

**RWE**

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**RWE Renewables UK Dogger Bank  
South (West) Limited**

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South (East) Limited**

# **Dogger Bank South Offshore Wind Farms**

**Environmental Statement**

**Volume 7**

**Chapter 2 - Need for the Project**

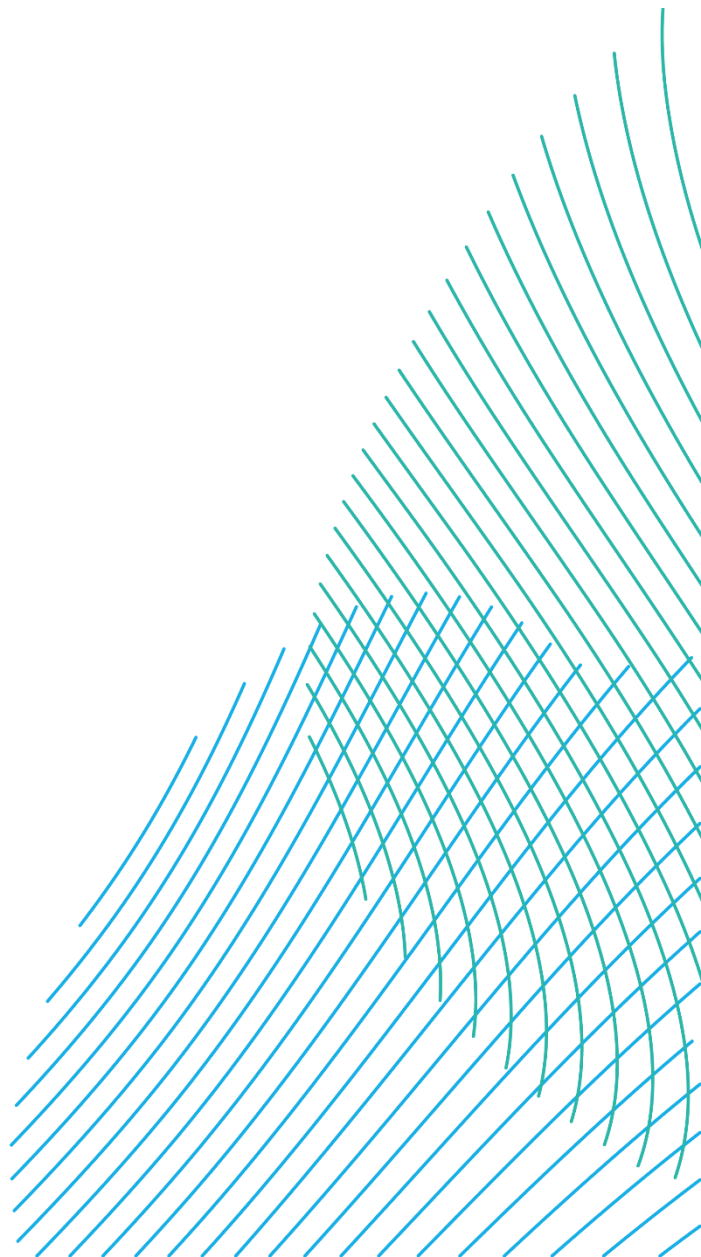
**June 2024**

**Application Reference: 7.2**

**APFP Regulation: 5(2)(a)**

**Revision: 01**

**Unrestricted**



Company:	<b>RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited</b>	Asset:	<b>Development</b>
Project:	<b>Dogger Bank South Offshore Wind Farms</b>	Sub Project/Package:	<b>Consents</b>
Document Title or Description:	Environmental Statement- Chapter 2 - Need for the Project		
Document Number:	004300142-01	Contractor Reference Number:	PC2340-RHD-XX-ZZ-RP-Z-0085

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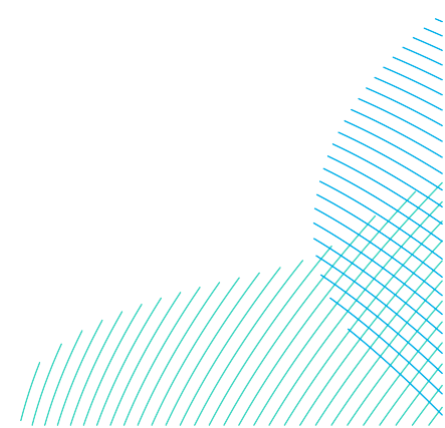
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<b>Rev No.</b>	<b>Date</b>	<b>Status/Reason for Issue</b>	<b>Author</b>	<b>Checked by</b>	<b>Approved by</b>
01	June 2024	Final for DCO Application	RHDHV	RWE	RWE

