

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

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South (East) Limited**

**Dogger Bank South Offshore  
Wind Farms**

**The Lincolnshire Wildlife Trust Statement of  
Common Ground (Revision 3)**

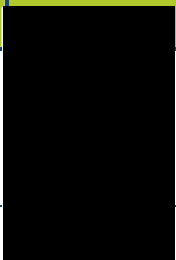
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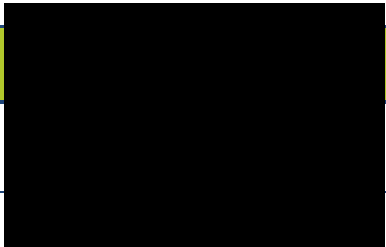
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01	January 2025	Submission for Deadline 1	RHDHV	RWE	RWE
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03	July 2025	Submission for Deadline 8	RHDHV	RWE	RWE

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On behalf of	Lincolnshire Wildlife Trust

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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.
National Significant Infrastructure Project (NSIP)	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
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 <b>Project Change Request 1 - Offshore &amp; Intertidal Works</b> [AS-141] which was accepted into Examination on 21 <sup>st</sup> January 2025.
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.

Term	Definition
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
AEoI	Adverse Effects on Site integrity
ANS	Artificial Nesting Sites
CEA	Cumulative Effects Assessment
CRM	Collision Risk Modelling
DBS	Dogger Bank South
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EPP	Evidence Plan Process
ES	Environmental Statement
ETG	Expert Topic Group
ExA	Examining Authority
FFC	Flamborough and Filey Coast
HRA	Habitats Regulations Assessment
LWT	Lincolnshire Wildlife Trust
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
RIAA	Report to Inform Appropriate Assessment
RSPB	Royal Society for the Protection of Birds
SoCG	Statement of Common Ground
SPA	Spatial Protection Area



# 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 Lincolnshire Wildlife Trust (LWT) 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 LWT was not set out in the Rule 6 letter issued by the Planning Inspectorate post-application of the Projects DCO. However, due to the LWT's continued engagement with the Projects the Applicants have included the LWT in the list of stakeholders for which to enter the SoCG process with.
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 LWT, and which have been raised within the **LWT's Relevant Representation** [RR-028] 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 LWT and will provide the ExA with a clear overview of the level of common ground between both parties. This document has been updated throughout the Examination process.
7. The following application documents have informed the discussions with LWT address the elements of the Projects that may affect the interests of LWT (**Table 1-1**).

Table 1-1 Application Documents of interest to the LWT

ES Chapter/ Application Document	Planning Inspectorate (PINS) Reference
Chapter 8 Marine Physical Environment	APP-080 (superseded by Revision 2 – REP7-035)
Appendix 8-3 – Marine Physical Processes Modelling Technical Report	APP-084 (superseded by Revision 3 – REP2-017)
Chapter 9 Benthic and Intertidal Ecology	APP-085 (superseded by Revision 2 – REP7-038)
Appendix 9-3 Benthic Ecology Monitoring Report	APP-089
Chapter 10 Fish and Shellfish Ecology	APP-091 (superseded by Revision 2 – REP7-042)
Chapter 11 Marine Mammals	APP-095 (superseded by Revision 2 – REP7-045)
Chapter 12 Offshore Ornithology	APP-103 (superseded by Revision 3 – REP4-032)
Report to Inform Appropriate Assessment Habitats Regulations Assessment - Part 1 of 4 – Introduction and Terrestrial Ecology	APP-045 (superseded by Revision 2 – REP5-007)
Report to Inform Appropriate Assessment Habitats Regulations Assessment - Part 2 of 4 – Annex I Offshore Habitats and Annex II Migratory Fish	APP-046 (superseded by Revision 5 – REP7-015)
Report to Inform Appropriate Assessment Habitats Regulations Assessment - Part 3 of 4 - Annex II Marine Mammals	REP5-009 (superseded by Revision 2 – REP5-009)
Report to Inform Appropriate Assessment Habitats Regulations Assessment - Part 4 of 4 – Marine Ornithological Features	APP-048 (superseded by Revision 4 – REP4-016)
Project Change Request 1 – Offshore and Intertidal Works	AS-141
Appendix A: Fish and Shellfish Environmental Assessment Update	AS-142
Appendix B: Marine Mammal Environmental Statement Update	AS-143

ES Chapter/ Application Document	Planning Inspectorate (PINS) Reference
Appendix C: Marine Mammal Report to Inform Appropriate Assessment (RIAA) Habitats Regulations Assessment (HRA) Update	As-144

8. The LWT and the Applicants have been working together to minimise possible impacts of the Projects on the LWT's operations, and so LWT 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 LWT, this SoCG is focused on matters of material interest and relevance to LWT, 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 to date.
  - **Agreement Log:** a record of the Applicants' position alongside LWT's position. **Table 3-2** sets 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 3-7** to **Table 3-12**.
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 LWT.

