



Secretary of State for Energy Security and  
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**Our reference** 006705743-01  
**Your reference** EN010125  
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06 March 2026

Dear Secretary of State,

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

**PINS Reference: EN010125**

**Third Request for Information response**

The Applicants are responding to the Secretary of State's Third Request for Information ('RFI3') issued on 5<sup>th</sup> February 2026.

As outlined in previous correspondence, the Applicants are disappointed that the Secretary of State considered it necessary to delay the deadline for a DCO decision by a further 15 weeks on the 8<sup>th</sup> January 2026, which results in a determination period of more than double the statutory time limit set by the Planning Act 2008. The Applicants recognise the importance of ensuring that the Secretary of State has all necessary information to reach a fully informed decision but maintain that the limited number of matters outstanding at the end of examination has not warranted this delay and the three month determination period should have been sufficient time for the Secretary of State to seek any further clarifications to enable a decision to be made. The nature of both RFI3 and the most recent request for information (dated 6<sup>th</sup> March) does not suggest that there are material issues which are preventing the Secretary of State from reaching a decision.

The Applicants note the request contained within RFI3 to the MOD to provide an update to Programme Njord by 19<sup>th</sup> February and elected to provide **24.1 Applicants' Response to RFI3 question to MOD** to clarify the Applicants' position on radar-related issues on the 18 February 2026. The remaining request contained within RFI3 was a broader query to all Interested Parties to comment upon submissions made since the close of examination. Allied to points made in previous correspondence, the post-examination stage is in place to support decision making, not to re-open and undertake examination of issues. The Applicants highlight that they have worked closely with key stakeholders such as MMO and Natural England on key topic areas where disagreement remained to seek alignment on issues within their submissions since examination, even reflecting these in Statement of Common Ground updates and therefore considers this additional step somewhat un-necessary.

Considering the Applicants have demonstrated alignment on matters related to many of its submissions in the post-examination period, its responses to RFI3 are not extensive. The responses the Applicants consider necessary are outlined below.



## Wake Effects

The Applicants' closing view on wake effects in light of responses by the Projcos and the Orsted IPs to RFI2 can be found in **24.3 The Applicants' RFI3 Wake Effects Submission**.

## HRA Compensation

### Benthic

Following further review of the MRF Guidance published on 18<sup>th</sup> December 2025 and subsequent engagement with Defra regarding how the fund will operate on the 17<sup>th</sup> January and 25<sup>th</sup> February 2026, the Applicants are also submitting **24.4 A Review of Benthic Compensation Requirements**. This document reiterates the Projects' position on this matter and highlights the implications of adopting the highly precautionary approach advocated by Natural England, in light of the significant costs of providing compensatory measures through the MRF, which were not previously known. This submission also emphasises that any requirement to over-compensate for the actual impacts of the Projects would potentially remove the ability of future developments to rely on the MRF for benthic compensation.

### Auk compensation

While the Applicants are not providing a formal submission on auk compensation, the Applicants wish to highlight that progress is continuing on the two project-led options proposed for auk compensation, predator eradication and control at the Outer Hebrides and the Out Skerries. In addition to receiving the letters of comfort from the landowners at both sites (provided in **Appendix 2 - Guillemot [and Razorbill] Compensation Plan (Revision 9)** [document reference 6.2.2] submitted on 30<sup>th</sup> January 2026), the Applicants have engaged the Community Trust at both locations and have received positive feedback with regards to the organisation of community consultation events in the coming months. The Applicants are also currently engaged in planning pre-eradication survey for spring/summer 2026 to inform how the eradication programmes would be undertaken. The Applicants reiterate the point made in **22.2 The Applicants' Response to Secretary of State Request for Information** on 9<sup>th</sup> December 2025 that, based on the information already obtained, each location has significant potential to meet the compensation requirements of the Projects. Following consultation with Natural England the Applicants understand that they will be making a submission at this deadline supporting the potential for the Isles of Scilly to provide compensation for the Projects, this alongside the progress made on Project-led options further reinforce that auk compensation can be achieved.

## Land Rights

The Applicants have continued to engage with Relevant Parties regarding voluntary agreements and with statutory stakeholders regarding protective provisions where agreements are not already in place. Whilst ongoing engagement with NGET suggested that some movement may be possible on specific issues, key fundamental disagreements remain between the parties. As such, the Applicants' confirm their position remains as those outlined in **PID-003B** and associated preferred Protective Provisions outlined in **PID-003C** submitted on the 24<sup>th</sup> October 2025.

## Conclusion

The Applicants understand that all necessary information to determine the decision on the DCO for the Projects has now been submitted. Considering this, the Applicants respectfully request that the Secretary of State determines the application as soon as practicable to avoid further delay to the

delivery of these nationally significant benefits with consent delay already significantly challenging the Projects' delivery programme.

Yours sincerely,



Thomas Tremlett

Senior Consents Manager

DBS Offshore Wind Farms

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