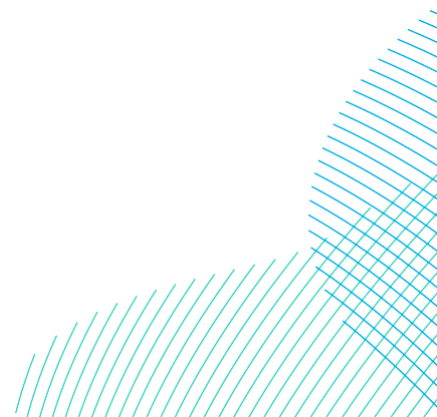


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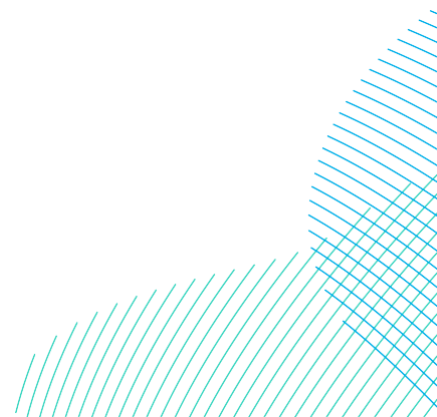
## Glossary

Term	Definition
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Dogger Bank South (DBS) Offshore Wind Farms	The collective name for the two Projects, DBS East and DBS West.
National Policy Statement (NPS)	A document setting out national policy against which proposals for NSIPs will be assessed and decided upon.
Nationally Significant Infrastructure Project (NSIP)	Large scale development including power generating stations which requires development consent under the Planning Act 2008. An offshore wind farm project with a capacity of more than 100 MW constitutes an NSIP.
The Applicants	The Applicants for the Projects are RWE Renewables UK Dogger Bank South (East) Limited and RWE Renewables UK Dogger Bank South (West) Limited. The Applicants are themselves jointly owned by the RWE Group of companies (51% stake) and Masdar (49% stake).
The Projects	DBS East and DBS West (collectively referred to as the Dogger Bank South offshore wind farms).



## Acronyms

Term	Definition
BEIS	Department for Business, Energy and Industrial Strategy now succeeded by the Department for Energy Security and Net Zero
CCUS	Carbon Capture, Usage and Storage
CfD	Contracts for Difference
COP	Conference of the Parties
DBS	Dogger Bank South
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
DESNZ	Department for Energy Security and Net Zero
ES	Environmental Statement
GHG	Greenhouse Gas
GW	Gigawatt
IPCC	Intergovernmental Panel on Climate Change
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
UK	United Kingdom
UKCCC	UK Climate Change Committee



## 2 Need for the Project

### 2.1 Introduction

1. This chapter of the Environmental Statement (ES) describes the importance of the Dogger Bank South (DBS) East and DBS West Offshore Wind Farms ('the Projects') in meeting United Kingdom (UK) policy commitments and legal decarbonisation targets for renewable energy and the wider policy objectives for future UK decarbonisation, energy security and the delivery of economic benefits.
2. The UK Government recognises that electricity generation from renewable sources is an important element in the Government's development of a low-carbon economy. The need for electricity-generating Nationally Significant Infrastructure Projects (NSIPs), including offshore wind farms, is highlighted by the relevant National Policy Statements (NPSs) (see section 2.2 of this chapter). The Overarching NPS for Energy EN-1 (Department for Energy Security & Net Zero (DESNZ), 2023a)) emphasises at section 3.3, paragraph 3.3.58, the need for the rapid development of new electricity NSIPs, stipulating that:  
*"Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy"*.
3. As discussed in **Volume 7, Chapter 1 Introduction (application ref: 7.1)**, the Projects would contribute towards the UK Government meeting the overarching key national policy aims of:
  - Achieving Net Zero by 2050 and reducing emissions (see section 2.3.1 of this chapter);
  - Increasing the security of energy supply (see section 2.3.2 of this chapter);
  - Lowering the cost and increasing the affordability of generated electricity (section 2.3.3 of this chapter); and
  - Contributing to sustainable development and economic opportunities (section 2.3.4 of this chapter).
4. Many UK policies and decarbonisation targets are in line with international commitments and conventions. Further relevant policies and legislation relating to the Projects are detailed in **Volume 7, Chapter 3 Policy and Legislative Context (application ref: 7.3)**.

