

CONSULTATION RESPONSE - OUTER DOWSING OFFSHORE WIND FARM (EN010130)

To: outerdowsingoffshorewind@planninginspectorate.gov.uk

From: Edward Daniels, Plant Manager

Organisation: Spalding Energy Company, Ltd (**SECL**) and Spalding Energy Expansion Ltd (**SEEL**), together **InterGen**

Date: 17th October 2025

Subject: EN010130 - Outer Dowsing Offshore Wind Farm - All Interested Parties Consultation Response

Dear Sir or Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by GT R4 Limited for an Order granting Development Consent for the proposed Outer Dowsing Offshore Wind Farm

1. INTRODUCTION

This response is submitted on behalf of InterGen in response to the Secretary of State's consultation letter dated 6 October 2025 regarding the above application.

InterGen operates critical natural gas pipeline infrastructure in the area that may be affected by the proposed development, specifically the new/modified transmission cable routes and/or new Weston Marsh substation(s) associated with the Outer Dowsing Offshore Wind Farm.

2. INTERESTS

InterGen owns and operates a 950MW CCGT and 300MW OCCT in Spalding, Lincolnshire, which are supplied with natural gas by a common 16" cross-country gas pipeline of length 7.2km and Maximum Operating Pressure of 75barg. The pipeline route runs from an Above Ground Interface (AGI) at Wragg Marsh to the Gas Reception Facility (GRF) adjacent to West Marsh Road in Spalding. Full details of the pipeline route are given in drawings 9622-PL-001 to 008, attached to this letter.

Our pipeline infrastructure is essential for power generation and operates under strict safety and regulatory requirements.

We have rights and obligations regarding the protection of our pipeline infrastructure.

3. SPECIFIC CONCERNS REGARDING THE PROPOSED DEVELOPMENT

Cable Route Interference: Based on the application materials, we understand that transmission cables from the offshore wind farm may cross or run in proximity to our existing gas pipeline infrastructure.

Siting of Substation(s): We also understand that new substation(s) associated with the offshore wind farm may be built in the Weston Marsh area in proximity to our existing gas pipeline infrastructure.

Safety Implications: Any interference with or proximity to our gas pipeline raises significant safety concerns that must be addressed in accordance with:

- Health and Safety Executive (HSE) guidance;
- Institution of Gas Engineers and Managers (IGEM) standards;

- Gas Safety (Management) Regulations 1996; and
- Pipeline Safety Regulations 1996.

This must include but not be limited to mitigation of:

- the increased corrosion potential due to electromagnetic induction from the proximity of new/modified overhead transmission cables
- ground investigations or excavations that disturb our underground infrastructure such as the pipeline itself, it's coatings or its cathodic protection systems,
- disturbance of above ground infrastructure such as pipeline markers cathodic protection test points, and
- construction traffic movements over the buried pipeline and associated infrastructure.

Operational Continuity: Our pipeline operations must be maintained without interruption during construction and operation of the proposed wind farm.

4. INFORMATION REQUESTS

We request that the Applicant provide:

- a. detailed cable routing plans showing precise proximity to our gas pipeline;
- b. detailed siting plans for new substation(s)
- c. geotechnical survey data at any proposed crossing points;
- d. construction site access plans including planned vehicle routes;
- e. construction methodology for substation or cable installations near or across our pipeline;
- f. risk assessment addressing potential impacts on gas pipeline safety and integrity;
- g. emergency response procedures during construction and operation; and
- h. maintenance access arrangements ensuring continued pipeline operation, maintenance and inspection.

We require confirmation of minimum separation distances that will be maintained between transmission cables and our pipeline infrastructure.

5. REQUIRED SAFEGUARDS AND COMMITMENTS

Protective Provisions: We request that any Development Consent Order includes specific protective provisions safeguarding our pipeline operations and covering the cost of any protective works that are required to be undertaken.

Crossing Agreements: If transmission cables will cross our pipeline, formal crossing agreements must be executed prior to construction commencing.

Direct Consultation: We require ongoing direct engagement between the Applicant and InterGen throughout:

- a. detailed design development;
- b. construction planning and execution; and
- c. operational phases affecting our infrastructure.

Technical Standards: All work near our pipeline must comply with relevant technical standards and be subject to our technical approval.

6. REGULATORY COMPLIANCE

The Applicant must demonstrate compliance with all relevant pipeline safety legislation and HSE guidance before any works commence near our infrastructure.

We reserve the right to require independent safety assessments and third-party verification of any proposed construction methodologies.

7. ONGOING ENGAGEMENT

We welcome early and ongoing dialogue with the Applicant to address these concerns and develop appropriate technical solutions.

