



NORTH FALLS

Offshore Wind Farm

Statement of Common Ground

Port of London Authority

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Glossary of Acronyms

ALARP	As Low As Reasonably Practicable
DCO	Development Consent Order
dML	deemed Marine Licence
EIA	Environmental Impact Assessment
DWR	Deep Water Route
MGN	Marine Guidance Note
NFOW	North Falls Offshore Wind Farm Limited
NIP	Navigation and Installation Plan
NRA	Navigational Risk Assessment
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground

Glossary of Terminology

Navigational Risk Assessment (NRA)	A document which assesses the hazards to shipping and navigation of a proposed Offshore Renewable Energy Installation (OREI) based upon the FSA.
Offshore cable corridor	The corridor of seabed from array area to the landfall within which the offshore export cables will be located.
Offshore export cables	The cables which bring electricity from the offshore substation platform(s) to the landfall, as well as auxiliary cables.
The Applicant	North Falls Offshore Wind Farm Limited (NFOW).
The Project or 'North Falls'	North Falls Offshore Wind Farm, including all onshore and offshore infrastructure.

1. Introduction

1.1 Background

1. This Statement of Common Ground (SoCG) has been prepared by North Falls Offshore Wind Farm Limited (NFOW) (the Applicant) and the Port of London Authority (PLA). 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.
2. 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.
3. This SoCG has been structured to reflect topics of the application which are of interest to the PLA. The applicable matters considered within the SoCG apply to the PLA’s statutory and non-statutory remit.
4. Table 1.1 presents the topics included in the SoCG with the Applicant and the PLA.

Table 1.1 Topics and Relevant Documents included in the SoCG

Topic/Chapter	DCO Document Reference
Environmental Statement (ES) Chapter 15 Shipping and Navigation	APP-029
ES Chapter 15 Shipping and Navigation Figures	APP-060
ES Appendix 15.1 Navigation Risk Assessment Parts 1 - 3	APP-106; APP-107; APP-108
Draft Development Consent Order (DCO)	REP6-005
Outline Navigation and Installation Plan	REP6-039
Outline Cable Specification and Installation Plan	REP6-051
Outline Sediment Disposal Management Plan	REP6-049
Deep Water Route Cable Installation Areas (Future Dredging Depths) Plan	REP6-055
Technical Note on the interaction of North Falls with the PLA onshore communication links	REP6-067

5. Topic specific matters agreed, not agreed, and matters that remain under discussion between the Applicant and the PLA are included within this SoCG. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicant and the PLA to reach agreement on each matter whatever possible or refine the extent of disagreement between parties.

1.2 Consultation with Port of London Authority

6. The Applicant has engaged with the PLA 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.
7. During formal consultation, the PLA provided comments on the Preliminary Environmental Information Report (PEIR) by way of letter dated 14th July 2023.
8. Further to the statutory consultation, meetings were held with the PLA through the pre-application process and during Examination (Table 1.2 Summary of Consultation with the PLA regarding Shipping and Navigation). These are detailed throughout the SoCG, Consultation Report (Document reference: APP-215) and minutes of the meetings.

Table 1.2 Summary of Consultation with the PLA regarding Shipping and Navigation

Date	Contact Type	Topic
Pre-Application		
22 nd February 2021	Email correspondence	Consultation on export cable site selection.
7 th July 2022	Meeting	Update provided to the Sunk Users Group.
14 th July 2023	PEIR response	Section 42 responses provided by Port of London Authority.
27 th September 2023	Meeting	Meeting to discuss updates to the Project following PEIR responses.
12 th October 2023	Hazard Workshop	Meeting to review the Navigation Risk Assessment (NRA).
17 th January 2024	Meeting	Update provided to the Sunk Users Group.
14 th June 2024	Workshop	North Falls in attendance at a workshop to discuss methods for cable installation with local ports (with Five Estuaries).
15 th January 2025	Meeting	Update provided to the Sunk Users Group.
19 th March 2025	Meeting	Pre D4 catch up
30 th April 2025	Meeting	Post D4 catch up
2 nd June 2025	Meeting	Post D5 catch up
11 th July 2025	Meeting	Pre D7 catch up

1.3 Summary of Agreed, Not Agreed and In Discussion

9. 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 1.3 is used in the SoCG.

10. Details of specific topics that are ‘agreed’, ‘not agreed’, or ‘in discussion’ between the Applicant and Port of London Authority are presented Table 2.1.

Table 1.3 Position status key

Position Status	Position Colour Coding
<p>Agreed. The matter is considered to be agreed between the parties.</p>	<p>Agreed</p>
<p>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 Port of London Authority 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.</p>	<p>Not Agreed- no material impact</p>
<p>Not Agreed- material impact The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant and Port of London Authority is considered to result in a materially different impact to the assessment conclusions. Discussions on these matters have concluded.</p>	<p>Not Agreed- material impact</p>
<p>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 Port of London Authority).</p>	<p>In discussion</p>

2. Statement of Common Ground

11. A summary of the consultation undertaken to date with the PLA and the matters agreed or not agreed between the Applicant and the PLA based on discussions and information exchanged between the Applicant and the PLA are set out below for each of the SoCG topic areas.

