

**RWE Renewables UK Dogger Bank
South (West) Limited**

**RWE Renewables UK Dogger Bank
South (East) Limited**

**Dogger Bank South Offshore
Wind Farms**

**National Federation of Fishermen's
Organisation Statement of Common Ground
(Revision 2)**

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Glossary

Term	Definition
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement (ES)	A document reporting the findings of the EIA and produced in accordance with the EIA Directive as transposed into UK law by the EIA Regulations.
Evidence Plan Process (EPP)	A voluntary consultation process with specialist stakeholders to agree the approach, and information to support, the Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) for certain topics.
Expert Topic Group (ETG)	A forum for targeted engagement with regulators and interested stakeholders through the EPP.
Habitats Regulation Assessment (HRA)	The process that determines whether or not a plan or project may have an adverse effect on the integrity of a European Site or European Offshore Marine Site.
Nationally Significant Infrastructure Projects	Large scale development including power generating stations which requires development consent under the Planning Act 2008. An offshore wind farm project with a capacity of more than 100MW constitutes an NSIP
Non-Statutory Consultee	Organisations that the Applicants may choose to engage (if, for example, there are planning policy reasons to do so) who are not designated in law but are likely to have an interest in a proposed development
Planning Inspectorate (PINS)	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects (NSIPs).
Preliminary Environmental Information Report (PEIR)	Defined in the EIA Regulations as information referred to in part 1, Schedule 4 (information for inclusion in Environmental Statements) which has been compiled by the Applicants and is reasonably required to assess the environmental effects of the development
Project Change Request 1	The changes to the DCO application for the Projects set out in Project Change Request 1 - Offshore & Intertidal Works [AS-141] which was accepted into Examination on 21 st January 2025.

Term	Definition
Receptor	A distinct part of the environment on which effects could occur and can be the subject of specific assessments. Examples of Receptors include species (or groups) of animals, plants, people (often categorised further such as 'residential' or those using areas for amenity or recreation), watercourses etc.
Section 42 Consultee	Organisations and individuals that are required to be consulted by the Applicants under Section 42 of the Planning Act 2008. Non-prescribed Section 42 consultees may be included by Applicants if identified as being of significance.
The Applicants	The Applicants for the Projects are RWE Renewables UK Dogger Bank South (East) Limited and RWE Renewables UK Dogger Bank South (West) Limited. The Applicants are themselves jointly owned by the RWE Group of companies (51% stake) and Masdar (49% stake).
The Projects	DBS East and DBS West (collectively referred to as the Dogger Bank South Offshore Wind Farms).

Acronyms

Acronym	Definition
CBRA	Cable Burial Risk Assessment
CEA	Cumulative Effects Assessment
DBS	Dogger Bank South
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
ETG	Expert Topic Group
ExA	Examining Authority
FLCP	Fisheries Liaison and Co-Existence Plan
MMO	Marine Management Organisation
NFFO	National Federation of Fishermen's Organisation
OFLCP	Outline Fisheries Liaison and Co-Existence Plan
PEIR	Preliminary Environmental Information Report
PEMP	Project Environmental Management Plan
PINS	Planning Inspectorate
SAC	Special Area of Conservation
SoCG	Statement of Common Ground

1 Introduction

1.1 Background

1. The Application is for development consent for the Applicants to construct and operate the proposed Projects under the Planning Act 2008. Further description of the Projects is available in **Chapter 5 Project Description (Revision 3)** [REP1-009].
2. This Statement of Common Ground (SoCG) has been prepared between RWE Renewables UK Dogger Bank South (West) Ltd and RWE Renewables UK Dogger Bank South (East) Ltd, ('the Applicants') and the National Federation of Fishermen's Organisation ('NFFO') 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 Dogger Bank South ('DBS') West Offshore Wind Farm and DBS East Offshore Wind Farm, collectively known as DBS Offshore Wind Farms (herein 'the Projects').
3. In drafting this SoCG, the Applicants have had regard to the Planning Act 2008 Guidance: Examination stage for Nationally Significant Infrastructure Projects (Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities, 2024).
4. The need for a SoCG between the Applicants and NFFO has been set out within the Rule 6 letter issued by the Planning Inspectorate post-application of the Projects DCO.
5. This SoCG is intended to provide the Examining Authority (ExA) with a clear summary of discussions between the parties and has been structured to reflect topics which are of interest to the NFFO, and which have been raised within the **NFFO's Relevant Representation** [RR-034] and **NFFO's Written Representations** [REP1-077] to the Dogger Bank South Offshore Wind Farms DCO that has been submitted to the Planning Inspectorate pursuant to the Planning Act 2008.
6. It is the intention that this document will facilitate further discussions between the Applicants and the NFFO and will provide the ExA with a clear overview of the level of common ground between both parties. This document will be updated throughout the Examination process.
7. The following application documents have informed the discussions with the NFFO and address the elements of the Projects that may affect the interests of the NFFO.

Table 1-1 - Application Documents of interest to the NFFO

Environmental Statement (ES) Chapter/ Application Document	Planning Inspectorate (PINS) Reference
Draft Development Consent Order	APP-027 (superseded by Revision 6 – REP1-004)
Chapter 10 Fish and Shellfish Ecology	APP-091
Chapter 13 Commercial Fisheries	APP-117
Cable Statement [Including: Outline Cable Burial and Specification, Installation and Monitoring Plan, Cable Burial Risk Assessment and Cable Protection Plan, including consideration of cabling in DB SAC]	APP-244 (superseded by Revision 3 – REP2-039)
Outline Fisheries Liaison and Co-existence Plan	APP-252 (superseded by Revision 3 – REP2-053)
Heat Mapping Report: Atlantic Herring and Sandeel	AS-105
Project Change Request 1 - Offshore & Intertidal Works	AS-141
Appendix G - Section 42 and 47 Responses and Applicants Regard of the Consultation Report	APP-044
Round 4 Kittiwake Strategic Compensation Plan	APP-053
Round 4 Dogger Bank Strategic Compensation Plan	APP-060

8. The NFFO and the Applicants have been working together to minimise possible impacts of the Projects on the NFFO's operations, and so the NFFO may influence and enhance the design of the Projects where appropriate.

