

1 St James's Market  
London  
SW1Y 4AH  
The Crown Estate - Official

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**Dear Sir/madam,**

**Application by RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited for the Dogger Bank South Offshore Wind Farms Project.**

**Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010**

**Examination Timetable – Deadline 3**

Thank you for inviting The Crown Estate (TCE) to provide additional information to the Examining Authority as part of its assessment of the proposed generation assets for the Dogger Bank South Offshore Wind Farms project. We would like to submit the following response to the first written questions (ExQ1)

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Question and reference		TCE Response
CA.1.16	<p>Update on achieving consent for the offshore export cable corridor.</p> <p>The SoR [AS-146, paragraph13.1] advises that two applications have been made to The Crown Estate through The Crown Estate's Cable Route Identification and Approval Process for the proposed Offshore Export Cable Corridors. Can you provide an update on the progress of these applications and, if they have not yet been consented, the timeframe for their determination?</p>	<p>The current state of progress is that the applications are ongoing, with an expectation to enter into Agreement For Lease (AFL) for the cable route corridors in Q2 2025 (by the end of examination)</p>
CA.1.19	<p>Plot 18-006 Can you provide further detail as to what is happening with plot 18-006? Is it Crown Land or has it been de-trunked?</p>	<p>The land referenced 18-006 is owned by the Secretary of State for Transport. The history is unknown.</p>
IOU.1.13	<p>The Crown Estate Leasing Provide a summary of the process for licensing rounds for offshore wind farms and how licences are obtained. What considerations does The Crown Estate take account of when issuing a lease for an offshore wind farm? Setting aside wake loss, are there other matters which The Crown Estate considers during the leasing process, which are also considered as part of the DCO application process? Can a copy of The Crown Estate's Round 4 Information Memorandum be submitted into the Examination?</p>	<p>The Crown Estate is a specialist real estate business, created by an Act of Parliament to manage a diverse portfolio that includes the seabed around England, Wales and Northern Ireland. In this capacity we work closely with industry and stakeholders to enable the sustainable development of the seabed, including by providing seabed rights for offshore renewable energy, such as wind farms, as well as marine aggregates and minerals, cables and pipelines, and carbon capture and storage. We have managed a number of offshore wind leasing rounds in UK waters. Our leasing activity provides successful offshore wind developers with lease agreements conveying long-term rights over parts of the seabed for the development and operation of offshore wind farms and their cables back to shore.</p> <p>There have been 4 offshore wind leasing rounds to date over a period of 30 years. In addition, we have provided extension opportunities to operational wind farms and test and demonstration leasing. We are currently in the process of leasing Round 5, a floating offshore wind opportunity in the Celtic Sea. Each leasing round has its own set of criteria and characteristics.</p> <p>The criteria, characteristics and considerations taken account in leasing Round 4 are described in the Information Memorandum published in September 2019: <a href="#">Information Memorandum Introducing Offshore Wind Leasing Round 4</a> (the R4 IM). The leasing round offered the potential to unlock at least 7 GW of new seabed rights. It was developed and refined through 18 months of active engagement with stakeholders and industry. The process undertaken was to ensure that the design of Round 4 enabled the delivery of clean, affordable energy, the country will need for the future, whilst balancing a range of needs in an increasingly busy sea space and wider natural environment. The leasing design process is summarised in our Guide to Offshore Wind Leasing Round 4: <a href="#">Offshore Wind Leasing Round 4 Delivering a low carbon future</a> published on our website.</p> <p>The R4 IM describes the process in more detail. Chapter 6 of the R4 IM, describes how we identified the four bidding areas for the leasing round. Working in collaboration with statutory stakeholders, we undertook extensive analysis of the technical resource and constraints of the seabed around England, Wales and Northern Ireland, to understand which areas were likely to offer the best resource for offshore wind development at that current time. That evidence base informed the four seabed rights made available to the market through Round 4 (known as Bidding Areas), within which developers had the opportunity to identify and propose their own project sites. While not unconstrained, we believed that those four areas offered the strongest opportunities for new offshore wind leasing development, on the basis that they were</p>

