



**RWE Renewables UK Dogger Bank  
South (West) Limited**

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South (East) Limited**

**Dogger Bank South Offshore  
Wind Farms**

**Change Notification Letter  
Pre-Examination Procedural Deadline**

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08 October 2024

Dear Ms Dowling,

**Dogger Bank South Offshore Wind Farms Project – Notification of Intention to Submit a Change Request**

**PINS Reference: EN010125**

In accordance with the guidance provided in the Planning Inspectorate’s Advice Note ‘*Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted*’ (August 2024) this letter is a notification of the Applicants’ intention to submit a change request for the attention of the Examining Authority (“ExA”) for Dogger Bank South East (“DBS East”) and Dogger Bank South West (“DBS West”) (together referred to as “the Projects”) (EN10125). This letter addresses the requirements in the Advice Note relating to ‘Step 1’ of the process for requesting a change to an accepted application.

The change request is being prepared primarily in response to engagement with the key stakeholders. It is also intended to implement changes that the Applicants have identified through design work to reduce the scope of works within the draft Development Consent Order.

All proposed changes relate to offshore and intertidal aspects of the Projects.

The changes include:

Change 1: Removal of Gravity Based Structure (GBS) foundations

Change 2: Removal of Electrical Switching Platform (ESP) from the design envelope

Change 3: Reduction of the number of platforms in the design envelope, plus associated scour protection

Change 4: Reduction of cabling within the array areas, plus associated seabed preparation and cable protection

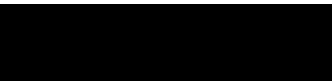
Change 5: Removal of the short trenchless crossing option at landfall

This Notification of Intention to Submit a Change Request letter (document reference 10.2) includes:

- A brief introduction section;
- A summary of the proposed changes and the reasons and need for making these changes in Section 2;
- A high-level summary of the environmental impact in Section 3;
- The Applicant's proposed approach to consultation in Section 4;
- The Applicant's view as to how this could be accommodated within the examination timetable in Section 5 and the expected submission date for the change request; and
- The Applicants' outline of what is intended to be submitted as part of the change request in Section 6.

If you have any questions about this letter or the changes that the Applicants are intending to submit, please do not hesitate to contact me on the details below.

Yours sincerely,



Thomas Tremlett

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RWE Renewables UK Dogger Bank South (West) Limited

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## 1 Introduction

The Development Consent Order (DCO) Application for the Projects was accepted by the Secretary of State for examination on 10 July 2024. The Applicants have been engaging with Interested Parties to seek to resolve concerns or comments ahead of the examination commencing. Further design work and this engagement has resulted in the Applicants deciding to seek a number of changes to their application. This letter is to notify the ExA that the Applicants are intending to submit a change request and summarise the reasons for, and scope of, the proposed changes.

The acceptability of any change is to be determined by the ExA. The proposed changes taken alone or together would not materially change the nature of the Projects.

The Applicants have considered all the changes proposed within this document in relation to its Environmental Impact Assessment (EIA) in section 3 below. This is to ensure that the environmental impacts of those proposed changes have been appropriately assessed with any likely significant environmental effects identified, and to satisfy the requirements of the Infrastructure Planning (EIA) Regulations 2017 (as amended) (the 'EIA Regulations').

At this time, the conclusions of the assessments as set out in the submitted Environmental Statement (ES) are not considered by the Applicants to change, although updates to assessments will be consulted upon and submitted to demonstrate the reduction in effects as a result of the changes. The proposed changes are not expected to result in any new or different likely significant effects. Across the environmental topics affected by the change the predicted likely significant effects are anticipated to remain the same or reduce in terms of significance.

The proposed changes do not affect the Order Limits and are limited to reducing the scope of activities within the Works Description outlined in the draft DCO. No additional land outside of the Order limits is required for the proposed changes and no upgrade of the powers sought over the plots as shown on the Land Plans is required. The changes therefore do not require the inclusion of "additional land" as defined in the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 and so those Regulations are not engaged.