1.2 Approach to SoCG

9. This SoCG has been developed during the pre-examination [and examination] phases of the Projects. In accordance with discussions between the Applicants and the NFFO, this SoCG is focused on matters of material interest and relevance to the NFFO, namely matters covered in the Application Documents outlined in **Table 1-1** and related topics.
10. The structure of this SoCG is as follows:
 - **Introduction:** background to the development of the SoCG.
 - **Consultation and Engagement:** a summary of consultation and engagement with the NFFO to date.
 - **Agreement Log:** a record of the Applicants' position alongside the NFFO's position. **Table 3-2** to **Table 3-5** set out those areas agreed in relation to the application documents set out in **Table 1-1**. Where a matter is 'not agreed' or 'under discussion' this is described in further detail in **Table 3-6** to **Table 3-9**.
11. It is agreed that this SoCG is an accurate description of the areas agreed and under discussion between the parties, and that this SoCG accurately records key meetings and consultation with the NFFO.

2 Consultation and Engagement

2.1 Introduction

12. The NFFO have been consulted on the proposed development throughout the pre-application stage, having engaged in the Commercial Fisheries Expert Topic Group (ETG) meetings under the Evidence Plan Process, as well as via non-statutory and statutory consultation under Section 42 of the Planning Act 2008.

2.2 Consultation and Engagement Summary

13. **Table 2-1** summarises the consultation that the Applicants have undertaken with the NFFO as statutory or non-statutory consultation during the pre-application and post-application phases.

Table 2-1 - Summary of pre-application and post-application consultation with the NFFO

Date	Form of Consultation	Meeting Title / Topic	Summary of Consultation
Pre-Application			
30/03/2022	ETG Meeting	Joint Commercial Fisheries Working Group (Sofia and DBS)	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> • Introduction to DBS project; and • Discussions and Questions.
06/01/2023	ETG Meeting	Commercial Fisheries Working Group	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> • Project Introduction and Update; • Commercial Fisheries Overview; • Offshore Survey work; and • MarineSpace EIA update.
18/07/2023	Section 42 Consultation	Commercial Fisheries	NFFO response to Section 42 consultation on the Preliminary Environmental Information Report (PEIR). See Appendix G of the Consultation Report [APP-044].
11/12/2023	ETG Meeting	Commercial Fisheries	Post-PEIR updates to the Projects were presented to the NFFO.
Post-Application			
16/09/2024	Email	Relevant Representation	Received NFFO's Relevant Representation via the Planning Inspectorate.

Date	Form of Consultation	Meeting Title / Topic	Summary of Consultation
01/10/2024	Meeting	Draft SoCG Meeting	Meeting to discuss the draft NFFO SoCG.
04/10/2024	Email	Draft SoCG and meeting minutes	Draft SoCG and minutes from meeting on the 1 st October 2024 issued to NFFO for comment.
08/10/2024	Email	Relevant Representation	The Applicants issued their responses to the NFFO's Relevant Representation via the Planning Inspectorate.
21/10/2024	Email	Draft SoCG	NFFO returned the draft SoCG with comments.
15/11/2024	Email	Project Change Request 1	Project Change Request 1 - Environmental Assessment Update [AS-141] issued to NFFO for comment.
16/12/2024	Email	Draft SoCG	Revised draft SoCG issued to NFFO for comment.
13/01/2025	Email	Draft SoCG	NFFO confirmed agreement of draft SoCG for submission into Examination at Deadline 1.
27/01/2025	Email	Draft SoCG	The Applicants sought agreement from the NFFO on SoCG ID's 18 and 19 (regarding the EIA baseline) and 23 (regarding the assessment methodology) as these items had not been raised in the NFFO's Relevant Representation [RR-034]
27/01/2025	Email	Draft SoCG	NFFO confirmed agreement to set SoCG ID's 18 and 19 to agreed, and 23 to be set as 'not agreed - no material impact'
28/01/2025	Email	Draft SoCG	The Applicants thanked the NFFO for agreement and confirmed the SoCG would be finalised for submission at Deadline 1.
28/01/2025	Email	Written Representation	NFFO issued their Written Representation to the Applicants.
14/02/2025	Document Publication	Written Representation	The Applicants' responses to the NFFO's Written Representation were published by PINS.
28/03/2025	Email	SoCG (Revision 2)	The Applicants issued Revision 2 of the NFFO SoCG for review.

Date	Form of Consultation	Meeting Title / Topic	Summary of Consultation
01/04/2025	Meeting	SoCG (Revision 2) Meeting	Meeting to discuss the SoCG with NFFO.
02/04/2025	Email	SoCG (Revision 2)	The Applicants issued an updated version of Revision 2 of the NFFO SoCG for review.
02/04/2025	Email	SoCG (Revision 2)	The NFFO issued across their initial comments and updates on Revision 2 of the NFFO SoCG.
15/04/2025	Meeting	SoCG (Revision 2) Meeting	Continuation of the meeting on the 1 st April 2025 to discuss the SoCG with NFFO.
22/04/2025	Email	SoCG (Revision 2)	The Applicants emailed the SoCG to the NFFO for confirmation prior to Deadline 4 submission.
23/04/2025	Email	SoCG (Revision 2)	NFFO confirmed agreement of SoCG for submission into Examination at Deadline 4.

3 Agreement Log

3.1 Overview

14. The following sections of this SoCG summarise the level of agreement between the parties for each relevant offshore topic.
15. To easily identify whether a matter is 'agreed', 'not agreed' or 'under discussion', a colour coding system of, red, amber, green, is used respectively within the 'position status colour' column as set out in **Table 3-1**.
16. Where a matter is 'not agreed' or 'under discussion' further detail is provided in section 3.6.

Table 3-1 - Agreement logs position status key

Position Status	Position Status Colour
The matter is considered to be agreed between the parties.	Agreed
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.	Under discussion
The matter is not agreed between the parties, however the outcome of the approach taken by either the Applicants or the NFFO is not considered to result in a material impact to the assessment conclusions. Discussions have concluded.	Not agreed – No material impact
The matter is not agreed between the parties and the outcome of the approach taken by either the Applicants or the NFFO is considered to result in a materially different outcome on the assessment conclusions.	Not agreed – material impact

3.2 General

Table 3-2 - General topics agreed, in discussion or not agreed with the NFFO

SoCG ID	The Applicants' Position	The NFFO's Position	Position Status
EIA – Consultation			
1.	The Applicants have adequately consulted with the NFFO throughout all stages of the Projects to date and the Summary of Consultation (section 2.2 of this SoCG) is a fair and accurate record of pre-application consultation.	The NFFO agree with the Applicants and consider this matter agreed.	
2.	The NFFO have been adequately consulted on the Project Change Request 1 – Offshore and Intertidal Works [AS-141] which was provided to the NFFO as part of a targeted non-statutory consultation exercise on 14 th November 2024 by the Applicants.	The Project Change Request 1 was under consultation until the 16 th December 2024, no comments from the NFFO were received.	
Cable Statement (Including Preliminary Cable Burial Risk Assessment)			
3.	The Preliminary Cable Burial Risk Assessment (CBRA) provided within the Cable Statement (Revision 3) [REP2-039] includes sufficient detail to inform stakeholders of the likely cable and cable protection installation methodology to be used for the Projects. See SoCG ID 3 in Table 3-6 for further detail.	It was noted during the NFFO SoCG call held on 1 st October 2024 that comments on the CBRA would be provided with the NFFO's Written Representation. The NFFO provided further comments on the Cable Statement (Revision 3) [REP2-039] in their Written Representations, stating the document was ' <i>lacking in detail but understand this will follow post-consent</i> '.	

