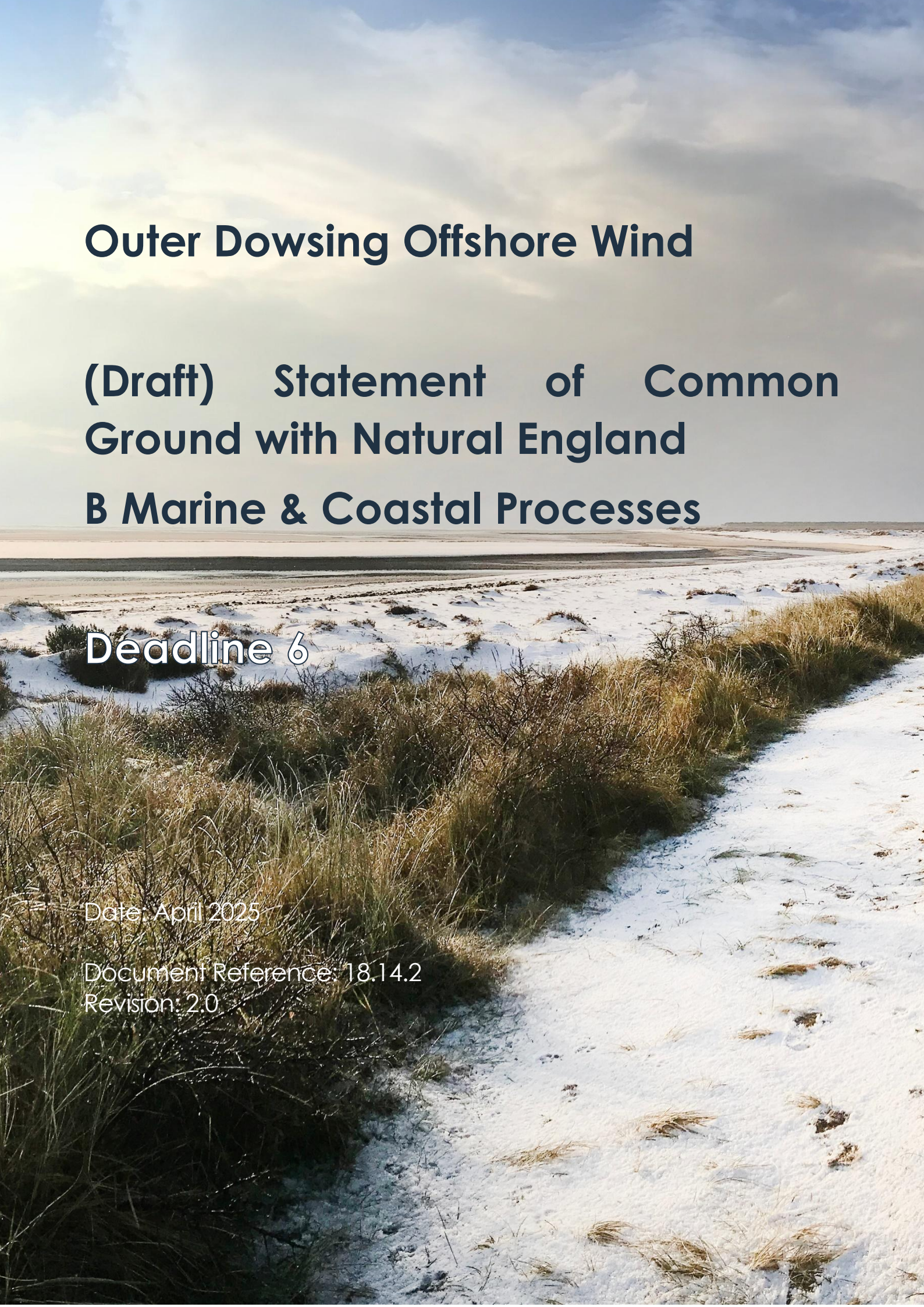

Outer Dowsing Offshore Wind

(Draft) Statement of Common Ground with Natural England

B Marine & Coastal Processes

Deadline 6

Date: April 2025

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Company:	**Outer Dowsing Offshore Wind**			Asset:		**Whole Asset**
Project:	**Whole Wind Farm**			Sub Project/Package:		Whole Asset
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1.0	November 2024	Deadline 2	GoBe	Outer Dowsing	Shepherd & Wedderburn	Outer Dowsing
2.0	April 2025	Deadline 6	GoBe	Outer Dowsing	Shepherd & Wedderburn	Outer Dowsing

