



# FIVE ESTUARIES OFFSHORE WIND FARM

## STATEMENT OF COMMON GROUND THE UNITED KINGDOM CHAMBER OF SHIPPING

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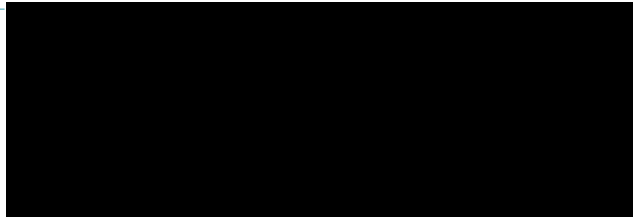
In preparation of this document Five Estuaries Wind Farm Ltd has made reasonable efforts to ensure that the content is accurate, up to date and complete for purpose.

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## DEFINITION OF ACRONYMS

Term	Definition
DCO	Development Consent Order
ECC	Export Cable Corridor
ES	Environmental Statement
ETGs	Expert Topic Groups
km	Kilometre
MGN	Marine Guidance Note
MW	Megawatts
NIP	Navigation Installation Plan
nm	Nautical Mile
NRA	Navigational Risk Assessment
NSIP	National Significant Infrastructure Project
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
VEOWF	Five Estuaries Offshore Wind Farm



## 1 INTRODUCTION

### 1.1 BACKGROUND

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared between Five Estuaries Offshore Wind Farm Limited (hereafter referred to as ‘the Applicant’) and the UK Chamber of Shipping to set out the areas of agreement and disagreement between the two parties in relation to the proposed Development Consent Order (DCO) application for the Five Estuaries Offshore Wind Farm (hereafter referred to as “VEOWF”).
- 1.1.2 Following detailed discussions undertaken between the parties, the Applicant and the UK Chamber of Shipping have sought to progress a SoCG. It is the intention that this document provides the Planning Inspectorate with a clear overview of the level of common ground between both parties. This document will be updated if any additional points are identified or any positions change during the Examination.

### 1.2 APPROACH TO SOCG

- 1.2.1 This SoCG sets out the topic, a brief summary of the issue or matter subject to disagreement or agreement, the position of the Applicant and that of the UK Chamber of Shipping, and a colour coding to illustrate the level of agreement and/or materiality.
- 1.2.2 A full description of the approach adopted is set out in 9.33 Approach to Statements of Common Ground [APP-266] submitted as part of the DCO application.

### 1.3 THE PROPOSED DEVELOPMENT

- 1.3.1 VEOWF is the proposed extension to the operational Galloper Offshore Wind Farm. The project includes provision for the construction, operation, maintenance and decommissioning of an offshore wind farm located approximately 37 kilometres (km) (20 nautical miles (nm)) off the coast of Suffolk at its closest point in the southern North Sea; including up to 79 wind turbine generators and associated infrastructure making landfall at Sandy Point between Frinton-on-Sea and Holland-on-Sea, the installation of underground cables, and the construction of an electrical substation and associated infrastructure near to the existing Lawford Substation to the west of Little Bromley in order to connect the development to National Grid’s proposed East Anglia Connection Node substation, which would be located nearby.
- 1.3.2 All onshore connection infrastructure would be located in the administrative area of Tendring District Council, within Essex County Council. VEOWF will have an overall capacity of greater than 100 Megawatts (MW) and therefore constitutes a Nationally Significant Infrastructure Project (NSIP) under Section 15 (3) of the Planning Act 2008.
- 1.3.3 A full Project description is included in the Environmental Statement (ES), in particular 6.2.1 Offshore Project Description [APP-069] and 6.3.1 Onshore Project Description [APP-083].



