



NORTH FALLS

Offshore Wind Farm

Statement of Common Ground

(Tracked)

East Suffolk Council

Document Reference: 10.27
Volume: 10
Date: ~~April~~July 2025
Revision: 01

Project Reference: EN010119



Project	North Falls Offshore Wind Farm
Document Title	Statement of Common Ground with East Suffolk Council (Tracked)
Document Reference	10.27
Supplier	NFOW

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Revision	Date	Status/Reason for Issue	Originator	Checked	Approved
0	July 2025	DraftSoCG	NFOW	NFOW	NFOW
1	July 2025	Deadline 8	NFOW	NFOW	NFOW

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Glossary of Acronyms

NFOW	North Falls Offshore Windfarm Ltd
SoCG	Statement of Common Ground
LBBG	Lesser Black Back Gull
OCSS	Offshore Connection Support Scheme
ESC	East Suffolk Council
EPP	Evidence Plan Process
OTNR	Offshore Transmission Network Review

1. Introduction

1.1 Background

1. This Statement of Common Ground (SoCG) has been prepared by North Falls Offshore Windfarm Limited (NFOW) (the Applicant) and East Suffolk Council (ESC).
2. It identifies areas of North Falls Offshore Wind Farm (hereafter ‘the Project’ or ‘North Falls’) where matters are agreed, not agreed or that remain under discussion between the parties.
3. The Applicant has had regard to the Planning Inspectorate (2024) guidance regarding Statements of Common/Uncommon Ground for Hearings and Inquiries when compiling the SoCG.
4. This SoCG has been structured to reflect topics of the application which are of interest to ESC. The applicable matters considered within the SoCG apply to ESC statutory and non-statutory remit.
5. Table 1.1 presents the topics included in the SoCG with the Applicant and ESC.

Table 1.1 Topics included in the SoCG

Topic/Chapter	DCO Document Reference
Need for Offshore Wind Energy Generation and Project Coordination	Needs Case and Project Benefits Statement [APP-232]
Offshore Connection Options	Co-ordination Report [AS-006]
Seascape and Landscape Visual Impacts	ES Chapter 29 Seascape, Landscape and Visual Impact Assessment [APP-043]
Lesser Black Back Gull (LBBG) compensation impacts at Orford Ness	Appendix 2 Lesser Black-backed Gull Compensation Document [APP-188] and Annex 2A Outline Lesser Black-backed Gull Compensation Implementation and Monitoring Plan [APP-189]

6. Details of the consultation undertaken on those topics not included in the Evidence Plan Process are set out in the corresponding chapters of the Environmental Statement (ES).
7. Topic specific matters agreed, not agreed, and matters that remain under discussion between the Applicant and ESC are included within this SoCG. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicant and ESC to reach agreement on each matter whatever possible or refine the extent of disagreement between parties.
8. Throughout the SoCG the phrase “Agreed” identifies any point of agreement between the Applicant and ESC. The phrase “Not Agreed” identifies any point that is not agreed between the Applicant and ESC.

1.2 Consultation with East Suffolk Council

9. The Applicant has engaged with ESC on the project during the pre-Application process, both in terms of informal non-statutory engagement and formal consultation carried out pursuant Section 42 of the Planning Act 2008.
10. Several meetings were held with East Suffolk Council through the Evidence Plan Process (EPP). These are detailed in this SoCG.

1.3 Summary of Agreed, Not Agreed and In Discussion

11. In order to easily identify whether a matter is 'agreed', 'not agreed', or 'in discussion' the position status colour coding system set out in Table 2.1 is used in the SoCG. Details of specific topics that are 'agreed', 'not agreed', or 'in discussion' between the Applicant and East Suffolk Council are presented in Table 2.2.

Table 1.2 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 yet agreed between the parties however the outcome of the approach taken by either the Applicant and East Suffolk Council 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. Discussion on these matters have concluded.	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 and East Suffolk Council is considered to result in a materially different impact to the assessment conclusions. Discussions on these matters have concluded.	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 the documents are yet to be shared with East Suffolk Council.	In discussion

2. Statement of Common Ground

12. A summary of the consultation undertaken to date with East Suffolk Council and the matters agreed or not agreed between the Applicant and East Suffolk Council are set out below.

2.1 Consultation

Table 2.1 Summary of Consultation with East Suffolk Council.

Date	Contact Type	Topic
Pre-Application		
April to May 2021	Written Consultation	Consultation on terms for the North Falls EIA/HRA Evidence Plan process.
June 2021	Presentation	An introductory session
June to July 2021	Workshops (Expert Topic Group (ETG) meetings)	Pre-scoping ETG meeting undertaken in accordance with the project's Evidence Plan process.
December 2021	Workshops (ETG meetings)	Post scoping ETG meetings undertaken in accordance with the Project's Evidence Plan process.
March 2022 – February 2023	Workshops (ETG Meetings)	Pre-PEIR ETG meetings undertaken in accordance with the Project's Evidence Plan process.
September 2022 – May 2024	Workshops (ETG Meetings)	Post-PEIR ETG meetings undertaken in accordance with the North Falls Evidence Plan process.
15 January 2025	Workshop (ETG)	Meeting to discuss Lesser Black Back Gull compensation measures.

