



## TRINITY HOUSE

The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

Your Ref: **EN010109**  
Identification No. **20032913**

10 July 2023

Dear Sir / Madam,

**The Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore  
Wind Farm Extension Project  
Written Response to Examining Authority's Fourth Written Questions and Requests for  
Information (WQ4) for Deadline 8**

We refer to the above application for Development Consent and the Examining Authority's (ExA) Fourth Written Questions and Requests for Information (WQ4) issued on 29 June 2023.

**Question: Q4.1.4.1:**

**Statement of Common Ground (SoCG)**

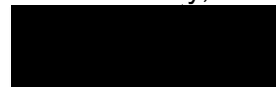
- a) *Applicant, submit final signed SoCG with electronic signatures at Deadline 8.*
- b) *Relevant parties, submit at D8 your confirmation that the final signed SoCG submitted by the Applicant is the version agreed with you. You may do so, by attaching to your submission the copy of the SoCG that is agreed with you.*

**Trinity House Response:-**

Trinity House would confirm that the final signed SoCG (Revision B) to be submitted by the Applicant at Deadline 8 dated 10 July 2023 (as attached) is the version agreed by Trinity House.

We trust that this response is helpful and would ask that all correspondence regarding this matter is addressed to myself at russell.dunham@trinityhouse.co.uk and to Mr Steve Vanstone at navigation@trinityhouse.co.uk

Yours faithfully,



Russell Dunham ACII  
Legal Advisor

@trinityhouse.co.uk



# Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

Draft Statement of Common Ground with Trinity House  
(Revision B)

**Revision B**

Deadline 7

July 2023

Document Reference: 12.19

|   |                  |
|---|------------------|
| Title:  |                  |
| <b>Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects<br/>Draft Statement of Common Ground: Trinity House</b> |                  |
| PINS Document no.: 12.19  |                  |
| Document no.: C282-AN-Z-GA-00007  |                  |
| Revision:<br>B  |                  |
| Date:   | Classification   |
| <b>July 2023</b>  | <b>Draft</b>     |
| Prepared by:  |                  |
| <b>Royal HaskoningDHV</b>   |                  |
| Approved by:  | Date:            |
| <b>Tom Morris, Equinor</b>  | <b>July 2023</b> |

## Table of Contents

|          |   |           |
|----------|---|-----------|
| <b>1</b> | <b>Introduction .....</b>   | <b>8</b>  |
| 1.1      | Background .....  | 8         |
| 1.2      | The Development.....  | 8         |
| 1.3      | Consultation with <i>Trinity House</i> .....                        | 10        |
| 1.4      | Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ Matters ..... | 10        |
| <b>2</b> | <b>Statement of Common Ground.....</b>                              | <b>10</b> |
| 2.1      | Shipping and Navigation .....                                       | 11        |
| <b>3</b> | <b>Signatures.....</b>  | <b>14</b> |
|          | <b>References .....</b>   | <b>15</b> |

## Table of Tables

|  |    |
|--|----|
| Table 1: Topics included in the draft SoCG.....  | 8  |
| Table 2: Position status key.....  | 10 |
| Table 3: Summary of consultation with Trinity House regarding shipping and navigation.....               | 11 |
| Table 4: Topics agreed, in discussion or not agreed in relation to Shipping and Navigation Matters ..... | 12 |

## Glossary of Acronyms

|      |   |
|------|---|
| CIA  | Cumulative Impact Assessment                    |
| DCO  | Development Consent Order                       |
| 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.  |
| Separated Grid Option                                       | Transmission infrastructure which allows each project to transmit electricity entirely separately.   |
| 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 *Trinity House*. 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 *Trinity House*. The applicable matters considered within this draft SoCG apply to *Trinity House's* statutory remit which includes *shipping and navigation*.
4. **Table 1** presents the topics included in the draft SoCG with the Applicant and *Trinity House*.

*Table 1: Topics included in the draft SoCG*

| Topic/Chapter           | Reference   | Evidence Plan Process (EPP) (Yes/No) |
|-------------------------|---|--------------------------------------|
| Shipping and Navigation | <b>Environmental Statement Chapter 13 – Shipping Navigation</b> APP-099 and <b>Environmental Statement Appendix 13.1 – Navigation Risk Assessment</b> APP-198 | 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 *Trinity House* are included within this draft SoCG. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicant and *Trinity House* 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 *Trinity House*. The phrase “Not Agreed” identifies any point that is not agreed between the Applicant and *Trinity House*.

### 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 *Trinity House*

13. The Applicant has engaged with *Trinity House* 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, *Trinity House* provided comments on the Preliminary Environmental Information Report (PEIR) by way of a letter dated 10<sup>th</sup> June 2021.
15. Further to this, three meetings were held with *Trinity House* through the pre-application process. These are detailed throughout 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 *Trinity House* 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 <i>Trinity House</i> 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 <i>Trinity House</i> 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 <i>Trinity House</i> ).   | In discussion                   |

## 2 Statement of Common Ground

18. A summary of the consultation undertaken to date with *Trinity House* and the matters agreed, in discussion or not agreed (based on discussions and information exchanged between the Applicant and *Trinity House* 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 Trinity House regarding shipping and navigation*

| Date                    | Contact Type            | Topic  |
|-------------------------|-------------------------|--|
| <b>Pre-Application</b>  |                         |  |
| 16/10/2018              | Scoping Response        | Scoping opinion responses provided by Trinity House.                             |
| 25/09/2018              | Meeting                 | Introduction to DEP and SEP.   |
| 15/06/2020              | Online Meeting          | Meeting to discuss approach to layouts.  |
| 10/06/2021              | PEIR response           | Section 42 responses provided by Trinity House.                                  |
| 10/08/2021              | Hazard workshop         | Group Trinity House meeting to review the Navigation Risk Assessment hazard log. |
| 11/03/2022              | Online Meeting          | Project updates and layout discussions   |
| <b>Post-Application</b> |                         |  |
| 24/11/2022              | Relevant Representation | Relevant represents submitted to the Planning Inspectorate                       |
| 10/01/2023              | Online Meeting          | Introduction and initial conversations on the SoCG                               |
|                         |                         |  |

