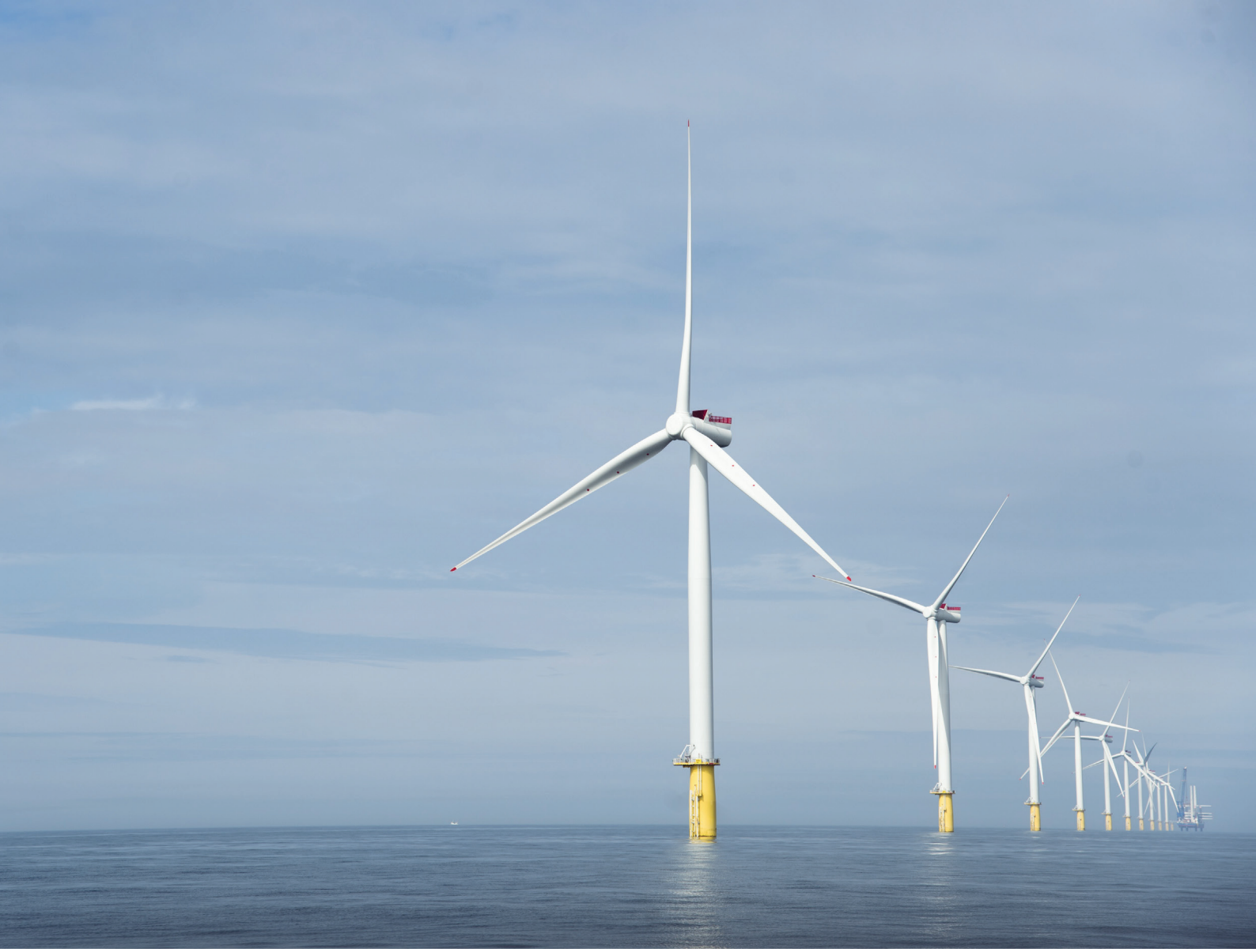

Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

Draft Statement of Common Ground: UK Chamber of Shipping

Revision A
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Glossary of Acronyms

CIA	Cumulative Impact Assessment
DCO	Development Consent Order
DECC	Department for Energy and Climate Change
DEFRA	Department for the Environment and Rural Affairs
DEL	Dudgeon Extension Limited
DEP	Dudgeon Offshore Wind Farm Extension Project
DOW	Dudgeon Offshore Wind Farm
EIA	Environmental Impact Assessment
EPP	Evidence Plan Process
ES	Environmental Statement
HVAC	High-Voltage Alternating Current
HVDC	High-Voltage Direct Current
km	Kilometre
MGN	Marine Guidance Note
MW	Megawatts
OWF	Offshore Wind Farm
PEIR	Preliminary Environmental Information Report
SEL	Scira Extension Limited
SEP	Sheringham Offshore Wind Farm Extension Project
SoCG	Statement of Common Ground
SOW	Sheringham Shoal Offshore Wind Farm
UK	United Kingdom

