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Our ref. 005615352-01
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15th January 2025

Dear Ms Dowling,

Dogger Bank South Offshore Wind Farms

Project Change Request 1 – Offshore and Intertidal Works and Project Change Request 2 – Onshore Substation Zone 1 and 2 (“Project Change Requests 1 and 2”)

PINS Reference: EN010125

Following discussions at the Preliminary Meeting (PM) on January 14, 2025, we are writing to clarify the Applicants’ approach to changes to the Environmental Statement (ES) in respect of the Project Change Requests 1 and 2.

Appendix A of the Covering Letter accompanying the application (dated January 10, 2025) outlines the specific documents to be updated if the change requests are accepted. The only ES documents the Applicants propose to update are as follows:

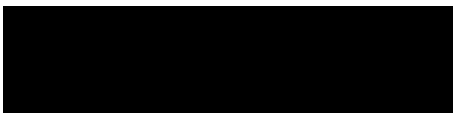
- 7.5.5.2 AS-053: Appendix 5-2 - Obstacle Crossing Register (Clean)
- 7.5.5.2 AS-054: Appendix 5-2 - Obstacle Crossing Register (Tracked Changes)
- 7.5.5.3 APP-075: Appendix 5-3 - Engineering Drawings
- 7.8.8.3 APP-084: Appendix 8-3 - Marine Physical Processes Modelling Technical Report
- 7.11.11.3 APP-099: Appendix 11-3 - Underwater Noise Modelling Report
- 7.11.11.4 APP-100: Appendix 11-4 - iPCoD Modelling
- 7.23.1 PDA-010: Environmental Statement Chapter 23 - Landscape and Visual Impact Assessment - Figures 23-1 to 23-15

As noted at the PM, apart from the documents listed above, the Applicants do not propose to amend each individual chapter of the ES should either or both change requests be accepted by the Examining Authority (ExA). The changes have been thoroughly assessed and documented in supplementary materials accompanying the change requests and the Applicants are confident that the changes do not give rise to any new or different significant environmental effects, noting that one impact is likely to reduce from “significant” to “not significant” as a result of Change Request 1. Both changes seek to reduce the design envelope of the Projects in order to provide more certainty in terms of how the Projects will be built out and in order to refine the assessment of the Projects’ impacts. Therefore, if the changes were accepted, the Projects would remain within the original design envelope assessed in the ES.

Revising every chapter of the ES would be an extremely time consuming task and introduce unnecessary complexity and uncertainty without providing any clear benefit to the Examination. Comprehensive assessments of the changes have been provided in supporting documents accompanying Project Change Requests 1 and 2. Furthermore, as mentioned at the PM and as noted in the Project Change Requests 1 and 2 applications, the Applicants intend to incorporate the assessment of the proposed changes within the dDCO by amending Schedule 19 (Documents to be Certified), Table 1. This amendment will ensure that the assessments related to Project Change Requests 1 and 2 are treated as part of the ES and that any references to the ES in the dDCO incorporate the change requests. This change was proposed in the draft DCO (Rev 04) submitted with the change request application.

The Applicants believe this approach is reasonable, proportionate, and consistent with established practices in similar DCO applications. For example this approach has been taken in A1 Birtley to Coal House Improvement Scheme DCO [TR010031] and Thanet Extension Offshore Wind Farm DCO [EN010084]. These changes are driven by stakeholder feedback, and the Applicants consider that if accepted they would improve the scheme. Consequently the Applicants are keen for a pragmatic approach in order to adopt them swiftly and reduce uncertainty.

Yours sincerely,



Thomas Tremlett
Senior Consents Manager

DBS Offshore Wind Farms

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