



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

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Dogger Bank South Offshore Wind Farms

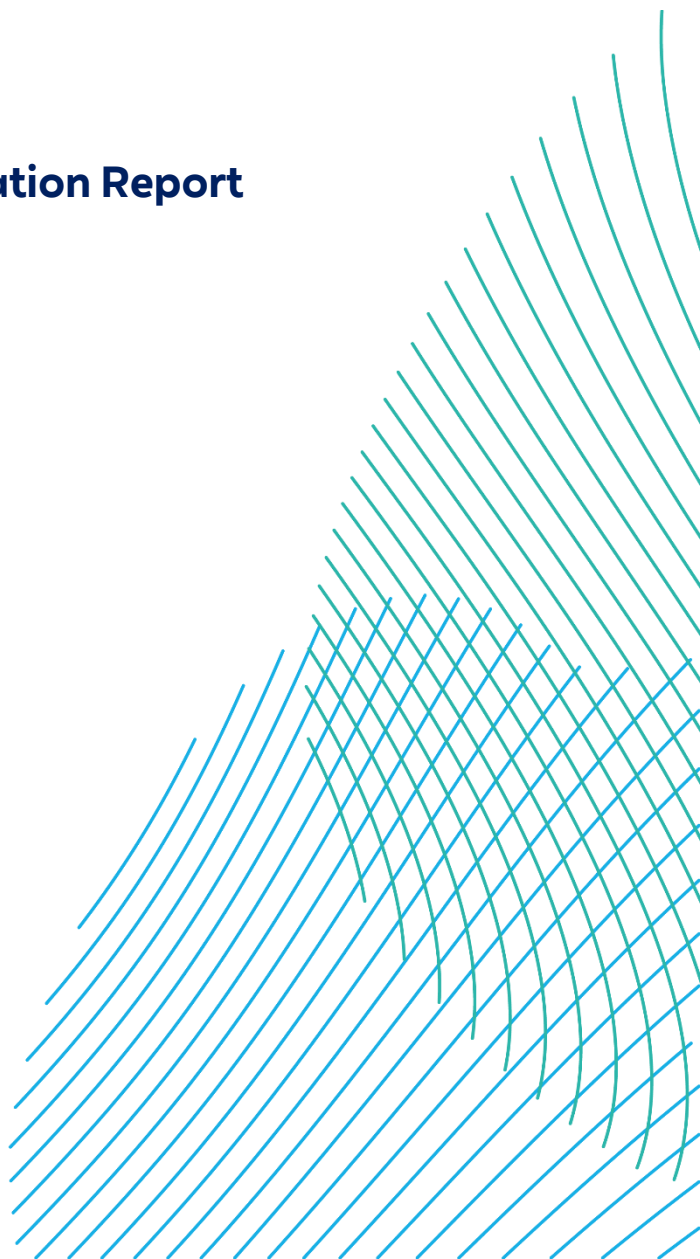
**Preliminary Environmental Information Report
Chapter 2 – Need for the Project**

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Glossary

Term	Definition
Dogger Bank South (DBS) offshore wind farms	The collective name for the two Projects, DBS East and DBS West.
The Applicant	RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited as the owners of DBS West and DBS East respectively are the named undertakers that will have the benefit of the Development Consent Order. References in this document to obligations on, or commitments by, 'the Applicant' are given on behalf of RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited.
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
CfD	Contracts for Difference
COP	Conference of the Parties
DBS	Dogger Bank South
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
GHG	Greenhouse Gas
IPCC	Intergovernmental Panel on Climate Change
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Projects
PEIR	Preliminary Environmental Information Report
UK	United Kingdom
UKCCC	UK Climate Change Committee

2. Need for the Project

2.1. Introduction

1. This chapter of the Preliminary Environmental Information Report (PEIR) 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) (section 2.2). The Overarching NPS for Energy EN-1 (Department of Energy and Climate Change (DECC), 2011a) emphasises the need for the rapid development of new electricity NSIPs, stipulating that:
"In order to secure energy supplies that enable us to meet our obligations for 2050, there is an urgent need for new (and particularly low carbon) energy NSIPs to be brought forward as soon as possible, and certainly in the next 10 to 15 years, given the crucial role of electricity as the UK decarbonises its energy sector".
3. As discussed in **Chapter 1 Introduction**, the Projects will 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);
 - Increasing the security of energy supply (see section 2.3.2);
 - Lowering the cost and increasing the affordability of generated electricity (section 2.3.3); and
 - Contributing to sustainable development and economic opportunities (section 2.3.4).
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 **Chapter 3 Policy and Legislative Context**.

