

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

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

**Dogger Bank South Offshore
Wind Farms**

**National Grid Electricity Transmission Plc
Statement of Common Ground (Revision 3)
Submission for Deadline 9**

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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). |
| Order Limits | The limits within which the Projects may be carried. |
| 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 |
| ExA | Examining Authority |
| NGET | National Grid Electricity Transmission Plc |
| NHHM | North Humber to High Marnham |
| PINS | Planning Inspectorate |
| RR | Relevant Representation |
| 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, Figure 5-1 [APP-072]**.
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 National Grid Electricity Transmission Plc (NGET) 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 following guidance: *Planning Act 2008: 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 NGET is set out in the Rule 6 letter issued on 24th September 2024 by the Planning Inspectorate following acceptance of the DCO application for examination.
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 NGET and which have been raised within the **NGET Relevant Representation [RR-035]** 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 NGET 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 NGET and address the elements of the Projects that may affect the interests of the NGET.
8. This SoCG has been developed during the pre-examination and examination phases of the Projects in accordance with discussions between the Applicants and NGET.

9. 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 those of NGET relating to topics discussed between parties and the status of agreement on those topics.

2 Consultation and Engagement

2.1 Introduction

10. NGET has been consulted on the Projects throughout the pre-application stage, as well as via non-statutory and statutory consultation under Section 42 of the Planning Act 2008.
11. NGET is a statutory undertaker for the purposes of the Planning Act 2008. NGET owns, operates and maintains the high-voltage electricity transmission network in England and Wales.
12. NGET owns and operates a 400kV overhead line that is located within and in close proximity to the Order Limits for the Projects and has a number of interests within the Order Limits as listed within the **Book of Reference (Revision 03)** [AS-043]. Details of this overhead line are:
 - 4ZR 400kV OHL – Creyke Beck - Thornton 1 - Creyke Beck - Thornton 2 (and associated cable fibres).
13. NGET has stated within its Relevant Representation that as a statutory undertaker, its primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the Order Limits.

2.2 Consultation and Engagement Summary

14. **Table 2-1** summarises the consultation that the Applicants have undertaken with NGET 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 NGET

| Date | Form of consultation | Meeting Title/Topic | Summary of Consultation |
|--------------------------|----------------------|--------------------------|---|
| Pre – Application | | | |
| 13/09/2022 | Meeting | Project Intro/Engagement | DBS/NGET project intro discussion/cumulative assessments request. |
| 02/11/2022 | Meeting | Project Updates | DBS/NGET updates meeting. |
| 01/03/2023 | Meeting | Project Updates | DBS/NGET project updates. |
| 21/03/2023 | Meeting | Project Updates | DBS/NGET project updates. |

| Date | Form of consultation | Meeting Title/Topic | Summary of Consultation |
|------------|----------------------|-----------------------|--|
| 11/04/2023 | Email to NGET | Consultation | Introductory email to Ellie Laycock providing project updates and notification of upcoming statutory consultation. |
| 18/04/2023 | Emails with NGET | Project Interactions | Further plans and details provided to NGET asset protection team and NGET asset plan provided. |
| 19/04/2023 | Email from NGET | Asset Protection | Provision of line profile drawings. |
| 24/04/2023 | Email to NGET | Protective Provisions | Request for NGET's standard form Protective Provisions for consideration by DBS. |
| 25/04/2023 | Meeting | Project Updates | DBS/NGET project updates. |
| 17/05/2023 | Meeting | Project Updates | DBS/NGET project updates. |
| 05/06/2023 | Letter | Consultation | Notification of statutory consultation and information. |
| 06/06/2023 | Email to NGET | Offshore Interactions | Email to asset protection and Jake Stevens for meeting to discuss crossing requirements including agreements for offshore assets (EG2, TGDC and E4L5). |
| 14/06/2023 | Meeting | Project Updates | DBS/NGET project updates. |
| 27/06/2023 | Email from NGET | Offshore Interactions | Confirmation from Ellie Laycock of contacts for offshore asset interactions. |
| 12/07/2023 | Letter/Email | Consultation | Response from NGET to Section 42 statutory consultation confirming asset interactions and considerations. |
| 15/07/2023 | Meeting | Project Updates | DBS/NGET project updates. |
| 15/08/2023 | Meeting | Project Updates | DBS/NGET project updates. |
| 06/09/2023 | Meeting | Project Updates | DBS/NGET project updates. |
| 05/10/2023 | Meeting | Project Updates | DBS/NGET project updates. |
| 09/11/2023 | Meeting | Project Updates | DBS/NGET project updates. |

| Date | Form of consultation | Meeting Title/Topic | Summary of Consultation |
|---------------------------|------------------------------|-----------------------|--|
| 10/11/2023 | Letter | Consultation | Notification of targeted statutory consultation. |
| 30/11/2023 | Meeting | Project Updates | DBS/NGET project updates. |
| 11/01/2024 | Email to NGET | Offshore Interactions | Request to Kate Kingston for further information on offshore requirements and propose meeting to discuss. |
| 09/02/2024 | Email from Addleshaw Goddard | Project Interactions | Request from Addleshaw Goddard (solicitors for NGET) to provide a summary and plans showing extent of the proposed interactions. |
| 14/02/2024 | Email to Addleshaw Goddard | Project Interactions | Summary and plans of proposed interactions provided to Addleshaw Goddard. |
| 28/02/2024 | Meeting | Project Interactions | DBS/Burges Salmon/Addleshaw Goddard to discuss interactions. |
| 13/03/2024 | Meeting | Project Updates | DBS/NGET project updates. |
| 14/03/2024 | Email from Addleshaw Goddard | Project Interactions | Further clarification queries raised on the summary and plans provided. |
| 19/03/2024 | Email to Addleshaw Goddard | Project Interactions | Response to clarification queries provided. |
| 01/05/2024 | Meeting | Project Updates | DBS/NGET project updates. |
| 03/07/2024 | Meeting | Project Updates | DBS/NGET project updates. |
| Post – Application | | | |
| 28/06/2024 | Email from Addleshaw Goddard | Protective Provisions | Draft Protective Provisions provided. |
| 05/07/2024 | Email from NGET | Project Interactions | Request for updated plan interactions. |
| 09/07/2024 | Email to NGET | Project Interactions | Provision of plans and update on status. |

