

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

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

**Dogger Bank South Offshore  
Wind Farms**

**Natural England – Statement of Common Ground  
Update**


**Document Date: October 2025**


**Document Reference: 20.3**

**Revision Number: 01**

**Classification: Unrestricted**

Company:	RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited	Asset:	Development		
Project:	Dogger Bank South Offshore Wind Farms	Sub Project/Package	Consents		
Document Title or Description:	Natural England – Statement of Common Ground Update				
Document Number:	006320778-01	Contractor Reference Number:	PC2340-RHD-OF-ZZ-TN-Z-0061		
<p><i>COPYRIGHT © RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited, 2025. All rights reserved.</i></p> <p><i>This document is supplied on and subject to the terms and conditions of the Contractual Agreement relating to this work, under which this document has been supplied, in particular:</i></p> <p><b>LIABILITY</b></p> <p><i>In preparation of this document RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited has made reasonable efforts to ensure that the content is accurate, up to date and complete for the purpose for which it was contracted. RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited makes no warranty as to the accuracy or completeness of material supplied by the client or their agent.</i></p> <p><i>Other than any liability on RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited detailed in the contracts between the parties for this work RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited shall have no liability for any loss, damage, injury, claim, expense, cost or other consequence arising as a result of use or reliance upon any information contained in or omitted from this document.</i></p> <p><i>Any persons intending to use this document should satisfy themselves as to its applicability for their intended purpose.</i></p> <p><i>The user of this document has the obligation to employ safe working practices for any activities referred to and to adopt specific practices appropriate to local conditions.</i></p>					
Rev No.	Date	Status/Reason for Issue	Author	Checked by	Approved by
01	October 2025	Post-Examination Update	Haskoning	RWE	RWE

Signatories	
Signed	
Name	Thomas Tremlett
Position	Senior Consents Manager
On behalf of	RWE Renewables UK Dogger Bank South (West) Ltd and RWE Renewables UK Dogger Bank South (East) Ltd, ('the Applicants')

Signatories	
Signed	
Name	Emma John
Position	Senior Officer
On behalf of	Natural England

## Contents

1	Natural England - SoCG Update.....	7
1.1	Benthic and Intertidal Ecology .....	8
1.2	In Principle Monitoring Plan.....	8
1.3	Fish and Shellfish Ecology.....	9
1.4	Offshore Ornithology .....	10

## Tables

Table 1-1	Benthic and Intertidal Ecology Updates .....	8
Table 1-2	In Principle Monitoring Plan Updates .....	8
Table 1-3	Fish and Shellfish Ecology Updates .....	9
Table 1-4	Offshore Ornithology Updates.....	10

## Glossary

Term	Definition
Array Areas	The DBS East and DBS West offshore Array Areas, where the wind turbines, offshore platforms and array cables would be located. The Array Areas do not include the Offshore Export Cable Corridor or the Inter-Platform Cable Corridor within which no wind turbines are proposed. Each area is referred to separately as an Array Area.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Dogger Bank South (DBS) Offshore Wind Farms	The collective name for the two Projects, DBS East and DBS West.
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.
Expert Topic Group (ETG)	A forum for targeted engagement with regulators and interested stakeholders through the EPP.
Numerical modelling	Refers to the analysis of coastal processes using computational models.
Offshore Development Area	The Offshore Development Area for ES encompasses both the DBS East and West Array Areas, the Inter-Platform Cable Corridor, the Offshore Export Cable Corridor, plus the associated Construction Buffer Zones.
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.
Special Area of Conservation (SAC)	Strictly protected sites designated pursuant to Article 3 of the Habitats Directive (via the Habitats Regulations) for habitats listed on Annex I and species listed on Annex II of the Directive
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
ES	Environmental Statement
HRA	Habitats Regulations Assessment
MCZ	Marine Conservation Zone
MMO	Marine Management Organisation
MPA	Marine Protected Area
PEIR	Preliminary Environmental Information Report
RIAA	Report to Inform Appropriate Assessment
SAC	Special Area of Conservation
SoCG	Statement of Common Ground

# 1 Natural England - SoCG Update

1. This document details the progress made post-Examination on relevant matters previously noted as 'not agreed' in the **Natural England Statement of Common Ground (SoCG) (Revision 2)** [REP9-018] issued at Deadline 9 of the Dogger Bank South (DBS) Examination.
2. For any outstanding issues not included in this report, the Applicants believe that no further progress can be made in relation to these issues and that these items are now for the Secretary of State to decide on.