## 2 THE UK CHAMBER OF SHIPPING'S REMIT

### 2.1 INTRODUCTION

- 2.1.1 The UK Chamber of Shipping is the trade association for the UK shipping industry, representing dry and wet trades, passenger transport (cruise & ferry), offshore supply and construction, towage and specialist, as well as professional service providers with shipping interests.
- 2.1.2 The following application documents have informed the discussions with the UK Chamber of Shipping and address the elements of VEOWF that may affect the interests of the interested party:
- > 6.2.9 Shipping and Navigation [APP-078]
  - > 9.10 Navigational Risk Assessment [APP-240]
  - > 9.20 Outline Navigation Installation Plan [REP1-039]
- 2.1.3 The main area of interest raised by The UK Chamber of Shipping was the assessment of navigational safety issues particularly in relation to commercial vessel operators, alongside ensuring the impact to commercial operation and environmental performance are avoided or minimised as far as possible.
- 2.1.4 The UK Chamber of Shipping and the Applicant have been working together to avoid and minimise possible impacts of the project of concern to the UK Chamber of Shipping.

### 2.2 CONSULTATION SUMMARY

- 2.2.1 Since 2019, the project has been engaging with relevant stakeholders through different levels of activity. The project has undertaken the necessary consultations before submitting the application and has held Expert Topic Groups (ETGs) on a number of specific topics, as well as bilateral meetings with key stakeholders. The comments received and the meetings between the project and the interested party have informed the basis for this SoCG and are presented in Table 2.1.

**Table 2.1 UK Chamber of Shipping Consultation Overview**

Date	Consultation Type	Consultation
03 November 2021	Scoping response	Feedback following the VEOWF Scoping report.
07 April 2022	Virtual meeting	Meeting alongside DFDS Seaways to discuss VEOWF array area boundary following the project design updates.
20 October 2022	In person hazard workshop	Discussion on the potential hazards of VEOWF, as well as mitigation measures to be applied.



Date		Consultation Type	Consultation
12 May 2023	Section response	42	Feedback following review of the VEOWF Navigational Risk Assessment (NRA) at the Preliminary Environmental Information Report (PEIR) stage.
26 July 2023	Virtual meeting		Discussion including DFDS Seaways to discuss amendments to the array area following PEIR.
29 August 2023	Virtual meeting		Continuation of discussions on amendments to the array area.
25 January 2024	Hazard Workshop virtual follow-up Meeting		Review of potential hazards and mitigation measures for VEOWF following project updates and refinements.
16 July 2024	Virtual meeting		Provide an update on project status and discuss requirements for the SoCG.
25 November 2024	Email correspondence		Further discussion on SoCG.
25 February 2025	Email correspondence		Final discussion on SoCG





### 3 AGREEMENTS LOG

- 3.1.1 The following sections of this SoCG set out the level of agreement between the Applicant and the UK Chamber of Shipping for the relevant areas of interest identified in paragraph 2.1.3. The tables below detail the positions of the Applicant alongside those of the UK Chamber of Shipping and whether the matter is agreed or not agreed.
- 3.1.2 In order to easily identify whether a matter is 'agreed', 'not agreed' or an 'ongoing point of discussion', the agreements logs in the tables below are colour coded to represent the status of the position according to the criteria in Table 3.1 below. Colours were chosen in order to ensure inclusivity for the visibility of data.

**Table 3.1 Position Status Key**

<b>POSITION STATUS</b>	<b>COLOUR CODE</b>
The matter is considered to be agreed between the parties.	<b>Agreed</b>
The matter is neither 'agreed' or 'not agreed' and is a matter where further discussion is required between the parties, for example where relevant documents are being prepared or reviewed.	<b>Ongoing point of discussion</b>
The matter is not agreed between the parties.	<b>Not agreed</b>