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 onshore site	The Dudgeon Offshore Wind Farm Extension onshore area consisting of the DEP onshore substation site, onshore cable corridor, construction compounds, temporary working areas and onshore landfall area.
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.
Horizontal directional drilling (HDD) zones	The areas within the onshore cable route which would house HDD entry or exit points.
Infield cables	Cables which link the wind turbine generators to the offshore substation platform(s) (commonly referred to as array cables).
Interlink cables	Cables linking two separate project areas.
Interlink cable corridor	This is the area which will contain the interlink cables between offshore substation platform/s and the adjacent Offshore Temporary Works Area.
Landfall	The point at the coastline at which the offshore export cables are brought onshore, connecting to the onshore cables at the transition joint bay above mean high water
Offshore cable corridors	This is the area which will contain the offshore export cables or interlink cables, including the adjacent Offshore Temporary Works Area.
Offshore export cable corridor	This is the area which will contain the offshore export cables between offshore substation platform/s and

	landfall, including the adjacent Offshore Temporary Works Area.
Offshore export cables	The cables which would bring electricity from the offshore substation platform(s) to the landfall. 220 – 230kV.
Offshore scoping area	An area presented at Scoping stage that encompassed all planned offshore infrastructure, including landfall options at both Weybourne and Bacton, allowing sufficient room for receptor identification and environmental surveys. This has been refined following further site selection and consultation for the PEIR and ES.
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.
Onshore cable corridor	The area between the landfall and the onshore substation sites, within which the onshore cable circuits will be installed along with other temporary works for construction.
Onshore export cables	The cables which would bring electricity from the landfall to the onshore substation. 220 – 230kV.
Onshore Substation	Compound containing electrical equipment to enable connection to the National Grid.
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 onshore site	The Sheringham Shoal Wind Farm Extension onshore area consisting of the SEP onshore substation site, onshore cable corridor, construction compounds, temporary working areas and onshore landfall area.
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 Sheringham Extension Limited (SEL) and Dudgeon Extension Limited (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 Chamber of Shipping*. 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 Chamber of Shipping. The applicable matters considered within this draft SoCG apply to Chamber of Shipping's non-statutory remit as shipping and navigation consultees.
4. Table 1 presents the topics included in the draft SoCG with the Applicant and the Chamber of Shipping.

Table 1: Topics included in the draft SoCG

Topic/Chapter	Reference	Evidence Plan Process (EPP) (Yes/No)
Shipping and Navigation	**Environmental Statement Chapter 13 – Shipping Navigation** [APP-099] and **Environmental Statement Appendix 13.1 – Navigation Risk Assessment** [APP-198]	No

5. Further detail of this topic 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 Chamber of Shipping* are included within this draft SoCG. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicant and *the Chamber of Shipping* 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 Chamber of Shipping*. The phrase "Not Agreed" identifies any point that is not agreed between the Applicant and *the Chamber of Shipping*.

1.2 The Development

8. SEP and DEP will each have a maximum export capacity greater than 100 megawatts (MW). The SEP and DEP wind farm sites are 15.8 kilometres (km) and 26.5km from the coast for SEP and DEP respectively at their closest point. When operational, SEP and DEP combined would have the potential to generate

renewable power for around 785,000 United Kingdom (UK) homes from up to 23 wind turbines at SEP and up to 30 wind turbines at DEP.

9. SEP and DEP will be connected to shore by offshore export cables installed to the landfall at Weybourne, on the north Norfolk coast. From there, the onshore export cables travel approximately 60km inland to a new high voltage alternating current (HVAC) onshore substation near to the existing Norwich Main substation. The onshore substation will be constructed to accommodate the connection of both SEP and DEP to the transmission grid.

10. The key offshore components will comprise:

- Offshore wind turbines and their associated foundations;
- Offshore Substation Platform/s (OSP/s) and their associated foundations;
- Scour protection around foundations;
- Subsea cables comprising:
  - Offshore export cables (linking the OSP/s to the landfall)
  - Interlink cables (linking two separate Project areas)
  - Infield cables (linking the wind turbine generators to the OSP/s)
  - External cable protection on subsea cables as required
  - Fibre optic communications cables integrated with the power cables; and
- Temporary working areas.

