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

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

# **Dogger Bank South Offshore Wind Farms**

**Consultation Report**

**Volume 5**

**Appendix G - Section 42 and 47 Responses and Applicants  
Regard**

**June 2024**

**Application Reference: 5.8**

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

**Revision: 02**

**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>
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Document Number:	005028815-02	Contractor Reference Number:	N/A

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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	February 2024	Draft for PINS Submission	RWE	RWE	RWE
02	June 2024	Final for DCO Application	RWE	RWE	RWE

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

# **RWE Renewables UK Dogger Bank South (East) Limited**

# **Dogger Bank South Offshore Wind Farms**

**Consultation Report**

**Volume 5**

**Appendix G1 - Responses Received from Section 42  
Consultees and Applicants' Regard**

**June 2024**

**Application Reference: 5.8**

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

**Revision: 02**

**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:	Consultation Report – Appendix G1 – Responses Received from Section 42 Consultees and Applicants' Regard		
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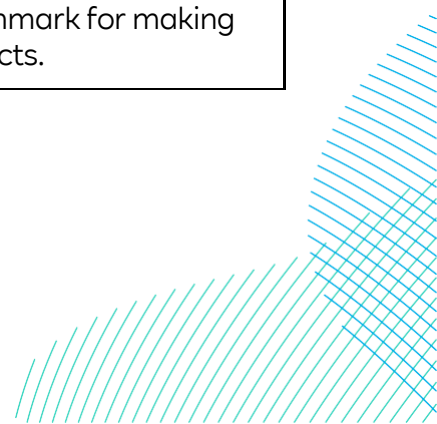
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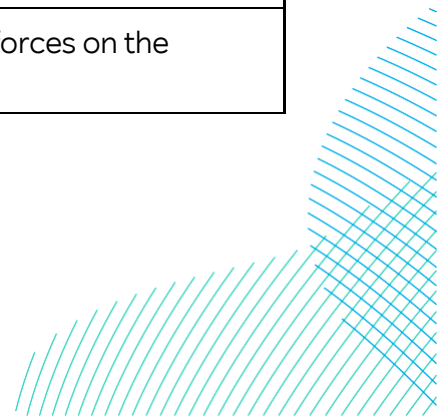
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## Glossary

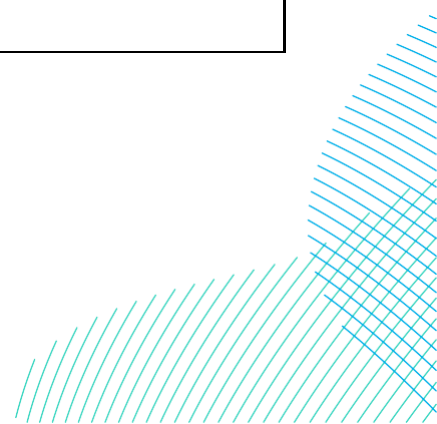
Term	Definition
Accommodation Platform	An offshore platform (situated within either the DBS East or DBS West Array Area) that would provide accommodation and mess facilities for staff when carrying out activities for the Projects.
Agricultural Land Classification	Agricultural Land Classification is a grading system used to assess and compare the quality of agricultural land in England and Wales. A combination of climate, topography and soil characteristics and their unique interaction determines the grade of the land. The grades range from 1 to 5. Grade 1 being excellent, Grade 2 very good, Grade 3a and 3b good to moderate (no subdivide), Grade 4 poor and Grade 5 very poor.
Air Navigation Service Provider (ANSP)	A public or private entity managing air traffic on behalf of a company, region or country. NATS is the main ANSP in the UK.
Allision	The act of striking or collision of a moving vessel against a stationary object.
Aquifer	Geological strata that hold water.
Array Areas	The DBS East and DBS West offshore Array Areas, where the wind turbines, offshore platforms and array cables would be located. The Array Areas do not include the Offshore Export Cable Corridor or the Inter-Platform Cable Corridor within which no wind turbines are proposed. Each area is referred to separately as an Array Area.
Array cables	Offshore cables which link the wind turbines to the Offshore Converter Platform(s).
Automatic Identification System (AIS)	A system by which vessels automatically broadcast their identity and key statistics including location, destination, length, speed and current status, e.g., under power. Most commercial vessels and United Kingdom/European Union fishing vessels over 15m length are required to carry AIS.
Baseline	The existing conditions as represented by the latest available survey and other data which is used as a benchmark for making comparisons to assess the impact of the Projects.