Table 2.2 Status of Discussions

SoCG ID	Topic	The Applicant Position	East Suffolk Council Position	Position Summary
ESC_001	Need for offshore wind energy generation and project coordination	North Falls' Order Limits and proposed infrastructure including the onshore cable route and substation are to be located outside of East Suffolk Council's authority boundary. North Falls and Five Estuaries have both been allocated the same grid connection point by National Grid Electricity Systems Operator (NGESO), the site of which has been identified by NGET as being the EACN. North Falls and Five Estuaries have coordinated extensively on their development proposals to include: • an aligned landfall location for the offshore export cables to come ashore; • a shared onshore cable corridor; and • an overlapping onshore substation zone for the co-location of their prospective substations.	<i>ESC is being consulted on and is aware of a number of energy related projects that may have an impact on our District, and we welcome and support collaborative working between all Applicants and the National Grid to ensure that the optimal solution is delivered. We expect this to involve coordination and the sharing of infrastructure where feasible to reduce the amount required onshore.</i> <i>However, we wish to highlight that this Statement of Common Ground is provided on the basis that the North Falls Offshore Wind Farm proposes an onshore grid connection located outside of Suffolk and beyond the East Suffolk Council District, however, should this change in future resulting in onshore infrastructure being proposed within our district, our position on this project may need to be revisited.</i>	Agreed
ESC_002	Offshore Connection Options	The Applicant's full position with regards to offshore grid connection options is as described in the Applicant's Common Response 001 in the Applicant's	<i>It is understood that despite the Secretary of State deciding not to grant further OCSS funding, an offshore coordinated connection remains a connection option with North</i>	In-discussion <u>Not Agreed-</u> <u>no material</u> <u>impact</u>

SoCG ID	Topic	The Applicant Position	East Suffolk Council Position	Position Summary
		Response to Relevant Representations of members of public [REP1-048]). While the Secretary of State has decided not to grant further funding for the Offshore Co-ordination Support Scheme (OCSS) workstream, an offshore cable coordinated connection point remains a grid connection option within the North Falls DCO application. Option 3 provides a connection point for North Falls to connect to an offshore coordinated cable option brought forward by a third party outside of the OTNR workstream, should that cable route and option be promoted and be environmentally, regulatory and commercially viable within appropriate timescales.	<i>Falls' DCO application in order to safeguard against the possibility of the current onshore connection option changing, and a viable offshore coordinated connection option being brought forward by an alternative party that still allows North Falls to be operational by 2030. Therefore, 'Option 3: Offshore electrical connection, supplied by a third party' remains on the table alongside onshore connection Options 1 and 2.</i> <i>ESC will therefore continue to monitor such a scenario closely in case either directly or indirectly this introduced a need for additional onshore transmission infrastructure within East Suffolk. Currently, the SeaLink project is proposing an onshore connection at Friston within the East Suffolk District, such a scenario requiring additional onshore infrastructure in East Suffolk in order to accommodate an offshore connection, would not be supported by ESC.</i> <u>22/07/2025 UPDATE:</u> The Applicant has confirmed to ESC that at Deadline 8 (and the end of Examination), no third party is promoting a co-ordinated offshore cable option in collaboration with the North Falls proposed grid connection point (Option 3). ESC therefore understands that in light of this, an onshore connection option within	

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			the District of Tendring, Essex, will be the preferred outcome. ESC will continue to monitor this until a connection Option (1,2 or 3) is confirmed.	
ESC_003	Seascape and Landscape Visual Impacts	The Applicant's full position with regards to potential impacts on the Suffolk and Essex Coast and Heaths National Landscape is described in response to RR-316 as contained within the Applicant's Response to Relevant Representations from statutory consultees and non-prescribed consultees [REP1-045]. ES Chapter 29 Seascape, Landscape and Visual Impact Assessment [APP-043] concludes in Table 29.1 that there will be no significant impacts on the special qualities of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (now defined at the Suffolk and Essex Coast and Heaths National Landscape). The ES chapter sets out the following reasoning: Taking a precautionary approach to the assessment, the scale of change on certain perceptual aspects of the SECHNL special qualities is judged to be medium,	<i>ESC's initial seascape visual impact concerns have been significantly reduced following the removal of the northern array of wind turbines, together with the overall reduction in proposed maximum turbine heights to below 400m at a distance of approximately 42km offshore. We therefore do not consider that the statutory purposes for designation of the National Landscape are compromised to an extent that justify grounds for objection.</i> <i>This conclusion is based on the currently submitted proposals, should these change at any stage, ESC would need to revisit our position in terms of seascape visual impacts. ESC will continue to monitor this throughout the examination period and engage where necessary to support our position in relation to possible impacts on the seascape. Should the current project proposals change, potentially resulting in a significant impact being identified, we will seek appropriate mitigation and if necessary, compensation.</i>	In-discussion <u>Not agreed – material impact</u>