2.1 Shipping and Navigation

Table 2.1 Topics agreed, in discussion or not agreed in relation to Shipping and Navigation

ID	The Applicant Position	Port of London Authority Position	Position Summary
1	<p>NRA</p> <p>The NRA (APP- APP-106, APP-107, and APP-108) and the Shipping and Navigation Chapter (APP-029) adequately identify, address and mitigate impacts associated with vessels navigating within PLA waters or in proximity or approach to them including pilot operations.</p>	<p>The PLA is satisfied with the general approach taken by the Applicant to assessing impacts on shipping and navigation in the NRA and the Shipping and Navigation Chapter of the ES.</p>	<p>Agreed</p>
2	<p>Future Scenario</p> <p>The NRA (APP- APP-106, APP-107, and APP-108) and ES Chapter (APP-029) have adequately identified and assessed a worst-case future scenario, and through mitigations associated with cable installation, cable burial, and cable protection has ensured all impacts are As Low As Reasonably Practicable (ALARP).</p>	<p>The PLA is satisfied with the general approach taken by the Applicant to assessing a worst case future scenario.</p>	<p>Agreed</p>

ID	The Applicant Position	Port of London Authority Position	Position Summary
3	<p>Cable Burial Depth</p> <p>The Applicant recognises the importance of maintaining vessel access to key local ports via the DW routes in the area, together with appropriate cable burial and consideration of the potential for increases in vessel draught in the future. Technical discussions are currently ongoing internally to understand what is technically achievable in terms of burial depth over and in proximity to the DW routes, noting the ports position that burial should be such that a dredged channel depth of 22m is achievable in the future. An offshore seabed site investigation is expected to be in August, with the results feeding additional technical assessments.</p> <p>The Applicant has submitted an outline Cable Specification and Installation Plan (oCSIP) [REP6-051] which sets out the Applicant's proposals on cable burial depth over the DW routes to ensure they could be</p>	<p>Cable installation and maintenance depths at the Sunk and Trinity DWRs are critical and must safeguard future depths of 22m below Chart Datum.</p> <p>The PLA and the Applicant have agreed the extent of the areas required for deeper cable burial and this is reflected in 9.57 Deep Water Route Cable Installation Areas (Future Dredging Depths) Plan (Rev 1) [REP6-055]</p> <p>The DCO now includes a design requirement linked to a certified plan showing the spatial extents to which the requirement applies.</p> <p>Cable installation and maintenance depths must also make allowance for an over-dredge tolerance attributable to standard dredging methodology</p> <p>Protective Provisions for the PLA must include for remediation so that if following installation of the cables or following inspection it is identified that the requirements regarding cable burial are not being achieved then the undertaker must carry out remediation</p>	In Discussion

ID	The Applicant Position	Port of London Authority Position	Position Summary
	dredged to 22m in the future. These areas of deeper burial are secured on the face of the Order under Schedule 1, Part 3, 2., (3).	works to ensure the requirements are achieved.	
4	<p>Cable Burial - CSIP The Applicant has submitted an outline CSIP [REP6-051] setting out the cable burial requirements including in relation to the DWR's.</p>	<p>Various updates have been made to the oCSIP during examination and subject to some final amendments which are required in the main as a result of the deadline 6 version of the Deep Water Route Plan introducing the Sunk Pilot Diamond Area, the PLA is confident that the technical content of the document can be agreed</p> <p>The final CSIP must be in strict accordance with the oCSIP</p> <p>The PLA considers that due to the importance of this document for vessels entering and existing the UK's largest Port, that the PLA should have approval of this document through protective provisions.</p>	In Discussion
5	<p>NIP The outline NIP (latest version [REP6-039]) is considered an appropriate mechanism for</p>	The outline NIP (oNIP) and NIP could be an appropriate mechanism for minimising shipping and navigation impacts during cable installation and	In Discussion

ID	The Applicant Position	Port of London Authority Position	Position Summary
	<p>managing relevant shipping and navigation impacts associated with cable installation, and operation and maintenance in the area of interest (as defined in the NIP) including the potential for concurrent working. Project compliance with the NIP is secured within the DCO (deemed Marine Licence (dML)).</p>	<p>maintenance, including in relation to the Sunk Pilot Diamond and the DWR's. The PLA are in discussion with the Applicant regarding the contents of the oNIP.</p> <p>Due to the importance of this document for vessels entering and exiting the UK's largest Port, the PLA should have approval of this document through protective provisions.</p>	
6	<p>Temporary impacts on the PLA's onshore navigational equipment</p> <p>The Applicant agrees with the PLA statement in their relevant representation that the likelihood of any impact is “very low”, but acknowledges the concern. This will be discussed with PLA as examination progresses to confirm whether any additional action is required.</p> <p>This was discussed with the PLA at a meeting held on the 19th March 2025, and the PLA subsequently provided</p>	<p>The PLA are content following the submission of a technical note [REP6-067] that there is no impact on the PLA's radio link</p>	Agreed