## 2 Summary of Changes

### CHANGE 1: REMOVAL OF GBS FOUNDATIONS FROM MODELLING

This change is being made following the decision to remove GBS foundations from the Array Areas prior to submission and the post-submission decision to remove the ESP from the design envelope. These changes taken together have allowed GBS to be removed entirely from the Projects' design envelope and, thus, also removed as a worst case from the physical process modelling.

This change is being made as the ESP is not required for the delivery of the Projects following changes to National Grid Electricity System Operator's (ESO) Holistic Network Design (HND)<sup>1</sup>.

The removal of GBS foundations from the Projects' design envelope will result in a reduction of habitat loss associated with the ESP platform on the Offshore Export Cable Corridor, whilst a wider update to the physical process modelling will provide a demonstration of the reduction of impacts to physical processes across the Offshore Development Area.

This change would require amendments to the requirements and Deemed Marine Licences 3 and 4 in the draft DCO.

### CHANGE 2: REMOVAL OF ESP FROM THE DESIGN ENVELOPE

This change is being made as the ESP is not required for the delivery of the Projects following changes to National Grid ESO HND.

As set out in section 3, this change would yield benefits in terms of removing noise impacts on seal populations, whilst also reducing noise impacts on spawning herring, and reducing shipping and navigational risks. The removal of the ESP would be captured in the updated physical process and noise modelling which are being updated in any event, regardless of this change.

This change would require an amendment of requirements and works descriptions, in addition to amendments to Deemed Marine Licences 3 and 4 in the Draft DCO, as well as updates to the offshore works plans.

### CHANGE 3: REDUCTION OF THE NUMBER OF OFFSHORE PLATFORMS IN THE DESIGN ENVELOPE

This change involves a reduction of the number of offshore platforms in the Projects' design envelope from eight to three and is being made following design evolution of the Projects allowing the removal of the need for collector platforms and the ESP. Making this change would have an additional benefit of allowing the removal of significant lengths of inter-platform cabling and associated seabed preparation for cable installation and cable protection (see change 4). Consequent benefits would include quantifiable reductions of impacts on the

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<sup>1</sup> As of October 1<sup>st</sup> 2024, this organisation has been re-named the National Energy System Operator (NESO) and no longer forms part of the National Grid structure.

Dogger Bank Special Area of Conservation (SAC) and associated reductions in the need for compensation (due to reduced needs for scour and cable protection), whilst also further reducing burial/sandwave impacts in the SAC. This change will be captured in the revised physical process modelling, which needs to be undertaken in any case.

As set out in Section 3, this change will also result in reductions of noise impacts on harbour porpoise populations within the Southern North Sea SAC and marine mammal populations found across the southern North Sea more generally. In addition, noise effects on spawning herring will be reduced, as will seabed habitat loss and disturbance. The reduction in the number of offshore platforms will also reduce interactions with commercial fisheries and reduce shipping and navigational risks.

This change would require an amendment of the requirements and works descriptions, in addition to amendments to Deemed Marine Licences 3 and 4 in the draft DCO, as well as updates to the offshore works plans.

#### CHANGE 4: A NET REDUCTION OF OFFSHORE CABLING WITHIN THE ARRAY AREAS

This change involves a net reduction in cabling within the array areas brought about through a reduction in the lengths of inter-platform cabling required for the Projects (due to the removal of a significant number of platforms) and a smaller increase in the inter-array cabling. The inter-array cable length increase is required due to array cable layout constraints leading to a re-evaluation of the lengths included at submission.

The net reductions in array area cabling would have an additional benefit of allowing the removal of significant lengths of inter-platform cabling and associated seabed preparation for cable installation and cable protection. Consequent benefits would include quantifiable reductions of impacts on the Dogger Bank Special Area of Conservation (SAC) and associated reductions in the need for compensation (due to reduced needs for scour and cable protection), whilst also further reducing burial/sandwave impacts in the SAC.

This change would require an amendment of the requirements, in addition to amendments to Deemed Marine Licences 1, 2, 3, 4 and 5 in the draft DCO.