**Table 3.2 Status of Discussions**

Reference Number	Topic	Applicant's position	UK Chamber of Shipping's Position	Position Status
CoS1	Consultation	The UK Chamber of Shipping has been adequately consulted regarding shipping and navigation receptors to date.	Agreed	Agreed
CoS2	Marine traffic surveys	The marine traffic survey data collection is as per Marine Guidance Note (MGN) 654. This includes data collected for both the array areas and the offshore Export Cable Corridor (ECC).	Agreed	Agreed
CoS3	Baseline environment	The NRA [APP-240] and ES [APP-078] adequately characterises the shipping and navigation baseline environment.	Agreed	Agreed
CoS4	NRA and assessment methodology	NRA [APP-240] is compliant with the requirements of MGN 654 including completion of an MGN 654 checklist. Appropriate legislation, planning policy and guidance relevant to shipping and navigation has been used. The approach to the assessment is also deemed appropriate for the purposes of predicting changes to the baseline environment.	Agreed	Agreed
CoS5	Hazard (impact) identification	The hazards (impacts) identified within Chapter [APP-078] and NRA [APP-240] adequately capture the potential effects on shipping and navigation that may result from the Proposed Development.	Agreed	Agreed
CoS6	Risk level (impact significance) in isolation for array areas	Based on the information provided within the Chapter [APP-078] and NRA [APP-240] it is agreed that in isolation hazards (impacts) relating to the array areas, including vessel displacement and increased collision risk, third-party with project vessel collision risk, reduced access to local ports and harbours, reduction in under keel clearance, creation of allision risk, anchor interaction with inter-array cables, and reduction of emergency response capability are broadly acceptable or tolerable (unlikely to be significant) with the mitigation measures and required monitoring in place.	25/2/25: Agreed	Agreed
CoS7	Risk level (impact significance) in isolation for offshore ECC	Based on the information provided within the Chapter [APP-078] and NRA [APP-240] it is agreed that in isolation hazards (impacts) relating to the offshore ECC are broadly acceptable or tolerable (unlikely to be significant) with the mitigation measures and required monitoring in place. This includes burial to allow dredging to 22m where the export cables cross the Sunk and Trinity DWRs. Mitigation measures include	25/2/25: Ongoing point of discussion  The Chamber has reviewed PINS REFERENCE EN010115 and supports the position of PLA, London Gateway and Harwich Haven regarding cable burial & dredging. Accordingly, the Chamber firmly supports the wording as proposed under 2.4 of EN010115 and would	Ongoing point of discussion



Reference Number	Topic	Applicant's position	UK Chamber of Shipping's Position	Position Status
		commitments to the location of these burial depths and the management of concurrent working. The PLA has agreed in principle (within their SoCG) that these mitigations, which include the NIP, CSIP and CBRA, are the appropriate mechanisms to manage the risk. Further discussions are ongoing with the PLA and other IPs as required regarding the content of those documents.	consider the matter agreed if the Applicant and PLA reach agreement on the wording.	
CoS8	Risk level (impact significance) cumulative for array areas	Based on the information provided within the Chapter [APP-078] and NRA [APP-240] it is agreed that cumulative hazards (impacts), including those listed above for the in-isolation scenario are broadly acceptable or tolerable (unlikely to be significant) with the mitigation measures (including the NIP) and required monitoring in place.	25/2/25: Agreed	Agreed
CoS9	Risk level (impact significance) cumulative for offshore ECC	Based on the information provided within the Chapter [APP-078] and NRA [APP-240] it is agreed that cumulative hazards (impacts), including those listed above for the cumulative scenario are broadly acceptable or tolerable (unlikely to be significant) with the mitigation measures (including the NIP) and required monitoring in place.	25/2/25: Ongoing point of discussion.  The Chamber has reviewed PINS REFERENCE EN010115 and supports the position of PLA, London Gateway and Harwich Haven regarding cable burial & dredging. Accordingly, the Chamber firmly supports the wording as proposed under 2.4 of EN010115 and would consider the matter agreed if the Applicant and PLA reach agreement on the wording.	Ongoing point of discussion
CoS10	Decommissioning	The approach to decommissioning will be developed prior to the start of the decommissioning phase through a Decommissioning Plan with the nature of the works determined by legislation and guidance at the time.  In response to the Chambers position regarding the removal of all infrastructure, VE would assess this at the time of producing the Decommissioning Plan.	Accepted, the Chamber accepts the decommissioning plan will be undertaken in line with appropriate legislation and guidance at the time.  It is the Chamber position however that we strongly recommend the full decommissioning and removal of all infrastructure from the site, including all turbines, topsides, inter-array and interconnector cables, and foundations to a safe depth below the seabed.  Failure to enact full removal may hinder or encumber future activity or development, as well as provide safety hazard to vessels, for example through cabling which becomes exposed and presents snagging risk.	Agreed



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