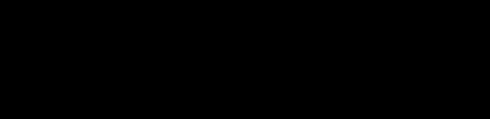
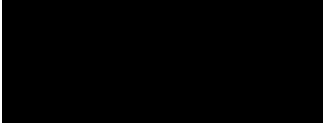
**Table 4: Topics agreed, in discussion or not agreed in relation to Shipping and Navigation Matters**

| ID  | The Applicant Position   | Trinity House Position   | Position Summary |
|---|--|--|------------------|
| <b>Consultation</b>                                   |  |  |                  |
| 1   | Trinity House has been adequately consulted on shipping and navigation matters to date.  |  | Agreed           |
| <b>NRA and EIA – Baseline Environment and Data</b>    |  |  |                  |
| 2   | <b>Marine Traffic Surveys</b> The vessel traffic surveys were conducted in accordance with Marine Guidance Note (MGN) 654 (Maritime and Coastguard Agency, 2021) and therefore suitable for assessment.  | This would ultimately be for the MCA to determine but Trinity House consider the assessment suitable for our purposes. | Agreed           |
| 3   | <b>Secondary Data Sources</b> Other supporting data sources as detailed within the NRA (APP-198) adequately inform the shipping and navigation baseline.   |  | Agreed           |
| 4   | <b>Baseline Environment</b> The data presented within the NRA (APP-198) and Environmental Statement (ES) Shipping and Navigation Chapter (APP-125) adequately identifies shipping and navigation baseline including main routes operating within the area.                         |  | Agreed           |
| <b>NRA and EIA - Assessment Methodology</b>           |  |  |                  |
| 5   | <b>NRA and EIA Methodology</b> The assessment has been undertaken in line with relevant shipping and navigation legislation and guidance including being compliant with MGN 654 requirements.  | As per item 2 above.   | Agreed           |
| 6   | <b>Future Case Methodology</b> 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.                             |  | Agreed           |
| <b>NRA and EIA – Assessed Boundary and Worst Case</b> |  |  |                  |
| 7   | <b>Worst Case</b> The worst case for shipping as identified in the NRA (APP-198) and ES Shipping and Navigation Chapter (APP-125) has been assessed. This includes the maximum build out of turbines within the site boundaries and consideration of a single line of orientation. | Trinity House is content that a realistic worst case scenario has been assessed.                                       | Agreed           |

| ID   | The Applicant Position  | Trinity House Position  | Position Summary |
|--|---|---|------------------|
| 8  | <b>Layout Commitments</b> As per the meeting held on the 11 <sup>th</sup> March 2022 and email dated 29 <sup>th</sup> March 2022 Trinity House are content with the Layout Commitments detailed in Table 20.2 of the NRA (APP-198).   |   | Agreed           |
| <b>EIA – Impact Assessment Conclusions</b>   |   |   |                  |
| 9  | <b>Hazard (Impact) Identification</b> The hazards (impacts) identified adequately capture the potential effects on shipping and navigation that may result from the Project.  |   | Agreed           |
| 10   | <b>Risk Level (Impact Significance) - Project in isolation</b> Based on the information provided within NRA (APP-198) and the ES Shipping and Navigation Chapter (APP-125) it is agreed that in isolation hazards (impacts), including main route deviations caused by the project and impacts on search & rescue, are unlikely to be significant with the mitigation measure and monitoring detailed in place. |   | Agreed           |
| 11   | <b>Risk Level (Impact Significance) - Cumulative</b> Based on the information provided within NRA (APP-198) and the ES Shipping and Navigation Chapter (APP-125) it is agreed that cumulative hazards (impacts), including main route deviations, are unlikely to be significant with the mitigation measures and monitoring detailed in place.   | Agreed in terms of navigational safety, however, Trinity House cannot comment on the significance in relation to individual commercial interests. | Agreed           |
| <b>Draft DCO / Mitigation and Monitoring</b> |   |   |                  |
| 12   | Ongoing discussions between Trinity House and the Applicant in relation to Arbitration Clause.  | Trinity House is content with the draft DCO/DML at the time of sign off.  | Agreed           |
| <b>Other Matters as Required</b>             |   |   |                  |
| 13   | Not Required  |   |                  |

### 3 Signatures

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

|  |
|--|
| <p>Signed: </p> <p>Print Name: <u>    T.B.Harris    </u></p> <p>Job Title: <u>    Navigation (Examiner) Manager    </u></p> <p>Date: <u>    05/07/23    </u></p> <p>Duly authorised for and on behalf of the <b>Trinity House</b></p>         |
| <p>Signed: </p> <p>Print Name: <u>    T. R. Morris    </u></p> <p>Job Title: <u>    Offshore Consents Lead    </u></p> <p>Date: <u>    10/07/2023    </u></p> <p>Duly authorised for and on behalf of <b>Equinor New Energy Limited</b></p> |

## 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.

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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/980898/MGN_654_-_FINAL.pdf)