#### CHANGE 5: REMOVAL OF SHORT TRENCHLESS CROSSING OPTION AT LANDFALL.

This change involves the removal of the short trenchless crossing option at landfall from the proposed works, avoiding the need for trenchless crossing exit pits in the intertidal area. Ongoing stakeholder engagement before and since submission has identified that the option caused concerns for stakeholders principally due to potential impacts on coastal processes and the secondary effects that may occur via this pathway. Since submission, additional engineering studies have been undertaken which have concluded that this option is not going to be taken forward for the delivery of the Projects. As a result, it would be prudent to remove it from



the application and provide updated environmental assessment information accordingly. The removal of this aspect would also reduce potential construction noise, visual and tourism and recreational impacts in the intertidal zone. It should be highlighted that the emergency access route along the beach would remain within the application.

This change would require an amendment of the requirements and the works descriptions, in addition to amendments to Deemed Marine Licences 3 and 4 in the draft DCO and updates to the offshore works plans.

### 3 Environmental Impact Assessment

The Applicants highlight that in general, the proposed changes are anticipated to have no material effect on the assessments and conclusions of the environmental assessments but do bring forward a tangible reduction in environmental impact compared to those presented in the Report to Inform Appropriate Assessment (**APP-046 – APP-048**) and Environmental Statement (**APP-064 – APP-225**) at the point of submission.

The maximum design parameters for the Projects remain within the original Rochdale Envelope described in the Environmental Statement. The proposed changes reduce the activities permitted under the draft DCO which will reduce impacts on some receptors and reduce some pathways for secondary effects to occur. The Change Request will be supported by a 'Change Request: Environmental Assessment Update' document which will report the updated conclusions of relevant Environmental Statement topic chapters including:

- Marine Physical Environment – A reduction of permanent and temporary impacts on physical processes across the Offshore Development Area from the intertidal area to the Array Areas.
- Benthic and Intertidal Ecology – A reduction in permanent and temporary impacts to benthic receptors as a result of reductions in permanent seabed footprints, reductions of the scope of marine works and the reduction in risk to inter-tidal receptors as a result of the removal of the short trenchless crossing option at the landfall.
- Fish and Shellfish – Reduction of permanent and temporary impacts on species such as herring and sandeel due to a reduction of seabed footprints, piling works and the scope of marine works.
- Marine Mammals – Reduction of temporary impacts to marine mammals due to a reduction in piling activities included within the works consented by the draft DCO.
- Offshore Ornithology – Reduction in the potential for secondary effects for ornithological receptors as a result of reduced impacts to aquatic receptors.



- Commercial Fisheries – Reductions of seabed footprints and disturbance resulting in a reduction of temporary and permanent impacts on commercial fisheries receptors.
- Shipping and Navigation – The removal of the ESP removes a large isolated structure from the Offshore Export Cable Corridor that could have been considered an allision risk and therefore there would be a reduction in shipping and navigation risk.
- Infrastructure and Other Users – Potential reductions in temporary and permanent impacts to other marine users and infrastructure as a result of the reduction in cable and pipeline crossings numbers.
- Offshore Archaeology and Cultural Heritage – Reductions of risk of damaging unknown offshore heritage assets through the changes to permanent and temporary works at landfall and further offshore.

A summary of the updates to the onshore topics which have considered a short trenchless crossing at landfall (and associated intertidal exit pits) in the assessments of impacts will be included in the Change Request: Environmental Assessment Update document as outlined below:

- Terrestrial Ecology and Ornithology – A reduction in the total amount of directly impacted beach habitat resulting in a potential reduction in temporary impacts to terrestrial ecology and ornithological receptors.
- Flood Risk and Hydrology – A potential reduction in hydrological impacts due to the reduced footprint of activity within the coastal waterbody.
- Landscape and Visual Impact Assessment – A reduction in the level of disturbance and activity, resulting in a potential reduction of the temporary impacts to visual receptors.
- Noise – A reduction in magnitude of construction noise in the landfall zone associated with the removal of the intertidal exit pits required for the short trenchless crossing option.
- Human Health – Potential reduction in health-related impacts associated with temporary disruption to the public open space (beach), by avoiding the need for intertidal exit pits.
- Tourism and Recreation – A reduction in the temporary impacts to users of the beach as a result of the reduction in the level of disturbance due to the removal of the short trenchless crossing option.