## 2.2 National Policy Statements

### 2.2.1 Overview

5. NPSs are produced by the UK Government and set out national policies against which proposals for NSIPs will be assessed. The Examining Authority will have regard to NPSs in its examination of applications for Development Consent Orders (DCOs). The Secretary of State must decide on the application in accordance with applicable NPSs.
6. Three of the energy infrastructure NPSs produced by the (now) Department for Energy and Net Zero are relevant to the Projects, being:
  - Overarching NPS for Energy (EN-1) (DESNZ, 2023a);
  - NPS for Renewable Energy Infrastructure (EN-3), (DESNZ, 2023b); and
  - NPS for Electricity Networks Infrastructure (EN-5), (DECC, 2023c).
7. NPS EN-1, EN-3 and EN-5 have been revised. A draft version of each NPS was published for consultation in September 2021, which closed in November 2021 (BEIS, 2021). Further updated drafts of the NPSs were published for consultation feedback in March 2023, with consultation ending in June 2023 (DESNZ, 2023d). The NPSs were subsequently laid before Parliament in November 2023 as the final stage before formal designation, with the energy NPSs receiving designation by the Secretary of State for Energy and Climate Change in January 2024.
8. The November 2023 NPSs include several key changes and new considerations since 2011 in light of new policy documents and regulations (e.g., The Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017) and environmental and renewable targets (e.g., the amended 2050 emissions reduction target introduced by the Climate Change Act 2008 (2050 Target Amendment) Order 2019).
9. The November 2023 NPSs also include references to plans to decarbonize the UK's economy and strategies to ensure energy security and a reduction in the cost of energy for consumers. The November 2023 NPSs highlight the need for diversification of the energy-generating infrastructure to include a mix of sources to help the transition to net zero.
10. The November 2023 NPSs identify the need and urgency for new energy infrastructure, with action required over the next decades in order for the identified needs to be met. The need for the Projects is therefore fundamentally supported by the case presented within NPS EN-1. Further information on how the NPSs relate to the Projects can be found in **Volume 7, Chapter 3 Policy and Legislative Context (application ref: 7.3)**.



## 2.3 Need for Renewable Energy

### 2.3.1 Climate Change and Greenhouse Gases

11. As quoted in the EN-1 (paragraph 2.2.1), November 2023, “In June 2019, the UK became the first major economy to legislate for a 2050 net zero greenhouse gas (GHG) emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. In December 2020, the UK communicated its Nationally Determined Contribution to reduce GHG emissions by at least 68 per cent from 1990 levels by 2030. In April 2021, the Government legislated for the sixth carbon budget (CB6), which requires the UK to reduce GHG emissions by 78 per cent by 2035 compared to 1990 levels.”
12. According to the UK Climate Change Committee’s (CCC) ‘Balanced Pathway’ approach to achieving Net Zero by 2050, the deployment of low-cost renewables would need to account for 75% - 90% of electricity demand in 2050.
13. In April 2022, the UK Government published the British Energy Security Strategy (BEIS and Prime Minister's Office, 2022). The strategy sets out an ambition to deliver an increased target of up to 50 Gigawatt (GW) of offshore wind by 2030. The Projects would make a significant contribution to the UK's aim of reducing carbon emissions and achieving this target. Based on an estimated capacity of 3GW once fully operational, the DBS Projects could be capable of generating enough electricity to meet the average annual domestic energy needs of around 3 million typical UK homes<sup>1</sup>.
14. Climate change is a major contributor to global temperatures. The Met Office recorded the seven highest annual average temperatures since 2015; with the four highest being in 2016, 2019, 2020 and 2022 (Met Office, 2022). In 2022, the UK recorded both the highest (40.3°C) and the fourth highest (38.1 °C) national temperatures on record. The UK Climate Change Committee (UK CCC) states that this could have additional effects on healthcare and education within a national setting (UK CCC, 2022a/b).

