



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

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

**Dogger Bank South Offshore
Wind Farms**

**Maritime and Coastguard Agency Statement of
Common Ground**

Submission for Deadline 1

Document Date: January 2025

Document Reference: 9.7

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:	Maritime and Coastguard Agency Statement of Common Ground				
Document Number:	005368460-01	Contractor Reference Number:	PC2340-RHD-ZZ-ZZ-RP-Z-0162		
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Rev No.	Date	Status/Reason for Issue	Author	Checked by	Approved by
01	January 2025	Submission for Deadline 1	RHDHV	RWE	RWE

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Contents

1	Introduction	7
1.1	Background	7
1.2	Approach to SoCG	8
2	Consultation.....	9
2.1	Introduction to Consultation.....	9
2.2	Consultation Summary	9
3	Agreement Log	12
3.1	Overview	12
3.2	General	13
3.3	Shipping and Navigation	13
3.4	Status of Discussions for Matters ‘Not Agreed’ or ‘Under Discussion’	16
3.4.1	Shipping and Navigation.....	16
4	Summary	17
5	References	18

Tables

Table 1-1	- Application Documents of interest to the MCA	8
Table 2-1	- Summary of pre-application and post-application consultation with the MCA.....	9
Table 3-1	– Agreement logs position status key	12
Table 3-2	– General Topics agreed, in discussion or not agreed with the MCA	13
Table 3-3	– Topics agreed, in discussion or not agreed in relation to Shipping and Navigation	13
Table 3-4	- Status of discussions relating to Shipping and Navigation	16

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.
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 proposed changes to the DCO application for the Projects set out in Project Change Request 1 - Offshore & Intertidal Works [document reference 10.49].
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
DBS	Dogger Bank South
DCO	Development Consent Order
dML	Deemed Marine Licence
EIA	Environmental Impact Assessment
ES	Environmental Statement
ExA	Examining Authority
MCA	Maritime and Coastguard Agency
MGN	Marine Guidance Note
NRA	Navigational Risk Assessment
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
SAR	Search and Rescue
SoCG	Statement of Common Ground
UK	United Kingdom

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** [APP-071].
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 the Maritime and Coastguard Agency (MCA) 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 the MCA has been set out within the Rule 6 letter issued by the Planning Inspectorate post-application of the Projects' DCO.
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 MCA, and which have been raised within the **MCA's Relevant Representation** [RR-031] 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 the MCA 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 the MCA and address the elements of the Projects that may affect the interests of the MCA:

Table 1-1 - Application Documents of interest to the MCA

Environmental Statement (ES) Chapter/ Application Document	Planning Inspectorate (PINS) Reference
Draft Development Consent Order	APP-027 (superseded by AS-130 and AS-131)
Chapter 14 Shipping and Navigation	APP-121
Appendix 14-2 Navigational Risk Assessment	APP-124
Volume 8-30 Outline Vessel Traffic Monitoring Plan	APP-254
Appendix 15-3 Helicopter Access Report	APP-129

8. The MCA and the Applicants have been working together to minimise possible impacts of the Projects on shipping and navigation in relation to the MCA’s remit as an Executive Agency of the Department for Transport responsible for safety of life at sea within United Kingdom (UK) waters.

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 the MCA, this SoCG is focused on matters of material interest and relevance to the MCA, 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 the MCA’s position. **Table 3-2** and **Table 3-3** set 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 3-4**.
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 the MCA.

12. As referenced in **Table 2-1**, the Applicants consulted the MCA on Project Change Request 1 between 15th November and 16th December 2024. The MCA provided consultation comments on 15th December 2024 regarding the Change Request. As Project Change Request 1 was only recently accepted into the Examination on 21st January 2025, this SoCG does not include details of those comments, which will instead be included in the next iteration of this document.

2 Consultation

2.1 Introduction to Consultation

13. The MCA have been consulted on the proposed development throughout the pre-application stage, having engaged in Shipping and Navigation meetings through the lifetime of the Projects, as well as via non-statutory and statutory consultation under Section 42 of the Planning Act 2008.

2.2 Consultation Summary

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

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
Pre – Application			
27/09/2021	Dedicated Meeting	Pre-scoping	Introduction to the Projects and high level overview of shipping and navigation ahead of Scoping Report.
13/01/2022	Initial Scoping Opinion	Initial scoping response	MCA confirmation of proposed methodology for vessel traffic surveys.
22/08/2022	Scoping Opinion	Scoping response	MCA outline of navigational issues which should be considered in line with Marine Guidance Note (MGN) 654.
16/09/2022	Email	Baseline data collection	MCA confirmation that October acceptable for collection of winter vessel traffic survey data given surveys previously undertaken.

