

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

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South (East) Limited**

**Dogger Bank South Offshore
Wind Farms**

**UK Chamber of Shipping Statement of Common
Ground (Revision 2)**

Submission for Deadline 4

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Contents

1	Introduction	7
1.1	Background	7
1.2	Approach to SoCG	8
2	Consultation and Engagement	9
2.1	Introduction to Consultation	9
2.2	Consultation Summary	9
3	Agreement Log	12
3.1	Overview	12
3.2	General	13
3.3	Shipping and Navigation	14
3.4	Status of Discussions for Matters 'Not Agreed' or 'Under Discussion'	17
3.4.1	Shipping and Navigation	17
4	Summary	18
5	References	19

Tables

Table 1-1 - Application Documents of interest to the UK Chamber of Shipping	8
Table 2-1 - Summary of pre-application and post-application consultation with the UK Chamber of Shipping	9
Table 3-1 – Agreement logs position status key	12
Table 3-2 – General Topics agreed, in discussion or not agreed with the UK Chamber of Shipping.....	13
Table 3-3 – Topics agreed, in discussion or not agreed in relation to Shipping and Navigation	14
Table 3-4 – Status of discussions relating to Shipping and Navigation	17

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.
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.
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
DBS	Dogger Bank South
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environment Statement
ExA	Examining Authority
MGN	Marine Guidance Note
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
SoCG	Statement of Common Ground
UK	United Kingdom

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 United Kingdom (UK) Chamber of Shipping to set out the areas of agreement and disagreement between the two parties in relation to the proposed Development Consent Order (DCO) application for the 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 the UK Chamber of Shipping 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 UK Chamber of Shipping, and which have been raised within the **UK Chamber of Shipping's Relevant Representation** [RR-052] 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 UK Chamber of Shipping 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 UK Chamber of Shipping and address the elements of the Projects that may affect the interests of the UK Chamber of Shipping:

Table 1-1 - Application Documents of interest to the UK Chamber of Shipping

ES Chapter/ Application Document	Planning Inspectorate (PINS) Reference
Chapter 5 Project Description	APP-071 (superseded by Revision 3 - REP1-009)
Chapter 14 Shipping and Navigation	APP-121
Appendix 14-2 Navigational Risk Assessment	APP-124
Project Change Request 1 - Offshore & Intertidal Works	AS-141

8. The UK Chamber of Shipping and the Applicants have been working together to minimise possible impacts of the Projects in relation to the UK Chamber of Shipping's remit as the trade organisation for the UK shipping industry representing dry and wet trades, passenger transport (cruise and ferry), offshore supply and construction, towage and specialist, as well as professional service providers with shipping interests.

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 UK Chamber of Shipping, this SoCG is focused on matters of material interest and relevance to the UK Chamber of Shipping, 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:** a summary of consultation and engagement to date.
 - **Agreement Log:** a record of the Applicants' position alongside the UK Chamber of Shipping's position. **Table 3-2** and **Table 3-3** 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 3-4**.
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 UK Chamber of Shipping.

2 Consultation and Engagement

2.1 Introduction to Consultation

12. The UK Chamber of Shipping have been consulted on the proposed development throughout the pre-application stage, having engaged in Shipping and Navigation meetings as well as via non-statutory and statutory consultation under Section 42 of the Planning Act 2008.

2.2 Consultation Summary

13. **Table 2-1** summarises the consultation and engagement that the Applicants have undertaken with the UK Chamber of Shipping as part of the statutory and non-statutory consultation and engagement during the pre-application and post-application phases.

Table 2-1 - Summary of pre-application and post-application consultation with the UK Chamber of Shipping

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
Pre – Application			
21/09/2021	Dedicated Meeting	Pre-Scoping	Introduction to the Projects and high level overview of shipping and navigation ahead of Scoping Report.
13/01/2022	Initial Scoping Opinion	Initial scoping response	UK Chamber of Shipping noted importance of a wide routeing study area give the cumulative impact of increasing offshore wind farms.
01/02/2023	Dedicated Meeting	Pre-Preliminary Environmental Information Report (PEIR)	Update on the Projects and discussion of points raised in scoping response.
25/04/2023	Dedicated Meeting	Hazard Workshop	First Hazard Workshop undertaken with UK Chamber of Shipping and other shipping and navigation stakeholders.
17/07/2023	Section 42 Consultation	Section 42 response	UK Chamber of Shipping strongly advocated for full removal of all infrastructure above and below the seabed at decommissioning and noted a preference to reduce the footprint of the DBS array areas to maximise power output efficiency.

