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Our ref: 17503; 540564
Your ref: EN010125



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BY EMAIL ONLY

Dear Sir/Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

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

The following constitutes Natural England’s formal statutory response to the Secretary of State’s (SoS) Request for Information (RFI) dated 5th February 2026. To inform this response Natural England has reviewed the post examination documents submitted by the Applicant in response to the previous two RFIs (dated 6th November 2025 and 16th January 2026). Natural England’s responses to the submitted documents relevant to our remit are signposted from Tables 1 - 3 in Annex 1 of this letter. Natural England is also submitting a detailed response to the ‘Isles of Scilly estimated rates of seabird recovery following brown rat removal’ as submitted by Defra dated 18th December 2025 [C1-026], in Annex 2 of this letter.

1. Disposal of Dredged Sediment within Dogger Bank SAC

While Natural England welcomes the Applicant’s updates to 8.20 Cable Statement (Revision 6) [C1-009] and 8.6 Commitments Register (Revision 5) [C1-009] where it is stated:

“Where any sediment is dredged from within the Dogger Bank SAC by a trailing suction hopper dredger during the construction of the authorised scheme it will be returned to the seabed within the Dogger Bank SAC ‘upstream’ of the direction of net sediment transport via a discharge pipe, a down pipe or similar (for example by reverse pumping the cargo through the suction pipe and draghead). Sediment disposal will be made as close to the seabed as is practicable.”

Natural England advises that the text is amended to include the following ‘...Dogger Bank SAC as

close to the sandwave as practicable whilst within like sediment and 'upstream'.... This is to aid sandbank recovery wherever possible.

2. In-Principle Monitoring Plan (IPMP)

Natural England welcomes the Applicant's updates to 8.23 In Principle Monitoring Plan (IPMP; Revision 7) [C1-010] and the draft DCO (Revision 13) [C1-016], whereby standalone monitoring plans for marine physical environment, benthic and intertidal ecology, marine mammals and sandeel monitoring have been secured. However, we note that the Applicant maintains that indirect effects wording should not be included in the draft DCO conditions. Our advice on this matter remains unchanged.

Furthermore, whilst the draft DCO secures provision of a marine mammal monitoring plan, the Applicant maintains in their response to SoS RFI (22.2 The Applicants' Response to Secretary of State Request for Information [C1-016]) that monitoring of potential disturbance during construction incorporated in the Outline Marine Mammal Mitigation Protocol (MMMP; Revision 5) [REP7-117] is sufficient, and therefore has not updated the IPMP. Natural England highlights that the marine mammal monitoring that has been requested relates to the operational phase which will not be captured in the MMMP. Further, whilst the Applicant suggests that the IPMP provides a framework for further discussion on monitoring in the post-consent phase, we consider this would be unlikely to occur for marine mammals without operational impacts being secured in either the IPMP or DCO.

Whilst Natural England has previously commented on several of the Applicant's arguments against monitoring operational underwater noise in [C1-012], we raise the following additional points following review of [22.2, C1-016]. Natural England recognise that there would be merit in a strategic approach to addressing this evidence gap, however, even if progressed strategically, data collection at individual wind farms would remain a requirement. In addition, we highlight that the conclusions of the Holme et al., (2023) study cited by the Applicant state that: "*there are challenges associated with extrapolating aggregated results from smaller turbines to the realm of new, larger, and technologically different turbines. Such findings have implications to efforts set to predict the noise impact of future offshore wind farms, as broadband SPL does not scale with increasingly larger turbines*". Therefore, whilst the Applicant's assessment may have been robust in modelling terms, as changes in underwater noise with turbine size are not linear or completely understood, unless it is informed and tested on real data obtained from monitoring the operational noise from large turbines, the validity of the assessment cannot be certain.

We therefore maintain the advice provided under Question 27 of our response to the SoS RFI dated 06 November 2025 [C1-012], that where the requested updates are not made to the IPMP, the MMO's proposed amendments to the DCO relating to indirect effects and marine mammal monitoring detailed in [PIR-001] are retained.

3. Benthic Compensation

3.1 Habitat loss estimates

In Section 3 of our response to the SoS RFI dated 06 November 2025 [C1-012], we mistakenly identified that updated benthic habitat loss / disturbance figures provided by the Applicant (in documents 6.1, 6.2 and 6.2.3 [PID-002]) had increased, whereas they had in fact decreased. This was correctly highlighted in the Applicant's letter to the SoS dated 9th December 2025 [C1-023]. The Applicant has also indicated in [C1-023] that they do not consider that further evidence is available for the use of the 20 m distance in their 'without prejudice' calculation of halo effects from placement of cable protection within Dogger Bank SAC. Natural England therefore maintain our advice as presented within [C1-012] and Section 9.1 in [EN010125-002048-Natural England - Appendix B8 - End of examination position on the applicant's assessment of marine physical environment and benthic and intertidal ecology.pdf](#).