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<sup>1</sup> Calculation based on 2021 generation, and assuming average (mean) annual household consumption of 3,509 kWh, based on latest statistics from Department of Energy Security and Net Zero (Subnational Electricity and Gas Consumption Statistics Regional and Local Authority, Great Britain, 2021, Mean domestic electricity consumption (kWh per meter) by country/region, Great Britain, 2021

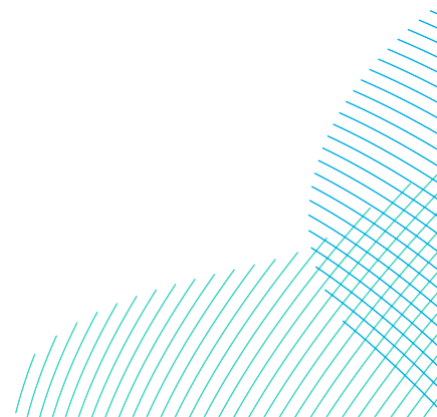


15. The sixth assessment report from the Intergovernmental Panel on Climate Change (IPCC, 2021) lists a number of climate impacts, including:
  - Impacts on human health and mortality;
  - Deterioration of ecosystem structure and function;
  - Socioeconomic consequences;
  - Species extinctions; and
  - Reduced food and water security.
16. At a local level, the East Riding of Yorkshire Council published its Climate Change Strategy in 2022 (East Riding of Yorkshire Council, 2022), identifying the Humber region as a flagship region for wind power. The Strategy supports the development of wind power projects and highlights a need to “*Plan energy infrastructure developments efficiently*”.
17. The international and UK legislation that has been put in place to secure a reduction in emissions is outlined in **Volume 7, Chapter 3 Policy and Legislative Context (application ref: 7.3)**.

## 2.3.2 Energy Security

18. Energy security relates to ensuring secure, reliable, uninterrupted supplies to consumers, and having an energy generation and transmission system that can effectively and efficiently respond and adapt to changes. It is made up of three characteristics: flexibility, adequacy, and resilience (BEIS, 2017).
19. NPS EN-1 recognises that it is critical that the UK continues to have secure, reliable, affordable electricity supplies, consistent with net zero as the transition to a low-carbon economy is made. The November 2023 NPS, states that “**3.2.6 The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part.** EN-1 at paragraph 3.2.7 also states that the Secretary of State should: “**give substantial weight to the contribution which projects would make towards satisfying this need when considering applications for development consent** under the Planning Act 2008. 3.2.8 *The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.*” (emphasis added).
20. The UK Government recognises the importance to businesses and households of access to an affordable, secure, and sustainable supply of energy and the importance of this is set out in the Energy White Paper (BEIS, 2020).

21. The British Energy Security Strategy Policy Paper highlights the need to address our underlying vulnerability to international oil and gas prices by reducing our dependence on imported oil and gas. Furthermore, that the efficiency of this transition is based on the delivery of renewable projects to reduce exposure to volatile fossil fuel markets. The paper details the UK Government's 'Ten-point plan for a green industrial revolution', together with the 'Net zero strategy' with the intention that the Energy Strategy should drive initiatives to ensure the UK is far more self-sufficient in generating its own energy from UK renewable energy sources into the future. The Strategy is aimed at driving an unprecedented £100 billion of private sector investment by 2030 into new UK industries including offshore wind and supporting around 480,000 clean jobs by the end of the decade.
22. Compounding the UK's underlying vulnerability to international oil and gas prices is the fact that many of the UK's older fossil fuel and nuclear plants have either reached the end of their operational life span, are no longer economical to run, and / or do not meet legal air quality limits. Closure of fossil fuel generators and nuclear plants, most notably coal and nuclear, is expected to intensify by 2025 (BEIS, 2018).
23. The development of the Projects would help to counteract these losses of energy by generating clean, sustainable, and secure energy from within the UK, working towards meeting the UK's needs for greater energy demand. This includes contributing to meeting the UK Government's ambition set out in the 2022 British Energy Security Strategy to deliver up to 50GW of offshore wind by 2030.
24. In addition, the development of the Projects, as part of the UK's energy transition would contribute towards the UK achieving the target of net zero GHG emissions by 2050 and help to alleviate the priority risks associated with climate change such as flooding, water supply shortages and risks to health, food security and productivity and trade.



