

Dogger Bank South Examining Authority  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

Our reference 005405096-01  
Your reference EN010125  
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3 December 2024

Dear Ms Dowling,

**Dogger Bank South Offshore Wind Farms Project**  
**PINS Reference: EN010125**  
**Response to Rule 17 letter 26 November 2024**

This letter is provided in response to the Examining Authority's ("ExA") **Rule 17 letter** [PD-008] dated 26 November 2024.

**Request to Interested Parties**

The Applicants have responded to this matter in a separate letter dated 28 November 2024 [AS-091].

**Request to the Applicants**

The Applicants are asked to review the status of application documents to which the Examining Authority and Interested Parties have sought updates, with reference to the list supplied. The Applicants have reproduced this table in **Appendix A** to this letter, with commentary on the status of the documents.

Following provision of further document updates on 29 November 2024, the information requested is now substantially available to the ExA and Interested Parties. The only exceptions are listed below:

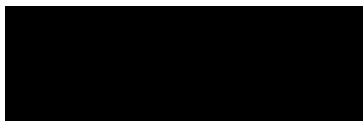
- a. The draft Development Consent Order and supporting documents will be provided by 6<sup>th</sup> December 2024. These documents are intentionally provided last so that changes arising from amendments to other documents can be incorporated. This suite of documents will include:
  - **3.1 draft Development Consent Order**
  - **3.2 Explanatory Memorandum**
  - **10.39 Schedule of Changes to dDCO**

- b. **1.4 Guide to the Application** is also updated at this final submission (by 6<sup>th</sup> December 2024) to incorporate all of the revisions provided in the pre-examination period to date
- c. Row 21 – Coastal Erosion Rate Technical Note – this is expected in mid-December due to incorporation of data recently received from East Riding of Yorkshire Council
- d. **8.23 In Principle Monitoring Plan** – this document will be updated if agreement is reached with the MMO on time limits to sign off post-consent submissions. The discussions are underway, but an update is not expected soon.
- e. Row 51 – Phase 2 Archaeological Trial Trenching – as stated in our letter [PDA-011], this new work will be provided in early 2025 once reporting is complete
- f. Row 53 – Agri environment scheme – **7.21 Land Use** will be updated with available information on 6<sup>th</sup> December 2024
- g. **7.18 Terrestrial Ecology and Ornithology** – this will be updated again on 6<sup>th</sup> December 2024
- h. Row 70 – photomontages – as stated in our letter [PD-006], this new work will be provided in early 2025, as they need to include trees after leaf fall

The Applicants consider that once items (a) and (b) have been provided all pre-examination document revisions sought, and requests for information, would have been dealt with. These will be reflected in the new edition of the Guide to the Application and of the draft DCO.

The Applicants are currently consulting on potential changes to the Application, in line with the ExA's advice. The Applicants expect Change Applications to be made in January, subject to consideration of feedback received.

Yours sincerely,



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Dogger Bank South Projects  
DBS Offshore Wind Farms  
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Dogger Bank South  
(East) Limited**

Registered no. 13656240

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## Appendix A – Responses to requests for information

The table below has been copied from the ExA’s Rule 17 Letter Dated 26 November. To avoid confusion, the Applicants have directly copied the table and just provided update in the final column. Some documents were provided to the ExA on 29 November 2024 with these dates reflected in this column where relevant.

