

Dogger Bank D Offshore Wind Farm
1 Waterloo Street
Glasgow
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26 June 2025

Dogger Bank D response to Dogger Bank South application for development consent

Further to our letter dated 6th September 2024, we are writing to you regarding the application for development consent submitted for the Dogger Bank South Offshore Wind Farms (DBS) by RWE Renewables UK Ltd.

Within our letter dated 6th September 2024 we stated that Dogger Bank D (DBD) wished to register as an Interested Party to participate in the DBS Examination as necessary, in particular relating to issues which DBD and DBS share in common, including (but not limited to):

1. Cumulative Effects;
2. Coordination; and
3. Compensation (Habitats Regulations).

The purpose of this letter is to provide a progress update on shared coordination and compensation matters.

Coordination

Further to our letter dated 6th September 2024, we reiterate that DBD is committed to exploring co-ordination opportunities, including to minimise the impacts on the local communities and the environment as far as practicable, and notes that DBS similarly recognises that the coordination of offshore transmission infrastructure is a clear policy expectation in Section 4.4.1 of the Planning Statement (APP-226), which sets out the relevant National Policy Statements (NPSs), namely the 'Energy NPSs':

- The Overarching NPS for Energy (EN-1);
- The National Policy Statement for Renewable Energy Infrastructure (EN-3); and
- National Policy Statement for Electricity Networks Infrastructure (EN-5).

The main focus of coordination efforts to date between DBD and DBS relate to an area of overlap between the two projects' respective Export Cable Corridors (ECC) in the nearshore/ landfall area. As a result of this overlap and the flexibility on potential routing proposed for the DBS cables in the nearshore, DBD requires to maintain a worst-case scenario of routing through the Holderness Inshore Marine Conservation Zone (MCZ). However, there is potential that further coordination on routing in the nearshore may enable the MCZ to be avoided by DBD.

DBD and DBS have held two meetings to date (25/07/2024 and 17/06/2025) to progress potential coordination in the nearshore.

Following the first meeting, DBD has progressed coordination efforts by completing technical studies looking in detail as to how coordinated use of DBS's ECC may be possible in order for DBD to seek to avoid any requirement to route through Holderness Inshore MCZ. The outcome from the technical study was presented to DBS on 17/06/2025. DBD notes that both meetings have been positive and supportive to progressing a coordinated solution. However, we have not yet been able to reach an agreed solution which could avoid DBD taking forward an option which routes through the Holderness Inshore MCZ. Significant further efforts will be required by both DBD and DBS in order for coordination in this instance to be successful.

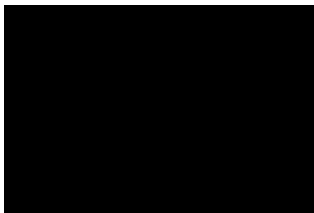
We hope to continue to progress coordination discussions with DBS at pace, so that the current worst-case requirement to route through Holderness Inshore MCZ at landfall can be excluded as an option prior to DBD's planned consent application in July 2026, thereby helping to ensure both DBD and DBS meet the relevant NPS expectations. We acknowledge that this will require a concerted effort on both sides, and although we are confident that both sides will make this effort, a timely and successful outcome is not guaranteed. So if the Secretary of State is minded to grant the DBS Order in the terms proposed, they should be mindful that DBD may not have other means of proceeding except to include cable routing through the Holderness Inshore MCZ at landfall within its DCO application.

Compensation

As outlined in our letter dated 6th September 2024, Dogger Bank D would also like to reiterate our interest in exploring opportunities for collaboration on compensation measures, particularly where improved environmental outcomes can be achieved through a coordinated or collaborative approach. This includes instances where challenges in securing measures could potentially be more effectively addressed through a multi-party or coordinated approach.

To support such collaboration, DBS and DBD jointly developed a draft Memorandum of Understanding between September and December 2024, aimed at facilitating coordination on compensation where appropriate. DBD remains interested in finalising the MoU and continuing to progress these discussions.

Yours sincerely,



Consent Team Leader
Dogger Bank D

(Interested Party Number: 20050150)