## 1.1 Benthic and Intertidal Ecology

Table 1-1 Benthic and Intertidal Ecology Updates

Topic	The Applicants' Position	Natural England's Position
Halo effects	<p>The Applicants note that in Natural England's Deadline 9 submission, it was stated that <i>'if a reduced buffer for halo effect from cable protection (e.g. 20m) can be agreed then the compensation requirement will be reduced'</i>. Natural England then stated that <i>'if compensation for habitat disturbance is required and the same approach as for habitat loss (i.e. MPA designation or extension is provided for habitat disturbance) is applied, then some of the habitat loss from the Halo effect would already be compensated for, with the additional amounts of compensation extending from the edge of the disturbance corridor out to the edge of the halo effect (only). However, if compensation for habitat disturbance is not considered necessary by the Secretary of State, then habitat loss from the edge of cable protection out to the edge of the agreed halo effect buffer would need to be included as habitat loss'</i>.</p> <p>In light of these comments, the Applicants have updated Table 6-7 of the <b>Report to Inform Appropriate Assessment (RIAA) Habitats Regulations Assessment (HRA) Part 2 of 4 Annex I Offshore Habitats and Annex II Migratory Fish (Revision 5)</b> [REP7-016] and Table 4-4 of the <b>Habitats Regulations Derogation: Provision of Evidence (Revision 4)</b> [REP7-018] to include a fifth without prejudice scenario which includes habitat loss and an estimated halo effects area, based on a 50m halo around turbine and offshore platform foundations and 20m halo around cable protection measures.</p> <p>In addition, the Applicants note that scenarios 3 and 4 (see Table 6-7 of the <b>RIAA HRA Part 2 of 4 Annex I Offshore Habitats and Annex II Migratory Fish (Revision 5)</b> [REP7-016] and Table 4-4 of the <b>Habitats Regulations Derogation: Provision of Evidence (Revision 4)</b> [REP7-018]) presented previously in Examination already accounted for the potential overlap of habitat disturbance area and halo effects.</p> <p><b>Do Natural England agree that all potential scenarios for habitat loss within the Dogger Bank SAC have been included for consideration by the Secretary of State now?</b></p>	Natural England confirmed during a meeting held on 16 <sup>th</sup> September 2025 that they agree that the appropriate scenarios for habitat loss have been included to enable further consideration by the Secretary of State and Interested Parties.

## 1.2 In Principle Monitoring Plan

Table 1-2 In Principle Monitoring Plan Updates

Topic	The Applicants' Position	Natural England's Position
Secondary Scour	<p>The Applicants note that Natural England advised in their Deadline 9 submission that monitoring of secondary scour should <i>'be extended to also include cable protection if installed on/adjacent to Dogger Bank SAC, within the nearshore zone and in the near vicinity to Smithic Bank and Holderness Inshore MCZ'</i>.</p> <p>Following a review of this request, the Applicants suggest the following update to Table 1-2 of the <b>In Principle Monitoring Plan (Revision 5)</b> [REP7-115] (changes highlighted in red text):</p> <p><i>'This would also include monitoring of secondary scour at a sub-set of locations where scour/cable protection measures are installed in agreement with the MMO.'</i></p> <p><b>Does Natural England agree with the proposed amendment to Table 1-2 of the In Principle Monitoring Plan (Revision 5) [REP7-115] with regards to secondary scour monitoring?</b></p>	Natural England confirmed during a meeting held on 2 <sup>nd</sup> October 2025 that they agree with the proposed amendment to Table 1-2 of the <b>In Principle Monitoring Plan (Revision 5)</b> [REP7-115] with regards to secondary scour monitoring.
Monitoring of Disposal Mounds	<p>The Applicants note that Natural England advised in their Deadline 9 submission that <i>'DCOs consented for Dogger Bank Creyke Beck A&amp;B and Teesside A&amp;B (as was) required that should drilling be utilised to install piled foundations, "appropriate surveys to determine change in size and form of the drill disposal mounds over the lifetime of the authorised scheme" were necessary regardless of the size of the disposal mounds. We advise that the same should apply to DBS'</i>.</p> <p>Following review of this request, the Applicants suggest the following update to Table 1-3 of the <b>In Principle Monitoring Plan (Revision 5)</b> [REP7-115] (changes highlighted in red text):</p>	Natural England confirmed during a meeting held on 2 <sup>nd</sup> October 2025 that they agree with the proposed amendment to Table 1-3 of the <b>In Principle Monitoring Plan (Revision 5)</b> [REP7-115] with regards to monitoring of drill disposal mounds.