No.	Document / Update	Expected When	Promised in which Document	Received Y or N	Proposed Submission Date
1	Guide to the application	D1 and D2	[AS-006] and [AS-016]	Y [PDA-001] but will need updating due to number of documents subsequently submitted	Revision 3 will be submitted 6 <sup>th</sup> December 2024
2	Draft DCO*	D1 and D2	[AS-006] and [AS-016]	N	Revision 3 will be submitted 6 <sup>th</sup> December 2024
3	Explanatory Memorandum*	D1 and D2	[AS-006], [AS-003] and [AS-016]	N	Revision 3 will be submitted 6 <sup>th</sup> December 2024
4	Book of Reference	D1	[AS-006] and [AS-016]	Y [AS-043] and [AS-044]	N/A
5	Offshore Operations and Maintenance Plan*	D1	[AS-006] and [AS-016]	Y [AS-027] and [AS-028]	N/A
6	Outline Marine Mammal Mitigation Protocol (Revision 2)*	D1 [AS-016 stated D2]	[AS-006] and [AS-016]	N	29 <sup>th</sup> November 2024
7	In Principle Site Integrity Plan (SIP) for Southern North Sea (SNS) Special Area of Conservation (SAC) (Revision 2)*	D1 [AS-016 stated D2]	[AS-006] and [AS-016] which said D2	N	29 <sup>th</sup> November 2024
8	Statement of Commonality of Statements of Common Ground	D1	[AS-006]	N/A as Applicants advised that they would delay submission until after start of Examination	The Applicants will provide this document in line with a future revised examination timetable

No.	Document / Update	Expected When	Promised in which Document	Received Y or N	Proposed Submission Date
9	19 SoCGs as listed in [AS-006]	D1	[AS-006]	N/A as Applicants advised that they would delay submission until after start of Examination	The Applicants will provide this document in line with a future revised examination timetable
10	Response to Relevant Representations (including response to NE) (Revision 2)	D1	[AS-006]	Y [PDA-013], [PDB-006] and [AS-048]	N/A
11	Land Rights Tracker	D1	[AS-006] and [AS-016]	Y [AS-045] and [AS-046]	To note, [AS-045] and [AS-046] is revision 2 of the Land Rights Tracker, submitted 13 <sup>th</sup> November 2024.
12	Deadline 1 cover letter	D1	[AS-006]	N/A	N/A
13	Archaeological Trial trenching Phase 2 (Interim Report) Section 5	D1	[AS-006] and [AS-016]	Y [AS-023]	N/A
14	Archaeological Trial Trenching Phase 2 (Interim Report) Section 6	D1	[AS-006] and [AS-016]	Y [AS-024]	N/A
15	DBS Phase 2 2024 Archaeological Trial Trenching Technical Note (Revision 2)	D1	[AS-006] and [AS-016]	Y [AS-022]	N/A
16	Sediment deposition paper	D1	[AS-006]	N	29 <sup>th</sup> November 2024 – The Applicants confirm this document is titled 'Benthic Ecology Technical Note'.
17	Written summaries of oral submissions at hearings	D1	[AS-006]	N/A	N/A
18	Applicants suggested draft itinerary for an ASI	D1	[AS-006]	N	The Applicants will provide this document in line with a future revised examination timetable
19	Examination progress tracker	D1	[AS-006]	N/A	The Applicants will provide this document in line with a future revised examination timetable

No.	Document / Update	Expected When	Promised in which Document	Received Y or N	Proposed Submission Date
20	Geophysical Assessment Report (final)	D1	[AS-006], [AS-003] and [AS-016] – AS-016 advises its in 9 parts	[AS-029] to [AS-036]	This document was submitted in nine parts on the 8 <sup>th</sup> October [PDA-016] to [PDA-024] (Revision 1) and re-submitted on the 8 <sup>th</sup> November as six parts [AS-029] to [AS-036] (Revision 2).
21	Coastal erosion rate technical note (new document)	D1	[AS-006] and [AS-016] which said D2	N	Mid-December – The Applicants confirm this document is titled ‘Coastal Erosion Rate Technical Note’.
22	Fish heat mapping report (new document)	D1	[AS-006]	N - Applicants to confirm if this is the same as the Herring and Sandeel heat map referred to in [AS-016] to be submitted at D2	29 <sup>th</sup> November 2024 – The Applicants can confirm this is the same as the Herring and Sandeel heat map referred to in [AS-016] to be submitted at D2. This document is titled ‘Heat Mapping Report: Atlantic Herring and Sandeel’.
23	Project level kittiwake compensation plan (revision 2)	D1	[AS-006]	Y [PDB-002]	N/A
24	Guillemot [and razorbill] compensation plan (revision 2)	D1	[AS-006]	Y [PDB-004]	N/A
25	Review of evidence on recovery of sandbank habitat following habitat damage (new document)	D1	[AS-006] and [AS-016]	Y [AS-025] Applicants to confirm if this is the same as the Sandbank habitat recovery technical note referred to in [AS-016] to be submitted at D2	N/A – The Applicants confirm this is the same as the Sandbank habitat recovery technical note referred to in [AS-016], which was submitted on 7 <sup>th</sup> November 2024.