3.2 DCO conditions

The Applicant has submitted an update to Schedule 18 of their draft DCO [C1-027], regarding strategic benthic compensation, following the publication of Defra's guidance on the Marine Recovery Fund (MRF; 17th December 2025). Since the submission of [C1-027], the Applicant has provided Natural England with a further update to the DCO wording, dated 27th February 2026, which they intend to submit with their response to this RFI. We understand that this updated wording has also been shared with the MMO and Defra. Therefore, Natural England provides the following advice based on the 27th February update, which has superseded [C1-027].

Within the 27th February update, the Applicant has included a condition whereby the compensation quantum secured through the MRF could be reduced post-construction following provision of as-built parameters. As discussed during a meeting with the Applicant on this matter, the long-term implementation of the MRF falls outside the remit of Natural England. While we recognise the points being raised, any such approach, if taken forward, would likely require broader discussion with the relevant Regulators and SNCBs, given the potential implications for the delivery of compensation in England.

Natural England considers that this proposed change does not align with how compensation has previously been, or is currently, implemented based on predicted adverse effects on integrity (AEoI) at the time of consent, nor with our understanding of the core principles underpinning strategic compensation. Accordingly, we defer to DEFRA and DESNZ regarding the final position on the approach. We also note that the inclusion of such a condition would be inconsistent with recently consented DCOs for other offshore wind farms requiring benthic compensation (e.g. Outer Dousing¹

¹ <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010130-002645-DCO%20as%20made%20by%20SoS.pdf>

(ODOW) and Five Estuaries²).

We note that the Applicant has also included a compensation quantum within the DCO requirements according to their preferred impact values (1.61 km²), by securing 'permanent loss of habitat', referring to the direct location of infrastructure only, as part of the condition wording. This again is inconsistent with recently consented DCOs, which do not reference the specific impact pathway(s) causing adverse effects, and have secured an area of compensation for 'the impact' more generally. It is Natural England's view that out of the benthic habitat loss / disturbance scenarios provided in [PID-002], we consider that Scenario 5 (Halo effect + Disturbance (Encompassing habitat loss)) represents the most appropriate compensation target for the impacts of the two Projects to be secured in the DCO condition (noting previous advice in relation to the Halo Effect from cable protection).

In recognition of both the points raised by the Applicant, and confirmation of as-built parameters for Dogger Bank A and Sofia within Dogger Bank SAC becoming available in the public domain, Natural England proposed several options to the Applicant to reduce the compensation quantum during a meeting on 26th February 2026. While we understand that due to the current project phase the Applicant is not in a position to progress these options, we have included them below for the SoS's awareness in the context of other and future project determinations.

- 1) Reduction of the Project envelope for cable and scour protection required within Dogger Bank SAC: A recent Marine License Application for Dogger Bank A³ has confirmed that 0.174 km² of cable and scour protection was installed within Dogger Bank SAC during construction of the project, with reductions of 99% and 85% respectively compared to the consented envelope. Similar reductions have also been achieved on Sofia OWF⁴. We therefore consider it likely that the Applicant's envelope contains a significant degree of precaution, noting for example, that for export cable protection applied for DBS OWFs envelope is ~93% higher than has been required on Dogger Bank A.
- 2) Lifetime Allowance: Compensation would be secured for the Project parameters as applied for, and recognising that the construction impacts of the existing Dogger Bank projects for direct loss will be lower than predicted, we consider that the cable and scour protection envelope for DBS could be consented for the lifetime of the project (i.e. to also include the operational phase), rather than just being for the construction phase.
- 3) Phased Compensation: If the Project envelope currently factors in cable and scour protection

² <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010115-002032-DCO%20as%20made%20by%20SoS.pdf>

³ [REDACTED] MLA/2025/00516

⁴ [REDACTED] DCO/2016/00019;

requirements for the operational phase, these could be removed to reduce the envelope and compensation quantum to just cover construction requirements, as was the case for Dogger Bank A/B/C and Sofia. Subsequently, a separate Marine License for the introduction of cable and scour protection during the operational phase could then be applied for post-installation, with a refined envelope based on the known requirements. This would likely require significantly reduced compensation to be secured for this phase compared to it being based on the unused consented envelope.

In the absence of one of the above suggestions being progressed, and/or further evidence on potential impacts, we advise that the DCO conditions for benthic compensation should reflect those consented for ODOW and Five Estuaries, with the compensation quantum based on Scenario 5.

