

Marine Management Organisation
Trinity House
The Quay
Harwich
CO12 3JW

Our reference 007009014-01
Contact Thomas Tremlett
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24 June 2026

Dear Leah,

The Dogger Bank South East and West Offshore Wind Farms Order 2026 ("the Order")

Variations to Deemed Marine Licences 1 - 6 within Schedules 10 – 14A of the Order ("the DMLs") under the Marine and Coastal Access Act 2009

Further to the above development consent order which was made by the Secretary of State for Energy Security and Net Zero on 14 May 2026, RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited as Applicants for, and undertakers of, the Dogger Bank South East and West Offshore Wind Farm Order 2026 ("the undertakers") hereby submit this written request for variations to the DMLs.

The undertakers have carefully reviewed the DMLs as made and identified a small number of anomalies for which we respectfully request that variation under section 72(3)(d) of the Marine and Coastal Access Act 2009 is considered.

To support this request the undertakers enclose a tracked change version of the DMLs which shows the requested changes.

Requested variations

An explanation for the requested variations to the DMLs is set out below.

1. Cross-referencing errors – all DMLs

As a result of the Secretary of State re-numbering the conditions in Part 2 of each of the DMLs, there are a large number of cross-referencing errors within each DML that the undertakers request are corrected. In undertaking the exercise of checking all of the cross-references, the undertakers have also identified a small number of additional cross-referencing errors that existed within the DMLs in the final version of the Order (Revision 13) [C1-016B] that was submitted to the Secretary of State and have also taken the opportunity of correcting these. These are not repeated here due to the volume of changes required but are included within the tracked change DMLs enclosed with this letter.

2. Reinstatement of reference to topic specific monitoring – all DMLs

The undertakers note that the requirements to undertake topic specific post-construction monitoring have been removed from the relevant conditions of all DMLs. This wording was agreed between the undertakers and the MMO following the request contained within the **MMO's Deadline 9 submission** (document reference PIR-001) and as confirmed in **The Applicants' Response to the Marine Management Organisation's Deadline 9 Document** (PID-002). The result is that topic specific monitoring is still required as part of pre-construction surveys but this is not

replicated in the post-construction survey conditions. The undertakers believe this may be an error as no explanation has been given by the Secretary of State for this omission.

DMLs 1 and 2

The undertakers therefore request that the following wording is amended in paragraph (3) of condition 31 in DMLs 1 and 2:

- "(d) undertake post-construction vessel traffic monitoring in accordance with the outline vessel traffic monitoring plan by automatic identification system for a duration of three consecutive years following the completion of construction of the authorised project, unless otherwise agreed in writing by the MMO, with provision for a report to be submitted annually to the MMO, Trinity House and the MCA; ~~and~~*
- (e) undertake any marine mammal monitoring referred to in the marine mammal mitigation protocol submitted in accordance with condition 24(1)(g);*
- (f) undertake any marine mammal monitoring required by the monitoring plan submitted in accordance with condition 24(1)(b);*
- (g) undertake any sandeel monitoring required by the monitoring plan submitted in accordance with condition 24(1)(b);*
- (h) undertake any benthic monitoring required by the monitoring plan submitted in accordance with condition 24(1)(b); and*
- (i) undertake any marine processes monitoring required by the monitoring plan submitted in accordance with condition 24(1)(b)."*

DMLs 3 and 4

The undertakers request that the same wording is amended in paragraph (3) of condition 29 in DMLs 3 and 4:

- "(d) undertake post-construction vessel traffic monitoring in accordance with the outline vessel traffic monitoring plan by automatic identification system for a duration of three consecutive years following the completion of construction of the authorised project, unless otherwise agreed in writing by the MMO, with provision for a report to be submitted annually to the MMO, Trinity House and the MCA; ~~and~~*
- (e) undertake any marine mammal monitoring referred to in the marine mammal mitigation protocol submitted in accordance with condition ~~13~~22(1)(g);*
- (f) undertake any marine mammal monitoring required by the monitoring plan submitted in accordance with condition 22(1)(b);*
- (g) undertake any sandeel monitoring required by the monitoring plan submitted in accordance with condition 22(1)(b);*
- (h) undertake any benthic monitoring required by the monitoring plan submitted in accordance with condition 22(1)(b); and*
- (i) undertake any marine processes monitoring required by the monitoring plan submitted in accordance with condition 22(1)(b)."*