No.	Document / Update	Expected When	Promised in which Document	Received Y or N	Proposed Submission Date
26	Auk survey/ auk site selection report (new document)	D1	[AS-006]	N unless this is the Guillemot and Razorbill Compensation Site Shortlist Refinement Report (rev 1) [PDB-008], Applicants to clarify	N/A – The Applicants confirm this is the Guillemot and Razorbill Compensation Site Shortlist Refinement Report (rev 1) [PDB-008].
27	Outline construction traffic management plan (including figures) (revision 2)*	D1	AS-006], [PDA-011] and [AS-016] – which said it would provide clean and tracked	Y [AS-020] and [AS-021]	N/A
28	Volume 7, 7.24.24.2 Environmental Statement Appendix 24-2 – Transport Assessment (revision 2)	D1	[AS-006] and [AS-016]	Y [AS-019]	N/A
29	Change notification letter – onshore substation zone	D1	[AS-006]	N	This document [AS-015] was submitted to the Examining Authority on the 4 <sup>th</sup> November 2024 and is titled 'Intention to Submit a Change Request Re Onshore Substation Zone (Change Request 2)'.
30	Outline Landscape Management Plan (revision 2)*	D2	[AS-006] and [AS-016]	N	29 <sup>th</sup> November 2024
31	Outline code of construction practice (revision 2)*	D2	[AS-006] and [AS-016]	N	29 <sup>th</sup> November 2024
32	Outline drainage strategy (revision 2)*	D2	[AS-006] and [AS-016]	N	29 <sup>th</sup> November 2024
33	Outline ecological management plan (revision 2)*	D2	[AS-006] and [AS-016]	Y [AS-076] and [AS-077]	Revision 3 will be submitted 6 <sup>th</sup> December in relation to beach access and habitat protection.

No.	Document / Update	Expected When	Promised in which Document	Received Y or N	Proposed Submission Date
34	In principal monitoring plan*	D2	[AS-006]	N	This document will be updated if agreement is reached with the MMO on time limits to sign off post-consent submissions. The discussions are underway, but an update is not expected soon.
35	Outline fisheries liaison and co-existence plan*	D2	[AS-006] and [AS-016]	Y [AS-082] and [AS-083]	N/A
36	Land rights tracker	D2	[AS-006]	Y [AS-045]	This is a duplication of row 11. [AS-045] and [AS-046] is revision 2 of the Land Rights Tracker, submitted 13 <sup>th</sup> November 2024.
37	Deadline cover letter	D2	[AS-006]	N/A	N/A
38	Comments on LIRs	D2	[AS-006]	N/A	N/A
39	Comments on the WRs	D2	[AS-006]	N/A	N/A
40	Transboundary response	D2	[AS-006] and [AS-016]	N	6 <sup>th</sup> December 2024 – The Applicants confirm this document is titled ‘The Applicants’ Responses to Regulation 32 Transboundary Consultation Responses’.
41	Offshore ornithology EIA update	D2	[AS-006] and [AS-016]	Y new Chapter 12 submitted with 12 individual appendices [AS-057] to [AS-071]	N/A
42	Offshore ornithology RIAA HRA update	D2	[AS-006] and [AS-016]	Y [AS-085] and [AS-086]	N/A
43	Project level kittiwake compensation plan (revision 3)	D2	[AS-006] and [AS-016]	Y [AS-087] and [AS-088]	N/A
44	Guillemot [and razorbill] compensation plan (revision 3)	D2	[AS-006] and [AS-016]	Y [AS-089] and [AS-090]	N/A