## 2 Consultation and Engagement

### 2.1 Introduction to Consultation

12. LWT have been consulted on the proposed development throughout the pre-application stage, having engaged in the Marine Physical Environment, Benthic and Intertidal Ecology, Fish and Shellfish Ecology, Marine Mammals, and Offshore Ornithology Expert Topic Group (ETG) Meetings under the Evidence Plan Process (EPP), 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 LWT.

**Table 2-1 Summary of pre-application and post-application consultation with LWT**

Date	Form of Consultation	Meeting Title/Topic	Summary of Consultation
<b>Pre – Application</b>			
07/02/2023	ETG Meeting	Offshore Ornithology Pre-PEIR	<p>The following topics were discussed during the ETG meeting:</p> <ul style="list-style-type: none"> <li>• Provide ETG with a project update.</li> <li>• Provide a summary of the baseline environment for offshore ornithology, following the site-specific surveys undertaken for the Projects.</li> <li>• Detail the assessment methodology and preliminary findings of the assessment process.</li> </ul>
21/02/2023	ETG Meeting	Marine Mammal Pre-PEIR	<p>The following topics were discussed during the ETG meeting:</p> <ul style="list-style-type: none"> <li>• Provide ETGs with a project update.</li> <li>• Provide a summary on responses to scoping comments, the site-specific surveys undertaken to inform PEIR, the underwater noise modelling approach and a brief summary of sites screened in for HRA.</li> </ul>
27/02/2023	Email	Offshore Ornithology Pre- ES	Comments from Natural England on the Ornithology ETG.

Date	Form of Consultation	Meeting Title/Topic	Summary of Consultation
09/05/2023	ETG Meeting	Offshore Ornithology Non-Kittiwake Compensation	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> <li>Potential compensation measures for non-kittiwake species.</li> </ul>
17/07/2023	Section 42 Consultation	Marine Physical Environment, Benthic and Intertidal Ecology, Fish and Shellfish Ecology, Marine Mammals, and Offshore Ornithology	LWT response to Section 42 consultation on PEIR. See <b>Appendix G</b> [APP-044] of the <b>Consultation Report</b> [APP-034].
14/09/2023	ETG Meeting	Marine Mammals	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> <li>Project update;</li> <li>Site selection;</li> <li>Marine Mammals: PEIR comments and responses;</li> <li>Updated underwater noise modelling;</li> <li>Noise mitigation measures;</li> <li>Noise monitoring; and</li> <li>Cumulative Effects Assessment (CEA).</li> </ul>
21/09/2023	ETG Meeting	Benthic and Intertidal Ecology	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> <li>Project Update: <ul style="list-style-type: none"> <li>Benthic and intertidal ecology; and</li> <li>Review of PEIR comments.</li> </ul> </li> <li>Marine Conservation Zone Area considerations;</li> <li>Fish and Shellfish Ecology: <ul style="list-style-type: none"> <li>Herring and Sandeel PEIR Queries; and</li> <li>Other related queries.</li> </ul> </li> </ul>
25/01/2024	Email	Offshore Ornithology	CC issued a summary report detailing the collision and displacement numbers of key species that were used to inform the Offshore Ornithology ES chapter.