SoCG ID	The Applicants' Position	The NFFO's Position	Position Status
		See SoCG ID 3 in Table 3-6 for further detail.	
Project Change Request 1			
4.	Project Change Request 1: Offshore and Intertidal Works [AS-141] is appropriate and acceptable.	No response provided by the NFFO on Project Change Request 1: Offshore and Intertidal Works [AS-141], assumed agreed.	

3.3 Compensation Measures

Table 3-3 - Compensation topics agreed, in discussion or not agreed with the NFFO

SoCG ID	The Applicants' Position	The NFFO's Position	Position Status
Kittiwake Compensation			
5.	The Outline Kittiwake Compensation Implementation and Monitoring Plan [APP-054] provides a sufficient plan for the development of future implementation and monitoring of any agreed compensation measures, should consent for the Projects be granted and compensation for the kittiwake be required. See SoCG ID 5 in Table 3-7 for further detail.	See SoCG ID 5 in Table 3-7 for further detail.	

SoCG ID	The Applicants' Position	The NFFO's Position	Position Status
Strategic Benthic Compensation			
6.	<p>The Applicants' primary compensation measure for the Dogger Bank (new Special Area of Conservation (SAC) designation or extension) as detailed in the Project Level Dogger Bank Compensation Plan [APP-059] provides sufficient compensation for the Projects activities within the Dogger Bank SAC.</p> <p>See SoCG ID 6 in Table 3-7 for further detail.</p>	<p>During the second NFFO SoCG meeting held on 1st April 2024, the NFFO raised concerns regarding the impact on strategic benthic compensation measures on the fishing industry. NFFO are concerned that benthic compensation will lead to further displacement of the fishing industry. If this were to happen, NFFO believe that the fishing industry will be compensating for another industry's impacts.</p> <p>See SoCG ID 6 in Table 3-7 for further detail.</p>	

3.4 Fish and Shellfish Ecology

Table 3-4 - Topics agreed, in discussion or not agreed in relation to Fish and Shellfish Ecology

SoCG ID	The Applicants' Position	NFFO's Position	Position Status
EIA – Planning and Policy			

SoCG ID	The Applicants' Position	NFFO's Position	Position Status
7.	<p>All relevant plans and policies have been identified in section 10.4.1 of Chapter 10 Fish and Shellfish Ecology [APP-091] and these have been appropriately considered in the assessment.</p> <p>The NFFO did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their Relevant Representation. It is therefore considered by the Applicants that the matter is agreed.</p>	The NFFO agree with the Applicants and consider this matter agreed.	
EIA – Baseline Environment			
8.	<p>The ES adequately characterises the baseline environment as detailed in section 10.5 of Chapter 10 Fish and Shellfish Ecology [APP-091].</p> <p>Response provided by the Applicants within Appendix 10-1 - Fish and Shellfish Ecology Consultation Responses [APP-093].</p> <p>It was stated in The Applicants' Responses to Relevant Representations [PDA-013] that:</p> <p><i>'Section 10.5 of Chapter 10 Fish and Shellfish Ecology [APP-091] used landings data (2023) and international bottom trawl survey data (2012-2022)</i> Response provided by the Applicants within Appendix 10-1 - Fish and Shellfish Ecology Consultation Responses [APP-093].</p> <p>It was stated in The Applicants' Responses to Relevant Representations [PDA-013] that:</p>	<p>The NFFO raised several queries with regards to the adequacy of data used to inform the baseline in their Relevant Representation and Section 42 response (see Appendix G - Section 42 and 47 Responses and Applicants Regard of the Consultation Report [APP-044]).</p> <p>The NFFO stated in their Relevant Representation [RR-034] that they...<i>'do not support many of the conclusions drawn from the impact assessment for fish and shellfish receptors due to the concerns we have raised on suitability of data used. For example, there is no information or data presented on the distribution of shellfish species in the development area, a receptor that commercial fisheries are dependent upon.</i></p>	

SoCG ID	The Applicants' Position	NFFO's Position	Position Status
	<p>'Section 10.5 of Chapter 10 Fish and Shellfish Ecology [APP-091] used landings data (2023) and international bottom trawl survey data (2012-2022) to determine the fish and shellfish baseline. Appendix 9-3 Benthic Ecology Monitoring Report [APP-089] and Appendix 9-4 Environmental Features Report [APP-090] also present data from site specific grab and drop-down video samples in 2022 to inform the benthic environment of the DBS Array Areas and Offshore Export Cable Corridor.</p> <p>These datasets both include data on shellfish species. Chapter 10 Fish and Shellfish Ecology [APP-091], section 10.5.3 of the baseline environment discusses fish and shellfish ecology receptors within the Fish and Shellfish Ecology Study Area (defined as ICES Rectangles 36E9; 36F0; 37E9; 37F0; 37F1; 37F2; 38F0; 38F1; and 38F2). This section identifies the total area of potential habitat where different fish and shellfish species may be found across the Fish and Shellfish Ecology Study Area. Spawning and nursery grounds within the Fish and Shellfish Ecology Study Area are also inferred from Coull et al. (1998) and Ellis et al. (2012). Section 10.5.3.4 specifically discusses shellfish and notes European lobster <i>Homarus gammarus</i>; Brown crab <i>Cancer pagurus</i>; King scallops <i>Pecten maximus</i> and queen scallops <i>Aequipecten opercularis</i>; Common whelk <i>Buccinum undatum</i>; and Norway lobster <i>Nephrops norvegicus</i> for their commercial importance.</p> <p>Please refer to section 10.4.2 Data and Information Sources of Chapter 10 Fish and Shellfish Ecology [APP-091] for further details on this topic.'</p> <p>The Applicants acknowledge the NFFO's position.</p>	<p>Notwithstanding the above however, the NFFO agreed to amend this position to 'not agreed – no material impact' on the SoCG call held on 1st April 2025.</p>	