## 2.3.3 Energy Affordability

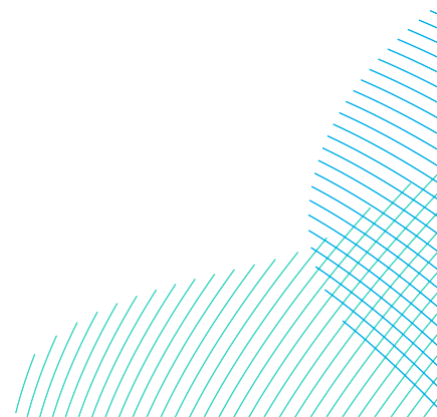
25. The UK CCC's report Net Zero (2019), notes that there is potential that the acceleration of the global action to cut emissions will also play a key role in the United Nation's Sustainable Development Goal of ending poverty in all its forms, zero global hunger and affordable and clean energy for all. Governments are aiming to achieve the Sustainable Development Goals by 2030, and many are directly or indirectly affected by the state of the global climate system. The development of renewable energy industries in the UK can alter the reliance on imported fossil fuels, creating self-sufficient energy markets that may be less impacted by wholesale energy price increases and the record household energy bill increase that followed the energy price cap increase in 2022 (UK Parliament, 2022).
26. The UK is a world leader in offshore wind with plans to increase investment and generation capacity to meet the UK Government's 2030 50GW target. To achieve GHG and decarbonisation targets and energy security, renewable energy must be affordable. Ongoing improvements in turbine technology and operations and maintenance processes and the existing "Up to £320 million in government support for fixed bottom and floating wind ports and infrastructure" (BEIS and Prime Minister's Office, 2022) will help manage costs effectively. Innovations have resulted in a significant reduction in energy costs from offshore wind within the past decade. This builds on the previous significant reduction in the cost of energy produced by offshore wind of 32% between 2012 and 2016 (ORE Catapult, 2017).
27. In July 2022, 11GW of renewable energy (7GW offshore wind) was secured through the fourth round of the Contracts for Difference (CfD) scheme. This will increase the country's overall capacity built and under construction by 35%.
28. No bids for offshore wind bids were submitted for the fifth round of the CfD scheme, which concluded in September 2023. This was primarily due to the global rise in inflation and the impact on supply chains presenting challenges on costs for projects participating in this round (DESNZ, 2023e). Following the announcement of the CfD results, the UK Government stated that "To support the industry even further, the government reviews its approach ahead of each Contracts for Difference round and, with the introduction of annual auctions, project developers, including from the offshore wind industry, will now have more frequent opportunities to participate. This will also allow the government to respond more quickly to ensure the scheme continues to support the sector, maintain investment and continue its success" (DESNZ, 2023e).

29. Despite the challenges on costs faced by developers of offshore wind projects in recent years, offshore wind has remained cheaper per megawatt hour than gas in the UK energy market. Recent analysis indicates that even if the strike price for offshore wind had increased by 40% in round five of the CfD scheme, the price per megawatt hour would still have been less than that of gas (Carbon Brief, 2023).

### 2.3.4 Maximising Economic Opportunities

30. The UK Clean Growth Strategy (UK Government, 2017a) recognises that actions and investments will be needed to meet the Paris Agreement commitments to ensure a shift to clean growth. This creates enormous potential economic opportunity – an estimated \$13.5 trillion of public and private investment in the global energy sector alone will be required between 2015 and 2030 if the signatories to the Paris Agreement are to meet their national targets (BEIS, 2017). The Strategy also states that the UK's low carbon economy could grow by an estimated 11 per cent per year between 2015 and 2030 and could deliver between £60 billion and £170 billion of export sales of goods and services by 2030.
31. A key commitment within the Green Paper: Building our Industrial Strategy (UK Government, 2017b) was to “*lead the world in delivering clean energy technology*” and to support innovation in this area. The aim was for “*the UK to be a global leader in innovation, science and research and our Industrial Strategy will help us to deliver our ambitious CO<sub>2</sub> reduction targets while, creating jobs and opportunities for people across the country*”. The energy sector in the UK plays a central role in the economy and renewable energy can play a major part in boosting the economy and providing new jobs and skills.
32. The commercial and economic climate in the UK has changed in subsequent years since the UK Clean Growth Strategy was issued. The UK Government's primary economic objective continues to be the creation and support of jobs, but it also has a priority on promoting the expansion of established, new, and emerging sectors. For this reason, The Green Paper was withdrawn on 1<sup>st</sup> March 2023 and the Industrial Strategy has been incorporated into the Plan for Growth and its associated strategies (HM Government, 2021). Such strategies include:
- “*Supporting the transition to Net Zero - as part of the Plan for Growth invest in net zero to create new opportunities for economic growth and jobs across the country, including supporting up to 60,000 jobs in the offshore wind sector, 50,000 jobs in carbon capture, usage and storage (CCUS) and up to 8,000 in hydrogen in our industrial clusters.*”