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 returned this SoCG with significant alterations, which regrettably left insufficient time for the Applicant and Natural England to engage and enter into a final form of SoCG. This draft SoCG is provided as returned to the Applicant by Natural England on 2nd April 2025.

Annex B Marine and Coastal Processes

1. The Applicant has considered the potential impacts of the Project seaward of Mean High Water Springs (MHWS) and on specific receptors above MHWS on Marine and Coastal Process receptors, during the construction, operation and maintenance and decommissioning phases as set out in Chapter 7 Marine Physical Processes (APP-062).
2. Marine and Coastal Process receptors, were included within the Marine Ecology, Coastal Processes and Compensation & Derogation panel as part of the EPP. Minutes of the meetings held as part of the EPP can be found in Appendix 5.1.15 of the Consultation Report submitted as part of the Project's application for development consent (APP-052).
3. Table ~~Table 1~~ sets out areas of agreement (common ground), areas where discussions are ongoing and areas where is has not been possible to reach agreement and discussions are no longer being pursued relating to Marine and Coastal Processes. This is reflecting Tab B of the Natural England Risk and Issues Log.

Table 1: Marine physical processes

Ref	Applicant Position	Stakeholder Position	Status
	Study Area		
NE MP 1	The Applicant considers an appropriate study area has been included in the assessment.	This was discussed and agreed during the EPP, as detailed in Annex A of Evidence Plan Process Consultation (APP-052).	Agreed
	Baseline Data		
NE MP 2	The Applicant considers they have used relevant and appropriate desk-based data and project specific survey data to inform a robust and appropriate baseline characterisation for Marine Physical Processes.	This was discussed and agreed during the EPP, as detailed in Annex A of Evidence Plan Process Consultation (APP-052). NE has concerns [RR-045] with the bathymetric survey data used to inform the seabed mobility study, has a number of limitations including data coverage, timing, and number of epochs. There is also some uncertainty regarding absolute measure of bed elevation change, which was not undertaken, owing to insufficient data overlap, and the identification of erosional areas, which could be associated with scour processes. In the Seabed Mobility Assessment, currently Holocene sediment thickness data are not sufficiently detailed to inform the seabed mobility study. Further bathymetric data will also be required in order to allow more accurate assessment/corroboration of bedform migration rates. This evidence is important for informing the assessment of seabed mobility and recovery of bedforms. As advised at Deadline 5, The Applicant should commit to carrying out a more detailed bedform migration analysis and seabed mobility study prior to