



Dated 10 July 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 9

1 Introduction

- 1.1 This submission is made at Deadline 9 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**];
 - (d) Written Representation dated 13 June 2025 (incorporating NGT's response to Rule 17 Letter dated 9 June 2025) [**REP6-066**] (NGT's D6 Submission); and
 - (e) Written Representation dated 25 June 2025 [**REP7-149**]; and
 - (f) Closing Statement dated 3 July 2025 [**REP8-050**],
- (together the **NGT Submissions**).

2 Summary of NGT's position

- 2.1 NGT's position firmly remains as set out in detail in the NGT's Submissions and in particular in NGT's D6 Submission: that only the NGT PPs (a copy of which are included at **Appendix 2** of **NGT's Written Representation**) will provide sufficient protection for existing assets and interests as well as compliance with relevant safety standards.
- 2.2 The Applicant has included a set of protective provisions for the benefit of NGT in the draft form of Order submitted at Deadline 7 [**REP7-011**] (**D7 PPs**). The comments made in NGT's D6 Submission continue to apply in relation to the D7 PPs and NGT considers that the D7 PPs do not provide sufficient protection for NGT. The Applicant has failed to provide adequate explanation or evidence as to why the NGT PPs should not be included in the draft Order.
- 2.3 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

10 July 2025