

Dated 23 May 2025

**APPLICATION BY RWE RENEWABLES UK DOGGER BANK SOUTH (WEST) LTD AND RWE
RENEWABLES UK DOGGER BANK (EAST) LIMITED FOR AN ORDER GRANTING
DEVELOPMENT CONSENT FOR THE DOGGER BANK OFFSHORE WIND SCHEME**

PLANNING INSPECTORATE REFERENCE NUMBER: EN010125

REGISTRATION IDENTIFICATION NUMBER: 20050035

WRITTEN REPRESENTATION
submitted on behalf of National Gas Transmission plc
at Deadline 5

1 Introduction

- 1.1 This submission is made at Deadline 5 on behalf of National Gas Transmission plc (**NGT**) in connection with the application by RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited (**Promoter**) for the Dogger Bank South Offshore Wind Farms Development Consent Order (**Draft Order**) to enable the construction of the Dogger Bank South Offshore Wind Farm (**Dogger Bank South Project**) (defined in the Draft Order as the **Authorised Development**).
- 1.2 It provides an update on the matters referred to in NGT's written representation dated 29 January 2025 (**NGT's Written Representation**) [REP1-078] and to its written representation dated 29 April 2025 submitted at Deadline 4 (**D4 Submission**) [REP4-112].

2 Status of negotiations

- 2.1 As the Examining Authority is aware, NGT has requested that the set of protective provisions that it has put forward for the benefit of its undertaking (**NGT's PPs**, a copy of which are included at **Appendix 2 of NGT's Written Representation**) should be included in the Draft Order. NGT's Written Representation sets out why NGT's PPs are necessary.
- 2.2 To this end, NGT's solicitors (Addleshaw Goddard LLP) have been engaging with the Promoter's solicitors.
- 2.3 Whilst discussions between the parties are ongoing and NGT would not expect the inclusion of NGT's PPs in the Draft Order to be contentious given their purpose and precedent in other development consent orders, an agreed position has not yet been reached with the Promoter.

3 Summary of NGT's position

- 3.1 In light of the above, NGT's position remains as set out in NGT's Written Representation and in NGT's D4 Submission.
- 3.2 NGT's Written Representation provides both NGT's PPs and the explanation as to why these protective provisions are necessary. In summary, NGT has existing infrastructure located within or in close proximity to the Dogger Bank South Project that needs to be protected via the protective provisions that NGT is proposing be included in the final form of the Draft Order. NGT's PPs will ensure that NGT's existing assets and interests are adequately protected, as well as compliance with relevant safety standards.
- 3.3 Since an agreed position has not been reached with the Promoter, NGT must continue to maintain the position set out in NGT's Written Representation and requests that NGT's PPs should be included in the Draft Order accordingly.

Addleshaw Goddard LLP

For and on behalf of National Gas Transmission plc

23 May 2025