

Ørsted IPs' – Submission

This short submission is made on behalf of Hornsea 1 Limited, the collective of Breesea Limited, Soundmark Wind Limited, Sonningmay Limited and Optimus Wind Limited (together, the “**Hornsea 2 Companies**”), Orsted Hornsea Project Three (UK) Limited, Orsted Hornsea Project Four Limited, Lincs Wind Farm Limited, Westermost Rough Limited and Race Bank Wind Farm Limited (together or in any combination, the “**Ørsted IPs**”). It is noted that the Ørsted IPs that continue to hold objections to the Outer Dowsing Offshore Wind Project (the “**Outer Dowsing Project**”) in relation to wake loss are Hornsea 1 Limited, the Hornsea 2 Companies and Race Bank Wind Farm Limited.

The Ørsted IPs understand that the Equinor IPs wrote to the Secretary of State on 3 February 2026 with comments on the Applicant's January 2026 Submission on Wake Effects [C9-005]. The Ørsted IPs have had sight of this submission from the Equinor IPs and wish to note that they are fully supportive of its contents.

The Ørsted IPs also note that the Secretary of State has not issued a further Request for Information (“**Rfi**”) that would have allowed Interested Parties the opportunity to comment on the Applicant's most recent submissions, including the Applicant's January 2026 Submission on Wake Effects [C9-005] – a lengthy submission in excess of 50 pages. Given that this document contains a number of points which the Applicant had not previously raised, the Ørsted IPs would expect those points to be afforded limited weight in the Secretary of State's decision-making process for the Outer Dowsing Project, to avoid procedural unfairness and to act in a reasonable and lawful manner. Examples of such new information include:

- The Applicant has revised the definition of ‘capacity’ put forward within its without prejudice requirement (at Appendix 2 of [C9-005]) to: “‘*capacity*’ means: *the amount of electricity that is generated from the authorised development*”. The Ørsted IPs note that it is simply not possible to minimise wake effects on existing third-party offshore wind farms whilst simultaneously maximising the capacity of the authorised development if the definition of capacity is extended to cover both capacity and generation, as the Applicant proposes. To achieve this would be to defy basic physics.
- The Applicant has introduced a range of new propositions and lines of argument that seek to make mitigation contingent upon a likely effect on future viability. Notwithstanding that an additional Rfi has not been issued, the Ørsted IPs simply wish to note that Requirement 29 of the Mona Offshore Wind Farm Order 2025 was included in the made DCO for that project, despite the following extract from the Secretary of State's Decision Letter: “*The Secretary of State accepts that this will have a financial impact on Ørsted IPs and that this impact may be of some relevance to future decisions in relation to their assets. However, the Secretary of State agrees with the ExA that there is insufficient evidence that wake effects will in itself be likely to affect the future viability or safety of any of Ørsted IPs existing infrastructure*”.