

16 MARCH 2026

DOGGER BANK SOUTH OFFSHORE WIND FARM PROJECTS (DBS PROJECTS)

**RESPONSE TO THE SECRETARY OF STATE'S FOURTH CONSULTATION DATED 6
MARCH 2026**

on behalf of

**DOGGER BANK OFFSHORE WIND FARM PROJECT 1 PROJCO LIMITED, DOGGER
BANK OFFSHORE WIND FARM PROJECT 2 PROJCO LIMITED AND DOGGER BANK
OFFSHORE WIND FARM PROJECT 3 PROJCO LIMITED**

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SECRETARY OF STATE'S FOURTH CONSULTATION

DOGGER BANK OFFSHORE WIND FARM PROJECT 1 PROJCO LIMITED, DOGGER BANK OFFSHORE WIND FARM PROJECT 2 PROJCO LIMITED AND DOGGER BANK OFFSHORE WIND FARM PROJECT 3 PROJCO LIMITED

1. INTRODUCTION

- 1.1 Dogger Bank Offshore Wind Farm Project 1 Projco Limited (**DBA Projco**) is a statutory undertaker for the purposes of the Planning Act 2008. DBA Projco has the benefit of development consent for the Dogger Bank A Offshore Wind Farm (**DBA**) which was granted pursuant to The Dogger Bank Creyke Beck Offshore Wind Farm Order 2015 as amended (the **DBA/DBB DCO**).
- 1.2 Dogger Bank Offshore Wind Farm Project 2 Projco Limited (**DBB Projco**) is a statutory undertaker for the purposes of the Planning Act 2008. DBB Projco has the benefit of development consent for the Dogger Bank B Offshore Wind Farm (**DBB**) which was granted pursuant to the DBA/DBB DCO.
- 1.3 Dogger Bank Offshore Wind Farm Project 3 Projco Limited (**DBC Projco**) is a statutory undertaker for the purposes of the Planning Act 2008. DBC Projco has the benefit of development consent for the Dogger Bank C Offshore Wind Farm (**DBC**) which was granted pursuant to The Dogger Bank Teesside A and B Offshore Wind Farm Order 2015 as amended (the **DBC DCO**).
- 1.4 DBA, DBB and DBC are due to commence commercial operation between 2025 and 2027 and so will be operational before construction of the Dogger Bank South (**DBS**) projects commence.
- 1.5 DBA Projco, DBB Projco and DBC Projco (together the **Projco IPs**) submitted a consultation response on 6 December 2025 (the **Projco IPs' First Consultation Response**) in response to the Secretary of State's first consultation letter dated 6 November 2025 (the **First Consultation**).
- 1.6 The Projco IPs submitted a consultation response on 30 January 2026 (the **Projco IPs' Second Consultation Response**) in response to the Secretary of State's second consultation letter dated 16 January 2026 (the **Second Consultation**) in respect of the National Policy Statements (**NPS**) designated on 6 January 2025 (the **2025 NPS**) which consider the current NPSs (the **2024 NPS**) and the supplementary guidance for renewable energy infrastructure (EN-3): Offshore wind wake effects (the **EN-3 Guidance**) which accompanies the 2025 NPSs. The Projco IPs submitted a consultation response on 6 March 2026 (the **Projco IPs' Third Consultation Response**) in response to the Secretary of State's second consultation letter dated 5 February 2026 (the **Third Consultation**) in respect of comments on documents submitted in the post-examination stage.
- 1.7 The Projco IPs are making this submission in response to the Secretary of State's letter dated 6 March 2026 (the **Fourth Consultation Letter**). The Third Consultation Letter seeks comments on documentation submitted at the decision stage.

2. PROJCO IPS' RESPONSE

- 2.1 There are separate agreements proposed between the relevant Projco IPs and the Applicant in respect of: RWE Renewables UK Dogger Bank South East Limited (**DBSEL**) and the Dogger Bank South East Project (**DBSE**); and, RWE Renewables UK Dogger Bank South West Limited (**DBSWL**) and the Dogger Bank South West Project (**DBSW**).

- 2.2 The agreements between the Applicant and the Projco IPs will comprise the following:
- 2.2.1 onshore crossing agreement between the DBSEL and the DBA Projco to regulate the crossing of the DBA electricity transmission cable by the DBSE projects' assets;
 - 2.2.2 onshore crossing agreement between the DBSWL and the DBA Projco to regulate the crossing of the DBA electricity transmission cable by the DBSW projects' assets;
 - 2.2.3 onshore crossing agreement between the DBSEL and the DBB Projco to regulate the crossing of the DBB electricity transmission cable by the DBSE projects' assets;
 - 2.2.4 onshore crossing agreement between the DBSWL and the DBB Projco to regulate the crossing of the DBB electricity transmission cable by the DBSW projects' assets (together the **onshore crossing agreements**);
 - 2.2.5 offshore proximity agreement between the DBSEL and the DBA Projco to regulate the proximity of the DBSE projects' assets with the DBA electricity transmission cable;
 - 2.2.6 offshore proximity agreement between the DBSWL and the DBA Projco to regulate the proximity of the DBSW projects' assets with the DBA electricity transmission cable;
 - 2.2.7 offshore proximity agreement between the DBSEL and the DBB Projco to regulate the proximity of the DBSE projects' assets with the DBB electricity transmission cable; and
 - 2.2.8 offshore proximity agreement between the DBSWL and the DBB Projco to regulate the proximity of the DBSW projects' assets with the DBB electricity transmission cable (together the **offshore proximity agreements**).
- 2.3 The onshore crossing agreements in respect of DBA and DBB were completed on 2 July 2025.
- 2.4 The offshore proximity agreements in respect of DBA and DBB are currently being negotiated by the Applicant and the respective Projco IP. However, the offshore proximity agreements have not yet completed.
- 2.5 The DBA Projco is currently going through the offshore transmission owner (**OFTO**) transfer process in respect of the transmission assets associated with DBA as required by the Electricity Act 1989 and the Electricity (Competitive Tenders for Offshore Transmission Licences) Regulations 2015. This is part of the OFTO Tender Round 10. As part of that process, and because the agreements relate to the electricity transmission assets, the DBA Projco has sought the approval of the proposed OFTO asset owner who will acquire the electricity transmission assets.
- 2.6 The Government has made The Electricity (Individual Exemption from the Requirement for a Transmission Licence) (Dogger Bank A) Order 2025 (the **Exemption Order**) which came into force on 10 February 2025 and which was amended by The Electricity (Individual Exemption from the Requirement for a Transmission Licence) (Dogger Bank A) (Amendment) Order 2025 (the **Amendment Order**) to reflect the fact that the transfer of the transmission assets from DBA to the OFTO has not yet taken place.
- 2.7 The Exemption Order (as amended by the Amendment Order) grants the DBA Projco an exemption from section 4(1)(b) of the Electricity Act 1989 in respect of transmission taking place over the transmission system connected to DBA. The exemption ends on the earlier of:
- 2.7.1 the day after the day on which the transmission system connected to DBA is transferred to a successful bidder; or
 - 2.7.2 18 December 2026.

- 2.8 The DBB Projco will also be going through the OFTO transfer process in respect of transmission assets associated with DBB. This is part of the OFTO Tender Round 11.
- 2.9 The Projco IPs can provide an update before 30 April 2026.

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