SoCG ID	The Applicants' Position	NFFO's Position	Position Status
9.	<p>Sufficient survey data has been collected to inform the assessment as presented within section 10.5 of Chapter 10 Fish and Shellfish Ecology [APP-091].</p> <p>See response to SoCG ID 8 above.</p>	<p>NFFO stated that '<i>There are no site-specific surveys undertaken to aid in characterising the fish and shellfish baseline environment here. A desk-based study should address the pedigree of data being used, including the specific spatial and temporal characteristics of the examples cited. For example, more caution is needed in using Roach et al., (2022) with regard to impacts on lobster, since the habitat found in the study site in that paper is very different from that observed at the Dogger bank region.</i>' in their Section 42 response (see Table 2-1 row SNFF 000 5 of Appendix G - Section 42 and 47 Responses and Applicants Regard of the Consultation Report [APP-044]).</p> <p>The NFFO stated in the NFFO Relevant Representation (RR-034:3) that they...'do not support many of the conclusions drawn from the impact assessment for fish and shellfish receptors due to the concerns we have raised on suitability of data used. For example, there is no information or data presented on the distribution of shellfish species in the development area, a receptor that commercial fisheries are dependent upon'.</p>	

SoCG ID	The Applicants' Position	NFFO's Position	Position Status
		The NFFO agreed to amend this position to 'not agreed – no material impact' on the SoCG call held on 1 st April 2025.	
EIA – Assessment Methodology			
10.	<p>The study area identified in section 10.3.1 of Chapter 10 Fish and Shellfish Ecology [APP-091] is appropriate.</p> <p>The NFFO did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their Relevant Representation. It is therefore considered by the Applicants that the matter is agreed.</p>	The NFFO agree with the Applicants and consider this matter agreed.	
11.	<p>The realistic worst case scenario presented in the assessment for the development scenarios, as outlined in Table 10-1 of Chapter 10 Fish and Shellfish Ecology [APP-091] is appropriate.</p> <p>The NFFO did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their Relevant Representation. It is therefore considered by the Applicants that the matter is agreed.</p>	The NFFO agree with the Applicants and consider this matter agreed.	
12.	<p>The embedded mitigation measures in Table 10-3 of Chapter 10 Fish and Shellfish Ecology [APP-091] are appropriate and in line with industry ways of working for the impacts identified.</p>	In the NFFO's Section 42 response, the NFFO noted that ' <i>We are concerned with the lack of fish and shellfish species monitoring proposed. The justification given is that landings data will highlight any impacts of</i>	

SoCG ID	The Applicants' Position	NFFO's Position	Position Status
	<p>The Applicants stated in their response to the MMO in The Applicants' Responses to Relevant Representations [PDA-013] (RR-030:5.6.2) that monitoring for shellfish would have been considered if there had been sufficient uncertainty associated with the predictions made the impact assessment, but given the confidence that no impacts were determined on shellfish populations, no monitoring was put in place. However, the Applicants add that proposed pre- and post-construction monitoring will be carried out for sandeels in the In Principle Monitoring Plan (Revision 2) [REP2-043].</p>	<p><i>the development on the populations in the region. As described earlier, fisheries dependent data is influenced by many factors and should be interpreted with caution when used solely to assess impacts at a site/stock level. Additionally, the spatial restriction on fisheries in the region from other developments and legislative restrictions will influence these data and may mask a signal of an impact/effect from the development. The proposed development completely overlaps key spawning and nursery grounds for several key species, yet impacts to these receptors has been assessed as minor adverse at worse due to the impact being a localised effect. The evidence does not support this assumption.'</i> (see Table 2-1 row SNFF Oo1 1 of Appendix G - Section 42 and 47 Responses and Applicants Regard of the Consultation Report [APP-044]).</p> <p>At the NFFO SoCG meeting on the 14th April 2025, the NFFO agreed this could be 'agreed' as the Applicants have followed the industry standard approach, however there is no site specific monitoring proposed which they do not agree with.</p>	

SoCG ID	The Applicants' Position	NFFO's Position	Position Status
13.	<p>The impact assessment methodologies used for the EIA, as presented in section 10.4.3 of Chapter 10 Fish and Shellfish Ecology [APP-091], provide an appropriate approach to assessing potential impacts of the Projects.</p> <p>Response to the NFFO's Relevant Representation was provided on 8th October 2024, awaiting further comments from NFFO on this point.</p> <p>In The Applicants' Responses to Relevant Representations [PDA-013] (RR-034:4) the Applicants stated that <i>'the construction timelines of other offshore wind farms do not align with that of DBS East or DBS West, and in consideration of the mitigations and best practice guidance proposed to be adhered to by all other OWFs the overall cumulative effect is considered to be low'</i>,</p> <p>In addition, the Applicants stated that <i>'VMS data from the MMO (2009-2020) indicates UK and EU mobile vessels using bottom trawls to have an extensive operational range that extends beyond the Commercial Fisheries Study Area. It was concluded that these data generally align with fisheries stakeholders understanding of fishing patterns. It is therefore assumed that mobile vessels will have a number of other fishing grounds that can be exploited during the temporary and overall short-term construction period when compared to the operational lifetime of the Project. Other data such as MMO (2012-2022) and EU STECF (2006-2016) landings data and scouting and vessel traffic survey data were also used within the assessment. A full list of the data and information used to inform the assessment of commercial fisheries is described in section 13.4.2 of Chapter 13 Commercial Fisheries [APP-117].</i></p>	<p>NFFO noted in their Relevant Representation [RR-034] that data from other wind farm surveys which used incorrect methodology for the assumptions made were used to inform the baseline for the Projects.</p> <p><i>'We feel that the commercial fisheries assessment underestimates the impacts at almost every stage. The assumption that mobile gear vessels can simply move from the area during construction reduces the level of impact these fisheries will feel. This is an oversimplification and demonstrates a lack of understanding of how the fisheries in the region have been squeezed into a smaller and smaller marine space over progressive offshore wind developments, marine legislation and offshore cabling'.</i></p> <p>At the NFFO SoCG meeting held on 1st April 2025, the NFFO agreed that this could be amended to 'Not Agreed – no material impacts' as per SoCG ID 26.</p>	