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 also have regard for them and decide on the application in accordance with applicable NPSs.
6. Three of the twelve NPSs produced by the Department of Energy and Climate Change are relevant to the Projects, being:
 - Overarching NPS for Energy (EN-1) (DECC, 2011a);
 - NPS for Renewable Energy Infrastructure (EN-3), (DECC, 2011b); and
 - NPS for Electricity Networks Infrastructure (EN-5), (DECC, 2011c).
7. NPS EN-1, EN-3 and EN-5 are in the process of being revised. A draft version of each NPS was published for consultation in September 2021, which closed in November 2021 (BEIS, 2021)¹.
8. The updated draft 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 updates 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 updated draft NPSs highlight the need for diversification of the energy-generating infrastructure to include a mix of sources to help the transition to net zero.

¹ Following the consultation in 2021 on the draft energy NPS, a new consultation opened on the 30 March 2023 on revised drafts of the energy NPSs, including EN1, EN3 and EN5. Due to the timing of this consultation, and finalisation of this PEIR we have been unable to review and take these revised draft NPS into account within these documents. However, these will be reviewed and incorporated into the final ES where relevant.

10. The 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 **Chapter 3 Policy and Legislative Context**.

2.3. Need for Renewable Energy

2.3.1. Climate Change and Greenhouse Gases

11. As quoted in the draft EN-1 (paragraph 2.2.4), *“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 set out its Nationally Determined Contribution to reduce GHG emissions by at least 68 per cent from 1990 levels by 2030. In April 2021, the Government announced the sixth carbon budget and as a result will legislate to reduce GHG emissions by ~78% 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 50GW of offshore wind by 2030. The Projects will make a significant contribution to the UK's aim of reducing carbon emissions and achieving this target, with an anticipated capacity of 3GW being expected to generate enough electricity to power 3.4 million homes.
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 CCC states that this could have additional effects on healthcare and education within a national setting (UK CCC, 2022a/b).
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 **Chapter 3 Policy and Legislative Context**.

2.3.2. Energy Security

18. Energy security is about 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 and reliable supplies of electricity as the transition to a low-carbon economy is made. EN-1 also states that the Secretary of State should: “*give substantial weight to the contribution which projects would make towards satisfying this need.*”
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 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 UKs 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 will 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 will 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, being a world leader in offshore wind, has plans to further increase investment and generation capacity in line with the UK Government's 2030 50GW target. In order to progress towards GHG, decarbonisation targets and energy security, there is a need for renewable energy to be affordable. This will benefit from using state-of-the-art turbine technology and improved operations and maintenance processes along with 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).

27. Such 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).
28. 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%.
29. The CfD scheme has continued to place downward pressure on prices, with the per unit (MWh) price of offshore wind secured in this round being almost 70% less than that secured in the first allocation round, in 2015. This makes offshore wind one of the most attractive and cost-effective methods of generating large quantities of low-carbon energy.
30. The Projects will contribute to the UK goal of creating affordable clean energy by continuing to drive technology and development costs down, making use of low-cost renewable technologies and creating a self-sufficient energy market.

2.3.4. Maximising Economic Opportunities

31. 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.
32. A key commitment within the Green Paper: Building our Industrial Strategy (UK Government, 2017b) is to “*lead the world in delivering clean energy technology*” and to support innovation in this area. The aim is for “*the UK to be a global leader in innovation, science and research and our Industrial Strategy will help us to deliver our ambitious CO₂ 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.

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 will 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 and **Chapter 28 Socio-Economics**.
35. At a local level, the East Riding Local Plan 2012-2029 (East Riding of Yorkshire District 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 will 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 CO₂ reduction to net zero GHG emissions by 2050 and renewable energy production growth, with the potential to deliver up to 3GW of clean, renewable energy across the two Projects.
38. The UK currently has 12GW of installed offshore wind capacity, with an ambition to achieve 50GW by 2030. The 3GW from 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 will also help to reduce the UK's reliance on imported energy and to improve energy security, generating enough clean renewable energy to power up to 3.4 million typical UK households per year.
39. The Projects will provide a valuable contribution to employment, as outlined in **Chapter 28 Socio-Economics** of this PEIR. During the construction of the Projects, it is estimated up to 2,150 full-time equivalent jobs could be created. During the operation phase, it is expected that the Projects could employ 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 will 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 **Chapter 28 Socio-Economics**). 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 project lifetime is expected to be £1 billion, making a significant contribution on the national level.

2.5. Summary

41. There is a clear 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. Of this, the Projects will provide up to 3GW of renewable energy capacity.
42. The Projects will 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. The Projects will provide a secure, reliable, affordable renewable energy supply in the UK for up to 3.4 million homes. 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.
44. The Projects will contribute towards driving technology and development costs down, helping to provide low-cost energy to consumers and community benefits to help fight fuel poverty.

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