ID	The Applicant Position	Port of London Authority Position	Position Summary
	additional information including the precise locations of the relevant sites. The Applicant is continuing to engage with the PLA.		
7	<p>Protective Provisions</p> <p>As outlined in the Applicant's Response to the Ports' Request for Protective Provisions submitted at Deadline 4 [REP4-044], the Applicant does not consider that Protective Provisions are necessary.</p>	To date no discussions have been had with the PLA regarding protective provisions. The PLA has set out in its deadline 2 response its preferred protective provisions for Five Estuaries which can be used as the basis of protective provisions for North Falls.	Not Agreed
8	<p>Pre-construction activities</p> <p>Activities associated with preparation for cable installation will fall under the Navigation and Installation Plan. Pre-construction activities will be subject to their own marine licensing process.</p>	Revision 2 of the oNIP and revision 1 of the oCSIP submitted at deadline 5 now secure commitments relating to pre-construction activities including boulder relocation, archaeological find relocation, and UXO clearance. Surveys and monitoring remain outstanding and consultation should be further secured through protective provisions.	In Discussion
9	<p>Cable Crossings / Cable Protection</p> <p>The number of, and the proposed location of cable</p>	Whilst the PLA would prefer a clear statement in the oCSIP, Five Estuaries and Sealink's red line boundaries do	In discussion

ID	The Applicant Position	Port of London Authority Position	Position Summary
	<p>crossing locations have been identified in the Export Cable Crossing Zone Plan [REP6-055]. As shown these all occur in the Sunk Outer Precautionary Area and therefore clear of the DWRs.</p>	<p>not overlap with North Falls at the deep water route or the pilot station buffer.</p> <p>Cable protection would be subject to Requirement (2)(3) due to the ExA's Schedule of Proposed Changes meaning that the Requirement applies to any part of the authorised development located within the areas shown on the Deep Water Route Cable Installation Area (Future Dredging Depths) Plan so even if cable protection was placed within the DWR's or Sunk Pilot Diamond Buffer it could not be placed at a level that would preclude or impede dredging to the relevant depts as set out in the Requirement.</p> <p>Further commitments on no wet storage of cables within the DWRs should be made.</p>	
10	<p>Offshore Cable Corridor</p> <p>The Applicant considers it is most likely that the export cables will be within the southernmost section of the cable corridor between KP28 and KP42. The PLA have provided details over where</p>	<p>The PLA is supportive of the cable being routed within the southern half of the cable corridor between KP28 and KP42 and welcomes the wording at paragraph 31 of the oCSIP [REP6-052] which commits to cables crossing the Trinity, Sunk A and Sunk B deep water routes being routed as far south within</p>	Agreed

ID	The Applicant Position	Port of London Authority Position	Position Summary
	they would seek areas of deeper burial in the northern part of the corridor in this area and the Applicant is considering the input.	the red line boundary as far away from the Sunk Pilot Diamond as is reasonably practicable. It also commits to the cable between the DWR's being routed as far south as possible within the red line boundary as is reasonably practicable	
11	<p>Sediment Disposal - DWR The Applicant has committed to not disposing of dredged material in the Sunk or Trinity DW Buffers as shown in the outline Sediment Disposal Management Plan [REP6-049].</p>	The PLA is content that the oSDMP [REP6-050] now protects both the deep water routes and Sunk Pilotage Area	Agreed
<p>Sediment Disposal – Sunk Pilot Boarding Area The Applicant has outlined its current proposals on sediment disposal in the outline Sediment Disposal Management Plan [REP6-049].</p>	Agreed		
12	<p>DCO/Deemed Marine Licence The PLA will be consulted prior to the approval of the NIP,</p>	The PLA welcomes the ExA's inclusion of Schedule 2 Requirement 2(3) in the dML at Schedule 9, condition (10) sub	In discussion

ID	The Applicant Position	Port of London Authority Position	Position Summary
	<p>CSIP and SDMP and this has been included in the relevant condition of the dML (Schedule 9) at Deadline 5.</p> <p>The design requirement included in Schedule 1, Part 3, 2(3) of the dDCO at Deadline 4, requires that Work No. 3 (export cables) are installed and maintained at depths that will not preclude future dredging to 19m or 22m chart datum respectively as requested by the PLA.</p>	<p>paras (4) and (5). Minor amendments will be needed to the drafting to reflect the deadline 6 Deep Water Route Cable Installation Area (Future Dredging Depths) Plan</p>	

3. Signatures

12. The above SoCG is agreed between the Applicant and Port of London Authority on the day specified below.

<p>Signed: _____</p> <p>Print Name: _____ Lucy Owen _____</p> <p>Job Title: _____ Deputy Director of Planning and Development _____</p> <p>Date: _____</p> <p>Duly authorised for and on behalf of the Port of London Authority</p>
<p>Signed: _____</p> <p>Print Name: _____</p> <p>Job Title: _____</p> <p>Date: _____</p> <p>Duly authorised for and on behalf of North Falls Offshore Wind Farm Ltd</p>

4. References

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NORTH FALLS

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RWE

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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