11. The key components at the landfall will comprise:

- Up to two ducts (one per Project) installed under the cliff by Horizontal Directional Drilling (HDD). An additional drill per Project is included (four in total) in the impact assessment worst-case scenarios where applicable, for contingency purposes in the unlikely event of HDD failure; and
- Up to two transition joint bays to house the connection between the offshore and onshore cables.

12. The key onshore components will comprise:

- Ducts installed underground to house the electrical cables along the onshore cable corridor;
- Onshore cables installed within ducts;
- Joint bays and links boxes installed along the cable corridor;
- Trenchless crossing zones at certain locations such as some roads, railways, and sensitive habitats (e.g. rivers of conservation importance);
- Temporary construction compounds and accesses;
- An onshore substation and onward 400kV connection to the existing Norwich Main substation; and
- Permanent operational substation access.

1.3 Consultation with the Chamber of Shipping

13. The Applicant has engaged with *the Chamber of Shipping* 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.

14. During the statutory Section 42 consultation, *the Chamber of Shipping* provided comments on the Preliminary Environmental Information Report (PEIR) by way of a letter dated 09/06/2021.

15. Further to this, five meetings were held with *the Chamber of Shipping* through the pre application process. These are detailed within the SoCG and minutes of the meetings are provided as Appendices to the Consultation Report (APP-030).

1.4 Summary of 'Agreed', 'Not Agreed' and 'In Discussion' Matters

16. 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.

17. Details on specific matters that are 'agreed', 'not agreed' or 'in discussion' between the Applicant and *the Chamber of Shipping are* presented in **Table 4**.

Table 2: Position status key

Position Status	Position Colour Coding
Agreed The matter is considered to be agreed between the parties.	Agreed
Not Agreed – no material impact The matter is not agreed between the parties; however, the outcome of the approach taken by either the Applicant or *the Chamber of Shipping* 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
Not Agreed – material impact The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or *the Chamber of Shipping* is considered to result in a materially different impact to the assessment conclusions.	Not Agreed – material impact
In discussion 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 Chamber of Shipping*	In discussion

2 Statement of Common Ground

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

2.1 Shipping and Navigation

Table 3: Summary of consultation with the Chamber of Shipping regarding Shipping and Navigation Matters

Date	Contact Type	Topic
Pre-Application		
30/09/2020	Online Meeting	Introduction to DEP and SEP
09/06/2021	PEIR response	Section 42 responses provided by the Chamber of Shipping
16/07/2021	Online meeting	Meeting to discuss Section 42 responses received by the Chamber of Shipping on the PEIR.
10/08/2021	Hazard workshop	Group stakeholder meeting to review the Navigation Risk Assessment hazard log.
10/02/2022	Online meeting	Project update and discussion of further actions since the Section 42 responses from the Chamber of Shipping.
16/08/2022	Online meeting	Commencement of SOCG
Post-Application		
14/10/2022	Relevant Representation	Relevant represents submitted to the Planning Inspectorate
11/01/2023	Online meeting	Further discussion on SOCG
27/02/2023	Online meeting	Discussion regarding matters agreed, in discussion and not agreed.

Table 4: Topics agreed, in discussion or not agreed in relation to Shipping and Navigation

ID	The Applicant Position	*The Chamber of Shipping* Position	Position Summary
Consultation			
1	The Chamber of Shipping (COS) has been adequately consulted on shipping and navigation matters to date. This includes consultation with COS members that were identified in regular operator consultation or responded at PEIR.	No further comment	Agreed
NRA and EIA – Baseline Environment and Data			
2	**Marine Traffic Surveys** The vessel traffic surveys were conducted in accordance with Marine Guidance Note 654 (Maritime and Coastguard Agency, 2021) and therefore suitable for the assessment.	No further comment	Agreed
3	**Secondary Data Sources** Other supporting data sources as detailed within the NRA (APP-198) adequately inform the shipping and navigation baseline.	No further comment	Agreed
4	**Baseline Environment** The data presented within the NRA (APP-198) and Environmental Statement (ES) Shipping and Navigation Chapter (APP-125) adequately identifies shipping and navigation baseline.	No further comment	Agreed
NRA and EIA - Assessment Methodology			
5	**NRA and EIA Methodology** The assessment has been undertaken in line with relevant shipping and navigation legislation and guidance including MGN 654.	No further comment noting item ID 6	Agreed
6	**Interpretation on Corridor Calculation** MGN 654 requires that where turbines are present on both sides of a sea area, the required width requirement should be proportional to the length of area bordered on both sides by wind turbines, based on a 20-degree course deviation. In the case of the wind farm sites, the length of the area bordered on “both sides” by wind turbines is of length 11.2nm, meaning that the required minimum width is 4.1nm. As shown in Figure 18.1 (NRA APP-198) the width of the area is in excess of this at 5.6nm, and hence the area is demonstrated as compliant. These calculations have been applied based upon the interpretation implied by the wording of MGN 654, whereby the area must be bordered on “both sides” by turbines.	The Chamber does not agree with the narrow interpretation of paragraph 4.7.f of MGN 654 used by the developer for the calculation of corridor width between OWFs. The Chamber does not believe the narrow interpretation used fully takes into account “the general location, sea area involved and nearby structures and installations” as required by the MCA. The Chamber acknowledges these concerns are referenced in paragraphs 322-325 of Document	In Discussion – the Applicant and CoS are currently discussing the assessment of the corridor and available sea room.