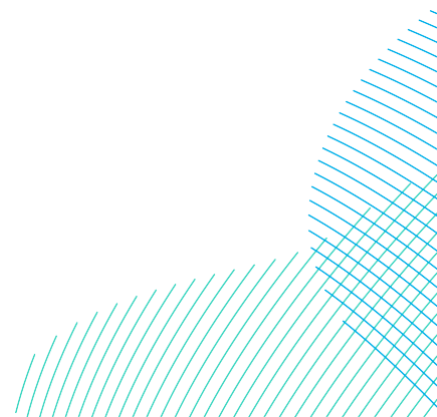
- *Grow our current net zero industries and encourage new ones to emerge. This includes working with industry, aiming to generate 5GW of low carbon hydrogen production capacity and capture 10Mt CO<sub>2</sub>/year using CCUS by 2030, and ending the sale of new petrol and diesel cars and vans in 2030.”*
33. The offshore wind industry in the UK provides important employment opportunities. The importance of maximising opportunities for the involvement of local supply chains and communities in offshore wind has been highlighted as a key success factor for the wind energy sector in the UK (The Crown Estate, 2022). Low-carbon businesses and their supply chain have created over 430,000 skilled jobs in the UK with 7,200 jobs directly in offshore wind (BEIS, 2020).
34. The Projects would provide investment and support the development of the supply chain, a skilled workforce and provide employment. Details of the anticipated expenditure from the construction, and operation and maintenance of the Projects (direct and indirect) are provided in section 2.4 of this chapter and **Volume 7, Chapter 28 Socio-economics (application ref: 7.28)**.
35. At a local level, the East Riding Local Plan 2012-2029 (East Riding of Yorkshire Council, 2016) supports the local development of the renewable and low-carbon energy sector, with the Humber placed to benefit from UK growth in these sectors. The high transport costs associated with transporting offshore wind turbines give the Humber a significant competitive advantage over other locations, with the UK government designating the Humber as a Centre for Offshore Renewable Engineering. An increase in renewable generation will contribute to fuel security and create opportunities for economic growth, particularly in relation to the Humber Renewable Energy Super Cluster Enterprise Zone and the Humber Green Port Corridor Enterprise Zone. The need for renewables has been incorporated into local policy which states: “*Support necessary infrastructure developments associated with the infrastructure required to deliver offshore renewable energy developments*”.





## 2.4 Dogger Bank South Offshore Wind Farms Contribution

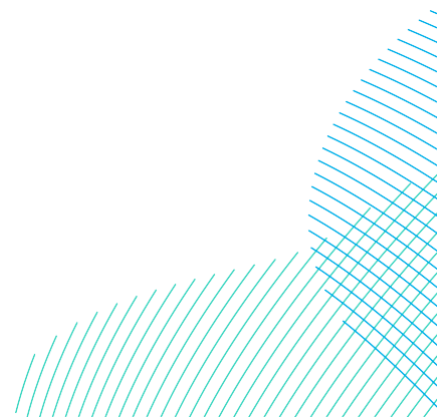
36. The Projects would make a significant contribution to the achievement of both the national renewable energy targets and to the UK's contribution to global efforts to reduce the effects of climate change. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 sets a UK target for at least a 100% reduction of GHG emissions (compared to 1990 levels) by 2050. This ambitious 'net zero' target will only be met by the crucial contribution from the offshore wind industry. The UK CCC, in its advice on the Sixth Carbon Budget, identified that the amount of renewable electricity generated in the UK must double by 2030 if it is to meet its legally binding climate change targets.
37. The Projects have a design life of approximately 30 years, after which the wind farms may be repowered (subject to the necessary approvals). The Projects would contribute to reaching national targets on CO<sub>2</sub> reduction to net zero GHG emissions by 2050 and renewable energy production growth.
38. The UK currently has 13.8GW of installed offshore wind capacity, with a further 78.1GW currently in the UK pipeline (HM Government, 2023). The Projects would make a significant contribution to domestic renewable electricity generation, progressing towards the achievement of UK decarbonisation targets and global commitments to mitigating climate change. The Projects would also help to reduce the UK's reliance on imported energy and to improve energy security, generating enough clean renewable energy to power around 3 million typical UK households per year<sup>1</sup>.
39. The Projects would provide a valuable contribution to employment, as outlined in **Volume 7, Chapter 28 Socio-economics (application ref: 7.28)** of this ES. During the construction of the Projects, it is estimated up to 2,390 full-time equivalent jobs could be supported. During the operation phase, it is expected that the Projects could support the employment of 1,120 full-time equivalent jobs (under the assumption that all direct operations and maintenance employment would be directly employed by the Projects and based in the UK for the lifetime of the Projects). The Projects would also contribute to the development of the supply chain and skilled workforce and the associated economic benefits. The indirect effects of employment and expenditure such as from the workforce will contribute to the local economy.