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
23/01/2023	Dedicated Meeting	Pre-Preliminary Environmental Information Report (PEIR)	Update on the Projects and discussion of points raised in scoping response.
25/04/2023	Dedicated Meeting	Hazard Workshop	First Hazard Workshop undertaken with MCA and other shipping and navigation stakeholders.
26/06/2023	Section 42 Consultation	Section 42 response	MCA agreed with the additional steps outlined in the Navigational Risk Assessment (NRA) as required for the ES stage to address outstanding items in the MGN 654 Checklist, including the need to undertake a Hazard Workshop.
09/10/2023	Dedicated Meeting	Post Section 42	Update on the Projects and discussion of points raised in Section 42 response.
09/11/2023	Dedicated Meeting	Second Hazard Workshop	Second Hazard Workshop undertaken with MCA and other shipping and navigation stakeholders.
02/05/2024	Email	Search and Rescue (SAR)	The Applicants noted MCA comments on helicopter access report in relation to their remit would be addressed post-application.
28/06/2024	Email	SAR	MCA provided feedback to the Applicants responses to their initial review of the helicopter access report.
Post-Application			
16/09/2024	Email	Relevant Representation	Received MCA's Relevant Representation via the Planning Inspectorate.
04/10/2024	Email	Draft SoCG	Issued draft SoCG to MCA for review.

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
08/10/2024	Email	Relevant Representation	The Applicants issued their responses to the MCA's Relevant Representation via the Planning Inspectorate.
21/10/2024	Dedicated Meeting	Draft SoCG	Meeting with the MCA to discuss the draft SoCG.
08/10/2024	Email	Relevant Representation	The Applicants responded to the MCA's Relevant Representation within The Applicants' Responses to Relevant Representations [PDA-013].
21/10/2024	Email	Draft SoCG	Issued updated SoCG to MCA based on meeting held 21/10/2024.
22/10/2024	Email	Draft SoCG	MCA returned draft SoCG to Applicants with updates.
15/11/2024	Email	Project Change Request 1	Project Change Request 1 - Environmental Assessment Update [document reference:C1.1] issued to the MCA for comment.
10/12/2024	Email	Draft SoCG	The revised Draft of the SoCG was issued for comment alongside Appendix 15-3 Helicopter Access Report [APP-129].
16/01/2025	Email	Draft SoCG	The MCA confirmed agreement of the revised draft of the SoCG for submission into Examination at Deadline 1.
23/01/2025	Email	Draft SoCG	The MCA confirmed agreement with amendments proposed to SoCG ID 5 following the Issue Specific Hearing 2.
27/01/2025	Dedicated Meeting	Issue Specific Hearing 2 Action Point Response	Call with the MCA to confirm agreement with the proposed responses to the Action Points issued by the Examining Authority following the Issue Specific Hearing 2.

3 Agreement Log

3.1 Overview

15. The following sections of this SoCG summarise the level of agreement between the parties for each relevant offshore topic.
16. 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**.
17. Where a matter is 'not agreed' or 'under discussion' further detail is provided in section 3.4.

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 Applicant or the MCA 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 the MCA 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 MCA

SoCG ID	The Applicants' Position	The MCA's Position	Position Status
Environmental Impact Assessment (EIA) – Consultation			
1	The Applicants have adequately consulted with the MCA 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.	MCA is in agreement.	

3.3 Shipping and Navigation

Table 3-3 – Topics agreed, in discussion or not agreed in relation to Shipping and Navigation

SoCG ID	The Applicants' Position	The MCA's Position	Position Status
EIA – Baseline Environment			
2	The ES adequately characterises the baseline environment as detailed in section 14.5 of Chapter 14 Shipping and Navigation [APP-121] and sections 7 to 12 of Appendix 14-2 Navigational Risk Assessment [APP-124].	MCA is in agreement.	

