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Our Ref: 17996

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Dear Sir/Madam

**IP NO. 20050058 – WRITTEN REPRESENTATIONS ON BEHALF OF NET ZERO NORTH SEA STORAGE LIMITED**

**EN010125 – APPLICATION BY RWE RENEWABLES UK DOGGER BANK SOUTH (WEST) LIMITED & RWE RENEWABLES UK DOGGER BANK SOUTH (EAST) LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE DOGGER BANK SOUTH OFFSHORE WIND FARMS**

We write on behalf of Net Zero North Sea Storage Limited ('NZNSS') to submit its Written Representations in respect of the Dogger Bank South Offshore Wind Farms (the 'Proposed Development') for which a DCO application (the 'Application') was submitted by RWE to the Secretary of State for Energy Security & Net Zero on 12 June 2024.

NZNSS is broadly supportive of the Proposed Development, however, it has concerns over the interactions with important low carbon projects in which it has an interest – projects that are essential to the UK's 2050 net zero target – and the lack of detail within the Application as to how those interactions would be managed and any impacts mitigated. The background to NZNSS's interest in the Proposed Development and its current concerns with regard to the Application are set out below.

**Background**

NZNSS is a party to the Net Zero Teesside Order 2024 (the 'Order') and is named as an "undertaker" for the purposes of the Order (article 2). The Order came into force on 11 March 2024 and grants development consent for the Net Zero Teesside Project ('NZN'), including a gas-fired electricity generating station with carbon capture plant; gas, electricity grid and water connections; a carbon dioxide gathering network; a high pressure carbon dioxide compression station; a high pressure carbon dioxide export pipeline; and associated and ancillary development. Work is now underway to discharge the pre-commencement requirements contained at Schedule 2 of the Order so as to facilitate the start of construction later this year.

A number of the elements of NZT approved by the Order form part of the Northern Endurance Partnership ('NEP') Project. NZNSS will be developing the NEP Project, which encompasses the carbon dioxide gathering network, including pipeline connections from industrial facilities on Teesside to transport the captured carbon dioxide; the carbon dioxide compression station to receive the captured carbon dioxide from the gathering network; and the onshore and offshore elements of the carbon

dioxide export pipeline, which will transport the carbon dioxide from Teesside to the Endurance store in the North Sea.

In respect of the offshore elements of the NEP Project, NZNSS has a Storage Licence (Licence No. CS001) and has recently obtained a Storage Permit (approved on 10 December 2024) from the North Sea Transition Authority. Furthermore, the Offshore Environmental Statement has been approved under the 'Offshore Oil And Gas Exploration, Production, Unloading And Storage (Environmental Impact Assessment) Regulations 2020' by the Secretary of State, while the Pipeline Work Authorisation application is being prepared.

The NEP Project forms part of the East Coast Cluster ('ECC'), one of the UK Government's selected CCUS clusters (including Teesside and Humberston), supporting its pathway to net zero emissions by 2050. NEP will be the carbon dioxide transport and storage provider for the ECC. On 10 December 2024 NEP announced financial close and entry into the execution stage of the Project. Construction work is set to start from mid-2025 and the NEP Project is expected to enter operation from 2028. The NEP infrastructure will serve a number of projects on Teesside, including NZT Power and H2Teesside.

The NEP Project is therefore at an advanced stage in its development and is moving into the construction stage. It is critical to the Government achieving its legally binding 2050 net zero emissions target and it is important that the Project is able to move forward at pace in order to deliver its benefits in terms of decarbonising power and industry, supporting the growth of green industries and delivering new jobs and economic growth.

### **Project Interactions**

The NEP offshore carbon dioxide export pipeline from Teesside (the 'Teesside pipeline') will be approximately 142 km in length and have a landfall to the south of the mouth of the Tees Estuary. An electric power and fibre-optic communications control cable will be installed with the Teesside pipeline to the subsea infrastructure at the Endurance Store. The Endurance store is located within the North Sea, south-east of Teesside and east of Flamborough Head on the Holderness Coast.

The Land and Works Plans that form part of the Application indicate that the electrical cable corridor for the Proposed Development will cross the Teesside pipeline. In addition, the southern routing of the electrical cable corridor will cross the CS025 Storage Licence area where NEP is developing a further carbon dioxide store.

Having reviewed a number of the key application documents, NSNZS is concerned as to the lack of detail within the Application on how the interactions of the electrical cable corridor with the Teesside pipeline and the CS025 carbon dioxide store will be managed and any impacts mitigated.

Chapter 5 'Project Description' of the Environmental Statement ('ES'), Section 5.5.7.1, deals with the 'Offshore Export Cables' for the Proposed Development. However, only limited information is provided on the proposed construction methods for installing the electrical cable within the vicinity of the Teesside pipeline and CS025 carbon dioxide store. Section 5.5.7.7 of the ES acknowledges that the pipeline will need to be crossed, but merely states (paragraph 166) that "*Crossings are designed to protect the obstacle being crossed, as well as the Projects cables once they have been installed. Detailed methodologies for the crossing of cables and pipelines would be determined in consultation with the owners of the infrastructure to be crossed.*" Furthermore, the ES states that the offshore electrical cable installation will commence from 2028, at which point the NEP Project will be entering operation.

NZNSS needs to see further information as to the construction methods that RWE proposes to cross the Teesside pipeline and the carbon dioxide store and how construction and other impacts will be minimised and mitigated in order to ensure that it is satisfied that there will be no adverse effect on the NEP infrastructure and its operations.

NZNSS is open to discussing the construction methods and crossing arrangements with RWE with the aim of reaching agreement on these matters and also the required crossing and proximity agreements. NZNSS would draw the Examining Authority's attention to ongoing discussions between the parties on a crossing agreement in relation to the first phase of the Dogger Bank Wind Farm. Those discussions could be extended to encompass agreements in relation to the latest phase.

Subject to reaching agreement on these matters, NZNSS will require that appropriate protections are included within any DCO that is made for the Proposed Development in order to safeguard the NEP infrastructure.

Yours faithfully,



**Geoff Bullock**  
**Director**  
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