| Date | Form of consultation | Meeting Title/Topic | Summary of Consultation |
|------------|----------------------|----------------------|--|
| 23/07/2024 | Letter | Consultation | Section 56 notice issued. |
| 04/09/2024 | Meeting | Project Updates | DBS/NGET project updates. |
| 02/10/2024 | Meeting | Project Updates | DBS/NGET project updates. |
| 06/11/2024 | Meeting | Project Updates | DBS/NGET meeting to discuss protective provisions |
| 04/12/2024 | Meeting | Project Updates | DBS/NGET project updates. |
| 05/02/2025 | Meeting | Project Updates | DBS/NGET project updates. |
| 05/03/2025 | Meeting | Project Updates | DBS/NGET project updates. |
| 12/03/2025 | Meeting | Project Updates | DBS/NGET meeting to discuss protective provisions |
| 02/04/2024 | Meeting | Project Updates | DBS/NGET project updates. |
| 04/04/2024 | Email | Project Updates | HoT for an agreement DBS - NGET Interface at Creyke Beck |
| 07/05/2024 | Meeting | Project Updates | DBS/NGET project updates. |
| 03/06/2025 | Email to NGET | Project Interactions | HoT for an agreement DBS - NGET Interface at Creyke Beck |
| 04/06/2025 | Meeting | Project Interactions | DBS - NGET Interface at Creyke Beck |
| 06/06/2025 | Email from NGET | Project Interactions | HoT for an agreement DBS - NGET Interface at Creyke Beck |
| 12/06/2025 | Meeting | Project Interactions | HoT for an agreement DBS - NGET Interface at Creyke Beck |
| 25/06/2-25 | Meeting | Project Interactions | HoT for an agreement DBS - NGET Interface at Creyke Beck |
| 30/06/2025 | Email to NGET | Project Interactions | HoT for an agreement DBS - NGET Interface at Creyke Beck |

Agreement Log

2.3 Overview

15. The following sections of this SoCG summarise the level of agreement between the parties for each relevant topic.
16. In order 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 'status' column as set out in **Table 3-1**.

Table 3-2 - Agreement logs position status key

| Position Status | Colour Code |
|---|---------------------------------|
| 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 Applicant or NGET 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 Applicant or NGET is considered to result in a materially different outcome on the assessment conclusions. | Not agreed – material impact |

2.4 General

Table 3-3 - General Topics agreed, in discussion or not agreed with NGET

| SoCG ID | The Applicants' Position | NGET's Position | Position Status |
|-----------------------------------|--|--|-----------------|
| Engagement | | | |
| 1. | The Applicants have adequately consulted with NGET 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. NGET did not raise any issues on this subject throughout discussion or within their Relevant Representation. It is therefore considered by the Applicants that this is agreed. | NGET has no further comments beyond that set out by the Applicant. | |
| 2. | Both parties acknowledge the projects need to help facilitate National Planning Policy and support the projects in principle | NGET has no further comments beyond that set out by the Applicant. | |
| NGET Future Infrastructure | | | |
| 3. | Parties agree that there is need to find a suitable way forward for more detailed arrangements on the engineering interface/conflicts in respect of future assets | NGET has no further comments beyond that set out by the Applicant. | |
| 4. | Frequent meetings have been held with NGET that have identified potential engineering interface/conflicts | NGET has no further comments beyond that set out by the Applicant. | |

| SoCG ID | The Applicants' Position | NGET's Position | Position Status |
|------------------------------|--|--|-----------------|
| | <p>and the Applicants have offered a solution as to how it considers these could be satisfactorily managed for both parties. Discussions on an agreement between the parties are continuing</p> <p>The objective is, as far as possible, to identify solutions to future engineering conflicts that can be deployed in the event those situations occurring.</p> <p>The Applicants will continue to engage whilst all projects develop to ensure ongoing collaboration.</p> | | |
| Protective Provisions | | | |
| 5. | <p>Protective Provisions for the benefit of electricity, gas, water and sewerage undertakers have been included within the draft DCO [APP-027] at Part 1, Schedule 15.</p> <p>The Applicants and NGET are engaging and continuing discussion in respect of the Protective Provisions for the benefit of NGET.</p> <p>The parties are hopeful that sufficient detail can be agreed to also allow a common position to be identified on the content of Protective Provisions to be applied.</p> <p>In the interim both Parties maintain their positions on Protective Provisions, the Applicants in respect of those</p> | NGET has no further comments beyond that set out by the Applicant. | |

| SoCG ID | The Applicants' Position | NGET's Position | Position Status |
|---------|---|-----------------|-----------------|
| | proposed at Deadline 7 and NGET in respect of those proposed at Deadline 6. | | |

3 Summary

17. This SoCG has outlined the consultation that has taken place between the Applicants and NGET during the pre-application phases. The agreement logs present the position reached at the point of Deadline 9 between the Projects and NGET in relation to relevant onshore matters.

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