

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

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**Dogger Bank South Offshore  
Wind Farms**

**National Gas Transmission Plc  
Statement of Common Ground  
Submission for Deadline 1**


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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
NGT	National Gas Transmission Plc
NTS	National Transmission System
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 Gas Transmission Plc (NGT) 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: 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 NGT is set out within the Rule 6 letter dated 24<sup>th</sup> September 2024, 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 NGT and which have been raised within the **NGT Relevant Representation** [RR-017] to the Dogger Bank South Offshore Wind Farm 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 NGT 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.

## 1.2 Approach to SoCG

7. This SoCG has been developed during the pre-examination and examination phases of the Projects in accordance with discussions between the Applicants and NGT.
8. 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 NGT relating to topics discussed between parties and the status of agreement on those topics.

## 2 Consultation and Engagement

### 2.1 Introduction

9. NGT owns and operates the high-pressure gas network (National Transmission System) in Great Britain and is a licensed gas transporter under the Gas Act 1986.
10. NGT owns and operates the gas National Transmission System (NTS) in Great Britain and has identified the following infrastructure within or in close proximity to the Order Limits for the Projects:
  - Feeder Main 6 – Burton Agnes to Paull; and
  - Feeder Main 29 – Ganstead to Asselby.
11. NGT 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, NGT has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the Order Limits.
12. NGT 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.

### 2.2 Consultation and Engagement Summary

13. **Table 2-1** summarises the consultation that the Applicants have undertaken with NGT 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 NGT**

Date	Form of consultation	Meeting Title/Topic	Summary of Consultation
<b>Pre – Application</b>			
03/03/2023	Email to NGT	Consultation	Consultee engagement introductory letter sent to assetprotection@nationalgrid.com.
17/03/2023	Email from NGT	Consultation	Objection received in response to engagement letter.
17/04/2023	Email to NGT	Asset Protection	Response to objection. Email to Phil Booth in asset protection providing further project information, plans and contact details for



Date	Form of consultation	Meeting Title/Topic	Summary of Consultation
			DBS. Request for a meeting to discuss interactions further and request for information on working parameters, crossing methods, guidance and protection measures required.
18/04/2023	Call	Asset Protection/Interactions	Call with Phil Booth to discuss project interactions
26/04/2023	Emails with NGT	Jocks Lodge Diversion	Discussion with NGT construction team working on Jocks Lodge A164 road scheme relating to information relating to diversionary works and contact details for access to undertake GI survey works.
27/04/2023	Email to NGT	Plans	Follow up email to Phil Booth providing further plans and information showing cable depths and proposed routing in locations in close proximity to NGT pipelines.
27/04/2023	Emails with NGT	Asset Protection	Response from Phil Booth providing NGT guidance documents and requesting cable voltage information. Confirmation that Deed of Consent would be required for cable crossings and works to be carried out in line with T/SP/SSW/22.
28/04/2023	Email from NGT	Meeting	Suggestion of meeting to discuss interactions further.
17/05/2023	Meeting	Project Interactions	Meeting with NGT and DBS to discuss project interactions and considerations.
24/05/2023	Email to NGT	Asset Protection	Request for confirmation on the location of NGT groundbeds and kiosks.
24/05/2023	Email to NGT	Minutes	Provision of meeting minutes and chaser on actions relating to confirmation of pipeline details and cathodic protection information.
05/06/2023	Letter	Consultation	Statutory Consultation notification letter issued to NGT assetprotection@nationalgas.com.

Date	Form of consultation	Meeting Title/Topic	Summary of Consultation
08/06/2023	Email from NGT	Consultation	Response to statutory consultation referring to previous objection issued in March.
10/11/2023	Letter	Consultation	Notification of targeted statutory consultation.
07/02/2024	Email to NGT	Shapefiles/Protective Provisions	Provision of updated red line boundary shapefiles to Fisher German acting for NGT. Request for a copy of NGT's standard Protective Provisions and solicitor contact details.
27/02/2024	Email to NGT	Protective Provisions	Follow up email requesting contact details to progress discussions on the form of Protective Provisions.
28/02/2024	Email from NGT	Protective Provisions	Confirming instructions sought internally.
06/03/2024	Email from NGT	Protective Provisions	Confirmation that Addleshaw Goddard were instructed and contact details provided.
12/04/2024	Email from Addleshaw Goddard	Plans	Request for a summary of interactions and relevant plans.
24/04/2024	Email to Addleshaw Goddard	Project Interactions	Narrative summary and plans showing interactions provided.
14/05/2024	Email from Addleshaw Goddard	Project Interactions	Further clarification queries raised on the summary and plans provided.
17/05/2024	Email to Addleshaw Goddard	Project Interactions	Response to clarification queries provided.
<b>Post – Application</b>			
05/07/2024	Email from Addleshaw Goddard	Protective Provisions	Draft protective provisions provided.