construction. This should also be captured in the OOOMP to ensure post-construction geophysical surveys are used to validate EIA predictions. The Applicant has updated Chapter 7 [REP4a-151], figures, and impact assessment for changes to the wave and tide regimes. These are very welcome. However, our concerns remain regarding the predicted changes to waves and tidal currents may affect sediment transport processes operating on and around the sandbanks/sandwaves within and adjacent to the array, particularly to the west and southwest for the duration of the Project. Furthermore, there remains uncertainty regarding the relative importance of waves and currents in driving morphological change at the sandbank-sandwave systems within and adjacent to the array.	Not agreed (No material impact)~~Agreed~~
	Assessment Methodology		
NE MP 3	The Applicant considers that an appropriate assessment has been used for the basis of the assessment. The Applicant's position on the points raised by NE is set out in rows 9, 11, 12 and 15 of Risk and Issues, Tab B, (document reference 23.2, updated at Deadline 6).	NE has concerns related to the assessment methodology, including: • the assessment of bedform migration and seabed mobility and, in turn, impacts to seabed morphology and scour potential. Therefore, we advise that the Applicant should commit to carrying out a more detailed bedform migration analysis and seabed mobility study prior to construction from ~~, and~~ studies and surveys used to inform the assessment. • discrepancies between Chapter 7 Marine Physical Processes (REP4a-142) and the Seabed Mobility Report (APP-152).	Not agreed (No material impact)
NE MP 4	The Applicant confirmed that the Inner Silver Pit glacial tunnel valley has been assessed in REP4a-142~~APP-062~~ and REP5-021~~APP-065~~.	At the start of the examination, NE had concerns that the Inner Silver Pit glacial tunnel valley was not included as a receptor. Following confirmation by the Applicant at Deadline 1 that this has been assessed, this issue was resolved.	Agreed
NE MP 5	The Applicant has appropriately assessed impacts in relation to the Offshore Reactive Compensation Platform (ORCP). At Deadline 4a, the Applicant committed to not using Gravity Base Structures (GBS) for ORCPs and has updated the assessment in V2 of Chapter 7 (REP4a-142). Response to NE concerns have been provided at Deadline 6 (document reference 23.2, updated at Deadline 6)	NE has~~ve~~ concerns around the assessment of potential seabed morphological change as a result of the ORCP (Risk and Issues, Tab B, ID 12 (document reference 23.2, updated at Deadline 6)). ~~At Deadline 4a, the Applicant committed to not using Gravity Base Structures (GBS) for ORCPs and has updated the assessment in V2 of Chapter 7 (REP4a-142).~~ Natural England notes and welcome the removal of the GBS option for the ORCP foundations from the project design, which reduces tidal current blockage effects.	Not Agreed