Topic	The Applicants' Position	Natural England's Position
	<p><i>Should drilling be utilised to install piled foundations, the Applicants will seek to ensure that no drill mounds (i.e. sediment arising from the drilling of the Projects foundations) persist above <del>3m from</del> the surrounding seabed. In the event that initial post-construction monitoring undertaken following the completion of construction identifies drill mounds that are present an appropriate monitoring campaign focussing initially on an agreed subset of mounds will be developed in consultation with the MMO.</i></p> <p>Does Natural England agree with the proposed amendment to Table 1-3 of the In Principle Monitoring Plan (Revision 5) [REP7-115] with regards to monitoring of disposal mounds?</p>	

## 1.3 Fish and Shellfish Ecology

Table 1-3 Fish and Shellfish Ecology Updates

Topic	The Applicants' Position	Natural England's Position
Noise restrictions for herring spawning	<p>At Deadlines 8 and 9 of Examination, the MMO changed their position regarding herring and sandeel restrictions that the Applicants had previously understood to be largely resolved in meetings prior to these deadlines. As a result of the comments received, the Applicants have engaged with the MMO post-examination, having two meetings (5/08/25 and 15/09/25) to discuss the <b>Without Prejudice Herring Spawning Plan (Revision 2)</b> [REP9-020] and the Back Calculation Report methodology in <b>Appendix 10-3 - Back-calculation of the Peak Atlantic Herring Spawning Period</b> [REP6-014]. At the meeting held on 5<sup>th</sup> August 2025, the Applicants were tasked with reviewing the herring spawning plan and determining what appropriate buffer could be added to the herring spawning restriction boundary. The MMO were also asked to consider an appropriate buffer, in order for both parties to discuss and come to an agreement.</p> <p>In addition, with regards to <b>Appendix 10-3 - Back-calculation of the Peak Atlantic Herring Spawning Period</b> [REP6-014], the Applicants and the MMO were to consider an appropriate post-work settlement period. The MMO would also review the growth rate approach for back calculations and consult with other internal herring experts.</p> <p>Does Natural England have any comments to make on the proposed amendments to the Without Prejudice Herring Spawning Plan and / or Back Calculation Report methodology as detailed above?</p> <p>[It is important to note that the above text was drafted for Natural England's agreement prior to the progression of discussions relating to impacts on herring between the Applicants and MMO and Cefas. At the time of submission of this document to the Secretary of State the Applicants have, following discussions with MMO and Cefas, prepared an update to <b>Appendix 10-3 - Back-calculation of the Peak Atlantic Herring Spawning Period</b> [REP6-014] for MMO and Cefas agreement and have also prepared a document titled <b>The Applicants' and the MMO's Post-Examination Joint Position on the without prejudice herring noise restriction</b> [document reference: 20.6]. These documents have been presented to MMO for their agreement and have been submitted to the Secretary of State along with the present document. Further details of the progression of these issues between the Applicants and MMO and Cefas are documented within <b>The Applicants' Response to the Marine Management Organisation's Deadline 9 Document</b> [document reference: 20.2]].</p>	Natural England confirmed during a meeting held on 16 <sup>th</sup> September 2025 that they will defer to Cefas on the Back Calculation Report methodology and the appropriate buffer to use for the herring spawning restriction boundary in the <b>Without Prejudice Herring Spawning Plan (Revision 2)</b> [REP9-020].
Effects on prey species	<p>At the end of Examination, the Applicants concluded that the assessment undertaken with regards to the potential effects on prey species was robust, followed standard practice and included all pathways that could be quantified(as detailed in the <b>Effects on Prey Species Technical Note (Revision 2)</b> [REP6-049] submitted at Deadline 6). The Applicants also noted that Natural England had accepted that no further assessment work can be done on this matter and that the disagreement is in regards to the conclusions of significance (detailed in <b>Appendix N7 - Comments on the Report on the Implications for European Sites (RIES)</b> [REP7-152]<sup>1</sup>.</p> <p>Do Natural England still agree there is no further evidence that can be provided by the Applicants on this matter to inform Natural England's position?</p>	Natural England confirmed during a meeting held on 16 <sup>th</sup> September 2025 that provision of further evidence would be unlikely to materially affect their advice on conclusions for this impact pathway.