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
09/11/2023	Dedicated Meeting	Hazard Workshop	Second Hazard Workshop undertaken with UK Chamber of Shipping and other shipping and navigation stakeholders.
29/03/2023	Email	Regular Operator consultation	Regular Operator consultation letter shared with the UK Chamber of Shipping for circulation with members.
Post Application			
16/09/2024	Email	Relevant Representation	Received Chamber of Shipping's Relevant Representation via The Planning Inspectorate.
04/10/2024	Email	Draft SoCG	Draft SoCG issued to UK Chamber of Shipping for review prior to call on 11/10/2024.
08/10/2024	Email	Relevant Representation	The Applicants responded to the Chamber of Shipping's Relevant Representation within The Applicants' Responses to Relevant Representations [PDA-013].
11/10/2024	Meeting	SoCG meeting	Meeting to discuss the draft SoCG with UK Chamber of Shipping.
15/11/2024	Email	Project Change Request 1	Project Change Request 1 - Environmental Assessment Update [AS-141] issued to the Chamber of Shipping for comment.
21/11/2024	Email	SoCG meeting minutes	Draft SoCG meeting minutes sent to the Chamber of Shipping for review.
22/11/2024	Email	SoCG meeting minutes	Comments on the SoCG meeting minutes issued by the Chamber of Shipping.
25/11/2024	Email	SoCG meeting minutes	Final SoCG meeting minutes issued to the Chamber of Shipping.
17/12/2024	Email	Draft SoCG	The revised Draft SoCG was issued for comment.
02/01/2025	Email	Draft SoCG	The Chamber of Shipping confirmed agreement of the Draft SoCG for submission into Examination.
23/01/2025	Email	Draft SoCG	The Applicants amended SoCG ID 5 at the Examining Authority's request at Issue Specific Hearing 2, to include clarification on the agreement that the proposed shipping route

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
			deviations and the mean 1 nautical mile distance between shipping routes and offshore structures is a reasonable assumption to make in the Shipping and Navigation assessment.
28/01/2025	Email	Draft SoCG	The Chamber of Shipping confirmed the proposed changes were accepted and that SoCG ID 8 and 9 were also agreed. The SoCG was finalised for submission at Deadline 1.
27/03/2025	Email	Revised SoCG	The Applicants amended the SoCG after Deadline 3 and issue to the Chamber of Shipping for agreement.
27/03/2025	Email	Revised SoCG	The Chamber of Shipping updated the SoCG and confirmed that all discussion points at the time of writing are agreed.

3 Agreement Log

3.1 Overview

14. The following sections of this SoCG summarise the level of agreement between the parties for Shipping and Navigation.
15. To easily identify whether a matter is 'agreed', 'not agreed' or 'under discussion', a colour coding system red, amber, green (RAG status) 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 3.4.

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 UK Chamber of Shipping 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 UK Chamber of Shipping 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 UK Chamber of Shipping

SoCG ID	The Applicants' Position	The UK Chamber of Shipping's Position	Position Status
Environmental Impact Assessment (EIA) – Consultation			
1.	The Applicants have adequately consulted with the UK Chamber of Shipping 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.	Agreed.	
Project Change Request 1			
2	Project Change Request 1: Offshore and Intertidal Works [AS-141] is appropriate and acceptable.	Agreed - The Chamber of Shipping does not have concerns regarding Project Change Request 1.	

3.3 Shipping and Navigation

Table 3-3 – Topics agreed, in discussion or not agreed in relation to Shipping and Navigation

SoCG ID	The Applicants' Position	The UK Chamber of Shipping's Position	Position Status
EIA – Baseline Environment			
3	The ES adequately characterises the baseline environment as detailed in section 14.5 of Chapter 14 Shipping and Navigation [APP-121] and sections 7 to 12 of Appendix 14-2 Navigational Risk Assessment [APP-124].	Agreed.	
4.	Sufficient survey data from the site-specific vessel traffic surveys has been collected in accordance with Marine Guidance Note (MGN) 654 requirements to inform the assessment as presented within section 14.6 of Chapter 14 Shipping and Navigation [APP-121] and section 10 of Appendix 14-2 Navigational Risk Assessment [APP-124].	Agreed.	
5	The approach to the assessment is also deemed appropriate for the purposes of predicting changes to the baseline environment as described in section 14.5 of Chapter 14 Shipping and Navigation [APP-121] and section 15 of Appendix 14-2 Navigational Risk Assessment [APP-124].	Agreed.	
EIA – Assessment Methodology			
6	The methodology applied in sections 14.3 and 14.4 of Chapter 14 Shipping and Navigation [APP-121] and section 3 of Appendix 14-2 Navigational Risk Assessment [APP-124] are appropriate, noting this includes consideration of	Agreed.	

