



Secretary of State for Energy Security and
Net Zero

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Our reference

006463966-01

Your reference

EN010125

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9th December 2025

Dear Secretary of State,

DBS East and DBS West Offshore Wind Farms ('the Projects')

PINS Reference: EN010125

RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited ('the Applicants') write to the Secretary of State in response to **Natural England's letter dated 5th December 2025** in response to the **Secretary of State's Request for Information (RFI) dated 6th November**.

The Applicants provided their own response to the Secretary of State's Request for Information dated 6th November 2025 on the 5th December 2025.

The Applicants and Natural England have engaged closely in recent months to resolve issues outstanding at the end of Examination, with Natural England kindly sharing with the Applicants their response to the Secretary of State ahead of publication on the Planning Inspectorate website. Following review of Natural England's submission, the Applicants were surprised by some of the content related to Benthic Ecology in that the matters noted had not been previously raised by Natural England despite the frequent engagement since the close of examination. The Applicants also note some simple clarifications regarding the Guillemot and Razorbill compensation topic could resolve potential uncertainty.

The programme for a DCO decision for the DBS Projects has already been significantly delayed by the decision to postpone the commencement of examination from October 2024 until January 2025. The Applicants have already borne the impact of this decision by the Examining Authority in 2024, which they consider to be highly irregular and inconsistent with the treatment of other offshore wind farms progressing through the DCO process in parallel.

With this in mind, the Applicants consider it prudent to provide responses to areas that can be clarified immediately to avoid delay and prevent the need for the Secretary of State to issue a further RFI on the topic which has the potential to further delay the DCO decision.

With respect to *Annex 2 - Natural England's updated advice on offshore ornithology - Compensation calculations for guillemot and razorbill compensation* of **Natural England's letter dated 5th December 2025**, the Applicants can confirm that the rats found at Out Skerries (and in the outer Hebrides) were brown rats. The Applicants also identified a typing error in Natural England's response regarding our commitment for a '1000km biosecurity zone', this should be a '1000m



biosecurity zone’ as stated in the Guillemot and Razorbill Compensation Update [document reference 22.8].

In Annex A of this letter the Applicants provide a response to *Section 3. Other Matters -Benthic ecology – Habitat loss compensation estimates* of **Natural England’s Letter dated 5th December 2025** to assist the Secretary of State to resolve this matter without the need for further questions. The Applicants are addressing these issues promptly to ensure the Projects can be determined within the expected timeline for the DCO. Continued DCO decision delays could potentially impact investor confidence and programme for delivery on these critical national infrastructure projects.

Yours sincerely,



Thomas Tremlett
Senior Consents Manager
DBS Offshore Wind Farms

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Annex A

Table 1 – The Applicants' Response to Section 3: Other Matters – Benthic ecology – Habitat loss compensation estimates of Natural England's Letter dated 5th December 2025

I.D.	Natural England's Comment	Applicants' Response
1	Benthic ecology – Habitat loss compensation estimates Natural England has reviewed the updated benthic compensation estimates provided in 6.1, 6.2 and 6.2.3 [PID-002] and agree that the appropriate scenarios for habitat loss have been included to enable further consideration by the Secretary of State.	The Applicants acknowledge this comment.
2	However, Natural England notes that the quantities/impacts for each activity have been updated, resulting in an overall increase in habitat loss. However, no evidence/justification has been provided to support the updates included within the documents. We would welcome the Applicant including the evidence/justification for the amendments within the documents.	The Applicants would like to clarify that Natural England are incorrect that there is an increase in habitat loss, there was in fact a reduction. The SoS is directed to Table 6.7 of Report to Inform Appropriate Assessment Habitats Regulations Assessment Volume 6 Part 2 of 4 – Annex I Offshore Habitats and Annex II Migratory Fish (Revision 6) (Tracked) [document reference 6.1]. This table provides the 5 scenarios for potential Habitat Loss, Disturbance and Estimated Halo Effects in the Dogger Bank SAC. This table was discussed with Natural England in a meeting of 16th September 2025 and a spreadsheet detailing all calculations was provided to Natural England on 14th October 2025, Natural England provided no feedback to the Applicants on this table or the spreadsheet prior to this response despite significant engagement regarding other aspects (mainly ornithology). The tracked version of the table in [document reference 6.1] shows how the scenarios were updated between versions.