SoCG ID	The Applicants' Position	NFFO's Position	Position Status
	<p>(See the full response in RR-034:4 of The Applicants' Responses to Relevant Representations [PDA-013].</p> <p>The Applicants acknowledge the NFFO's position.</p>		
14.	<p>The assessment of the significance of effects presented in section 10.6 of Chapter 10 Fish and Shellfish Ecology [APP-091] is consistent with the agreed assessment methodologies.</p> <p>See SoCG ID 8 and 13 for further detail.</p>	<p>In their Relevant Representation [RR-034] the NFFO stated: '<i>The NFFO disagreed with the conclusions reached in the assessment</i>'.</p> <p>The NFFO accept that the Applicants have followed agreed assessment methodologies. However, it is the position of the NFFO that those methodologies are not robust enough to capture social, economic and cultural impacts to commercial fisheries at the fleet or individual business level.</p> <p>See the response provided in 8 and 13 for further detail.</p>	
15.	<p>Section 10.6.1 of Chapter 10 Fish and Shellfish Ecology [APP-091] represents a comprehensive list of the potential impacts during construction.</p> <p>The NFFO did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their Relevant Representation. It is therefore considered by the Applicants that the matter is agreed.</p>	<p>The NFFO agree with the Applicants and consider this matter agreed.</p>	

SoCG ID	The Applicants' Position	NFFO's Position	Position Status
16.	<p>Section 10.6.2 of Chapter 10 Fish and Shellfish Ecology [APP-091] represents a comprehensive list of the potential impacts during operation.</p> <p>The NFFO did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their Relevant Representation. It is therefore considered by the Applicants that the matter is agreed.</p>	The NFFO agree with the Applicants and consider this matter agreed.	
17.	<p>The assessment of cumulative effects, as detailed in section 10.7 of Chapter 10 Fish and Shellfish Ecology [APP-091] is consistent with the agreed methodologies.</p> <p>See the response provided in SoCG ID 8 for further detail.</p>	<p>No specific comments were made regarding the Cumulative Effects Assessment (CEA) conclusions in the NFFO's Relevant Representation.</p> <p>See the response provided in SoCG ID 8 for further detail.</p> <p>At the NFFO SoCG meeting held on 14th April 2025, the NFFO agreed that this could be amended to 'Not Agreed – no material impacts'.</p>	
EIA - Assessment Conclusions			
18.	<p>The conclusions of assessment of significance as detailed in section 10.6 of Chapter 10 Fish and Shellfish Ecology [APP-091] are appropriate and are considered not significant in EIA terms.</p> <p>See the response provided in SoCG ID 8 for further detail.</p>	In their Relevant Representation the NFFO stated: <i>'The NFFO disagreed with the conclusions reached in the assessment'</i> .	

SoCG ID	The Applicants' Position	NFFO's Position	Position Status
		<p>Following the NFFO SoCG meeting held on 1st April 2025, the NFFO agreed that this could be amended to 'Not Agreed – no material impacts'.</p> <p>See the response provided in SoCG ID 8 for further detail.</p>	
EIA – Cumulative Effects Assessment (CEA) Conclusions			
19.	<p>The conclusions of the CEA as detailed in section 10.7 of Chapter 10 Fish and Shellfish Ecology [APP-091] are appropriate and are considered not significant in EIA terms.</p> <p>See the response provided in SoCG ID 8 for further detail.</p>	<p>No specific comments were made regarding the CEA conclusions in the NFFO's Relevant Representation.</p> <p>See the response provided in SoCG ID 8 for further detail.</p> <p>At the NFFO SoCG meeting held on 14th April 2025, the NFFO agreed that this could be amended to 'Not Agreed – no material impacts'.</p>	

3.5 Commercial Fisheries

Table 3-5 - Topics agreed, in discussion or not agreed in relation to Commercial Fisheries

SoCG ID	The Applicants' Position	The NFFO's Position	Position Status
EIA – Planning and Policy			
20.	<p>All relevant plans and policies have been identified in section 13.4.1 of Chapter 13 Commercial Fisheries [APP-117] and these have been appropriately considered in the assessment.</p> <p>The NFFO did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their Relevant Representation. It is therefore considered by the Applicants that the matter is agreed.</p>	The NFFO agree with the Applicants and consider this matter agreed.	
EIA – Baseline Environment			
21.	The ES adequately characterises the baseline environment as detailed in section 13.5 of Chapter 13 Commercial Fisheries [APP-117].	The NFFO confirmed this matter was agreed with the Applicants in an email dated 27 th January 2025.	
22.	Sufficient existing data sources have been used to inform the assessment as presented within section 13.6 of Chapter 13 Commercial Fisheries [APP-117].	The NFFO confirmed this matter was agreed with the Applicants in an email dated 27 th January 2025.	
EIA – Assessment Methodology			

SoCG ID	The Applicants' Position	The NFFO's Position	Position Status
23.	<p>The study area identified in section 13.3.1 of Chapter 13 Commercial Fisheries [APP-117] is appropriate.</p> <p>The NFFO did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their Relevant Representation. It is therefore considered by the Applicants that the matter is agreed.</p>	The NFFO agree with the Applicants and consider this matter agreed.	
24.	<p>The realistic worst case scenario presented in the assessment for the development scenarios, as outlined in Table 13-1 of Chapter 13 Commercial Fisheries [APP-117] is appropriate.</p> <p>The NFFO did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their Relevant Representation. It is therefore considered by the Applicants that the matter is agreed.</p>	The NFFO agree with the Applicants and consider this matter agreed.	
25.	<p>The embedded mitigation measures in Table 13-3-3 of Chapter 13 Commercial Fisheries [APP-117] are sufficient and appropriate.</p> <ol style="list-style-type: none"> Response to the NFFO's Relevant Representation was provided on 8th October 2024, awaiting further comments from NFFO on this point. <p>In The Applicants' Responses to Relevant Representations [PDA-013] it was stated that:</p>	<ol style="list-style-type: none"> In their Relevant Representation [RR-034], the NFFO disagreed with the lack of mitigation included within the assessment, specifically with regards to a lack of mitigation regarding potential economic loss for commercial fisheries receptors and the potential increase in spatial squeeze on fishermen in the region. 	

