

Outer Dowsing Offshore Wind

(Draft) Statement of Common Ground with Historic England

Deadline 1

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Acronyms & Definitions

Abbreviations / Acronyms

Abbreviation / Acronym	Description
ANS	Artificial Nesting Structure
DBA	Desk Based Assessment
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
dML	Deemed Marine Licence
EIA	Environmental Impact Assessment
ECC	Export Cable Corridor
EPP	Evidence Plan Process
ES	Environmental Statement
ETG	Expert Topic Group
GT R4 Limited	GT R4 or GT R4 Limited, the incorporated joint venture development Co.
GW	Gigawatt
HE	Historic England
LCC	Lincolnshire County Council
ODOW	Outer Dowsing Offshore Wind, trading name of GT R4 Limited
OnSS	Onshore Substation
ORCP	Offshore Reactive Compensation Platform
OSS	Offshore Substation
PADS	Principal Areas of Disagreement Statements
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
WSI	Written Scheme of Investigation

Terminology

Term	Definition
400kV cable corridor	The 400kV cable corridor is the area within which the 400kV cables connecting the onshore substation to the NGSS will be situated.
The Applicant	GT R4 Ltd. The Applicant making the application for a DCO. The Applicant is GT R4 Limited (a joint venture between Corio Generation (and it's affiliates), Total Energies and Gulf Energy Development (GULF)), trading as Outer Dowsing Offshore Wind. The Project is being developed by Corio Generation, TotalEnergies and GULF.
Baseline	The status of the environment at the time of assessment without the development in place.
Deemed Marine Licence (dML)	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.

Term		Definition
Development Consent Order (DCO)		An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
Effect		Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the sensitivity of the receptor, in accordance with defined significance criteria.
Environmental Statement		The suite of documents that detail the processes and results of the EIA.
Evidence Plan		A voluntary process of stakeholder consultation with appropriate Expert Topic Groups (ETGs) that discusses and, where possible, agrees the detailed approach to the Environmental Impact Assessment (EIA) and information to support Habitats Regulations Assessment (HRA) for those relevant topics included in the process, undertaken during the pre-application period.
Export Cables		High voltage cables which transmit power from the Offshore Substations (OSS) to the Onshore Substation (OnSS) via an Offshore Reactive Compensation Platform (ORCP) if required, which may include one or more auxiliary cables (normally fibre optic cables).
Impact		An impact to the receiving environment is defined as any change to its baseline condition, either adverse or beneficial.
Intertidal		The area between Mean High Water Springs (MHWS) and Mean Low Water Springs (MLWS)
Landfall		The location at the land-sea interface where the offshore export cables and fibre optic cables will come ashore.
Mitigation		Mitigation measures are commitments made by the Project to reduce and/or eliminate the potential for significant effects to arise as a result of the Project. Mitigation measures can be embedded (part of the project design) or secondarily added to reduce impacts in the case of potentially significant effects.
Onshore Export Cable Corridor (ECC)		The Onshore Export Cable Corridor (Onshore ECC) is the area within which, the export cables running from the landfall to the onshore substation will be situated.
Onshore Substation (OnSS)		The Project's onshore HVAC substation, containing electrical equipment, control buildings, lightning protection masts, communications masts, access, fencing and other associated equipment, structures or buildings; to enable connection to the National Grid.
Order Limits		The area subject to the application for development consent. The limits shown on the works plans within which the Project may be carried out.
Pre-construction		The phase of the Project before construction takes place.
Preliminary Environmental Information Report (PEIR)	Report	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.

Term	Definition
The Project	Outer Dowsing Offshore Wind, an offshore wind generating station together with associated onshore and offshore infrastructure.
Receptor	A distinct part of the environment on which effects could occur and can be the subject of specific assessments. Examples of receptors include species (or groups) of animals or plants, people (often categorised further such as 'residential' or those using areas for amenity or recreation), watercourses etc.
Statement of Common Ground	A statement of common ground is a written statement produced jointly between The Applicant and another Interested Party setting out the areas of agreement and /or disagreement between parties.
Study Area	Area(s) within which environmental impact may occur – to be defined on a receptor-by-receptor basis by the relevant technical specialist.
Trenchless Technique	Trenchless technology is an underground construction method of installing, repairing and renewing underground pipes, ducts and cables using techniques which minimize or eliminate the need for excavation. Trenchless technologies involve methods of new pipe installation with minimum surface and environmental disruptions. These techniques may include Horizontal Directional Drilling (HDD), thrust boring, auger boring, and pipe ramming, which allow ducts to be installed under an obstruction without breaking open the ground and digging a trench.