## 4 Consultation

The Applicants intend to carry out a non-statutory targeted consultation to ensure that all parties with a potential interest in the changes are made aware of the proposed changes and have the opportunity to provide comments in advance of the submission of the formal change request to the Examining Authority.

The Applicants seek the views of the Examining Authority on the scope and nature of the proposed consultation.

## SCOPE OF CONSULTATION

There will be an explanation of how and why changes are being made at this stage. There will be a summary description of each proposed change, what it is, why it is needed and what the impacts would be. This will be supplemented by a breakdown of the change by environmental topic areas with relevant updates to the EIA as outlined in the ES. The consultation material will consist of a covering letter explaining the changes and the 'Change Request: Environmental Assessment Update' document.

## CONSULTATION ACTIVITIES

The Advice Note '*Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination*' states:

*"The applicant should carry out appropriate consultation about the proposed change. This step may be carried out earlier, before the change notification, to potentially save time and inform the applicant's approach to the change application. However, the Examining Authority may consider that further consultation is required (Step 2). The applicant should consult all those persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 who would be affected by the proposed change, giving a minimum of 28 days from receipt of the information about the proposed change for responses.*

*If a targeted approach to the identification of those affected by the proposed change is adopted then detailed justification should be provided about why the applicant considers it is not necessary to consult all the prescribed persons. For example, the proposed change would not affect the functions of statutory undertakers."*

The Applicants are taking a targeted approach to consultation. There are anticipated to be no material changes to impacts previously identified in the ES submitted with the Applicant's DCO application as a result of these changes and the changes proposed have been made, to a large extent, in response to stakeholder feedback. Consequently, the Applicants are proposing a targeted approach of only consulting with those parties that have an interest in or are potentially affected by the proposed changes, in line with the approach suggested in the PINS advice note. A list of stakeholders identified by the Applicants to be relevant to the Request for Change is included in Appendix A. The consultation activities are proposed to include the following:

- A. Prescribed consultees presented in this report will be written to informing them of the consultation, providing them access to the consultation materials and explaining how they can provide feedback.
- B. There will be a covering letter explaining the changes and an Environmental Assessment Update.
- C. Promotional activity will include an email to those who have previously requested to be kept informed of Projects related information.

## SUMMARY OF CONSULTATION RESPONSES

A summary of the consultation responses will be submitted with the formal change submission confirming who has been consulted in relation to the proposed changes and how they have been consulted in accordance with the PINS Advice Note. The summary of consultation responses will also set out the feedback received and how the Applicants have considered this feedback.

As the proposed changes are not anticipated to result in any new or different likely significant environmental effects, the publicity requirements under the EIA Regulations are not engaged. However, the Applicants consider it prudent to undertake the proposed targeted consultation over a 30-day period, which is aligned with the suggestion in the PINS advice note that consultation takes place for a minimum of 28 days (and also aligns with the requirements of the EIA Regulations in any event) in order to provide opportunity for stakeholders to make representations on the proposals. The Applicants' proposed timetable is set out in Section 5 below. The consultation is currently estimated to begin in November.

## 5 Proposed Timetable

In light of the above, the Applicants have been considering the appropriate approach to bringing forward the proposed changes in the context of the Planning Inspectorate's Advice Note '*Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted*' (August 2024).

As required by the Advice Note, the Applicants have set out an explanation of how this request can be accommodated within the draft examination timetable.

The Applicants have submitted this notification in advance of the Preliminary Meeting scheduled for 22 October 2024 to allow the Examining Authority the opportunity in advance of the Preliminary Meeting to consider whether the Applicant's approach to consultation on the proposed changes is acceptable. The Applicants would welcome the opportunity to discuss any comments the Examining Authority has in relation to the procedural implications of the proposed changes at the Preliminary Meeting.