We request to be consulted on all detailed design elements that may affect our pipeline infrastructure.

We seek commitment for regular liaison meetings during the construction phase.

8. CONCLUSION

InterGen does not object in principle to the proposed Outer Dowsing Offshore Wind Farm, provided that:

- a. our legitimate concerns regarding pipeline safety and operational integrity are adequately addressed;
- b. appropriate protective provisions are included in any Development Consent Order;
- c. formal agreements are executed covering any pipeline crossings or proximity issues;
- d. ongoing consultation arrangements are established; and
- e. our reasonable costs (including all advisory and legal) related to this matter throughout consultation & development, design, construction and operations are borne in full by or on behalf of the Applicant.

We look forward to constructive engagement with the Applicant to resolve these matters satisfactorily.

We reserve the right to make further representations as additional information becomes available.

Yours faithfully,



Edward Daniels, Plant Manager
Spalding Energy Company, Ltd
Spalding Energy Expansion Ltd

Contact Details:
Spalding Power Station

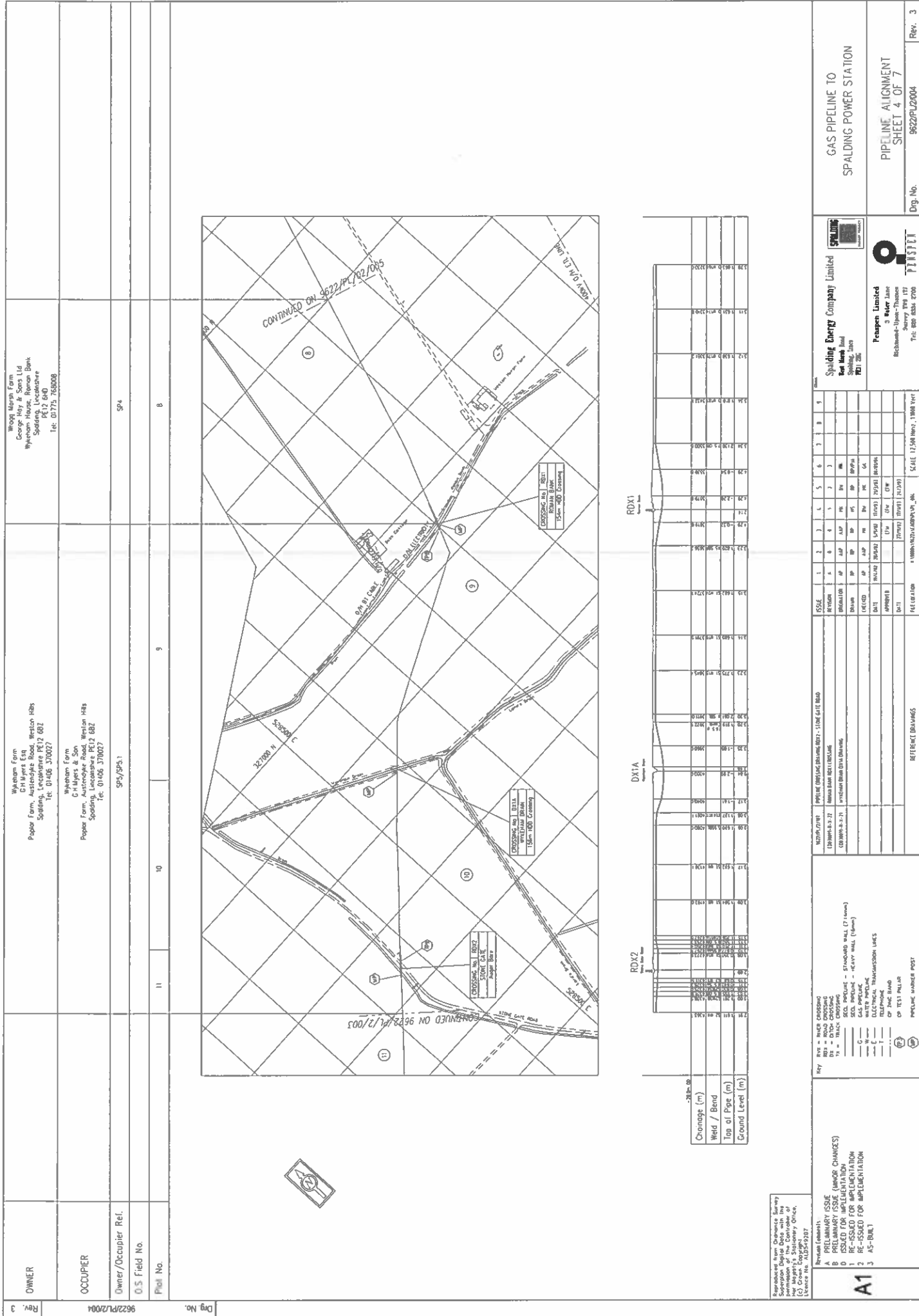


Email: @intergen.com

Phone: 