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) 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 1.6 million UK households.

1.2 Purpose of this Statement of Common Ground (SoCG)

3. Historic England is a governmental body with responsibilities for protecting the historic environment of England through preserving and listing historic bodies, scheduling ancient monuments, registering historic parks and gardens and advising central and local governments.
4. This SoCG has been prepared by the Applicant and Historic England to identify topics that are relevant to Historic 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: Guidance on the examination stage for Nationally Significant Infrastructure Projects (2024).

1.3 Consultation

6. The Applicant has engaged with Historic 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).

Table 1: Summary of consultation with Historic England

Date	Engagement	Topics
11 th July 2022	Expert Topic Group (ETG)	Introduction to the Project
10 October 2022	ETG	Post-Scoping onshore and marine archaeology and cultural heritage updates
25 th January 2023	ETG	Pre-Preliminary Environmental Information Report (PEIR) onshore and marine archaeology and cultural heritage updates
23 rd March 2023	ETG	Pre-PEIR onshore and marine archaeology and cultural heritage updates and consultation updates.

Date	Engagement	Topics
25 th July 2023	ETG	Post-PEIR onshore and marine archaeology and cultural heritage updates
19 September 2023	ETG	Post PEIR and Section 42 onshore and marine archaeology and cultural heritage updates
30 th November 2023	ETG	Autumn consultation updates, and onshore and marine archaeology and cultural heritage updates
12 September 2024	Teams Meeting	Discussion re PADS and response to relevant representations.

1.4 Topics addressed in this Statement of Common Ground

7. Table 2 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 2: Topics Included in this SoCG

Topic	Application Documents and references
Onshore Archaeology and Cultural Heritage	Chapter 20 Onshore Archaeology and Cultural Heritage (AS1-048) Appendix 20.1 Part 6 Desk Based Assessment (APP-185) 8.9 Onshore Outline Written Scheme Investigation (WSI) for Archaeological Works (PD1-052)
Marine Archaeology	Chapter 13 Marine and Intertidal Archaeology (APP-068) Chapter 13 Marine and Intertidal Archaeology Figures (APP-101) Chapter 13 Appendix 1 Marine and Intertidal Archaeology Technical Report (APP-167) 8.08 Outline Marine Archaeological Written Scheme of Investigation (WSI) (APP-282)

1.5 Identification of items agreed/not agreed/in discussion

8. 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 below.

Table 3: Colour coding system

Classification	Meaning
Agreed	Agreement has been reached between the parties
In discussion	This matter has not been 'agreed' or 'not agreed' but discussions are continuing, or information is to be provided with the intention of reaching agreement.
Not Agreed	This matter has not been agreed, but discussions have been concluded. It is considered that it does have a material impact upon the conclusions of the assessment.

2 Statement of Common Ground

2.1 Onshore Archaeology and Cultural Heritage

9. The Applicant has assessed the potential impacts of the Project from the Landfall, along the Onshore ECC and 400kV cable corridor and the OnSS during the construction, operation and maintenance and decommissioning phases.
10. Table 4 sets out the topics agreed, under discussion or not agreed in respect of Onshore Archaeology and Cultural Heritage

Table 4: Onshore Archaeology and Cultural Heritage

ID	ODOW Position	Historic England Position	Status
Archaeological Evaluation			
HE1	<p>Geophysical surveys have been carried out referencing deposit modelling and projected coastlines to highlight where the archaeological potential lies and sufficiently evaluated the Order Limits for EIA. The results of electromagnetism survey undertaken alongside magnetometer survey will be used to target trial trenching.</p> <p>Following the submission of the application, the Applicant undertook further engagement with Lincolnshire County Council (LCC) and Historic England to seek to understand concerns. In order to address concerns raised, a programme of geoarchaeological boreholes, trial trenching, and slit trenching/test pitting was undertaken in June-October 2024. This programme of works included trial trenching targeting magnetometer anomalies and slit trenching/test pitting in some blank areas. Results of these surveys will be shared with Historic England upon completion of the works.</p>	<p>Requirement 17 with our proposed amendment will still only be sufficient to address archaeological risks if an appropriate level of archaeological evaluation has been completed by the time DCO is granted and that information has been reflected in an updated Onshore WSI; where concerns from Lincolnshire County Council/Historic England remain around sufficiency of evaluation a more complex requirement to capture an iterative process.</p> <p>DCO Requirement 17 as updated 19 September 2024 can be found in the document library as PD-023, PD-024, PD-025. HE are content with this update to Requirement 17. We refer you to the advice of the LCC curator</p> <p>HE will review progress of field work alongside LCC (who are taking the lead on this area of advice).</p>	