Date	Form of Consultation	Meeting Title/Topic	Summary of Consultation
29/01/2024	ETG Meeting	Benthic and Intertidal Ecology Marine Physical Processes	<p>The following topics were discussed during the ETG meeting:</p> <ul style="list-style-type: none"> <li>• Project Update;</li> <li>• Physical Processes: <ul style="list-style-type: none"> <li>○ Modelling update;</li> <li>○ Summary of construction impacts and model results; and</li> <li>○ Summary of operation impacts.</li> </ul> </li> <li>• Benthic and Intertidal Ecology: <ul style="list-style-type: none"> <li>○ Benthic Ecology Monitoring Survey Summary;</li> <li>○ Impact results from the ES;</li> <li>○ Results from the CEA; and</li> <li>○ Report to Inform Appropriate Assessment (RIAA) conclusions.</li> </ul> </li> </ul>
01/02/2024	Email	Offshore Ornithology	CC issued draft versions of appendices 12.9, 12.13 and other early modelling results following NE query on materials sent previously.
06/02/2024	ETG Meeting	Offshore Ornithology Pre-ES	<p>The following topics were discussed during the ETG meeting:</p> <ul style="list-style-type: none"> <li>• DBS Project Update;</li> <li>• Discussion of key PEIR comments;</li> <li>• Presentation of preliminary ES results; and</li> <li>• Presentation of preliminary HRA results for project alone key Spatial Protection Area (SPA)s.</li> </ul>
23/02/2024	ETG Meeting	Fish and Shellfish	<p>The following topics were discussed during the ETG meeting:</p> <ul style="list-style-type: none"> <li>• Project Update;</li> <li>• Draft Assessment Findings;</li> <li>• Potential Mitigation Options; and</li> <li>• PEIR Comments.</li> </ul>
10/04/2024	ETG Meeting	Offshore Ornithology Auks Compensation	<p>The following topics were discussed during the ETG meeting:</p> <ul style="list-style-type: none"> <li>• Project updates;</li> <li>• Predator eradication / reduction;</li> </ul>

Date	Form of Consultation	Meeting Title/Topic	Summary of Consultation
			<ul style="list-style-type: none"> <li>• Bycatch and Artificial Nesting Sites (ANS); and</li> <li>• Next steps.</li> </ul>
11/04/2024	ETG Meeting	Benthic and Intertidal Ecology HRA Compensation	<p>The following topics were discussed during the ETG meeting:</p> <ul style="list-style-type: none"> <li>• Project Update;</li> <li>• RIAA Conclusions; and</li> <li>• Compensation.</li> </ul>
25/04/2024	ETG Meeting	Offshore Ornithology Kittiwake Compensation	<p>The following topics were discussed during the ETG meeting:</p> <ul style="list-style-type: none"> <li>• Project updates;</li> <li>• Conclusions for Flamborough and Filey Coast (FFC) SPA Kittiwake;</li> <li>• Overview of the Approach to Compensation; and</li> <li>• Offshore ANS Proposal.</li> </ul>
21/05/2024	Email	General	CC confirmed DBS DCO submission date had been revised to the 10 <sup>th</sup> June 2024.
13/06/2024	Email	General	CC confirmed DCO submitted 12 <sup>th</sup> June 2024, queried if stakeholder would wish for meetings later in summer to discuss application docs.
<b>Post Application</b>			
16/09/2024	Email	Relevant Representation	Received LWT's Relevant Representation via the Planning Inspectorate.
08/10/2024	Email	Relevant Representation	The Applicants issued their responses to the LWT's Relevant Representations via the Planning Inspectorate.
11/10/2024	Meeting	Draft SoCG	Meeting to discuss the draft SoCG issued to LWT on 3 <sup>rd</sup> October 2024.
17/10/2024	Email	Draft SoCG	Updated version of the draft SoCG following initial meeting issued to LWT for comment.

Date	Form of Consultation	Meeting Title/Topic	Summary of Consultation
25/10/2024	Email	Draft SoCG	LWT issued amended version of the SoCG to the Applicants.
15/11/2024	Email	Project Change Request 1	<b>Project Change Request 1 - Environmental Assessment Update</b> [AS-141] issued to LWT for comment.
18/12/2024	Email	Draft SoCG	Updated version of the draft SoCG issued to LWT for review following LWT amendments.
09/01/2025	Email	Draft SoCG	Updated version of the draft SoCG received from LWT.
20/01/2025	Email	Draft SoCG	LWT confirmed agreement of the revised draft of the SoCG for submission into Examination at Deadline 1.
02/04/2025	Email	SoCG (Revision 2)	The Applicants issued revision 2 of the LWT SoCG to LWT for review and comment.
10/04/2025	Email	SoCG (Revision 2)	LWT provided an updated version of the SoCG with additional comments and amendments.
24/04/2025	Email	SoCG (Revision 2)	LWT confirmed no further amendments to make to SoCG ahead of issue at Deadline 4.
06/06/2025	Email	SoCG (Revision 3)	The Applicants issued revision 3 of the LWT SoCG to LWT for review and comment.
18/06/2025	Email	SoCG (Revision 3)	LWT provided an updated version of the SoCG with additional comments and amendments.
30/06/2025	Email	SoCG (Revision 3)	The Applicants issued revision 3 of the LWT SoCG to LWT for review and sign off.
03/07/2025	Email	SoCG (Revision 3)	LWT returned a signed version of the LWT SoCG with agreement.



