

**Dated 25 June 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**

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**WRITTEN REPRESENTATION**  
**submitted on behalf of National Gas Transmission plc**  
**at Deadline 7**

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## 1 Introduction

- 1.1 This submission is made at Deadline 7 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 submissions to the Examination, being:
- (a) The written representation dated 29 January 2025 (**NGT's Written Representation**) [**REP1-078**];
  - (b) NGT's Written Representation dated 24 April 2025 submitted at Deadline 4 (**D4 Submission**) [**REP4-112**];
  - (c) Written Representation dated 23 May 2025 [**REP5-063**]; and
  - (d) Written Representation dated 13 June 2025 (incorporating NGT's response to Rule 17 Letter dated 9 June 2025) [**REP6-066**],
- (together the **NGT Submissions**).

## 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. The NGT Submissions set out why NGT's PPs are necessary.
- 2.2 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, at the current time 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 Submissions: that only the NGT PPs will provide sufficient protection for existing assets and interests as well as compliance with relevant safety standards.
- 3.2 The version of the protective provisions proposed by the Applicant in its Deadline 3 submission [**REP3-034**] (**D3 PPs**) are not sufficient and the Applicant has failed to provide adequate explanation or evidence as to why the NGT PPs should not be included in the Draft Order.
- 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**

**25 June 2025**