SoCG ID	The Applicants' Position	The MCA's Position	Position Status
3	Sufficient survey data from the site-specific vessel traffic surveys has been collected in accordance with MGN 654 requirements to inform the assessment as presented within section 14.6 of Chapter 14 Shipping and Navigation [APP-121] and section 10 of Appendix 14-2 Navigational Risk Assessment [APP-124].	MCA is content that vessel traffic surveys have been conducted in accordance with MGN 654. Agreed.	
4	The approach to the assessment is also deemed appropriate for the purposes of predicting changes to the baseline environment as described in section 14.5 of Chapter 14 Shipping and Navigation [APP-121] and section 15 of Appendix 14-2 Navigational Risk Assessment [APP-124].	MCA is in agreement.	
EIA – Assessment Methodology			
5	The methodology applied in sections 14.3 and 14.4 of Chapter 14 Shipping and Navigation [APP-121] and section 3 of Appendix 14-2 Navigational Risk Assessment [APP-124] are appropriate, noting this includes compliance with MGN 654 and the application of a 1nm mean distance from offshore structures for main commercial route deviations.	MCA is content that the methodology is appropriate and is MGN 654 compliant. Agreed.	
6	The embedded mitigation measures in Table 14-3 of Chapter 14 Shipping and Navigation [APP-121] and section 20 of Appendix 14-2 Navigational Risk Assessment [APP-124] are appropriate, noting this includes compliance with MGN 654 and agreement of a layout plan post-consent in consultation with MCA and Trinity House.	MCA is content with the embedded mitigation presented. Agreed.	

SoCG ID	The Applicants' Position	The MCA's Position	Position Status
7	The potential hazards (impacts) identified in section 14.6 of Chapter 14 Shipping and Navigation [APP-121] and section 17 of Appendix 14-2 Navigational Risk Assessment [APP-124] adequately capture the potential risks to shipping and navigation.	MCA is in agreement.	
EIA - Assessment Conclusions			
8	The conclusions of the assessment of significance as detailed in in section 14.6 of Chapter 14 Shipping and Navigation [APP-121] and section 17 of Appendix 14-2 Navigational Risk Assessment [APP-124] (broadly acceptable or tolerable with mitigation) are appropriate and are considered not significant in EIA terms.	MCA is in agreement.	
EIA – Cumulative Risk Assessment Conclusions			
9	The conclusions of the cumulative risk assessment as detailed in section 14.8 of Chapter 14 Shipping and Navigation [APP-121] and section 18 of Appendix 14-2 Navigational Risk Assessment [APP-124] (broadly acceptable or tolerable with mitigation) are appropriate and are considered not significant in EIA terms.	MCA is in agreement.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring			
10	The wording of DCO/Deemed Marine Licence (dMLs) [AS-120 and AS-121] conditions (summarised below) relevant to the MCA are appropriate: <ul style="list-style-type: none"> • Schedule 10, DML 1, Conditions 9, 13, 15, 18, 21, 22 and 24 • Schedule 11, DML 2, Conditions 9, 13, 15, 18, 21, 22 and 24 	MCA notes some minor amendments to wording. These will be attached to the Written Representation for review by the Applicants.	

SoCG ID	The Applicants' Position	The MCA's Position	Position Status
	<ul style="list-style-type: none"> Schedule 12, DML 3, Conditions 7, 11, 13, 16, 19, 20, 22 Schedule 13, DML 4, Conditions 7, 11, 13, 16, 19, 20, 22 Schedule 14, DML 5, Conditions 5, 9, 11, 12, 15, 16, 18 		
11	<p>Appendix 15.3 Helicopter Access Report [APP-129] sufficiently identifies the baseline helicopter access within the Offshore Development Area and any potential changes to access that may result from construction of the Projects, in relation to the MCA's remit.</p>	<p>Final version is currently being agreed with the MCA and the Applicants.</p>	

3.4 Status of Discussions for Matters 'Not Agreed' or 'Under Discussion'

3.4.1 Shipping and Navigation

Table 3-4 - Status of discussions relating to Shipping and Navigation

SoCG ID	Discussion Point	Applicants' Position	MCA's Position	Position Status
10	DCO/dMLs	Awaiting the MCA's written representation regarding potential changes to the DCO/dMLs.	MCA to provide comments regarding the specific wording of the relevant DCO/dML conditions in their written representation.	
11	Helicopter Access Report	Final version is currently being agreed with the MCA and the Applicants.	Final version is currently being agreed with the MCA and the Applicants.	

4 Summary

18. This SoCG has outlined the consultation that has taken place between the Applicants and MCA during the pre-application and Examination phases. This SoCG will be updated as discussions progress and made available to PINS as requested through the DCO examination phase.

5 References

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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