## 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 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 3.8.

**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 LWT 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 LWT 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 LWT

SoCG ID	The Applicants' Position	LWT's Position	Position Status
EIA – Consultation			
1.	The Applicants have adequately consulted with LWT 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.	LWT noted agreement on this topic during the LWT SoCG meeting held on 11 <sup>th</sup> October 2024.	
2.	LWT have been adequately consulted on the <b>Project Change Request 1 – Offshore and Intertidal Works</b> [AS-141] which was provided to LWT as part of a targeted non-statutory consultation exercise on 14th November 2024 by the Applicants.	The Project Change Request 1 was under consultation until the 16/12/2024, no comments from the LWT were received.	
EIA – Site Selection and Assessment of Alternatives			
3.	The site selection and route refinement outlined in <b>Chapter 4 Site Selection and Assessment of Alternatives Revision 2</b> [AS-017] has properly considered the alternatives for the relevant elements of the Projects.	LWT do not agree that this is an environmentally acceptable location for this development and are opposed to any further development on the Dogger Bank. We are taking a strategic approach when it comes to consulting on this application however and will not outright object. We do disagree that this is an appropriate place for such a development.	

SoCG ID	The Applicants' Position	LWT's Position	Position Status
Project Change Request 1			
4.	Project Change Request 1: Offshore and Intertidal Works [AS-141] is appropriate and acceptable.	No response provided by LWT on <b>Project Change Request 1: Offshore and Intertidal Works</b> [AS-141], assumed agreed.	

### 3.3 Marine Physical Environment

Table 3-3 Topics agreed, in discussion or not agreed in relation to Marine Physical Environment

SoCG ID	The Applicants' Position	LWT's Position	Position Status
EIA – Planning and Policy			
5.	<p>All relevant plans and policies have been identified in section 8.4.1 of <b>Chapter 8 Marine Physical Environment</b> [APP-o8o] and these have been appropriately considered in the assessment.</p> <p>LWT 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>	LWT noted agreement on this topic during the LWT SoCG meeting held on 11 <sup>th</sup> October 2024.	
EIA – Baseline Environment			

SoCG ID	The Applicants' Position	LWT's Position	Position Status
EIA – Assessment Methodology			
6.	<p>The study area identified in section 8.3.1 of <b>Chapter 8 Marine Physical Environment</b> [APP-080] is appropriate.</p> <p>The Applicants consider that the impact assessment accounts for the potential impacts of concern. Further detail regarding the topic of 'ecological halo effects' can be found in the response to Natural England within REP-2-065:1.1 of <b>The Applicants' Responses to Deadline 2 Documents</b> [REP2-028].</p> <p>As stated in section 4.3 of the <b>Ecological Halo Effects Technical Note</b> [REP5-041] submitted at Deadline 5:</p> <p><i>'The Applicants therefore consider that there is no evidence that there will be significant changes to the characteristic communities of the Dogger Bank SAC from ecological halo effects. The Applicants consider that the correct approach to this knowledge gap is to address it through carefully designed survey and monitoring as included in the IPMP'.</i></p> <p>Notwithstanding the above position, section 5 of the <b>Ecological Halo Effects Technical Note</b> [REP5-041] provides an estimate of footprint of effect (on a without prejudice basis) should the Secretary of State consider that ecological halo effects do contribute to adverse effect on integrity and require compensation. Note that this methodology is the Applicants' own methodology and that neither Natural England nor any other stakeholders provided advice on how this footprint could be determined, other than that it needs to be 'site-specific' (advice provided in meeting with Natural England on 8th May 2025).</p>	<p>LWT share Natural England's concerns regarding a 'secondary halo' of effects outside the area that has been considered the entire footprint of the works.</p> <p>LWT also share concerns outlined by TWT in their relevant representations over the impact to the seafloor affecting a wider area than is presented in the ES.</p> <p>The Applicants note regarding the ecological halo effects is appreciated and while LWT agree that an appropriate buffer has now been suggested for the potential area of impact, we disagree with the reduction of the predicted impact area based on wake and bed shear stress effects. We also disagree with the exclusion of halo effects around the cable route. The cumulative effects of cable installation, anchor scour and remedial works will likely compound the effective footprint of the works beyond the mapped infrastructure.</p>	