ID	ODOW Position	Historic England Position	Status
	<p>Further pre-construction trial trenching, slit trenches/test pitting and geoarchaeological boreholes will be agreed upon with LCC and Historic England through a review of the 2024 results and the provision of further WSIs following the Outline Onshore Written Scheme Investigation for Archaeological Works (PD1-052), as set out in Requirement 17 (Onshore archaeology) of the draft DCO (PD1-024)</p> <p>Outside of the areas targeted for geophysical survey, the targeting of blank areas will be proportionate to the rationale which excluded these areas for geophysical survey and will reflect the lower archaeological potential of these areas based on deposit modelling and historic coastlines.</p>	<p>Areas not targeted for geophysical survey on the basis of a landscape scale deposit model are different to what would conventionally be referred to as ‘blank areas’, the latter being areas in which geophysical survey was undertaken but returned blank results. This in turn is different to areas where geophysical survey was undertaken but the presence / absence of features was obscured by noise from alluvium, green waste, existing services etc. Caution should be exercised to avoid reproducing the limitations of one technique by limiting the deployment of complementary survey methods. For instance, within areas of silt deposition small but important islands of dry ground may exist. On the margins of areas of dry ground archaeological features may extend under surrounding silts or within shallow valleys.</p>	

ID	ODOW Position	Historic England Position	Status
Archaeological Mitigation			
HE2	<p>The Applicant has committed to undertaking trenchless techniques in order to avoid the deserted medieval village earthworks at Slackholme as shown on the Project Description Figures [APP-089]. As set out within the Outline Onshore Written Scheme Investigation for Archaeological Works (PD1-052) other areas of archaeology of high importance identified through archaeological evaluation will be preserved in-situ through trenchless construction techniques.</p>	<p>HE welcomes the approach proposed as Slackholme deserted medieval village. This is an undesignated heritage asset of demonstrably equivalent significance to a scheduled monument, and we support direct drill / trenchless solutions in this case. Lincolnshire medieval settlement earthworks have not been subject to structured scheduling review. NPS EN01 (para 5.9.6) and DCMS policy (Scheduled Monuments & nationally important but non-scheduled monuments October 2013) provide additional reference in respect of undesignated assets of equivalent significance / importance to Scheduled Monuments. Trenchless / direct drill options are a highly desirable solution where the route interacts with assets of high importance. In each instance where this technique is to be deployed a plan should be in place that addresses its feasibility for that asset / geology and the appropriate location of launch and receiver pits, measures for the management of bentonite slurry etc.</p>	
HE3	<p>A package of other suitable mitigation options has been identified within the Outline Onshore Written Scheme Investigation for Archaeological Works (PD1-052) and the Applicant has progressed archaeological trial trenching, geoarchaeological boreholes and slit trenching/test pitting to begin to further inform the mitigation requirements. The Outline Onshore Written Scheme Investigation for Archaeological Works confirms that all archaeological works will be undertaken in accordance with WSIs approved by LCC</p>	<p>DCO Requirement 17 as updated 19 September 2024 can be found in the document library as PD-023, PD-024, PD-025. HE are content with this update to Requirement 17. We refer you to the advice of the LCC curator</p>	

ID	ODOW Position	Historic England Position	Status
	in consultation with Historic England as secured by Requirement 17 of the draft DCO (PD1-024).		
HE4	The measures identified in the Outline Onshore Written Scheme of Investigation for Archaeological Works (PD1-052) are adequate to mitigate potential significant effects identified in Chapter 20: Onshore Archaeology and Cultural Heritage (AS1-048).		

2.2 Offshore Archaeology and Cultural Heritage

11. The Applicant has assessed the potential impacts of the Project from the Offshore generating station (windfarm), export cables to landfall, Offshore Reactive Compensation Platforms (ORCPs), and areas for the delivery of up to two Artificial Nesting Structures (ANS) and the creation of a biogenic reef) during the construction, operation and maintenance and decommissioning phases.

