

4th July 2025

Closing Statement on behalf of Albanwise Ltd and Albanwise Synergy Ltd
Interested Party References: DGBS-AFP156 and DGBS-AFP162

With respect to the Application by RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited for an Order Granting Development Consent for the Dogger Bank South Offshore Wind Farms

Submitted to The Examining Authority via DoggerBankSouth@planninginspectorate.gov.uk

We submit this Closing Statement on behalf of Albanwise Ltd and Albanwise Synergy Ltd (herein referred to collectively as Albanwise) in relation to the Examination of the Dogger Bank South Offshore Wind Farms Development Consent Order (DCO) application.

1. Summary of Involvement

Albanwise has actively participated in the Examination process, submitting:

- A Relevant Representation dated 6 September 2024, objecting to the proposed scheme on grounds of land use, farming impact and cumulative development constraints.
- Submission of Written Representations on 31 January 2025 reiterating the concerns raised in the Relevant Representation.
- Attendance and oral representation at Compulsory Acquisition Hearing 2 on 4 April 2025.
- Submission of written responses to the Examining Authority's ExQ1 questions (LUA 1.6 and 1.9) on 25 April 2025, detailing concerns around land sterilisation, restrictive covenants and the broader development potential of our land holdings.
- A further submission on 13 June 2025 in response to a Rule 17 Request for Information, providing an update on the status of negotiations with RWE.

2. Update on Negotiations

On 2 July representatives of Albanwise met with RWE to progress negotiations on the voluntary land agreements. Heads of Terms (HoTs) for the converter station land agreement were agreed and signed during this meeting. This represents a significant milestone in our engagement with RWE.

However, Heads of Terms for the cable easement agreement remain unresolved and discussions on this matter continue. While we welcome the recent progress, we must emphasise that Heads of Terms are not legally binding and, until full legal agreements are executed, none of the commitments or assurances discussed can be considered enforceable.

Regarding the response provided by RWE in REP6-080: R17.45, in Document 17.4¹ RWE's summary is not a fair and reasonable overview of how negotiations have progressed. It is

¹ 17.4 The Applicants' Responses to Deadline 6 Document, dated 27 June 2025

unduly selective which creates a deeply misleading impression to a third-party reader. Albanwise and its advisers have given serious consideration to the proposals put forward and identified deliverable means to RWE by which the aims of RWE (e.g. vacant possession of the land) can be delivered without undue detriment to Albanwise. However, even on 2 July RWE had not engaged agricultural specialists to advise them on the effectiveness of the approach we outlined.

On the 2nd, when HoTs were finally agreed, RWE sought material changes to the terms we had signed and returned on 6 May. The level of engagement has been intermittent from RWE throughout this process, especially over the last 18 months covering the Heads of Terms for the converter stations. There has also been considerable chopping and changing of the proposed structure by RWE which has forced Albanwise to incur significant costs in assessing the impact of different proposals.

3. Outstanding Issues

Our concerns regarding on the project which we are seeking to protect with the voluntary agreements being negotiated are:

- The form, scope and changing nature of land rights being sought and the form of agreements being negotiated.
- The scale and configuration of land take, including excessive land occupation and the blighting of land beyond that contained within the proposed agreement.
- The impact on the long-term livelihoods of our agricultural tenants due to short term construction operations.
- The impact on farming operations including soil quality, drainage, crop yields, and environmental land management schemes.
- The cumulative impact of this and other NSIPs on our estate, and the lack of coordination between developers.
- Given the very slow pace of negotiations to date the lack of binding legal agreements to secure the protections and mitigations discussed is a grave concern.

4. Conclusion

Albanwise continues to object to the DCO application in its current form. We urge the Examining Authority to give due weight to the unresolved issues and the disproportionate burden placed on our landholdings and operations. Should the DCO be granted, we request that:

- Protective provisions be included to safeguard our interests.
- RWE be required to finalise voluntary agreements
- The Examining Authority acknowledges the cumulative and long-term impacts on our land holdings and tenants.

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