



Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

Final Statement of Common Ground with Ministry of Defence

Revision B

Deadline 7

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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 9th 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

Team¹) 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
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 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
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 MOD 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 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
Pre-Application		
1 st November 2019	Email	<ul style="list-style-type: none"> • Trimmingham Air Defence Radar (ADR)

¹ 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"> • RAF Coningsby Air Traffic Control (ATC) Primary Surveillance Radar (PSR) • Landfall/Onshore - Weybourne Transmitter • Landfall/Onshore - Bacton • Lighting and Charting • UXO
2 nd July 2021	eMeeting	<ul style="list-style-type: none"> • Trimingham ADR • RAF Coningsby ATC PSR • Weybourne Transmitter
8 th February 2022	eMeeting	<ul style="list-style-type: none"> • Trimingham ADR Air Defence and Offshore Wind - Working Together Towards Net Zero Suspensive Conditions • RAF Coningsby ATC PSR • Weybourne Transmitter Wide Area Multilateralation (WAM)
10 th August 2022	eMail from DIO Safeguarding	<ul style="list-style-type: none"> • Trimingham ADR <ul style="list-style-type: none"> ○ Once relocated to Neatishead, MOD assessment predicts detectability across all array areas.
19 th January 2023	eMail	<ul style="list-style-type: none"> • Trimingham & Neatishead ADR • Weybourne Transmitter
Post-Application		
31 st January 2023	eMeeting	<ul style="list-style-type: none"> • SoCG template and timeframes • Weybourne MoD • ADR deployed at RRH Trimingham and RRH Neatishead • ADR mitigation proposal and DCO condition • Serco process • OWIC/MOD coexistence strategy
4 th July 2023	eMeeting	<ul style="list-style-type: none"> • SoCG • DCO wording



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

ID	The Applicant Position	MOD Position	Position Summary
EIA – Policy and Planning			
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
EIA – Baseline Environment			
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"> • • Development has potential to be visible to and impact on the operation of Air Defence Radar – RRH Trimmingham. • Development has potential to be visible to and impact on the operation of Air Traffic Radar – RAF Coningsby PSR. • Aviation safety – Requirement for lighting and charting. • UXO 	<p>The Applicant has recognised the principal defence issues that will be of relevance to the progression of the proposed development.</p>	Agreed
EIA – Assessment Methodology			
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
EIA – Project-Alone Assessment Conclusions			
4	Potential impacts on the following MOD receptors: <ul style="list-style-type: none"> • RAF Coningsby PSR • Trimmingham ADR / Neatishead ADR • RAF Weybourne transmitter site 	Potential impacts on the following MOD receptors: <ul style="list-style-type: none"> • RAF Coningsby PSR • Trimmingham ADR • Neatishead ADR • RAF Weybourne transmitter site 	Agreed
EIA – Cumulative Impact Assessment (CIA) Conclusions			
5	Potential cumulative impacts on the following MOD receptors: <ul style="list-style-type: none"> • Trimmingham ADR • Neatishead ADR Section 15.7 of the ES Chapter 15 – Aviation and Radar [APP-101] assess the Cumulative Impacts from the Project.	Potential cumulative impacts on the following MOD receptors: <ul style="list-style-type: none"> • Trimmingham ADR • Neatishead ADR 	Agreed
NSIP – Application			
6	Additional information looking into the impacts on RRH Trimmingham in more detail has been provided to MoD.	Following the submission of additional information, the MOD is content that, subject to any DCO containing an appropriately worded suspensive requirement, the objection on the grounds of the unacceptable impact of the onshore element of the proposal on air defence (AD) radar systems sited at RRH Trimmingham may now be withdrawn.	Agreed
7	Additional information looking into the impacts on RRH Neatishead in more detail has been provided to MoD.	Following the submission of additional information, the MOD is content that, subject to any DCO containing an appropriately worded suspensive requirement, the objection on the grounds of the unacceptable impact of the onshore element of the proposal on air defence (AD) radar systems sited at RRH Neatishead may now be withdrawn.	Agreed



ID	The Applicant Position	MOD Position	Position Summary
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) (communications equipment) sited at RAF Weybourne may now be withdrawn.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring			
9	<p>Wording of Requirement 27 (Ministry of Defence surveillance operations) in Schedule 2 to the DCO.</p> <p>The Applicant has included the proposed wording in the draft DCO (Revision J) submitted at Deadline 7 (document reference 12.27).</p>	The MOD has provided a requirement wording designed to secure the provision of appropriate mitigation of the impacts of the development on Air Defence radar systems within Annex A of the updated positions submission at Deadline 7. The Applicant and the MoD are in agreement that the DCO requirement wording adequately secures the need for ADR mitigation.	Agreed
10	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.	MOD agree that these conditions are both necessary and appropriate to secure aviation safety lighting and suitable charting, no changes to the wording within the draft Development Consent Order are requested.	Agreed



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: James Houghton

Print Name: James Houghton

Job Title: Senior Safeguarding Manager
(Defence Infrastructure Organisation – Estates – Safeguarding)

Date: 10 July 2023

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

Signed: 

Print Name: Sarah Chandler

Job Title: Head of Consenting, Europe

Date: 10 July 2023

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.