12. Table 5 sets out the topics agreed, under discussion or not agreed in respect of Offshore Archaeology and Cultural Heritage

Table 5: Offshore Archaeology

Ref	ODOW Position	Historic England Position	Status
Surveys			
HE5	The Applicant considers that it is appropriate that marine survey programmes, including all geotechnical works would be carried out post-consent and prior to construction.		
HE6	All survey campaigns would be designed and planned inclusive of the collection of archaeological specific cores to meet the archaeological objectives set out in an agreed WSI, to accord with the Outline Marine Archaeological Written Scheme of Investigation (PD1-050).		

Ref	ODOW Position	Historic England Position	Status
Embedded Mitigation			
HE7	The Applicant has committed to suitable embedded mitigation as detailed in Table 13.7 of Chapter 13 Marine and Intertidal Archaeology (APP-068).		
HE8	The measures identified in the Outline Marine Archaeological Written Scheme of Investigation (PD1-050) are adequate to mitigate potential impacts on the known and potential Historic Environment receptors within the marine archaeology study area, as described in Chapter 13: Marine and Intertidal Archaeology and Cultural Heritage (APP-068).		

2.3 Draft DCO and Outline Management Plans

13. The following relates to the draft DCO (PD1-024) submitted as part of the application.

Table 6: Draft DCO and Outline Management Consent Plans

Ref	ODOW Position	Historic England Position	Status
DCO			
HE9	Requirement 17 (Onshore archaeology) of the draft DCO (PD1-024) is sufficient to secure the mitigation measures described in the Outline Onshore Written Scheme of Investigation for Archaeological Works (PD1-052).		

Ref	ODOW Position	Historic England Position	Status
HE10	Condition 13(1)(g) of the deemed marine licences forming Schedules 10 (Deemed marine licence under the 2009 Act - generation assets) and 11 (Deemed licence under the 2009 Act – offshore transmission assets), condition 10(1)(g) of the deemed marine licences forming Schedules 12 (Deemed licence under the 2009 Act – northern artificial nesting structure 1), 13 (Deemed licence under the 2009 Act – northern artificial nesting structure 2), 14 (Deemed licence under the 2009 Act – southern artificial nesting structure 1), and 15 (Deemed licence under the 2009 Act – southern artificial nesting structure 2), and condition 8(1)(d) of the deemed marine licence forming Schedule 16 (Deemed licence under the 2009 Act – biogenic reef creation) of the draft DCO (PD1-024) are sufficient to secure the mitigation measures described in the Outline Marine Written Scheme of Investigation (PD1-050) in respect of the licensed activities to which those deemed marine licences relate.	Agreed subject to the inclusions of Historic England’s details and Birmingham office address within Schedules 12 (Deemed licence under the 2009 Act – northern artificial nesting structure 1), 13 (Deemed licence under the 2009 Act – northern artificial nesting structure 2), 14 (Deemed licence under the 2009 Act – southern artificial nesting structure 1), and 15 (Deemed licence under the 2009 Act – southern artificial nesting structure 2) and Schedule 16 (Deemed licence under the 2009 Act – biogenic reef creation).	

2.4 Pre-Application Actions

14. The following relate to pre-application advice and comments Historic England issued to the Applicant as part of their participation in the consultation phases carried out under section 42 of the 2008 Act.

Table 7: Pre-Application Actions

Ref	ODOW Position	Historic England Position	Status
HE11	The Applicant has undertaken a geophysical survey targeting the parts of the Order Limits within areas west of historic high water marks, which are considered to hold archaeological	The results should be integrated into the Outline Marine Written Scheme of Investigation.	

Ref	ODOW Position	Historic England Position	Status
	potential due to their historic location. A geophysical report was submitted as part of the Desk Based Assessment (DBA)(APP-185)		
HE12	The Applicant has submitted an updated deposit model as part of the DBA including updates in reference to a monitored programme of Site Investigations undertaken following the phase 2 consultation on the PEIR.	This will require further update following ongoing evaluation and survey work (the results should be integrated with the Outline WSI and / or Post-DCO WSIs).	
HE13	The Applicant has referenced Dr Caitlin Green's ' <i>Coastal Landscape Report</i> ' within the DBA	Welcomed	

3 Signatures

The above statement of common ground has been prepared by Outer Dowsing Offshore Wind and the Historic England and is agreed on the date below.

Signed for the Historic England	
Name	
Position	
Date	
Duly authorised for and on behalf of the Historic England	

Signed for Outer Dowsing Offshore Wind	
Name	
Position	
Date	
Duly authorised for and on behalf of Outer Dowsing Offshore Wind	

References

Department for Levelling Up, Housing and Communities (2024) Planning Act 2008: Guidance for the examination of applications for development consent.