4. Cable Protection Impacts on Navigational Safety

In our response to RFI dated 16th January 2026, Natural England confirmed agreement with MMO's proposed amendments to the draft DCO conditions relating to instances where cable protection may exceed 5% navigable depth. Natural England notes that the Applicant has since suggested further amendments to these conditions to separate requirements relating to impacts on navigational safety from impacts on nearshore processes, if an exceedance was to occur within the 10 m depth contour (Table 2-3 of 23.2 The Applicants' Response to the SoS Second RFI [C2-005]). We also note that the MMO does not have concerns on the updated wording and are in agreement with the reasoning behind it (Section 1.1.4 of MMO response to SoS Further Information Request 2 [C2-004]). Natural England can confirm that we are also supportive of the proposed amendments to the relevant conditions.

5. Razorbill

Natural England is currently reviewing the Secretary of State's rationale set out in the supporting HRA for the Outer Dowsing Offshore Wind Farm decision letter of 10 February 2026. This concluded that there would be no adverse effect on the integrity of the Flamborough and Filey Coast SPA razorbill population in-combination. Natural England continues to advise an adverse effect on integrity (AEoI) in-combination for several projects, with other competent authorities having accepted that advice.

Natural England therefore maintains the advice provided during the Examination of Dogger Bank South Offshore Wind Farms provided in [REP8-053]. However, we anticipate engaging further with DESNZ on this matter.

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

Yours faithfully,

[Redacted]

Senior Officer – Marine Sustainable Development

E-mail: [Redacted]@naturalengland.org.uk

Annex 1: Natural England’s response to the Applicant’s documents submitted in response to RFI dated 06 November 2025 and 5th February 2026, relevant to our remit

Table 1: Documents submitted in response to RFI dated 6th November 2026 (RFI 1)

PINS Document Reference	Document Name	Natural England’s Response/Position Summary
Miscellaneous		
C1-009	8.20 Cable Statement (Revision 6) (Tracked)	Natural England’s response to these documents is provided in Section 1 of this letter.
C1-009	8.6 Commitments Register (Revision 5) (Tracked)	
C1-010	8.23 In Principle Monitoring Plan (Revision 7) (Tracked)	Natural England’s response to this document is provided in Section 2 of this letter.
C1-016	22.2 The Applicants’ Response to Secretary of State Request for Information	Natural England’s response to this document is provided in Section 2 of this letter.
C1-017	7.10.10.3 Appendix 10-3 Back-calculation of the Peak Atlantic Herring Spawning Period (Revision 3) (Tracked)	Natural England defer to MMO for comments on this document.
C1-023	22.10 SoS Submission Response to Natural Englands Letter 09122025	Natural England’s response to this document is provided in Section 3.1 of this letter.
Ornithology compensation		
C1-010	6.2.1 Appendix 1 - Project Level Kittiwake Compensation Plan (Revision 8) (Tracked)	Natural England can confirm that the updates to these documents are in line with those commented on in Annex 2 of our response to RFI dated 6 th November 2025 [C1-012]. We note that 6.2.2 has now been superseded, please see Table 3 below. Further advice on compensation delivery at the Isles of Scilly is also provided in Annex 2 of this letter.
C1-010	6.2.1.2 Outline Kittiwake Compensation Implementation and Monitoring Plan (Revision 4) (Tracked)	
C1-010	6.2.2.1 Annex A - Outline Guillemot and Razorbill Compensation Implementation and Monitoring Plan (Revision 4) (Tracked)	
C1-016	6.2.2 Appendix 2 Guillemot and Razorbill Compensation Plan (Revision 8) (Tracked)	
C1-016	22.8 Guillemot and Razorbill Compensation Update	
Draft DCO		
C1-016	3.1 Draft DCO (Revision 13) (Tracked)	Natural England’s response to these documents is provided in Section 2 of this letter.
C1-016	3.4 Schedule of Changes to Draft DCO (to Revision 13)	

Table 2: Additional submissions

PINS Document Reference	Document Name	Natural England's Response/Position Summary
C1-027	22.11 SoS Submission Update following MRF launch	Natural England notes that this document has been superseded by a document provided to Natural England on 2 nd March 2026 (dated 27 th February 2026), which the Applicant intends to submit with their response to this RFI. Our response to this updated document is provided in Section 3 of this letter.
C1-026	Defra - IoS eradication - quantification of benefit v3 FINAL 1225	Natural England's response to this document is provided in Annex 2 of this letter.

Table 3: Documents submitted in response to RFI dated 5th February 2026 (RFI 2)

PINS Document Reference	Document Name	Natural England's Response/Position Summary
C2-004	MMO Response to SoS Further Information Request 2	Natural England's response to this document is provided in Section 4 of this letter.
C2-005	23.2 The Applicants' Response to the Secretary of State's Second Request for Information	Natural England's response to this document is provided in Section 4 of this letter.
C2-005	6.2.2 Appendix 2 Guillemot and Razorbill Compensation Plan (Revision 9) (Tracked)	Natural England welcomes the provision of letters of comfort from the landowners of Pabaigh Beag and Out Skerries.