SoCG ID	The Applicants' Position	LWT's Position	Position Status
	The Applicants note that an updated version of <b>Appendix E - Ecological Halo Effects Technical Note (Revision 2)</b> [REP7-127] was issued at Deadline 7 which includes without-prejudice estimates of the 'halo effect' including effects around cable protection measures and without a reduction of the predicted impact area based on wake and bed shear stress effects.		
7.	<p>The realistic worst case scenario presented in the assessment for the development scenarios, as outlined in Table 8-1 of <b>Chapter 8 Marine Physical Environment (Revision 2)</b> [REP7-035] and Table 4-2 of <b>Project Change Request 1 – Offshore and Intertidal Works</b> [AS-141] is sufficient and appropriate.</p> <p>The Applicants consider that the impact assessment accounts for the potential impacts of concern. Further detail regarding the impacts and recovery time of sandbanks can be found in the <b>Review of evidence on recovery of sandbank habitat following habitat damage (Revision 2)</b> [REP3-021] and in the response to Natural England within REP-2-065:1.1 of <b>The Applicants' Responses to Deadline 2 Documents</b> [REP2-028].</p> <p>As stated in section 4.3 of the <b>Appendix E - Ecological Halo Effects Technical Note (Revision 2)</b> [REP7-127] submitted at Deadline 5:</p> <p><i>'The Applicants therefore consider that there is no evidence that there will be significant changes to the characteristic communities of the Dogger Bank SAC from ecological halo effects. The Applicants consider that the correct approach to this knowledge gap is to address it through carefully designed survey and monitoring as included in the IPMP'.</i></p>	<p>The potential for changes to the physical/biological function of the sandbank has not been considered. The worst-case scenario should include effects on a wider area.</p> <p>LWT disagree that the sandbank is highly recoverable. The sandbank is already in an unfavourable condition and any further development will slow recovery rates.</p> <p>When referring to the 'characteristic communities of the Dogger Bank SAC' are you referring to just the physical environment or biological communities also? The Applicant has repeatedly used physical sediment recovery rates as a proxy for full ecological recovery. Further information on LWT's position on this can be found in our response to EXQ2 submitted 23/05/2025.</p>	

SoCG ID	The Applicants' Position	LWT's Position	Position Status
	Notwithstanding the above position, section 5 of the <b>Appendix E - Ecological Halo Effects Technical Note (Revision 2)</b> [REP7-127] provides an estimate of footprint of effect (on a without prejudice basis) should the Secretary of State consider that ecological halo effects do contribute to adverse effect on integrity and require compensation. Note that this methodology is the Applicants' own methodology and that neither Natural England nor any other stakeholders provided advice on how this footprint could be determined, other than that it needs to be 'site-specific' (advice provided in meeting with Natural England on 8th May 2025).		

## 3.4 Benthic and Intertidal Ecology

Table 3-4 Topics agreed, in discussion or not agreed in relation Benthic and Intertidal

SoCG ID	The Applicants' Position	LWT's Position	Position Status
EIA – Planning and Policy			
8.	All relevant plans and policies have been identified in section 9.4.1 of <b>Chapter 9 Benthic and Intertidal Ecology (Revision 2)</b> [REP7-038] and these have been appropriately considered in the assessment.	LWT noted agreement on this topic during the LWT SoCG meeting held on 11 <sup>th</sup> October 2024.	
Other Matters as Required			

SoCG ID	The Applicants' Position	LWT's Position	Position Status
9.	The sites screened in for assessment in the <b>RIAA HRA - Part 2 of 4 – Annex I Offshore Habitats and Annex II Migratory Fish (Revision 5)</b> [REP7-016] are appropriate.	LWT noted agreement on this topic during the LWT SoCG meeting held on 11 <sup>th</sup> October 2024.	
10.	<p>The Applicants' primary compensation measure for the Dogger Bank (new SAC designation or extension) as detailed in the <b>Project Level Dogger Bank Compensation Plan (Revision 4)</b> [REP7-020] provides sufficient compensation for the Projects activities within the Dogger Bank SAC.</p> <p>The Applicants' primary measure to compensate for impacts to sandbanks submerged by sea water all of the time as a feature of the Dogger Bank SAC is new MPA designation or extension. This measure will be delivered for multiple projects on a strategic basis by Defra as outlined in Defra's Written Ministerial Statement dated 29<sup>th</sup> January 2025.</p>	<p>The LWT note in their relevant representation that:</p> <p><i>'(the LWT) do not believe compensation will be sufficient to address the adverse impact on site integrity'.</i></p>	
11.	The outline <b>Dogger Bank Compensation Implementation and Monitoring Plan</b> (CIMP) [APP-061] 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 Dogger Bank Special Area of Conservation (DB SAC) sandbank feature be required.	<p>The LWT note in their relevant representation that:</p> <p><i>'(the LWT) do not believe compensation will be sufficient to address the adverse impact on site integrity'.</i></p>	