<sup>1</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010125/EN010125-001936-Natural%20England%20-%20Comments%20on%20the%20RIES%20and%20responses%20to%20any%20associated%20questions%20\(if%20issued\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010125/EN010125-001936-Natural%20England%20-%20Comments%20on%20the%20RIES%20and%20responses%20to%20any%20associated%20questions%20(if%20issued).pdf)

# 1.4 Offshore Ornithology

Table 1-4 Offshore Ornithology Updates

Topic	The Applicants' Position	Natural England's Position
Hotspot modelling	<p>At Deadline 7, the Applicants submitted <b>Appendix A - Offshore Ornithology Year 1 and 2 Combined Spatial Plots</b> [REP7-137], which was submitted in response to Natural England's comments made during Examination regarding the use of 'seabird hotspot modelling' to refine the Projects Offshore Development Area to avoid high density areas of birds within the Array Areas. This document provided examples of the site-specific aerial survey data that was collated and examined in the pre-application phase of the Projects to indicate what (if any) areas within Array Areas showed higher and lower densities of birds. The report demonstrates that refinement of the boundaries of the Array Areas was done between PEIR and ES which accounted for hot spots of higher densities of birds, where applicable.</p> <p>The Applicants note that while Natural England welcomed the provision of this report, further comments on the document were provided requesting additional information. Given the short timeframe between Deadlines 7 and 8 of Examination, the Applicants did not have time to address each of Natural England's requests in the second revision of the report [REP8-040] submitted at Deadline 8.</p> <p>Following the close of Examination the Applicants developed a plan to address Natural England's remaining comments on the matter. The proposed outputs of this additional work are as follows:</p> <ul style="list-style-type: none"> <li>Hotspot modelling for five species: kittiwake, guillemot, razorbill, puffin, gannet;</li> <li>Maps for species-specific breeding seasons: 5 species x 2 breeding seasons, which will be subdivided into seasons for each species as defined, including migration, post-breeding etc;</li> <li>Monthly maps: 5 x 24 = 120 maps total (this will be the maximum number if all species-months have sufficient data);</li> <li>Standardise z-axis (ie colour scale) – although this will be kept under review as the abundance may vary very widely;</li> <li>Spatial plots with 'refined' boundaries and buffers (of the submitted wind farm design);</li> <li>Consideration of depth/sandeel data, with data from Figure 3-1 of the Heat Mapping Report underlain on the modelled seabird distributions; and</li> <li>Provision of full model and diagnostic details – for &gt;100 models (subject to robust model fitting).</li> </ul> <p>The proposed outputs of the work were shared with Natural England on 18<sup>th</sup> August 2025 (prior to the work commencing), with Natural England responding via email on 20<sup>th</sup> August 2025 that they were '<i>on the whole happy with the proposed outputs</i>', with minor clarifications issued to Natural England following this email regarding seasonal definitions and consideration of sandeel data.</p> <p><b>Do Natural England agree that all necessary information has been provided to close out this matter?</b></p>	<p>Natural England provisionally agreed during a meeting held on 16<sup>th</sup> September 2025 that the proposed outputs would be sufficient to enable further consideration on this matter by the Secretary of State and Interested Parties. The Applicants provided a draft of <b>Spatial modelling of baseline seabird data for Dogger Bank South</b> [document reference: 20.4] to Natural England on 2<sup>nd</sup> October 2025, however there was insufficient time for it to be reviewed prior to formal submission.</p>

RWE Renewables UK Dogger Bank  
South (West) Limited

RWE Renewables UK Dogger Bank  
South (East) Limited

Windmill Business Park  
Whitehill Way  
Swindon  
Wiltshire, SN5 6PB

**RWE**

MASDAR 