SoCG ID	The Applicants' Position	The NFFO's Position	Position Status
	<p><i>'In response to consultation with the CFWG, detailed in Appendix 13-1 Commercial Fisheries Consultation Responses [APP-119], the low magnitude of impact definition has been updated within Table 13 11 to cover a potential loss of revenue of between 5-10%, while the medium magnitude of impact definition now covers a potential loss of revenue of between 11-50%. Estimated percentage reduction in annual value of landings valuations are informed by expert judgement that is based on data analysis, stakeholder feedback, the Array Area layouts presented and how these may affect fishing activity.'</i> ((RR-034: 5)</p> <p>And that:</p> <p><i>'.....Given the implementation of the Dogger Bank SAC Byelaw for the foreseeable future, mobile bottom contacting gear types will not be present in the DBS Array Areas and will therefore not be impacted by the construction of the DBS Array Areas. The MMO will review the Dogger Bank SAC Byelaw every five years and monitor the prohibition of bottom towed fishing gear on the SAC's conservation objectives (Dogger Bank Special Area of Conservation (Specified Area) Bottom Towed Fishing Gear Byelaw 2022) (RR-034:4).</i></p> <p>2. The Applicants acknowledge the NFFO's position.</p>	<p>In the NFFO SoCG meeting on 1st October 2024, the NFFO expressed their desire for a commercial fisheries activity monitoring project, which includes a defined period of monitoring activity, to be incorporated as an additional embedded mitigation measure, in addition to a regular review of the fishing restrictions within the SAC.</p> <p>2. At the NFFO SoCG meeting on 14th April 2025, it was noted that this discussion point was not agreed but did agree there was no material impact.</p>	
26.	<p>The impact assessment methodologies used for the EIA, as presented in section 13.4 of Chapter 13 Commercial Fisheries [APP-117], provide an appropriate approach to assessing potential impacts on the Projects.</p>	<p>The NFFO consider that the standard EIA Methodology used for offshore wind assessments is not appropriate. The NFFO agreed in an email dated 27th January 2025 however that this is not an issue specific to the Projects</p>	

SoCG ID	The Applicants' Position	The NFFO's Position	Position Status
		however and is the NFFO's national position on EIA Methodology. As such, it was agreed with the NFFO this item should be noted as 'Not Agreed – no material impacts' in an email dated 27 th January 2025.	
27.	<p>The assessment of significance presented in section 13.6 of Chapter 13 Commercial Fisheries [APP-117] is consistent with the agreed assessment methodologies.</p> <ol style="list-style-type: none"> 1. A response to the NFFO's Relevant Representation was provided on 8th October 2024, awaiting further comments from NFFO on this point. <p>The Applicants have based the assessment on the most up to date and representative data of the fishing community where practicably possible. Based on this data, impacts of displacement leading to increased gear conflict and pressure on adjacent fishing grounds are assessed to be, at worst, of a minor adverse effect which is not significant in EIA terms.</p> <p>See full response to the NFFO in The Applicants' Responses to Relevant Representations [PDA-013] (RR-034: 4).</p> <ol style="list-style-type: none"> 2. The Applicants acknowledge the NFFO's position. 	<ol style="list-style-type: none"> 1. The NFFO disagreed with the conclusions reached in the assessment in their Relevant Representation [RR-034], stating: <i>'We feel that the commercial fisheries assessment underestimates the impacts at almost every stage. The assumption that mobile gear vessels can simply move from the area during construction reduces the level of impact these fisheries will feel. This is an oversimplification and demonstrates a lack of understanding of how the fisheries in the region have been squeezed into a smaller and smaller marine space over progressive offshore wind developments, marine legislation and offshore cabling.'</i> 2. At the NFFO SoCG meeting 14th April 2025, the NFFO agreed that this could be amended to 'Not Agreed – no material impacts' as per the above SoCG ID 26. 	
28.	Section 13.6.1 of Chapter 13 Commercial Fisheries [APP-117] represents a comprehensive list of the potential effects during construction.	The NFFO agree with the Applicants and consider this matter agreed.	

SoCG ID	The Applicants' Position	The NFFO's Position	Position Status
	The NFFO did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their Relevant Representation. It is therefore considered by the Applicants that the matter is agreed.		
29.	Section 13.6.2 of Chapter 13 Commercial Fisheries [APP-117] represents a comprehensive list of the potential effects during operation. The NFFO did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their Relevant Representation. It is therefore considered by the Applicants that the matter is agreed.	The NFFO agree with the Applicants and consider this matter agreed.	
30.	The assessment of cumulative effects, as detailed in section 13.8 of Chapter 13 Commercial Fisheries [APP-117] is consistent with the agreed methodologies.	No specific comments were made regarding the CEA conclusions in the NFFO's Relevant Representation.	

SoCG ID	The Applicants' Position	The NFFO's Position	Position Status
EIA - Assessment Conclusions			
31.	The conclusions of the assessment of significance as detailed in in section 13.6 of Chapter 13 Commercial Fisheries [APP-117] are appropriate and are considered not significant in EIA terms. See SoCG ID 31 in Table 3-9 for further detail.	The NFFO disagreed with the conclusions reached in the assessment in their Relevant Representation, stating: <i>'We feel that the commercial fisheries assessment underestimates the impacts at almost every stage', and 'The NFFO disagreed with the conclusions reached in the assessment'.</i> See SoCG ID 31 in Table 3-9 for further detail.	
EIA – Cumulative Effects Assessment (CEA) Conclusions			
32.	The conclusions of the CEA as detailed in section 13.8 of Chapter 13 Commercial Fisheries [APP-117] are appropriate and are considered not significant in EIA terms.	No specific comments were made regarding the CEA conclusions in the NFFO's Relevant Representation.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring			
33.	The Conditions detailed in the Deemed Marine Licences (detailed below) to submit a Project Environmental Management Plan (PEMP) to the Marine Management Organisation (MMO) for approval post-consent is appropriate. The Outline Fisheries Liaison and Co-existence Plan must form part of the PEMP, in addition to the appointment of a fisheries liaison officer:	See SoCG ID 33 in Table 3-9 for further detail.	

SoCG ID	The Applicants' Position	The NFFO's Position	Position Status
	<ul style="list-style-type: none"> Schedule 10 – Condition 15; Schedule 11 – Condition 15; Schedule 12 – Condition 13; Schedule 13 – Condition 13; and Schedule 14 – Condition 11. <p>The NFFO did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their Relevant Representation. It is therefore considered by the Applicants that the matter is agreed.</p> <p>See SoCG ID 33 in Table 3-9 for further detail.</p>		
34.	<p>The Outline Fisheries Liaison and Co-existence Plan (Revision 3) [REP2-053]. submitted alongside the DCO application provides a sufficient basis to continue discussions with the wider commercial fisheries industry, and will help to mitigate potential impacts of the Projects on commercial fisheries receptors.</p> <p>See SoCG ID 34 in Table 3-9 for further detail.</p>	<p>In their Relevant Representation the NFFO welcomed the inclusion of the Fisheries Liaison and Co-existence Plan within the Applicants DCO Application, comments to be provided in their Written Representation.</p> <p>See SoCG ID 34 in Table 3-9 for further detail.</p>	