Date	Form of consultation	Meeting Title/Topic	Summary of Consultation
23/07/2024	Letter	Consultation	Section 56 notice issued.
06/08/2024	Email to NGT	Consultation	Update email to NGT advising that the relevant representation period is now open and offer of a call to discuss any outstanding queries.
09/08/2024	Email from NGT	Consultation	Confirmation all documentation received.
10/09/2024	Email from Addleshaw Goddard	Protective Provisions	Follow up email requesting comments on the draft.
10/09/2024	Email to Addleshaw Goddard	Protective Provisions	Confirming seeking instructions.
23/09/2024	Email from Addleshaw Goddard	Project Interactions/Protective Provisions	Request for copy of easement referred to in the BoR. Follow up email requesting comments on Protective Provisions.
25/09/2024	Email to Addleshaw Goddard	Project Interactions/Protective Provisions	Easement not available. Awaiting instructions on Protective Provisions.
10/10/2024	Email from Addleshaw Goddard	Protective Provisions	Follow up email requesting comments on the draft.
16/10/2024	Email to Addleshaw Goddard	Protective Provisions	Mark-up of draft Protective Provisions provided.
24/10/2024	Meeting with NGT and Addleshaw Goddard	Protective Provisions	Understanding that the Applicant's solicitor has now received the Protective Provision and comments have been made. Addleshaw Goddard are reviewing.
29/10/2024	Email from Addleshaw Goddard	Protective Provisions	Requesting input from Applicant's solicitors on comments within Protective Provisions.

Date	Form of consultation	Meeting Title/Topic	Summary of Consultation
13/11/2024	Email from Burges Salmon	Protective Provisions	Seeking instructions.

## 3 Agreement Log

### 3.1 Overview

14. The following sections of this SoCG summarise the level of agreement between the parties for each relevant topic.
15. 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 3-1 - 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 NGT 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 NGT 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 NGT

SoCG ID	The Applicants' Position	NGT's Position	Position Status
<b>Engagement</b>			
1.	<p>The Applicants have adequately consulted with NGT 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.</p> <p>NGT did not raise any issues on this subject throughout discussion or within their Relevant Representation. It is therefore considered by the Applicant that the matter is agreed.</p>		
<b>Asset Protection</b>			
2.	<p>The Applicants have been engaged with NGT including their asset protection team throughout the pre-application stages of the project. Relevant safe working guidance provided during meetings have been fully considered and project design refinements made in accordance with advice.</p>	<p>Within their <b>Relevant Representation</b> [RR-017] NGT states that it will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus.</p>	

SoCG ID	The Applicants' Position	NGT's Position	Position Status
<b>Protective Provisions</b>			
3.	The Applicants have been provided with NGT's preferred form of Protective Provisions for consideration. The form of Protective Provisions are still under discussion. Engagement between the parties is ongoing and the Applicants will continue to work with NGT to reach agreement.	Within their <b>Relevant Representation</b> [RR-017] NGT states that it will require protective provisions to be included within the Draft Development Consent Order (the "Order") for the Project to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGT is liaising with the Applicants in relation to such protective provisions, along with any supplementary agreements which may be required.	

## 4 Summary

16. This SoCG has outlined the consultation and engagement that has taken place between the Applicants and NGT during the pre-application phases. The agreement logs present the position reached at the point of Deadline 1 between the Projects and NGT in relation to relevant matters.
17. This SoCG will be updated as discussions progress and made available to PINS as requested through the DCO examination phase.



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