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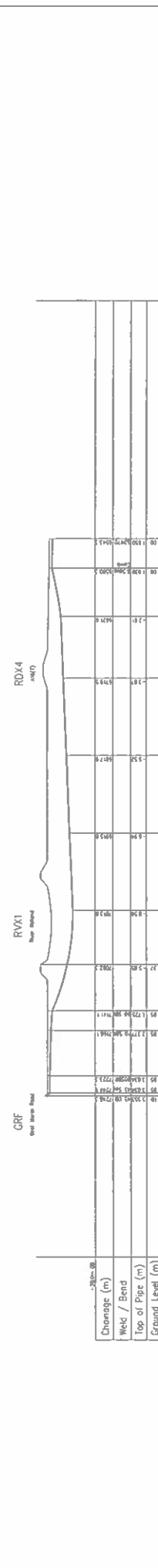
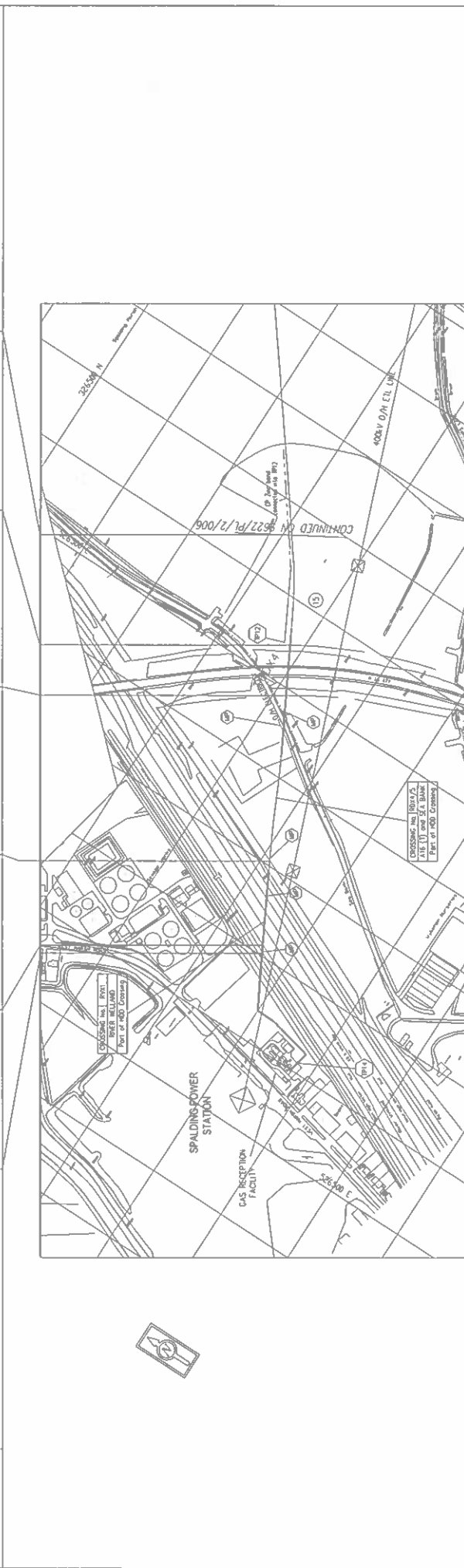
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OWNER		Bark at River Woodard The Crown Estate, Marine Estates c/o W R Smith Ltd FRICS Carter Jones, 6-8 Hils Road Leicester LE1 7JD Tel: 01924 627495	River Woodard Environment Agency Planning & Customer Services Waterwise Hse., Waterwise North Leicester LE1 7JG Tel: 01522 531100	The Crown Estate, Agricultural Estates c/o T E Jones Esq MRICS Carter Jones, 6-8 Hils Road Leicester LE1 7JD Tel: 01223 368371	AH(I) Trust Road in Duncan Fry Estates Manager, Highway Agency Broadway, Broad Street Birmingham B4 5 1BL Tel: 00459 356575	Horne Farm, Wykeham The Crown Estate, Agricultural Estates c/o T E Jones Esq MRICS Carter Jones, 6-8 Hils Road Leicester LE1 7JD Tel: 01223 368371	Horne Farm, Wykeham The Crown Estate, Agricultural Estates c/o T E Jones Esq MRICS Carter Jones, 6-8 Hils Road Leicester LE1 7JD Tel: 01223 368371
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Owner/Occupier Ref.	SPT	SPTa	SPTa/SPTa.2	SPTa/SPTa.2	SPTa	SPTa/SPTa.2	SPTa/SPTa.2
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	3	RE-ISSUED FOR IMPLEMENTATION
	2	RE-ISSUED FOR IMPLEMENTATION
	1	RE-ISSUED FOR IMPLEMENTATION
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	B	PRELIMINARY ISSUE (MINOR CHANGES)
	A	PRELIMINARY ISSUE
	Revision Comments	

