

**Dated 5 December 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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**RESPONSE TO REQUEST FOR INFORMATION FROM THE  
SECRETARY OF STATE DATED 6 NOVEMBER 2025  
submitted on behalf of National Gas Transmission plc**

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## 1 Introduction

1.1 This submission is made 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 (**Applicant**) 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 On 6 November 2025, the Secretary of State issued a request for information to interested parties, including NGT. At paragraph 32, the Secretary of State provided that:

*“In the document 10.4 Land Rights Tracker (Revision 9), submitted by the Applicants on 14 October 2025, it is stated that negotiations remain ongoing with NGT and NRI with regard to Protective Provisions. **The Applicants, NGT and NRI are requested to provide an update on whether agreement has been reached on the form of their respective Protective Provisions, and if not, when agreement is expected.**”*

1.3 This submission responds to that request for information and 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**];
- (f) Closing Statement dated 3 July 2025; [**REP8-050**],
- (g) Post-Examination submission dated 10 October 2025 (**Post-Examination Submission**),

(together the **NGT Submissions**).

## 2 Summary of NGT's position

2.1 Negotiations have not progressed beyond the position reached on 25 July 2025 being the date on which the Applicant confirmed that it would not engage on the protective provisions to be included in the Order for the benefit of NGT (**NGT Protective Provisions**) unless NGT was willing to agree to the removal of 'acceptable security'.

2.2 NGT has attempted to reach an agreed position with the Applicant since this date, providing significant justification as to why inclusion of 'both 'acceptable insurance' and 'acceptable security' is both necessary and well-precedented (see in particular the justification set out in the Post-Examination Submission). However, the Applicant has refused to consider the merit of these arguments and from 25 July 2025 ceased to engage on the NGT Protective Provisions in totality.

- 2.3 NGT is disappointed by the Applicant's failure to engage on the NGT Protective Provisions to reach an agreed position and considers it contrary to the spirit of the Examination process.
- 2.4 NGT's position must therefore firmly remain as set out in detail in the NGT Submissions and in particular in NGT's D6 Submission: that only the NGT Protective Provisions (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.

### **3 Conclusion**

- 3.1 Since an agreed position has not been reached with the Applicant, 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**

**5 December 2025**