Annex 2: Natural England's advice on the quantification of projected seabird benefits for the Isles of Scilly predator eradication project

The following advice relates to the Defra submission '*Isles of Scilly – Estimated Rates of Seabird Recovery Following Brown Rat Removal*' [C1-026] published by PINS on 18th December 2025.

In order to inform Marine Recovery Fund (MRF) planning, Natural England, at the request of Defra and the Defra-chaired Strategic Predator Reduction Working Group (which includes representation from Defra, DESNZ, the Offshore Wind Industry Council, NE, RSPB and the Royal Society for Wildlife Trusts), reviewed site assessments associated with the planned brown rat eradication on the outer islands of the Isles of Scilly (IoS) in order to identify anticipated recovery populations. We then set out the conclusions of that review in [C1-026]. Below, we provide further comment on the results presented in [C1-026] in the context of Dogger Bank South (DBS) compensation delivery.

Guillemot

At a 70% displacement and 2% mortality rate, the predicted impacts of the DBS Projects are 456 adult birds per annum at FFC SPA (central impact value (CIV)), and 13 adult birds per annum at Farne Islands SPA (CIV). For a total impact of 469 adult guillemot per annum, 2,072 breeding pairs would be required to successfully deliver compensation according to the Hornsea 4 method on a 1:1 basis. In order to scale the compensation requirement to give sufficient confidence that such a population could be delivered, Natural England would generally consider that this would require the delivery of 4,144 (2:1 ratio) or 6,216 (3:1) rat-free nest spaces scaled against the CIV, or 7,924 (2:1 ratio) or 11,886 (3:1 ratio) rat-free nest spaces scaled to the 95% Upper Confidence Interval (UCI).

The conclusions of [C1-026] estimate that following eradication of brown rats, there is high confidence that the guillemot population on the IoS could be uplifted from 497 pairs (2023 census) to an anticipated 3,000 pairs over a 30-year period, providing an additional 2,500 breeding pairs. Taken at face value, these values indicate that IoS would deliver against a compensation success criterion of 2,072 breeding pairs at a 1:1 ratio but would not deliver compensation quantum scaled to the UCI or at a ratio of 2:1 and 3:1.

However, Natural England highlight that whilst predator eradication compensation quantifications often refer to 'breeding pairs', they are often based on estimates of nest space provision that may not equate to the actual bird populations a locality can achieve. In this instance, due to how well studied the IoS is compared to other locations (e.g. Channel Islands, some Scottish islands), there is considerably higher confidence that the outcome of a rat

eradication would be the delivery of 2,500 additional breeding pairs i.e. that the success criterion would be met. In addition, [C1-026] makes reference to “*areas of more conventional guillemot habitat...that will be made available by the eradication*” which “*have the potential to support much higher densities for guillemot*”. As these areas may require a critical mass of prospecting breeders before they are occupied, our confidence is lower regarding whether they would be adopted and as such they have not been included within the estimate of breeding pair potential in the quantification report. However, given these areas are suitable, would be made rat-free and are potentially of a scale to address the UCI for all ratios presented, this provides additional comfort as the nest space provision on loS will be greater than 2,500, and as such, an appropriate scale of compensation would be provided.

Natural England therefore advise that provision of sufficient ‘high-confidence’ habitat to support ~2,500 breeding pairs, with provision of additional rat-free nest spaces in potentially suitable guillemot habitat, offers a reasonable prospect of delivering the number of pairs required to compensate for the impacts of the two DBS projects on FFC SPA and Farne Islands SPA guillemot.

Razorbill

At a 70% displacement and 2% mortality rate, the predicted impacts of the DBS Projects on razorbill at FFC SPA has been calculated as 140 birds (CIV). For a total impact of 140 adult razorbill per year, 545 breeding pairs would be required to successfully deliver compensation according to the Hornsea 4 method. In order to scale the compensation requirement to give sufficient confidence that such a population could be delivered, Natural England considers this would require the delivery of 1,091 (2:1 ratio) or 1,636 (3:1 ratio) rat-free nest spaces scaled against the CIV, or 3,337 (2:1 ratio) or 5,006 (3:1 ratio) nest spaces scaled to the 95% Upper Confidence Interval (UCI).

As with guillemot, it is worth noting that the well-studied nature of loS has allowed predictions of likely population increase to be made post-eradication, rather than just quantification of nest space. For razorbill, there is high confidence that the population in loS could be uplifted from 529 to 4,760 pairs, providing an additional 4,230 pairs. loS is therefore predicted to successfully deliver against all but the highest requirement. **Natural England therefore considers that the loS rat eradication would sufficiently compensate for the impacts of the two DBS projects on razorbill.**