Key	RW = ROAD CROSSING	SECT. POINT	PIPELINE
NOX = NO. OF LANE CROSSING	GAS PIPELINE		
DR = DITCH CROSSING	WATER PIPELINE		
Tn = TRAIL CROSSING	ELECTRIC LINE		
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GAS PIPELINE TO
SPALDING POWER STATION

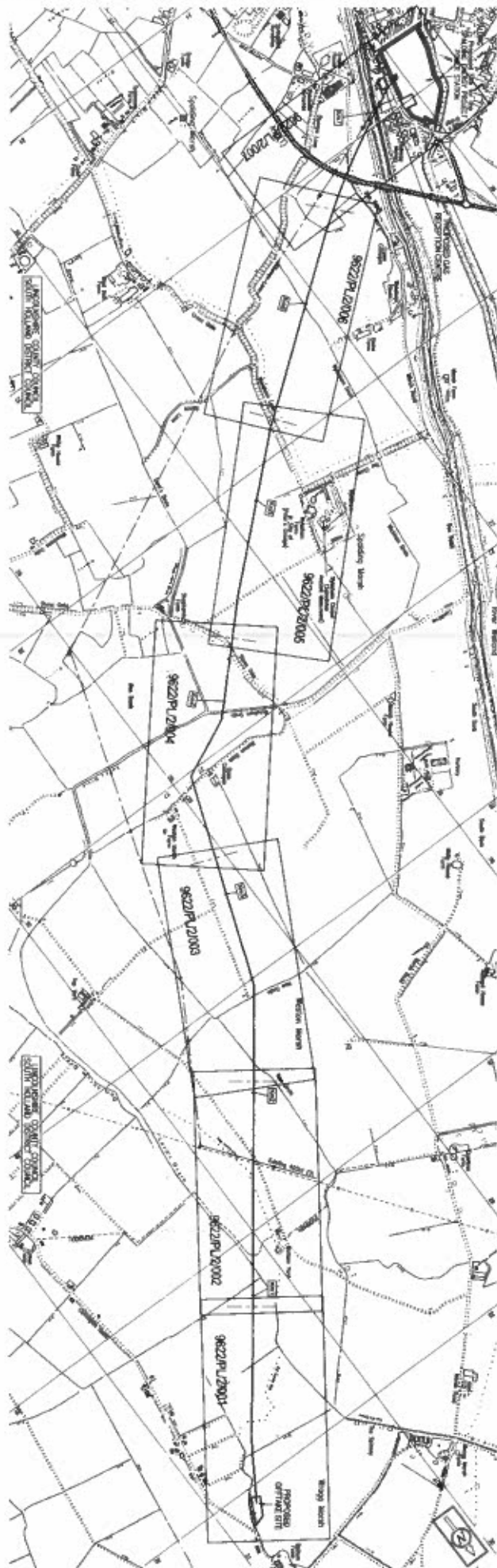
Spalding Energy Company Limited

PIPELINE ALIGNMENT
SHEET 7 OF 7

Peaspen Limited
3 Water Lane
Richmond-Upon-Thames
Surrey TW9 1ZZ
Tel: 020 8334 2700

Drg. No.,

Rev. 4



A1
 1. PRELIMINARY ISSUE (WORK CHANGES)
 2. PRELIMINARY ISSUE (WORK CHANGES)
 3. ISSUED FOR APPROVAL
 4. ISSUED FOR APPROVAL

PROPOSED PIPELINE ROUTE

REVISION	DATE	BY	CHKD	DESCRIPTION
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14	10/10/08	10/10/08	10/10/08	10/10/08
15	10/10/08	10/10/08	10/10/08	10/10/08
16	10/10/08	10/10/08	10/10/08	10/10/08
17	10/10/08	10/10/08	10/10/08	10/10/08
18	10/10/08	10/10/08	10/10/08	10/10/08
19	10/10/08	10/10/08	10/10/08	10/10/08
20	10/10/08	10/10/08	10/10/08	10/10/08

Spalding Energy Company Limited
 1. Gas Pipeline to
 Spalding Power Station
 Key Plan
 10/10/08

GAS PIPELINE TO
 SPALDING POWER STATION
 KEY PLAN
 10/10/08