DMLs 5 and 6

The undertakers also request that the following wording is amended in paragraph (3) of condition 25 in DMLs 5 and 6, including removing the reference to the SIP, as the SIP is not a required condition of DMLs 5 and 6:

- "(b) undertake, within twelve months of completion of the licensed activities, a full sea floor coverage swath-bathymetry survey to IHO Order 1a standard that meets the requirements of MGN654 and its annexes, and side scan sonar, of the area(s) within the Order limits in which construction works were carried out to assess any changes in bedform topography and such further monitoring or assessment as may be agreed to ensure that cables (including fibre optic cables) have been buried or protected; ~~and~~
- (c) undertake any marine mammal monitoring required by the SIP monitoring plan submitted in accordance with condition ~~22~~20(1)(b);
- (d) undertake any sandeel monitoring required by the monitoring plan submitted in accordance with condition 20(1)(b);
- (e) undertake any benthic monitoring required by the monitoring plan submitted in accordance with condition 20(1)(b); and
- (f) undertake any marine processes monitoring required by the monitoring plan submitted in accordance with condition 20(1)(b)."

3. DMLs 1 and 2

Condition 24 – Pre-construction plans and documentation

The undertakers request the removal of condition 24(1)(c)(dd) from DMLs 1 and 2 as it is not relevant to the area of seabed covered by these licences. The 10m depth contour referenced is only relevant to the marine licences relating to the export cables.

Condition 31 – Ornithological monitoring

The undertakers also note that additional wording appears to have been added in error to condition 38(4) of DMLs 1 and 2 and would request that it is removed, as follows:

- "(4) All monitoring reports must be made publicly available and submitted to relevant evidence databases (as agreed with the MMO) no later than six months following written approval of the relevant report by the MMO under this condition, ~~completion of the monitoring required~~ unless otherwise agreed in writing by the MMO, in consultation with the relevant statutory nature conservation body."

4. DML 3

Condition 22 – Pre-construction plans and documentation

There appears to be an error in condition 22(7) which the undertakers request is corrected as follows:

- "(7) The number of piled foundations installed within a 24-hour period when combined with the number of piled foundations installed pursuant to the licences granted under Schedules 10, 11 and 13 of the Order within the same ~~242~~-hour period must not exceed—..."

5. DML4

Condition 11 – Design parameters – offshore converter platform foundations

The undertakers have identified an error in the maximum seabed footprint (excluding scour protection) specified in condition 11(4)(b) and request that this is corrected as follows:

"(b) a seabed footprint (excluding scour protection) exceeding ~~3,347~~ 177 square metres."

Condition 31 – Completion of construction

The sub-paragraph numbering in condition 31(1) appears to need correcting as follows:

"31. —(1) The undertaker must submit a close out report to the MMO, the MCA, Trinity House, UKHO and the relevant statutory nature conservation body within three months of the date of completion of construction. The close out report must confirm the date of completion of construction and must include the following details—

(a) as built plans;

(b) latitude and longitude co-ordinates of the centre point of the location for each offshore converter platform, provided as Geographical Information System data referenced to WGS84 datum; and

~~(a)~~(c) latitude and longitude co-ordinates of the export cables, provided as Geographical Information System data referenced to WGS84 datum."

6. DMLs 5 and 6

Condition 20 – Pre-construction plans and documentation

The undertakers request the removal of condition 20(1)(c)(dd) from DMLs 5 and 6 as it is not relevant to the area of seabed covered by these licences. The 10m depth contour is only relevant to the marine licences relating to the export cables.

If it would be helpful to discuss any of the issues raised in this letter, please do not hesitate to contact me using the details below.

Yours sincerely,



Maria Milititsky

Lead Offshore Consents Manager

DBS Offshore Wind Farms

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