SoCG ID	The Applicants' Position	The UK Chamber of Shipping's Position	Position Status
	offshore wind farms up to 50 nautical miles (nm) from the DBS array areas for the cumulative risk assessment and the application of a 1nm mean distance from offshore structures for calculating main commercial route deviations.		
7	The embedded mitigation measures in Table 14-3 of Chapter 14 Shipping and Navigation [APP-121] and section 20 of Appendix 14-2 Navigational Risk Assessment [APP-124] are appropriate.	Agreed.	
8	The potential hazards (impacts) identified in section 14.6 of Chapter 14 Shipping and Navigation [APP-121] and section 17 of Appendix 14-2 Navigational Risk Assessment [APP-124] adequately capture the potential risks to shipping and navigation.	Agreed.	
EIA - Assessment Conclusions			
9	The conclusions of the assessment of significance as detailed in in section 14.6 of Chapter 14 Shipping and Navigation [APP-121] and section 17 of Appendix 14-2 Navigational Risk Assessment [APP-124] (broadly acceptable or tolerable with mitigation) are appropriate and are considered not significant in EIA terms.	Agreed.	
EIA – Cumulative Risk Assessment Conclusions			
10	The conclusions of the cumulative risk assessment as detailed in section 14.8 of Chapter 14 Shipping and Navigation [APP-121] and section 18 of Appendix 14-2	Agreed.	

SoCG ID	The Applicants' Position	The UK Chamber of Shipping's Position	Position Status
	Navigational Risk Assessment [APP-124] (broadly acceptable or tolerable with mitigation) are appropriate and are considered not significant in EIA terms.		
EIA – Decommissioning			
11	<p>The approach to decommissioning will be developed prior to the start of the decommissioning phase through a Decommissioning Plan with the nature of the works determined by legislation and guidance at the time. Decommissioning works would generally be the reverse of the construction works and involve similar types and numbers of vessels. The decommissioning duration of the offshore infrastructure may take up to five years, and it is assumed as a worst case that all sub-sea cables would be left in situ. However, the best environmental option would be considered at the time of decommissioning.</p> <p>A Decommissioning Plan will be developed prior to decommissioning with the nature of the works determined by legislation and guidance at the time.</p> <p>Chapter 5 Project Description (Revision 3) [REP1-009] (section 5.5.13, paragraph 192) states that...<i>' At the end of the operational lifetime of the Projects, it is anticipated that all structures above the seabed or ground level would be completely removed. The decommissioning sequence would generally be the reverse of the construction sequence and involve similar types and numbers of vessels and equipment. The decommissioning duration of the offshore infrastructure may take the same amount of time as construction of the Projects, up to five years per Project, although this indicative timing may reduce.</i></p>	<p>The Chamber of Shipping strongly advocates for full decommissioning and removal of all infrastructure from the site, including all turbines, topsides, inter-array cables and interconnector, and foundations to a safe depth below the seabed.</p> <p>Such removal reduces risk to navigational safety, returns seabed to its original state, and minimises hindrance encumbrance to future activity or development.</p> <p>The Chamber of Shipping recognises and respects the requirements in the Energy Act 2004 and accepts the process. The matter is considered agreed.</p>	

SoCG ID	The Applicants' Position	The UK Chamber of Shipping's Position	Position Status
	<p><i>The Energy Act 2004 requires that a decommissioning plan must be submitted to and approved by the Secretary of State, a draft of which would be submitted prior to the construction of the Projects. The decommissioning plan and programme would be updated during the Projects' lifespan in accordance with requirements.</i></p> <p><i>To take account of changing best practice and new technologies, the approach and methodologies employed at decommissioning would be cognisant of the legislation and policy requirements at time of decommissioning'.</i></p>		

3.4 Status of Discussions for Matters 'Not Agreed' or 'Under Discussion'

3.4.1 Shipping and Navigation

Table 3-4 – Status of discussions relating to Shipping and Navigation

SoCG ID	Discussion Point	Applicants' Position	UK Chamber of Shipping's Position	Position Status

4 Summary

17. This SoCG has outlined the consultation that has taken place between the Applicants and the UK Chamber of Shipping 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 Nationally 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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