3.6 Status of Discussions for Matters ‘Not Agreed’ or ‘Under Discussion’

3.6.1 General

Table 3-6 - Status of discussions relating to general topics

SoCG ID	Discussion Point	Applicants’ Position	NFFO’s Position	Position Status
3.	Cable Statement	<p>The Applicants stated in The Applicants’ Responses to Written Representations [REP2-057] (REP1-077:13) that ‘<i>The purpose of the Cable Statement is detailed in section 1.2 of the Cable Statement (Revision 3) [document reference 8.20], which notes that the document provides details of the proposed cable route, installation methods and consideration of cable route design. Risks associated with cables and commercial fisheries are assessed in section 13.6 of Chapter 13 Commercial Fisheries [APP-117] for the Projects alone during the construction, operation and decommissioning phases. This includes an assessment of loss or damage to fishing gear due to snagging and navigational safety impacts to commercial fishing receptor groups. Snagging and navigational safety are both assessed to be of a negligible to minor adverse residual significance of effect for all receptor groups during the operational phase, which is not</i></p>	<p>The NFFO stated in their Written Representation [REP1-077] that ‘<i>The outline cable statement is lacking in detail on how the risk associated with cables and fishing will be assessed, conclusions drawn and mitigation strategies. All this document states are how the applicant plans to install the associated cables with minimal reference to mitigation or remediation concerns. Our comments are limited due to this lack of detail. Fisheries concerns do not form part of any decisions on to cable routing requirements for this development. It must be acknowledged that the “avoid” component of marine spatial planning has not been applied here.</i></p> <p>During the second NFFO SoCG call held on 01/04/2024, the NFFO raised concern regarding mobility of the sediment in the Dogger Bank and noted concerns around cable exposures. NFFO noted that where multiple cable exposures arise, there may be wider impacts than identified in the current impact assessment, and in the instance that there are multiple</p>	

SoCG ID	Discussion Point	Applicants' Position	NFFO's Position	Position Status
		<p><i>significant in EIA terms. Mitigation in relation to these risks is also discussed in Chapter 13 Commercial Fisheries [APP-117].'</i></p> <p>Cable burial and the minimisation of the use of protection will be the principle measures for avoiding conflicts with fishing operations. The Cable Statement (Revision 3) [REP2-039]. Further to the above, the Cable Statement (Revision 3) [REP2-039] has been updated to include fisheries considerations noting that should cable burial to depth not be achievable, <i>"To ensure the safety of fishing activity and to minimise the amount of fishing grounds lost, cable protection in areas where the minimum target burial depth (0.5 - 1.5m depending on the cable in question) of cable cannot be achieved would be designed to minimise snagging hazards as far as possible, for example by minimising height above seabed, ensuring smooth and shallower profiles, selecting the right grade for rock placement and ensuring appropriate types of rock (e.g. smoother edges) are used"</i>.</p> <p>The Applicants agree for this to remain under discussion until the CBRA is updated post-consent.</p>	<p>cable exposures, the NFFO would view the current impact assessment as incorrect and invalid.</p> <p>The NFFO have noted their disagreement on this matter is advised by examples from operational offshore wind projects. This concern is relevant to the specific project due to the dominant seabed type.</p> <p>At the NFFO SoCG on the 14th April 2025, the NFFO highlighted that this would be further discussed post consent when the CBRA would be updated with more detail based on the final project design. The NFFO are happy the policy's will be developed but cannot have a position on something they do not know the content of yet.</p>	

3.6.2 Compensation Measures

Table 3-7 - Status of discussions relating to Compensation Measures

SoCG ID	Discussion Point	Applicants' Position	NFFO's Position	Position Status
5.	Kittiwake Compensation	<p>The Outline Kittiwake Compensation Implementation and Monitoring Plan [APP-054] provides a sufficient plan for the development of future implementation and monitoring of any agreed compensation measures, should consent for the Projects be granted and compensation for the kittiwake be required.</p> <p>The Applicants have organised a meeting for the 23rd April 2025 to discuss the plan.</p>	The NFFO's position will be updated following a meeting to discuss the plan.	
6.	Strategic Benthic Compensation	<p>The Applicants' primary compensation measure for the Dogger Bank (new SAC designation or extension) as detailed in the Project Level Dogger Bank Compensation Plan [APP-059] provides sufficient compensation for the Projects activities within the Dogger Bank SAC.</p> <p>The Applicants highlight that Defra are leading the development of the strategic compensation measures currently in planning.</p>	<p>NFFO raised concerns regarding the impact on strategic benthic compensation measures on the fishing industry. NFFO are concerned that benthic compensation will lead to further displacement of the fishing industry. If this were to happen, NFFO believe that the fishing industry will be compensating for another industry's impacts.</p> <p>At the NFFO meeting on the 14th April 2025, the NFFO acknowledge that it is not the Applicants role to decide where these sites are. The NFFO understand that it is out of the Applicants control however due to the design activities Commercial Fisheries will be further impacted.</p>	

SoCG ID	Discussion Point	Applicants' Position	NFFO's Position	Position Status
			The NFFO are unable to agree to this discussion point until Defra publish the strategic compensation measures. If during Examination, this is published and there are no material impacts, the NFFO are happy to update the position status.	

3.6.3 Fish and Shellfish Ecology

3. No points currently under discussion.

Table 3-8 - Status of discussions relating to Fish and Shellfish Ecology

SoCG ID	Discussion Point	Applicants' Position	NFFO's Position	Position Status

3.6.4 Commercial Fisheries

Table 3-9 - Status of discussions relating to Commercial Fisheries

SoCG ID	Discussion Point	Applicants' Position	NFFO's Position	Position Status
31.	Conclusions of the assessment	<p>Response to the NFFO's Relevant Representation was provided on 8th October 2024, awaiting further comments from NFFO on this point.</p> <p>In The Applicants' Responses to Relevant Representations [PDA-013] it was stated that:</p> <p><i>'In response to consultation with the CFWG, detailed in Appendix 13-1 Commercial Fisheries Consultation Responses [APP-119], the low magnitude of impact definition has been updated within Table 13 11 to cover a potential loss of revenue of between 5-10%, while the medium magnitude of impact definition now covers a potential loss of revenue of between 11-50%. Estimated percentage reduction in annual value of landings valuations are informed by expert judgement that is based on data analysis, stakeholder feedback, the Array Area layouts presented and how these may affect fishing activity' ((RR-034: 5).</i></p> <p><i>'...The Applicants has made every effort to base the assessment on the most up to data and representative data of the fishing community where practicably</i></p>	<p>The NFFO disagreed with the conclusions reached in the assessment in their Relevant Representation [RR-034], stating:</p> <p><i>'There are deeply concerning conclusions drawn in the impacts assessed for commercial fisheries. For example, the applicant has assessed a 5-20% economic loss to fishing business as low magnitude and a 20-50% loss as medium magnitude with no mitigation suggested. Any economic loss of this magnitude would result in a fisheries business failure, not a low/medium impact'.</i></p> <p>And:</p> <p><i>'We strongly disagree with the conclusions drawn in the commercial fisheries impact assessment. The spatial squeeze on fisheries in the region is one of the most extensive examples in the UK, this project is directly contributing to this expanding issue. Displacement effects are assessed as not significant for all fisheries assessed; we disagree with this assessment.'</i></p>	

