

Date: 14 February 2025
Our ref: 17503; 489455
Your ref: EN010125
Interested Party ref: 20050173



National Infrastructure Planning
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BY EMAIL ONLY

Dear Sir/Madam,

Application by RWE Renewables UK Dogger Bank South (West) Ltd and RWE Renewables UK Dogger Bank South (East) Ltd for an Order granting Development Consent for the Dogger Bank South Offshore Wind Farms

The following constitutes Natural England's formal statutory response for Examination Deadline 2.

1. Natural England's Deadline 2 Submissions

Natural England has reviewed the documents submitted by the Applicant at Deadline 1. An update of Natural England's position regarding documents relevant to our remit is provided in Annex 1, including anticipated timing of responses. Natural England is also submitting the following detailed responses, signposted from Annex 1:

- EN010125 489455 DBS – Natural England's Risk and Issues Log Deadline 2
- EN010125 489455 DBS Appendix B2 - Natural England's Advice on Marine Physical Environment Deadline 2
- EN010125 489455 DBS – Appendix C2.1 – Natural England's Advice on Benthic and Intertidal Ecology Deadline 2
- EN010125 489455 DBS – Appendix C2.2 – Natural England's advice on cable protection assessment for offshore windfarms and inclusion in marine licences Deadline 2
- EN010125 489455 DBS – Appendix F2 – Natural England's Advice on Marine Mammals Deadline 2

2. Draft Development Consent Order (DCO)

Due to staff absence, Natural England will be providing detailed comments on all currently submitted versions of the Draft DCO and associated documents as soon as possible following Deadline 2; we currently anticipate this to be within two weeks of the deadline.

3. Offshore Ornithology

As raised in Natural England's Deadline 1 cover letter [REP1-063], we will endeavour to provide a full ornithology update as soon as possible following Deadline 2; we currently anticipate this to be within two weeks of the deadline.

4. Fish and Shellfish

Due to staff absence, Natural England will be deferring comments on Fish and Shellfish until Deadline 3.

5. Strategic Compensation Measures for offshore wind activities

Natural England draws the attention of the ExA and the Applicant to the Ministerial Statement issued on 29th January 2025 which confirmed DEFRA's support for delivery of strategic benthic compensation, making wider compensation measures available and delivery of compensation through the Marine Recovery Fund.

[Written statements - Written questions, answers and statements - UK Parliament](#)

DESNZ also issued interim guidance on the Marine Recovery Fund. The guidance will provide developers a means to access MPA designation as a compensation measure, prior to the launch of the MRF. The interim guidance also provides advice to developers in planning who are developing their own avian compensation packages on how to ensure that their consent documents include the option to switch to sourcing their avian compensation through the Marine Recovery Fund when it is in place.

[Strategic compensation measures for offshore wind activities: Marine Recovery Fund interim guidance - GOV.UK](#)

Additionally Natural England's response to ExA question ME. 1.10 for Five Estuaries provides some additional information [EN010115-000899-Natural England - Responses to ExQ1.pdf](#) relating to compensatory measures.

For any queries relating to the content of this letter please contact me using the details provided below.

Yours faithfully

Emma John
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Annex 1: Natural England's Response to the Applicant's Documents Submitted prior to and at Deadline 1 Relevant to our Remit

PINS Document Reference	Document Name	Natural England's Response/Position Summary
General		
REP1-001	11.2 Deadline 1 Cover letter	Natural England has no comments to make on these documents.
REP1-002	1.4 Guide to the Application (Revision 4)	
REP1-049	11.4 The Applicants' Written Summaries of Oral Submissions made at CAH1, ISH1 and ISH2(1)	
REP1-050	11.5 The Applicants' Responses to Issue Specific Hearing 2 (ISH2) Supplementary Agenda Questions	
REP-051	11.6 The Applicants' Responses to January 2025 Action Points. Superseded by [AS-155/AS-156] 11.6 The Applicants' Responses to January 2025 Action Points (Revision 2)	Natural England's response to this document is provided in our Risk and Issues Log Deadline 2 and Appendix C2.1
REP1-027	9.1 Statement of Commonality of Statement of Common Ground	Natural England has no comments to make on this document.
DCO		
AS-121	Draft Development Consent Order (Rev 03) - Tracked	Natural England will provide a response on these documents as soon as possible after Deadline 2
AS-122	3.4 Schedule of Changes (Revision 1)	
REP1-005	3.1 Draft Development Consent Order (Revision 5) (Tracked)	
REP1-007	3.2 Explanatory Memorandum (Revision 5) (Tracked)	
REP1-008	3.4 Schedule of Changes to dDCO (to Revision 5)	
Project Description		
REP1-010	7.5 ES Chapter 5 - Project Description (Revision 3) (Tracked)	Natural England has no comments to make on this document.
Benthic & Intertidal Ecology		
AS-025	10.36 Review of evidence on recovery of sandbank habitat following habitat damage (Revision 01)	Natural England's response to these documents is provided in Appendix C2.1.
AS-028	8.24 Outline Offshore Operations and Maintenance Plan (Revision 02)	

PINS Document Reference	Document Name	Natural England's Response/Position Summary
	(Tracked)	
AS-081	8.27 Outline Scour Protection Plan (Revision 2) (tracked)	
AS-104	10.38 Benthic Ecology Technical Note	
Fish and Shellfish		
AS-105	10.41 Heat Mapping Report Atlantic Herring and Sandeel	Natural England will provide a response to this document at Deadline 3.
Marine Mammals		
AS-101	8.25 Outline Marine Mammal Mitigation Protocol (Revision 2) (Tracked)	Natural England's response to these documents is provided in Appendix F2.
AS-103	8.26 Draft In Principle Site Integrity Plan (Revision 2) (Tracked)	
Terrestrial Ecology and Ornithology		
AS-110	7.18 Environmental Statement Chapter 18 – Terrestrial Ecology and Ornithology (Revision 3) (Tracked) superseded by PDC-003 7.18 Environmental Statement Chapter 18 – Terrestrial Ecology and Ornithology (Revision 4) (Tracked)	Natural England's response to this document is provided in our Risk and Issues Log Deadline 2 and Appendix B2.
REP1-026	8.9 Outline Code of Construction Practice (Revision 3) (Tracked)	Natural England has no comments to make on this document.