No.	Document / Update	Expected When	Promised in which Document	Received Y or N	Proposed Submission Date
45	Unexploded ordnance clearance information and assessment	D2	[AS-006] and [AS-016]	Y [AS-055] and [AS-056]	N/A
46	Cable statement*	D2	[AS-006] and [AS-016]	Y [AS-078] and [AS-079]	N/A
47	Outline scour protection plan*	D2	[AS-006] and [AS-016]	Y [AS-80] and [AS-081]	N/A
48	Ornithological mitigation option report (new document)	D2	[AS-006] and [AS-016]	N	6 <sup>th</sup> December 2024 – The Applicants confirm this document is titled ‘Ornithological Mitigation Option Report’.
49	ES Appendix 5-2 Obstacle crossing register (revision 2)*	D2	[AS-006] and [AS-016]	Y [AS-053] and [AS-054]	N/A
50	Plans/figures provided to illustrate location of SPAS considered in Chapter 12 and RIAA	D1 (or sooner if requested by ExA)	[AS-003]	N	This document was submitted on 8 <sup>th</sup> October 2024 titled ‘2.13 Offshore Statutory and Non-statutory Nature Conservation Sites Plan (Revision 2)’ [PDA-007].
51	Final version of Phase 2 Archaeological trial trenching	Late Feb / D5	N/A	N	As stated in PDA-011, these will be provided when reporting is completed, expected in February 2025, and will be aligned to a suitable examination deadline.
52	Agricultural Land Classification surveys	Due Sept 2024	[AS-003]	Y [PDA-015]	N/A
53	Agri-Environmental Stewardship scheme – specific scheme details	D2	[AS-016]	N	As detailed in the Applicants’ previous response [AS-016], this information is only available from landowners and is not public source. It has been requested and if provided, will be if made available to the ExA. ES Chapter



No.	Document / Update	Expected When	Promised in which Document	Received Y or N	Proposed Submission Date
					21 – Land Use (Revision 2), will be submitted on the 6 <sup>th</sup> December 2024 to include an assessment of Agri-Environmental schemes during construction. Higher level Environmental Stewardship Scheme (ESS) farms have been considered as 'High sensitivity' land uses.
54	Arboricultural surveys to support detailed design and inform extent of root protection zones	Due October 2024	[AS-003]	Y [AS-036] and [AS-037]	N/A
55	Box 30 of s51 advice – minor errors and omissions	D1	[AS-003]	N	The Applicant reviewed this list in Appendix 1 of the Response to the Rule 6 Letter [PDA-011] and the majority of issues were addressed in submissions at the Pre-exam Procedural Deadline. Documents outstanding from the PDA were: <ul style="list-style-type: none"> <li>• Book of Reference (Revision 3) - provided as [AS-043] and [AS-044] on the 13<sup>th</sup> November;</li> <li>• Draft DCO (Revision 3) - due on 6<sup>th</sup> December; and</li> <li>• Explanatory Memorandum (Revision 3) - due on 6<sup>th</sup> December 2024.</li> </ul>
56	Statement of Reasons	D2	[AS-016]	Y [AS-041] and [AS-042]	N/A
57	Marine Mammal Mitigation Protocol (revision 2)*	D2	[AS-016]	N	This is a duplication of row 6 submitted 29 <sup>th</sup> November 2024.