Commented [GT1]: We would like to discuss on call on Monday 31 March.

Ref	Applicant Position	Stakeholder Position	Status
		Please refer to Appendix B3 at Deadline 5[REP5-163] The GBS option for ORCP foundations has been removed from the project design which reduces the blockage effect. The impact assessment has also been updated in the updated ES Chapter 7 [REP4a-151]. However, more detailed bathymetric and higher resolution wave and tidal current model data for the ORCP/SAC area are needed to inform the impact assessment of potential seabed morphological change.	
NE MP 6	The Applicant considers the cumulative assessment methodology is appropriate, following Planning Inspectorate guidance (PINS Advice Note 17 – Cumulative Effects Assessment now superseded by NSIPs: Advice on Cumulative Effects Assessment (Planning Inspectorate, 2024)).	NE consider that the Applicant should follow Natural England and Joint Nature Conservation Committee (JNCC) best practice for determining which projects should be included in cumulative assessments and the level of data that is available at each stage. NE confirm it is likely they agree to disagree with the Applicant on this matter.	Not agreed (No material impact)
	Maximum Design Scenario/ Worst Case Scenario		
NE MP 7	The Applicant considers that a realistic MDS and WCS has been established for the impact assessments.	NE has~~d~~ concern ~~was~~ around O&M activity not being defined (Risk and Issues, Tab B, ID 1, 13 (document reference 23.2, updated at Deadline 6)). The Applicant included further detail on cable repair and reburial in updated ES chapter 7. There is now agreement that it is well defined, however our concerns regarding impacts remain, see advice below. Natural England advises [REP5-171] that these MDS parameters should be taken into account in the relevant assessments for ecological receptors and relevant documents updated where necessary.	Agreed
		NE had initial concerns around the MDS for scour protection and the parameters for spoil mounds (Risk and Issues, Tab B, ID 2, 3). This is now resolved following clarification from the Applicant.	Agreed
NE MP 8	The Applicant has assessed this within the envelope of cable installation activities and has identified no receptors sensitive to SSC due to these activities.	NE has~~ve~~ concerns ~~around~~ the MDS for increases in SSC and consequential changes to seabed level does not consider boulder clearance, pre-lay grapnel run or Unexploded Ordnance (UXO) clearance (Risk and Issues, Tab B, ID 4). As updated in NE D5 R&I Log [REP5-171], the Applicant [REP4a-111] has stated that the impacts associated with boulder clearance, UXO clearance and/or pre-lay grapnel run activities are all implicitly considered within the envelope of cable installation activities and consider that there are no marine physical process receptors sensitive to SSC and subsequent deposition due to these activities. If the Applicant can provide some indication of these MDS parameters then we may be able to agree with their assumption. Moreover, these MDS parameters may be important for other benthic ecological receptors.	Not agreed (No material impact)
NE MP 9	The Applicant committed to the following at Deadline 4a: *"If cable protection is required in the nearshore (defined as the inner depth of closure out to 7.1m water depth), concrete mattresses will be utilised, a description of concrete mattresses is set out in Section 6.11.5.2 of ES Chapter 3 Project Description (APP-058)"* The Applicant has provided the dimensions on the nearshore cable protection in the Cable Specification and Installation Plan (V7 submitted at Deadline 6, document reference 8.5) and Outline Scour Protection Management Plan (V5 submitted at deadline 6, document reference 8.21) at Deadline 6 and has amended the commitment wording to clarify that cable protection will not exceed a height of 0.35m.	NE has concerns about cable ~~protection~~ protection. Within the nearshore, t~~T~~he Applicant has committed to low profile mattresses that will not exceed 0.35m height ~~within the nearshore~~, but as advised in [REP5-172] NE would like dimensions confirmed~~.~~ on (a) the anticipated maximum length, height, area and volume of cable protection across the nearshore and (b) its location relative to MLWS and the water depth across the proposed cable protection area (i.e., it's extent across the nearshore). Until this is reviewed, due to disruption of potential disruption of wave energy transmission, nearshore sediment pathways, and coastal morphology, an adverse effect on integrity to The Wash and North Norfolk Coast SAC cannot be ruled out. As advised in [REP5-171]. further evidence is presented by the Applicant that concrete mattresses will not be moved in this dynamic environment and/or by fishing activities.	Not Agreed (Natural England will require review of the Applicant's Deadline 6 submission)

Commented [MB2]: New commitment for Deadline 6 - cable protection in the nearshore area will not exceed 0.35m. Will be secured in the CSIP and Scour Protection and Cable Protection Management Plan.

Commented [MB3]: The Applicant can offer the following clarifications on the nearshore cable protection as requested by Natural England:

- Length = 2,076 m
- Area = 12,456 m^2
- Volume = 4,359 m^3

These will be provided in the Applicant's response to NE's risk and issues log at Deadline 6.

