

Outer Dowsing Offshore Wind

(Draft) Statement of Common Ground with Natural England Cover Letter

Deadline 6

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The Applicant initially prepared this Statement of Common Ground (SoCG) in November 2024, due to resource constraints Natural England advised the Applicant they were not able engage with the Applicant in relation to a SoCG until the last examination deadline (Deadline 6). Following further engagement with Natural England it was agreed that the Applicant would revise the format of the SoCG to follow that preferred by Natural England and issue the document to Natural England for review week commencing 24th March 2025. The Applicant issued this SoCG to Natural England on the 25th March 2025. Natural England advised the Applicant it would not be able to review the SoCG. This draft SoCG is provided as issued to Natural England on 25th March 2025.

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Acronyms & Definitions

Abbreviations / Acronyms

Abbreviation / Acronym	Description
AEoI	Adverse Effect on Integrity
AfL	Agreement for Lease
ANS	Artificial Nesting Structure
CRM	Collision Risk Modelling
DAS	Digital Aerial Surveys
DCO	Development Consent Order
dML	deemed Marine Licence
ECC	Export Cable Corridor
EIA	Environmental Impact Assessment
EPP	Evidence Plan Process
ES	Environmental Statement
EUNIS	European Nature Information System
FFC	Flamborough and Filey Coast
GBS	Gravity Base Structures
GT R4 Limited	GT R4 or GT R4 Limited, the incorporated joint venture development Co.
GW	Greater Wash
HPAI	High Pathogenic Avian Flu
HRA	Habitats Regulations Assessment
IDRBNR	Inner Dowsing Race Bank and North Ridge
IPMP	In Principle Monitoring Plan
JNCC	Joint Nature Conservation Committee
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
MRF	Marine Recovery Fund
NAF	Nocturnal Activity Factors
NE	Natural England
NNC	North Norfolk Coast
NSIP	Nationally Significant Infrastructure Project
ODOW	Outer Dowsing Offshore Wind, trading name of GT R4 Limited
OLEMS	Outline Landscape and Environmental Management Strategy
O&M	Operation and Maintenance
ONS	Onshore Substation
OOOMP	Outline Offshore Operations and Maintenance Plan
ORBA	Offshore Restricted Build Area
ORCP	Offshore Reactive Compensation Platform
OSS	Offshore Substation
OWF	Offshore Wind Farm
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PVA	Population viability analysis
RIAA	Report to Inform Appropriate Assessment
RTD	Red Throated Diver

Abbreviation / Acronym	Description
SAC	Special Area of Conservation
SNCB	Statutory Nature Conservation Bodies
SoCG	Statement of Common Ground
SoS	Secretary of State
SPA	Special Protected Area
SSC	Suspended Sediment Concentration
UXO	Unexploded ordnance
WCS	Worst Case Scenario

Terminology

Term	Definition
The Applicant	GTR4 Limited (a joint venture between Corio Generation (and its affiliates), TotalEnergies and Gulf Energy Development), trading as Outer Dowsing Offshore Wind
Array Area	The area offshore within which the generating stations (including wind turbine generators (WTG) and inter array cables), offshore accommodation platforms, offshore transformer substations and associated cabling are positioned, including the ORBA.
Development Consent Order (DCO)	The area offshore within which the generating stations (including wind turbine generators (WTG) and inter array cables), offshore accommodation platforms, offshore transformer substations and associated cabling are positioned.
deemed Marine Licence	A marine licence set out in a Schedule to the Development Consent Order and deemed to have been granted under Part 4 (marine licensing) of the Marine and Coastal Access Act 2009.
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Regulations, including the publication of an Environmental Statement (ES).
Environmental Statement (ES)	The suite of documents that detail the processes and results of the EIA.
Habitats Regulations Assessment (HRA)	A process which helps determine likely significant effects and (where appropriate) assesses adverse impacts on the integrity of European conservation sites and Ramsar sites. The process consists of up to four stages of assessment: screening, appropriate assessment, assessment of alternative solutions and assessment of imperative reasons of over-riding public interest (IROPI) and compensatory measures.
Maximum Design Scenario	The project design parameters, or a combination of project design parameters that are likely to result in the greatest potential for change in relation to each impact assessed
Offshore Export Cable Corridor (ECC)	The Offshore Export Cable Corridor (Offshore ECC) is the area within the Order Limits within which the export cable running from the array to landfall will be situated.
Outer Dowsing Offshore Wind (ODOW)	The Project

Term	Definition
Offshore Reactive Compensation Platform (ORCP)	A structure attached to the seabed by means of a foundation, with one or more decks and a helicopter platform (including bird deterrents) housing electrical reactors and switchgear for the purpose of the efficient transfer of power in the course of HVAC transmission by providing reactive compensation
Offshore Restricted Build Area (ORBA)	The area within the array area, where no wind turbine generator, offshore transformer substation or offshore accommodation platform shall be erected.
Preliminary Environmental Information Report (PEIR)	The PEIR was written in the style of a draft Environmental Statement (ES) and provided information to support and inform the statutory consultation process during the pre-application phase.
The Project	Outer Dowsing Offshore Wind, an offshore wind generating station together with associated onshore and offshore infrastructure.