40. There will also be significant expenditure in manufacturing, services, materials and equipment (see **Volume 7, Chapter 28 Socio-economics (application ref: 7.28)**). Together, the Projects have an estimated overall construction cost of £7 billion (in current pricing). Operation and Maintenance amounts to around £177 million per annum for the proposed Projects. In total, the Gross Added Value over the Projects' lifetime is expected to be £1 billion, making a significant contribution at the national level.

## 2.5 Summary

41. There is a clear and urgent need for the development of the Projects as established within the existing national policy framework through the relevant NPSs and within the various UK Government strategies, including a target of 50GW of offshore wind installed capacity by 2030 and the legally binding target of net zero emissions by 2050.
42. The Projects would make a substantial contribution to the achievement of national renewable energy targets towards net zero and to the UK's contribution to global efforts to reduce the effects of climate change by reducing emissions and increasing the proportion of renewables within the energy mix and generating more electricity from low-carbon sources.
43. Based on an estimated capacity of 3GW once fully operational, the DBS Projects could be capable of generating enough electricity to meet the average annual domestic energy needs of around 3 million typical UK homes<sup>1</sup>. The Projects would reduce carbon emissions and significantly contribute to the economy by providing substantial investment locally and nationally, as well as employment and new infrastructure during all phases of the Projects.





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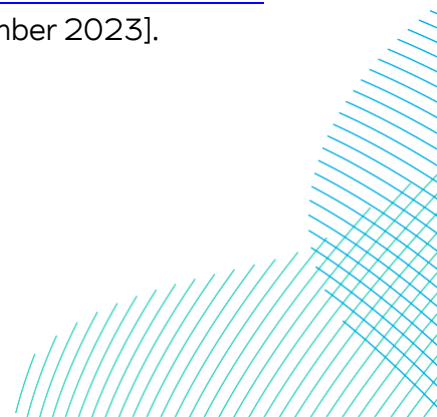
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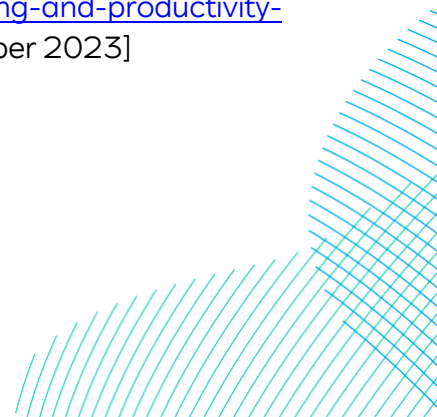
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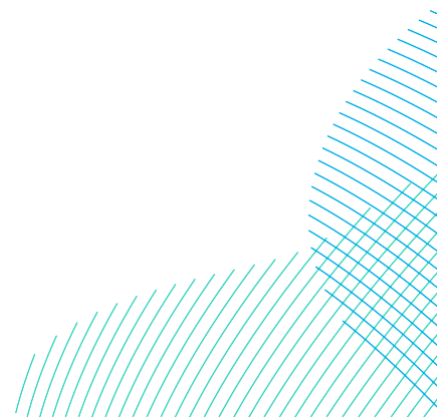
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