Ref	Applicant Position	Stakeholder Position	Status
		NE also requests further details of the extent of cable protection within ~~the~~ IDRBNR SAC, including location, seabed footprint and volume. (Risk and Issues, Tab B, ID 5, 6). Please refer to Natural England's final position at Appendix C7 at Deadline 6 regarding the implications of cable protection within IDRBNR SAC and the requirement that WCS of cable protection WCS both outwith and within IDRNR SAC should be agreed and secured within the DCO. -	
	Assessment Conclusions		
NE MP 10	The Applicant is confident in the assessment conclusions and that they are robust. The Applicant's position on the points raised by NE is set out in Tab B rows 19, 20, 24 of the Applicant response to Deadline 5 submissions (document reference 23.2, updated at Deadline 5). The Applicant maintains that all marine physical processes receptors are insensitive to increases in SSC resulting in elevated turbidity and consequential changes to seabed levels. The Applicant has progressed these issues by providing the items listed below during the Examination but has not been able to reach full agreement with NE. • commitment to monitor sandwave /sandbank recovery • commitment to use of concrete mattresses in the nearshore • nearshore cable protection that will not exceed 0.35m • clarification of near shore cable protection dimensions. The Applicant considers that detailed survey requirements for pre- and post-construction monitoring are most appropriately discussed post-consent once further Project refinements have been made, as is standard for the offshore wind industry.	NE does~~e~~ not agree with the conclusion of low magnitude impact, or that all marine process receptors are insensitive to construction-related increases in SSC, elevated turbidity, and changes to seabed levels. The EIA conclusions and the conservation objectives for the IDRBNR SAC and the Greater Wash SPA should re reviewed. ~~The Applicant maintains that all marine physical processes receptors are insensitive to increases in SSC resulting in elevated turbidity and consequential changes to seabed levels.~~	Not agreed (No material impact)
		NE has~~ve~~ concerns around the potential impacts to seabed morphology and how this could impact the features of the IDRBNR SAC and other Annex I sandbanks. Natural England welcomes the Applicant's commitment to removable external cable protection, which depending on the outcome of ongoing discussions on 'life time of the project' downgrades the impacts from permanent to lasting. However, our advice on AEoI of the IDRBNR SAC Annex I sandbanks features remains unchanged due to the lasting habitat change/loss with no chance of recovery whilst cable protection is in situ. This is consistent with our advice and Secretary of State determination for Hornsea Project 3, Norfolk Vanguard, Norfolk Boreas, and Sheringham and Dudgeon Extension projects NE welcomes the Applicant's commitment in the IPMP (REP4a-073) to monitor sandwave/ sandbank recovery. But consider the applicant should also commit to adaptive monitoring and triggers for the development of countermeasures.	Not agreed ~~(No material impact)~~
		NE has~~ve~~ concerns that the nearshore cable protection could have potential impacts to The Wash and North Norfolk Coast SAC due to ~~on~~ interfering with wave and tidal regimes, and nearshore sediment pathways. The Applicant has committed to low profile cable protection to be used in the nearshore. Util these updates are reviewed, ~~, following clarification of the dimensions~~ this issue is not resolved.	~~Agreed (subject to the Applicant's Deadline 6 submission)~~ Not Agreed Material Impact (Natural England will require review of the Applicant's Deadline 6 submission)
		NE have concerns around the assessment of potential secondary scour. NE welcome the Applicant's commitment to monitor scour in the updated IPMP (REP4a-073) but consider that the Applicant should commit to adaptive monitoring ~~,~~ if observations of scour (or secondary scour) are found to be significantly greater than predicted in the ES. This monitoring should also be adequately captured in the OOOMP [REP4-093] to ensure that post-construction geophysical surveys are used to validate assessments made within the ES.	Not agreed (No material impact)
	Mitigation		

Commented [MB4]: New commitment for Deadline 6 - cable protection in the nearshore area will not exceed 0.35m. Will be secured in the CSIP and Scour Protection and Cable Protection Management Plan.

Ref	Applicant Position	Stakeholder Position	Status
NE MP 11	The Applicant considers suitable mitigation has been committed to and secured. The Applicant has committed to using concrete mattresses if cable protection is required in the nearshore (defined as the inner depth of closure out to 7.1m water depth). These are low in profile and therefore not considered to affect regional or local sediment transport.	Natural England advised that cable protection should be avoided in shallow nearshore areas. The Applicant has now committed to low profile concrete mattresses, that will not exceed 0.35m in height, as the only cable protection measure to be used in the nearshore. While this is welcomed, Natural England will require review of the Applicant's Deadline 6 submission wording. Natural England welcomes the Applicant's commitment to removable external cable protection, Due to lasting habitat loss, our advice on AEoI of the IDRBNR SAC Annex I sandbanks features remains unchanged due to the lasting habitat change/loss with no chance of recovery whilst cable protection is in situ and implications due disruption of marine processes.	Not Agreed (Material impact ~~subject to the Applicant's Deadline 6 submission~~)

Commented [MB5]: New commitment for Deadline 6 - cable protection in the nearshore area will not exceed 0.35m. Will be secured in the CSIP and Scour Protection and Cable Protection Management Plan.