SoCG ID	Discussion Point	Applicants' Position	NFFO's Position	Position Status
		<p><i>possible. Data findings have also been supplemented by project-specific consultation feedback from commercial fisheries stakeholders. Data sources were presented to fisheries stakeholders during the CFWG meetings and discussed during port visits....' (RR-034:6).</i></p> <p><i>'...Based on these data, impacts of displacement leading to increased gear conflict and pressure on adjacent fishing grounds are assessed to be, at worst, of a minor adverse effect which is not significant in EIA terms...'</i> (RR-034:6).</p>	In the NFFO SoCG meeting on 14 th April 2025, the NFFO stated that the DBS East Array Area is of most concern.	
33.	Draft DCO	<p>The Applicants note that mitigation to ensure the safety of fishing activity and to minimise the amount of fishing grounds lost includes reviewing and updating the cable burial risks assessments up to the point of construction. The Applicants also note the commitment detailed in Cogo of the Commitments Register (Revision 2) [REP2-025] to 'The Applicants are committed to burying offshore export cables to 0.5-1.5m (depending on cable location) where practicable)'. Where cable protection is required, the Cable Statement (Revision 3) [REP2-039] was updated at Deadline 3 to note: "To ensure the safety of fishing activity and to minimise the amount of fishing grounds lost, cable protection in areas where the minimum target burial</p>	<p>In their Written Representation [REP1-077], the NFFO noted that they would 'expect to see reference to the mitigation strategy the Applicants will put in place if this where to happen, reference to the cable burial risk assessment and appropriate remediation strategies' [REP1-077:11].</p> <p>In the NFFO SoCG meeting on 14th April 2025, the NFFO stated that the minimum target depth is of most concern. As per SoCG ID 3, the NFFO highlighted that this would be further discussed post consent when the CBRA would be updated with more detail based on the final project design. The NFFO are happy the policy's will be developed but cannot have</p>	

SoCG ID	Discussion Point	Applicants' Position	NFFO's Position	Position Status
		<p><i>depth (0.5 - 1.5m depending on the cable in question) of cable cannot be achieved would be designed to minimise snagging hazards as far as possible, for example by minimising height above seabed, ensuring smooth and shallower profiles, selecting the right grade for rock placement and ensuring appropriate types of rock (e.g. smoother edges) are used".</i></p> <p>The Applicants agree for this to remain under discussion until the CBRA is updated post-consent.</p>	<p>a position on something they do not know the content of yet.</p>	
34.	Outline Fisheries Liaison and Co-existence Plan (OFLCP)	<p>In the Applicants' Responses to Written Representations [REP2-057], it is stated that:</p> <ol style="list-style-type: none"> 1. <i>'...Table 3-2 of the OFLCP (Revision 3) [document reference: 8.28] provides details of how information will be disseminated throughout the lifetime of the Project, noting that information will be distributed no less than two weeks prior to activities during the construction, pre/post-construction, operation and maintenance and decommissioning phases. This commitment is secured through conditions (15/13/11) of the Deemed Marine Licences (DMLs) of the Draft DCO (Revision 5) [REP1-004].</i> <p><i>As noted by the NFFO, the Applicants acknowledge that two weeks' notice is not always possible during</i></p>	<p>In their Relevant Representation [RR-034] the NFFO welcomed the inclusion of the Fisheries Liaison and Co-existence Plan within the Applicants DCO Application.</p> <p>The NFFO state in their Written Representation [REP1-077] that:</p> <ol style="list-style-type: none"> 1. The NFFO <i>'...welcome the two weeks minimum notice period for works described in Table 3-2. They recommend including urgent or emergency works where the two weeks notice is not possible...'</i> 	

SoCG ID	Discussion Point	Applicants' Position	NFFO's Position	Position Status
		<p><i>urgent or emergency works. Therefore, text has been added to Table 3-2 section 3.6 of OFLCP (Revision 3) [document reference: 8.28] (issued at Deadline 2) accordingly, noting that if emergency or urgent works need to be undertaken, a 2 week notice period may not be possible.</i>' (REP1-077:8)</p> <ol style="list-style-type: none"> The Applicants acknowledge this comment and a reference to the ESCA for cables and fisheries interactions has been added to Paragraph 9. Updates to the OFLCP (Revision 3) [REP2-053], issued at Deadline 2, have taken account any revised guidance as applicable. The Applicants acknowledge this comment and will ensure that clarity is provided to the fishing industry as to who should be contacted to discuss key issues. The Applicants acknowledge these comments. Relevant text has been added / updated to paragraphs mentioned in the Written Representations of the updated OFLCP (Revision 3) [REP2-053], issued at Deadline 2. 	<ol style="list-style-type: none"> The NFFO recommend including a reference to including the European Subsea Cable Association guidelines when they become available for future revisions of the FLCP. The NFFO understand that there are two separate companies that act in capacity of Fisheries Liaison Officers (Precision Marine Survey Limited) and Commercial Fisheries Advisor (MacAlister Elliott & Partners) (both of which have defined roles within the FLCP) but want to ensure that commercial fisheries are correctly informed of who has what responsibility to ensure any issues that arise are dealt with accordingly. The NFFO have also made several wording and text update requests in their Written Representations [REP1-077]. 	

SoCG ID	Discussion Point	Applicants' Position	NFFO's Position	Position Status
		5. The Applicants note they have made further updates to the OFLCP (Revision 4) [document reference 8.28], to be issued at Deadline 4. The comments that the NFFO had at the NFFO SoCG meeting on 14 th April 25, will be incorporated into this revision.	5. In the NFFO SoCG meeting on 14 th April 2025, the NFFO agreed with the amendments made in OFLCP (Revision 3) [REP2-053] and made further comments regarding the two different fisheries liaison officers. The NFFO also requested if examples of how the Projects development areas had been refined for Commercial Fisheries could be added to the OFLCP. The NFFO will look to review the changes made to the OFLCP (Revision 4) [document reference 8.28] after Deadline 4.	

4 Summary

4. This SoCG has outlined the consultation that has taken place between the Applicants and the NFFO during the pre-application and Examination phases. This SoCG will be updated as discussions progress and made available to PINS as requested through the DCO examination phase.

5 References

Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (2024). Planning Act 2008: Examination stage for Nation-ally Significant Infrastructure Projects. Available at: <https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects>. [Accessed August 2024].

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