ID	The Applicant Position	*The Chamber of Shipping* Position	Position Summary
		6.3.13.1 but disagrees with some of the explanation in particular with regard to the western extent of the northern part of DEP.	
7	**Future Case Methodology** The approach to the assessment of impacts is deemed appropriate for the purposes of predicting changes to the baseline environment. This includes modelling of base case plus future case and adverse weather routeing.	No further comment	Agreed
NRA and EIA – Assessed Boundary and Worst Case			
8	**Worst Case** The worst case for shipping and has been appropriately identified and assessed. This includes the maximum build out of turbines within the site boundaries and consideration of a single line of orientation.	No further comment	Agreed
EIA – Impact Assessment Conclusions			
9	**Impact Identification** The impacts identified adequately address and capture the potential effects on shipping and navigation that may result from the Project.	No further comment	Agreed
10	**Impact Significance - Project in isolation** Whilst it is noted that the COS maintain concerns about the cumulative impact of offshore windfarms in general, they are content that the in-isolation impacts have been adequately assessed within the SEP and DEP NRA (APP-198) and the ES Shipping and Navigation Chapter (APP-125) and that the impacts are within as low as reasonably practicable limits with the proposed mitigation and monitoring requirements.	The Chamber has concerns around the western extent of the northern element of DEP and believes it unnecessarily protrudes into a busy shipping channel impacting navigational safety and is a sub-optimal use of seabed. This disagreement however is not material to the in isolation impact significance of the wind farm array areas but advocates for commitments not to build out into this section of the PDE.	Not Agreed – no material impact
11	**Cumulative Impacts** As above whilst it is noted that the COS maintain concerns about the cumulative impact of offshore windfarms, in general they are content that the cumulative impacts have been adequately assessed within the SEP and DEP NRA (APP-	The Chamber has navigational safety and effective sea room management concerns about the cumulative impact of offshore windfarms in the area and calls for developer to ensure that available sea room for renewable energy production is not	Not Agreed – no material impact

ID	The Applicant Position	*The Chamber of Shipping* Position	Position Summary
	198) and the ES Shipping and Navigation Chapter (APP-125) and that the impacts are tolerable with the proposed mitigation and monitoring requirements.	squandered through build out of WTGs across the full site at the expense of navigable sea room.	
Other Matters as Required			
12	**Decommissioning Plan** At the end of the operational life of the wind farms, SEP and DEP will be decommissioned, in line with TCE AfL requirements. Under the Energy Act (2004), a decommissioning programme must be submitted to and approved by BEIS as secured through Requirement 8 of the Draft DCO (document reference 3.1), a draft of which will be submitted prior to the start of construction. As such, the scope of the decommissioning works would be determined by the relevant legislation and guidance at the time. It is anticipated that all structures above the sea bed or ground level will be completely removed, including all of the wind turbine components and the parts of the foundations above sea bed level.	The Chamber advocates for the removal of all infrastructure to a safe level below the seabed to allow for future safe navigation, returning the seabed to its original state and not hindering future activity or development. The Chamber recognises this may not always be physically possible but asserts that economic arguments against full removal should not be strongly weighted.	Agreed

3 Signatures

19. The above draft Statement of Common Ground is agreed between Equinor New Energy Limited and *the Chamber of Shipping* on the day specified below.

Signed: _____[redacted]_____

Print Name: _____ROBERT MERRYLEES_____

Job Title: ____Policy Manager (Safety & Nautical) & Analyst ____

Date: _____03 March 2023_____

Duly authorised for and on behalf of the **Chamber of Shipping**

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. Accessed 05/07/2022.

Maritime and Coastguard Agency (2021). Marine Guidance Note (MGN) 654 Safety of Navigation: Offshore Renewable Energy Installations (OREIs) - Guidance on UK Navigational Practice, Safety and Emergency. [Online] Available at: Response https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/980898/MGN_654_-_FINAL.pdf