The Applicants acknowledge that the acceptance of any proposed change is ultimately a decision for the ExA. The Applicants propose the following next steps and programme, subject to ensuring that all the associated documents are ready for submission:

- Notification of change request submitted on 8 October 2024 (pre-examination procedural deadline)
- Advice from the Examining Authority on the procedural implications of the proposed change (including in relation to the proposed consultation) – advice to be given at or before the Preliminary Meeting on 22 October 2024

- The Applicants anticipate that consultation on the proposed changes would run from the beginning of November 2024 for a 30-day period once the consultation materials have been finalised.
- The Applicants propose to submit the Change Request in December 2024 and in any event by Deadline 3, following consultation and consideration of stakeholder feedback received.

The Applicants propose to submit the Change Request sometime in December 2024 and in any event by Deadline 3, following consultation and consideration of any stakeholder feedback received. The Applicants are of the view that, based on the above programme, the proposed changes to the application can be accommodated within the remaining statutory timescales. The change request is anticipated to be submitted in advance of the hearings currently scheduled for January 2025, which would give sufficient opportunity for both the Examining Authority and Interested Parties to comment on the changes proposed, in addition to the targeted consultation described above.

## 6 Documents to be submitted with Change Request

The Applicants propose to submit the following documents with the change request:

- Covering letter - setting out a confirmed description of the proposed changes, the reasons and need for making the changes and how the changes would affect any consents and licences required for the Projects;
- A schedule of application documents and plans listing the revisions to each document and plan that would occur as a result of the changes (or confirmation that there would be no change) (N.B. The Applicants do not intend to submit updated versions of all of the affected documents until the change request has been accepted by the ExA);
- Change Request: Environmental Assessment Update - including an assessment showing that the changes would not result in any new or different likely significant effects;
- Clean and tracked changed versions of the draft DCO and explanatory memorandum (as appropriate); and
- Consultation report (as described above at Section 4).

## Appendix A - Proposed List of Stakeholders for Targeted Consultation

The Applicants propose undertaking targeted consultation on the changes listed above with the list of stakeholders outlined in Table A1 below. The Applicants propose that these stakeholders would be most likely to be affected by or interested in the proposed changes. As the changes all relate to the offshore and intertidal areas and works, it is not proposed to consult the majority of onshore statutory consultees as they will not be affected by the proposed changes.

*Table A1 – Proposed list of stakeholders to be consulted*

<b>Name of Stakeholder</b>	<b>Name of Stakeholder</b>
ABP Ports	National Grid Electricity System Operator Limited
BHP	National Grid Electricity Transmission PLC
BP Northern Endurance	National Grid Ventures Limited
Brett	National Grid Viking Link Limited
Bridlington Harbour Commissioners	Natural England (Offshore Wind Farms)
Bristow (including SAR)	NGET/SSE EGL2
British Helicopter Association	North Eastern IFCA
BT Limited	Norway
Cefas	Optimal Power Networks Limited
Civil Aviation Authority	Orsted Hornsea Project Four Limited
Cruising Association	Orsted Hornsea Project Three (UK) Limited
DEME	Perenco UK Limited
DFDS Seaways	Quadrant Pipelines Limited
Dogger Bank A Offshore Wind Farm	Royal National Lifeboat Institution
Dogger Bank B Offshore Wind Farm	Royal Yachting Association
Dogger Bank C Offshore Wind Farm	RSPB
Dogger Bank Offshore Wind Farm Project 4 Projco Limited (Dogger Bank D)	Shell Plc
Doggerland Foundation	Squire Energy Limited
Eastern Inshore Fisheries & Conservation Authority	SSEN Distribution Limited (SEGL2)
East Riding of Yorkshire Council	Swedish Pelagic Federation PO
Fisheries	The Crown Estate Commissioners
Gassco AS UK Branch	The Environment Agency
Hanson Limited	The Netherlands
Harbour Energy	The Wildlife Trusts
Historic England	Tidewater Marine UK Ltd
INEOS	TotalEnergies E&P UK Limited

Name of Stakeholder	Name of Stakeholder
Joint Nature Conservation Committee	Trinity House
Kellas Midstream Limited	UK Chamber of Shipping
Lincolnshire Wildlife Trust	UK Major Ports Group
Marine Management Organisation (MMO)	Whale and Dolphin Conservation
Maritime & Coastguard Agency	Yorkshire Wildlife Trust
Ministry of Defence	
National Federation of Fishermen's Organisations	