No.	Document / Update	Expected When	Promised in which Document	Received Y or N	Proposed Submission Date
58	Heat mapping report Atlantic herring and sandeel	D2	[AS-016]	Applicants to confirm if this is the same as the fish heat mapping report in [AS-006] to be submitted at D1	This is a duplication of row 22. The document is titled 'Heat Mapping Report: Atlantic Herring and Sandeel', submitted on 29 <sup>th</sup> November 2024.
59	Sandbank habitat recovery technical note	D2	[AS-016]	Applicants to confirm if this is the same as the review of evidence on recovery of sandbank habitat following habitat damage in [AS-006] to be submitted at D1	This is a duplication of row 25. The Applicants confirm this is the same as the review of evidence on recovery of sandbank habitat following habitat damage in [AS-006], submitted on 7 <sup>th</sup> November 2024
60	Schedule of changes to draft DCO	D2	[AS-016]	N/A	6 <sup>th</sup> December 2024
61	Tree Preservation Order and Hedgerow Plan	D1	[AS-016]	Y [AS-024], [PDA-009] and then [AS-026]	N/A
62	ES Chapter 4 Site selection and assessment of alternatives	D1	[AS-016]	Y [AS-017] and [AS-018]	N/A
63	Responses to Natural England's Relevant Representation (including Appendices A-F and I)	D1	[AS-016]	Y [AS-048]	N/A
64	Chapter 18 Terrestrial Ecology and Ornithology*	D2	[AS-016]	Y [AS-072] and [AS-073] updated in relation to arboricultural surveys but not in relation to beach access/ dune and cliff habitat so further update expected	Revision 3 will be submitted 6 <sup>th</sup> December 2024 in relation to beach access and habitat protection.
65	Water Environment Regulations Compliance Assessment*	D2	[AS-016]	Y [AS-074] and [AS-075]	N/A

No.	Document / Update	Expected When	Promised in which Document	Received Y or N	Proposed Submission Date
66	ES Chapter 21 – Land Use (revision 2) including Agri-Environmental Stewardship scheme assessment of effects during construction	D2	[AS-016]	N	6 <sup>th</sup> December 2024
67	ES Chapter 22 – Onshore Archaeology and Cultural Heritage (revision 2) <ul style="list-style-type: none"> <li>assessment of lighting effects on heritage assets;</li> <li>identification of substantial / less than substantial harm to heritage assets on an individual basis;</li> <li>assessment of effects on heritage assets on an individual basis (rather than grouped);</li> <li>matters scoped out of the ES.</li> </ul>	D2	[AS-016]	N	29 <sup>th</sup> November 2024
68	Appendix A – Outline soil management plan*	D2	[AS-016]	N	29 <sup>th</sup> November 2024 – submitted as part of the OCoCP (Revision 2)
69	Appendix C – Outline PRow Management Plan*	D2	[AS-016]	N	29 <sup>th</sup> November 2024 – submitted as part of the OCoCP (Revision 2)
70	Updated and new photomontages as requested by ExA	Jan 2025	[PD-006]	N – but not expected until Jan 2025	The Applicants confirm this is expected to be submitted in January 2025.
71	Report to Inform Appropriate Assessment Habitats Regulations Assessment - Part 2 of 4 – Annex I Offshore Habitats and Annex II Migratory Fish – Revision 3	Prior to start of examination	[AS-048]	Y [AS-051] and [AS-052]	N/A

No.	Document / Update	Expected When	Promised in which Document	Received Y or N	Proposed Submission Date
72	Dogger Bank South Offshore Wind Farms Project – Notification of Intention to Submit a Change Request related to works in the Onshore Substation Zone (Change Request 2).	N/A	N/A	Y [AS-015]	N/A
73	Array Layout Yield Study	N/A	N/A	Y [AS-014] submitted 4 <sup>th</sup> November 2024	N/A
74	Onshore Substation Refined Area of Search and Onshore Substation Zones Long List	N/A	N/A	Y [AS-011] submitted 4 <sup>th</sup> November 2024	N/A
75	Proposed Yorkshire Wolds National Landscape	N/A	N/A	Y [AS-012] submitted 4 <sup>th</sup> November 2024	N/A
76	Location of Jocks Lodge proposals compared to DBS Onshore Works	N/A	N/A	Y [AS-013] submitted 4 <sup>th</sup> November 2024	N/A
77	Environmental Statement Figure 16-2 - Infrastructure and Other Users (Revision 3)	N/A	N/A	Y [AS-10] submitted 4 <sup>th</sup> November 2024	N/A
78	Response to Rule 17 Letter Dated 24 October 2024 (10.21 Cover letter)	N/A	N/A	Y [AS-016] submitted 4 <sup>th</sup> November 2024	N/A
79	Responses to Supplementary Agenda Items ISH1 (Revision 01)	D1	[AS-016]	Y [AS-39]	N/A
80	Responses to Supplementary Agenda Items CAH1 (Revision 01)	D1	[AS-016]	Y [AS-40]	N/A
81	Soil Resource Assessment Survey Results (Revision 1)	N/A	N/A	Y [PDA-01] submitted 8 <sup>th</sup> October 2024	N/A
82	Archaeological Trial Trenching Phase 2 (Interim) Section 3	N/A	N/A	Y [PDA-029] submitted 8 <sup>th</sup> October 2024	N/A
83	Archaeological Trial Trenching Phase 2 (Interim) Section 10	N/A	N/A	Y [PDA-031] submitted 8 <sup>th</sup> October 2024	N/A