## 3.5 Fish and Shellfish Ecology

Table 3-5 Topics agreed, in discussion or not agreed in relation to Fish and Shellfish Ecology

SoCG ID	The Applicants' Position	LWT's Position	Position Status
EIA – Planning and Policy			
12.	All relevant plans and policies have been identified in section 10.4.1 of <b>Chapter 10 Fish and Shellfish Ecology (Revision 2)</b> [REP7-042] and these have been appropriately considered in the assessment.	LWT noted agreement on this topic during the LWT SoCG meeting held on 11 <sup>th</sup> October 2024.	
EIA – Baseline Environment			
13.	<p>Sufficient survey data has been collected to inform the assessment as presented within section 10.5 of <b>Chapter 10 Fish and Shellfish Ecology (Revision 2)</b> [REP7-042]. Additional information regarding sandeel spawning using the latest MarineSpace methodology has been provided in the <b>Heat Mapping Report: Atlantic Herring and Sandeel</b> [AS-105].</p> <p>The Applicants direct the LWT to the responses provided to the MMO regarding the <b>Heat Mapping Report: Atlantic Herring and Sandeel</b> [AS-105] in <b>The Applicants Responses to Deadline 2 Documents</b> [REP3-028] and <b>The Applicants' Fish and Shellfish Response to the MMO</b> [REP4-098] (submitted at Deadline 4) and <b>The Applicants' Responses to Deadline 4 Documents</b> [REP5-037], which may provide answers to any questions LWT may have on this report.</p>	Want updated methods used to estimate sandeel spawning grounds. Assessment of the worst case area of impact on this spawning habitat which includes impacts of structure placement and cable protection on the seabed- how does this impact physical and biological processes.	



SoCG ID	The Applicants' Position	LWT's Position	Position Status
EIA - Assessment Conclusions			
14.	<p>The conclusions of assessment of significance as detailed in section 10.6 of <b>Chapter 10 Fish and Shellfish Ecology (Revision 2)</b> [REP7-042] are appropriate and are considered not significant in EIA terms.</p> <p>The Applicants highlight the <b>Heat Mapping Report: Atlantic Herring and Sandeel</b> [AS-105], submitted in November 2024, which provided an update to the herring spawning and sandeel habitat suitability heat maps presented previously presented in <b>Chapter 10 Fish and Shellfish Ecology (Revision 2)</b> [REP7-042] using the latest Kyle-Henney et al. (2024) methodologies.</p>	<p>LWT noted concerns regarding the impacts to lesser sandeel as a result of the Projects:</p> <p><i>'LWT strongly disagrees with the applicant's decision to lower the appraised sensitivity to habitat disturbance, arguing that this is based on inaccurate recovery times for sandeel.</i></p> <p>Methods used to estimate spawning ground for sandeel outdated, use sandeel abundance data.</p>	

### 3.6 Marine Mammals

17. LWT noted in comments received on 18<sup>th</sup> June 2025 that due to time constraints LWT have chosen not to provide further updates on this issue due to engagement from other environmental bodies.

### 3.7 Offshore Ornithology

18. LWT noted during the LWT SoCG meeting held on 11<sup>th</sup> October 2024 that they would mirror the RSPB's position regarding the offshore ornithology SoCG (**RSPB SoCG (Revision 2)** (document reference 9.15)).

## 4 Summary

19. This SoCG has outlined the consultation that has taken place between the Applicants and LWT during the pre-application phases. This SoCG has been updated throughout the Examination and represents the agreed position and final SoCG between the Applicants and LWT at Deadline 8.

## 5 References

Kyle-Henney, M., Reach, I., Barr, N., Warner, I., Lowe, S., and Lloyd Jones, D. (2024). Identifying and Mapping Atlantic Herring Potential Spawning Habitat: An Updated Method Statement. Available at:

[Redacted URL]

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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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