Reference Documentation

ODOW Application Document Reference	Application Document
3.1	Draft DCO
6.1.7	Marine Physical Processes
6.1.9	Chapter 9 Benthic and Intertidal Ecology
6.1.11	Chapter 11 Marine Mammals
6.1.12	Chapter 12 Offshore and Intertidal Ornithology
6.1.22	Chapter 22 Onshore Ornithology
6.1.21	Chapter 21 Onshore Ecology
6.3.3.1	Cable Burial Risk Assessment [CONFIDENTIAL]
15.13	ENVISION Outer Dowsing Export Cable Corridor Sabellaria Review- Review and Interpretation of Survey Data
7.1	Report to Inform Appropriate Assessment
7.1	Report to Inform Appropriate Assessment [CONFIDENTIAL]
7.6.1	Without Prejudice Sandbank Compensation Plan
7.6.1.1	Sandbank Compensation Implementation and Monitoring Plan
7.6.3	Without Prejudice Benthic Compensation Evidence Base and Road Map
8.5	Outline Cable Specification and Installation Plan
8.7	In Principle Southern North Sea Special Area of Conservation Site Integrity Plan
8.21	Outline Scour and Cable Protection Management Plan

1 Introduction

1.1 Outer Dowsing Offshore Wind (ODOW)

1. Outer Dowsing Offshore Wind ('the Project') is a proposed offshore windfarm comprising both offshore and onshore infrastructure, including an offshore generation station (windfarm), with an Array Area located approximately 54km from the Lincolnshire coastline, export cables to landfall, onshore cables, connection to the electricity transmission network and ancillary and associated development.
2. The Project will have a total installed capacity of 1.5GW which is roughly equivalent to the annual electricity consumption of over 1.6million UK households.

1.2 Purpose of this Statement of Common Ground (SoCG)

3. Natural England are the government's advisor for the natural environment in England with the aim to conserve, enhance and manage the natural environment for the benefit of present and future generations, thereby contributing to sustainable development.
4. This SoCG has been prepared by ODOW ('the Applicant') and Natural England to identify topics that are relevant to Natural England's statutory role and state whether relevant matters are agreed, not agreed or still in discussion. If relevant, where matters are not agreed, an explanation is provided as to whether these matters are of consequence or not.
5. This SoCG has been prepared with due regard to the Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (Ministry of Housing, Communities and Local Government and Department for Communities and Local Government (DCLG), 2024).

1.3 Consultation

6. The Applicant has engaged with Natural England during the pre-application process, through statutory consultation carried out under section 42 of the Planning Act 2008, bilateral engagement and participation in the Evidence Plan Process (EPP).
7. During the Phase 2 consultation held by the Applicant in June/July 2023 the MMO provided comments on the Preliminary Environmental Information Report (PEIR).
8. Additionally, as part of the Applicant's participation in the NSIP Reform Early Adopters Programme (EAP) Natural England submitted a Principal Areas of Disagreement Summary Statement (PADSS) which has formed the basis for this SoCG.

1.4 Topics addressed in this Statement of Common Ground

9. Table 1.1 sets out the topics addressed in this SoCG. The topics referred to are referenced against the relevant chapter of the Environmental Statement (ES) or other DCO application plans and documents.

Table 1.1: Topics Included in this SoCG

Topic	Application Documents and references	EPP (Yes/No)
DCO/DML conditions	Draft DCO (REP1-006)	No
Marine and Coastal Processes	Marine Physical Processes (APP-076)	Yes
Benthic and Intertidal Ecology	Benthic and Intertidal Ecology (APP-064)	Yes
Benthic Compensation	Benthic and Intertidal Ecology (APP-064)	Yes
Marine Mammals	Marine Mammals (APP-066)	Yes
Offshore and Intertidal Ornithology	Offshore and Intertidal Ornithology (AS1-040)	Yes
Offshore Ornithology Compensation	Offshore and Intertidal Ornithology (AS1-040)	Yes
Onshore Ecology	Onshore Ecology (APP-076).	Yes
Onshore Ornithology	Onshore Ornithology (APP-077)	Yes

1.5 Identification of items agreed/not agreed/in discussion

10. This SoCG sets out the relevant topics and identifies them as agreed, not agreed or in discussion using a colour coding system. The colour coding system used throughout the document is summarised in Table 2.

Table 1.2: Colour coding system

Classification	Meaning
Agreed	Agreement has been reached between the parties.
Agreed in principle	The Applicant understands agreement has been reached but this has not yet been confirmed by Natural England.
In discussion	This matter has not been 'agreed' or is 'not agreed' but discussions are continuing; or information is to will be provided with the intention of reaching agreement.
Not agreed (No material impact)	The Matter is not agreed between the parties. However, while Natural England does not agree with the approach taken by the Applicant, Natural England does not consider this will result in material impact to the assessment conclusions. The matter is considered to be closed for the purposes of this SoCG.
Not Agreed	This matter has not been agreed and discussions are not currently on-going.

1.6 Status Update of items agreed/not agreed/in discussion

11. Annexes A to I sets out a status update of items agreed throughout the examination process to identify where agreement has been reached between the parties for the topics highlighted.