No.	Document / Update	Expected When	Promised in which Document	Received Y or N	Proposed Submission Date
84	Archaeological Trial Trenching Phase 2 (Interim) Section 11	N/A	N/A	Y [PDA-032] submitted 8 <sup>th</sup> October 2024	N/A
85	Archaeological Trial Trenching Phase 2 (Interim) Section 17	N/A	N/A	Y [PDA-030] submitted 8 <sup>th</sup> October 2024	N/A
86	Archaeological Trial Trenching Phase 1 (Final) Part 1 of 4 (Revision 1	N/A	N/A	Y [PDA-025] submitted 8 <sup>th</sup> October 2024	N/A
87	Archaeological Trial Trenching Phase 1 (Final) Part 2 of 4 (Revision 1	N/A	N/A	Y [PDA-026] submitted 8 <sup>th</sup> October 2024	N/A
88	Archaeological Trial Trenching Phase 1 (Final) Part 3 of 4 (Revision 1	N/A	N/A	Y [PDA-027] submitted 8 <sup>th</sup> October 2024	N/A
89	Archaeological Trial Trenching Phase 1 (Final) Part 4 of 4 (Revision 1	N/A	N/A	Y [PDA-028] submitted 8 <sup>th</sup> October 2024	N/A
90	Environmental Statement Chapter 23 – Landscape and Visual Impact Assessment - Figure 23-1 to Figure 23-15 (Revision 2)	N/A	N/A	Y [PDA-010] submitted 8 <sup>th</sup> October 2024	N/A
91	Landfall Temporary Construction Compound (TCC) Zone Options 01B and 01D (Revision 1)	N/A	N/A	Y [PDA-036] submitted 8 <sup>th</sup> October 2024	N/A
92	Waterbodies in a River Basin Management Plan and Coastal Waterbodies Plan (Revision 2)	N/A	N/A	Y [PDA-008] submitted 8 <sup>th</sup> October 2024	N/A
93	Works Plan (Offshore) (Revision 3)	N/A	N/A	Y [PDA-002] submitted 8 <sup>th</sup> October 2024	N/A
94	Works Plan (Onshore) (Revision 3)	N/A	N/A	Y [PDA-003] submitted 8 <sup>th</sup> October 2024	N/A
95	Land Plans (Onshore) (Revision 2)	N/A	N/A	Y [PDA-004] submitted 8 <sup>th</sup> October 2024	N/A
96	Crown Land Plan (Revision 2)	N/A	N/A	Y [PDA-006] submitted 8 <sup>th</sup> October 2024	N/A

No.	Document / Update	Expected When	Promised in which Document	Received Y or N	Proposed Submission Date
97	Special Category Land Plan (Revision 2)	N/A	N/A	Y [PDA-005] submitted 8 <sup>th</sup> October 2024	N/A
98	Project-Level Kittiwake Artificial Nesting Structure (ANS) Site Selection Report (Revision 01)	N/A	N/A	Y [PDB-007] submitted 29 <sup>th</sup> October 2024	N/A
99	Guillemot [and Razorbill] Compensation Site Shortlist Refinement Report (Redacted)	N/A	N/A	Y [PDB-008] submitted 29 <sup>th</sup> October 2024	N/A

\*Indicates that the applicants think that the document would only have minor updates following stakeholder feedback