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	<p>technically feasible, contain large areas of available resource and offer lower levels of consenting constraint. To assist bidders into the leasing round, we made our characterisation analysis for each of the four Bidding Areas available to the market. Bidders needed to undertake their own analysis and assessments to determine the best location for their project proposals. The process of regional refinement of the areas is described in the R4 IM, also attached as requested.</p> <p>In addition to the R4 IM our website also includes reports on the regions refinement process undertaken by us, <a href="#">1720790433-tce-r4-regions-refinement-report.pdf</a>. Section 2.1 of the report describes the resource and constraints analysis undertaken by us to identify the most favourable areas for offshore wind development within the regions identified. These areas were defined using spatial technical and constraints models and were subject to more detailed qualitative analysis (all available in characterisation reports). The analysis followed four key steps:</p> <ol style="list-style-type: none"><li>1. <b>Technical Resource model:</b> the starting point of the analysis and defined the area of seabed that is most favourable for offshore wind development (defined by waters between 5m and 50m depth and accessibility due to wave climate being below 2.5m for 80% of the time – following engagement with market stakeholders this was later extended to 60m depth).</li><li>2. <b>Exclusion model:</b> this formed part of the constraints analysis and removes activities and receptors that will preclude the development of offshore wind infrastructure such as existing seabed infrastructure and rights, and areas where health and safety or policy reasons mean development is unfeasible. The activities and receptors (input criteria) in the model were termed “hard constraints” and were described by spatial data layers. Hard constraints included: Ministry of Defence Practice and Exercise Areas (PEXA), visual interactions identifying regions where development potential would predominantly or entirely be within 13km of the coast and where development potential in a region was significantly overlapped by shipping routes that contain traffic of over 1,000 ships per year (consideration was also given to the number of different routes that transected the characterisation area and their alignment and proximity to hard constraints such as traffic separate schemes and other obstructions).</li><li>3. <b>Restrictions model:</b> this model included all other criteria which were structured and weighted in terms of the constraint each presents to development of offshore wind but does not necessarily preclude development. The input criteria in this model are termed “soft constraints”.</li><li>4. <b>Characterisation areas:</b> these are defined from the result of combining the first three stages in the list and taking the least constrained 50% of these, by feature. The model was then split into 18 areas following marine planning boundaries but also adding sub-divisions by grouping together areas with similar types of constraints. Detailed consideration and analysis has subsequently been undertaken on these areas which was made available to prospective applicants in the reports published.</li></ol> <p><b>Habitats Regulations Assessment:</b> The Crown Estate undertook a ‘<a href="#">plan level</a>’ <a href="#">Habitats Regulations Assessment</a> (HRA) which considered the impact of Offshore Wind Leasing Round 4, in its entirety, on the UK’s National Site Network. The HRA was able to rule out adverse effects on the features of all relevant protected sites with the exception of the kittiwake feature of the Flamborough and Filey Coast SPA and the sandbank feature of Dogger Bank SAC. Given this conclusion, The Crown Estate decided to proceed with a ‘derogation case’, setting out the argument that there were no alternative solutions that would meet the objectives of the plan, and that there were imperative reasons of overriding public interest for Offshore Wind Leasing Round 4 to proceed. This derogation case was approved by the Secretary of State for the</p>
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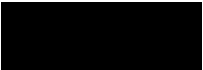
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		<a href="#">Department of Business, Environment and Industrial Strategy on 15<sup>th</sup> July 2022</a> . Subsequently, and as required by the Secretary of States approval, The Crown Estate led Steering Groups in the development of Strategic Compensation Plans for both the <a href="#">kittiwake</a> and <a href="#">sandbank</a> features, which have been submitted by the applicant to support their application.
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Yours sincerely,



Louise Rich  
Portfolio Manager  
The Crown Estate