SoCG ID	Topic	The Applicant Position	East Suffolk Council Position	Position Summary
		although other special qualities will be entirely unchanged. • The geographical extent of the change will be small, limited to coastal areas within around 40km of the Offshore Above-sea Development, between Bawdsey Manor and Orford Ness. • This will affect a very localised area of the coastal edge, in the context of this large-scale designation. • Effects will also be limited to days with clear weather. • For the vast majority of the NL, which is largely beyond 40km from the Offshore Above-sea Development, and due to the increased distance and the reduced visibility from inland areas, the scale of change will be small or negligible. • On clear days, operational wind farms including East Anglia One, Greater Gabbard and Galloper will also be visible. The Offshore Above-sea Development will be seen in the context of these offshore wind farms. • The Offshore Above-sea Development will intensify the	<i>ESC recognises that discussions between the Applicant and the statutory body are ongoing, however we note that agreement is yet to be reached. ESC wishes to see agreement reached between the parties, with the statutory body's concerns being addressed.</i> <i><u>22/07/2025 UPDATE:</u> ESC notes that as of Deadline 8 (and close of examination) the Applicant and statutory body have not agreed on some outstanding matters relating to Landscape Visual Impacts. As ESC wanted to see agreement reached between the parties, this matter must also remain not agreed for ESC.</i>	

SoCG ID	Topic	The Applicant Position	East Suffolk Council Position	Position Summary
		effects associated with offshore wind farm development that influence certain perceptual special qualities of the NL. • The contribution of offshore turbines to the seascape horizon is acknowledged in the special qualities of the NL, where it is acknowledged that they divide opinion. • The Offshore Above-sea Development will not greatly extend the spread of turbines across the horizon. It will introduce turbines into an area of the skyline which has already been altered by offshore wind farm development. • The project will also contribute to the “developing story of the Suffolk’s Energy Coast”. • Overall, the magnitude of impact to the special qualities of the NL will be locally low along the coast, and negligible further inland. • This is not judged to translate into significant effects on the special qualities of the SECHNL. In addition, to the above [APP-043] 3.1.31 Environmental Statement Chapter 29 Seascape, Landscape and Visual Impact		

SoCG ID	Topic	The Applicant Position	East Suffolk Council Position	Position Summary
		Assessment records the assessment of impacts on the communities along the Suffolk coast. Table 29.14 (page 54) to Table 29.19 records (page 61) the magnitude of visual effect on coastal communities. Generally, the visual impacts are low to medium.		
ESC_004	Lesser Black Back Gull (LBBG) compensation within ESC	The Applicant included a search area for LBBG compensation at submission stage, which has now been refined to a range of feasible options, one of which includes potential collaboration on Five Estuaries VE2 location. The Applicant is also considering options at Lantern Marshes, Gedgrave Marshes and Outer Trial Bank (described in the Lesser Black Backed Gull Compensation Document [7.2.2, Rev 1]). An Expert Topic Group meeting was held with East Suffolk Council, Natural England, National Trust and the RSPB to discuss these options on the 15th January.	ESC is not objecting to the proposed LBBG habitat compensation for the North Falls and Five Estuaries projects, in light of our overarching ecological position set out in our submitted Relevant Representation and Local Impact Report. We support both Applicants' ongoing engagement, working collaboratively and seeking to possibly provide a coordinated approach to LBBG compensation delivery. However, a cautious approach is warranted, with any possible cumulative impacts of a combined or in combination approach	Agreed

SoCG ID	Topic	The Applicant Position	East Suffolk Council Position	Position Summary
			to LBBG habitat compensation at Orford Ness being fully considered. ESC notes that any such provision would need to be delivered via TCPA 1990 post DCO consent so the planning balance would be assessed at that time.	

3. Signatures

15. The above SoCG is agreed between the Applicant and ESC on the day specified below.

Signed: _____

Print Name: _____

Job Title: Co

Date: Conse

Duly authorised for and on behalf of North Falls Offshore Wind Farm Limited

Signed: _____

Print Name: Martyn Fulcher MRTPI

Job Title: Head of Energy Planning and Coastal Management - ESC

Date: 22/07/2025

Duly authorised for and on behalf of the xx 2025

4. References



NORTH FALLS

Offshore Wind Farm



HARNESSING THE POWER OF NORTH SEA WIND

North Falls Offshore Wind Farm Limited

A joint venture company owned equally by SSE Renewables and RWE.

To contact please email contact@northfallsoffshore.com

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