I.D.	Natural England's Comment	Applicants' Response
		Scenario 1 – during preparation of the spreadsheet for Natural England, double counting in the cable protection and cable crossing assumptions were noticed. Therefore, this led to a reduction in habitat loss (from 1,815,352m² to 1,606,336m²). This reduction was highlighted to Natural England in the email accompanying the spreadsheet on 14th October 2025. Scenario 2 – the cable protection and cable crossing assumptions were updated in line with Scenario 1. Therefore, this led to a reduction in habitat loss (from 3,152,672m² to 2,943,656m²). Scenario 3 – this was a new scenario to account for halo effects only. Scenario 4 – this scenario was updated to include the 820m² footprint of UXO to account for Natural England comments. Therefore, this led to an increase in the disturbance footprint of approximately 0.003% (from 25,017,704m² to 25,018,254m²). Scenario 5 – the total for foundations was updated to account for an error in addition of approximately 50m² (0.001% of the total footprint). In addition, the halo effect for cable protection was amended assuming a 20m halo (see below). This reduced the total footprint from 35,069,191m² to 30,072,390m².
3	We note that the Applicant has adopted a revised 'halo effect' distance of 20m where cable protection is placed within Dogger Bank SAC. We believe that this may have been adopted following advice within Natural England's Deadline 9 cover letter [REP9-028]. Within [REP9-029], we acknowledged that the 'halo effect' for cable protection is likely to be less than the 50m for turbine infrastructure and provided an indicative figure of 20m as an example starting point for the Applicant to	For avoidance of doubt, the Applicants do not consider that any halo effect should be applied to the Projects' infrastructure as outlined in Ecological Halo Effects Technical Note [REP5-041]. This document specifically reiterates this case in respect of cable protection (see paragraph 56). A 50m halo was subsequently added to the scenario in Ecological Halo Effects Technical Note (Revision 2) [REP7-127] following Natural England feedback in [REP6-073]. This was revised down to 20m following Natural England's Deadline 9 cover letter [REP9-028]. The Applicants had every reason to believe following [REP9-028] that Natural England were advising that 20m was an appropriate halo for cable protection, following justification provided by the Applicants in Ecological Halo Effects Technical Note (Revision 2) [REP7-127] (paragraph 79) on the inappropriateness of applying the same halo to foundations and cable

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	explore reducing the distance too. But it should be noted that it remained for the Applicant to provide the necessary evidence or strong justification around the level of environmental risk for any revised distance proposed [REP8-051]. Until this is provided, then uncertainty remains regarding the scale and of the habitat change/loss from the 'halo effect', which also has implications for agreeing the amount of compensation for Annex I sandbank required.	protection. The 20m halo was therefore presented to Natural England as part of the 'without prejudice' scenario in the meeting of 16th September 2025 and a spreadsheet detailing all calculations was also provided to Natural England on 14th October 2025. At no point in that meeting or subsequently (e.g. in agreed meeting minutes) did Natural England state that the Applicants had misinterpreted their advice. In relation to providing evidence for the 20m halo, there is no evidence, it is simply less than 50m which is clearly not a credible figure considering the scale of cable protection. In Ecological Halo Effects Technical Note (Revision 2) [REP7-127] the evidence around halo effects is reviewed and discussed and relates solely to large structures such as foundations and even in this regard concludes the evidence base is weak. It is on the basis of the studies in habitats equivalent to the Dogger Bank that the Applicants concluded that halo effects would not cause significant effects around the Projects' foundations. The 50m halo for foundations was only provided on a 'without prejudice' basis. The Applicants note that as any patches of cable protection would be close to the sediment (1.4m high) and typically small in extent, they will themselves be subject to natural sand scour effects. As such, it is unlikely that cable protection measures would be colonised to the same extent as of the wind turbine foundations or scour protection. This is why a 'without prejudice' halo for cable protection was not proposed initially in Ecological Halo Effects Technical Note [REP5-041]. The Applicants consider that halo effects (for any structure) should not contribute to adverse effect on integrity (AEI) of the sandbank feature of the Dogger Bank SAC. In addition, the Applicants do not consider that disturbance is permanent and likewise should not contribute to AEI. The scenarios presented in Table 6.7 of Report to Inform Appropriate Assessment Habitats Regulations Assessment Volume 6 Part 2 of 4 – Annex I Offshore Habitats and Annex II Migratory Fish (Revision 6) [document reference 6.1] provide the Secretary of State with all the information required to decide on the footprint of effect depending on which scenario they consider is most appropriate.

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4	If there remains an absence of evidence, and depending on the level of risk, we acknowledge that it may be considered appropriate by the Secretary of State to accept the 20m as the 'halo effect' from the placement of cable protection for this project. However, in doing so, we advise that monitoring and remediation of the 'halo effect' is secured to ensure any impacts at a greater distance than 20m can be identified and addressed where needed. If this approach is adopted, then we believe the monitoring and remediation commitment could sit within the In Principle Monitoring Plan	The In-Principle Monitoring Plan (Revision 6) [document reference 8.23] (IPMP) already includes a provision for monitoring potential halo effects, this has been included since the first iteration of the IPMP provided with the application [APP-247] – see Table 1-3. <i>"Grab sampling will be designed to capture localised, near-field, far-field and reference sites."</i> This therefore is already suitably covered within the IPMP without any further need for update and the validity and need for such works can be discussed at the post-consent stage.