Term	Definition
Bathymetry	Topography of the seabed.
Beach	A deposit of non-cohesive sediment (e.g. sand, gravel) situated on the interface between dry land and the sea (or other large expanse of water) and actively 'worked' by present-day hydrodynamic processes (i.e. waves, tides and currents) and sometimes by winds.
Bed	The bottom of a channel.
Bedforms	Features on the seabed (e.g. sand waves, ripples) resulting from the movement of sediment over it.
Biodiversity Net Gain	An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected to ensure that the current loss of biodiversity through development will be halted and ecological networks can be restored.
Cable burial risk assessment	Risk assessment to determine suitable burial depths for cables, based upon hazards such as anchor strike, fishing gear interaction and seabed mobility.
Catchment	The total area of land that drains into any given watercourse.
Cetaceans	Commonly known as whales, dolphins, or porpoises
Clay	Fine-grained sediment with a typical particle size of less than 0.002mm.
Climate change	A change in global or regional climate patterns. Within this chapter this usually relates to any long-term trend in mean sea level, wave height, wind speed etc, due to climate change.
Coastal / Tidal Flooding	When high tide events overtop the shoreline to cause flooding to land behind.
Coastal processes	Collective term covering the action of natural forces on the shoreline and nearshore seabed.



Term	Definition
Collector Platforms (CPs)	Receive the AC power generated by the wind turbines through the array cables, collect it and transform the voltage for onward transmission to the Offshore Converter Platforms (OCPs).
Collision	The act or process of colliding (crashing) between two moving objects.
Collision Risk Model (CRM)	Quantitative means to estimate the number of predicted collisions between seabirds recorded in the Array Areas and rotating wind turbines.
Commitments Register	An Excel spreadsheet which identifies all of the Projects' commitments and mitigation relating to each technical topic under consideration in the EIA process and where each commitment is secured in the DCO.
Concurrent Scenario	A potential construction scenario for the Projects where DBS East and DBS West are both constructed at the same time.
Construction Buffer Zone	1km zone around the Array Areas and Offshore Export Cable Corridor, and 500m zone around the Inter-Platform Cabling Corridor. Construction vessels may occupy this zone, but no permanent infrastructure would be installed within these areas.
Cumulative effects	The combined effect of the Projects in combination with the effects of a number of different (defined cumulative) schemes, on the same single receptor / resource.
Cumulative Effects Assessment (CEA)	The assessment of the combined effect of the Projects in combination with the effects of a number of different (defined cumulative) schemes, on the same single receptor/resource.
Cumulative impact	The combined impact of the Projects in combination with the effects of a number of different (defined cumulative) schemes, on the same single receptor / resource.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).



Term	Definition
Development Scenario	Description of how the DBS East and / or DBS West Projects would be constructed either in isolation, sequentially or concurrently.
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the value, or sensitivity, of the receptor or resource in accordance with defined significance criteria.
EIA Regulations	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
Electrical Switching Platform (ESP)	The Electrical Switching Platform (ESP), if required would be located either within one of the Array Areas (alongside an Offshore Converter Platform (OCP)) or the Export Cable Platform Search Area.
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Directive and EIA Regulations, including the publication of an Environmental Statement (ES).
Environmental Statement (ES)	A document reporting the findings of the EIA and produced in accordance with the EIA Directive as transposed into UK law by the EIA Regulations.
Erosion	Wearing away of the land or seabed by natural forces (e.g. wind, waves, currents, chemical weathering).
European Site	Sites designated for nature conservation under the Habitats Directive and Birds Directive. This includes candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas, and is defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017.
Evidence Plan Process (EPP)	A voluntary consultation process with specialist stakeholders to agree the approach, and information to support, the Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) for certain topics.

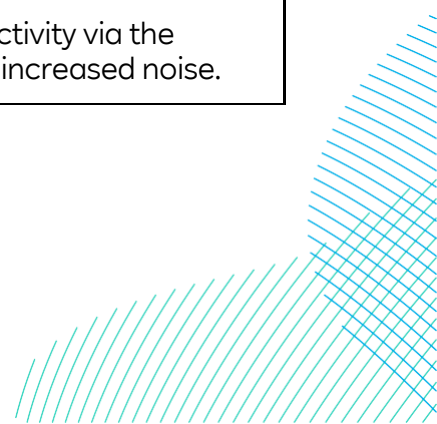




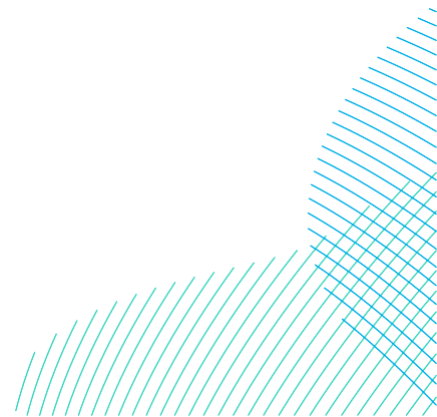
Term	Definition
Expert Topic Group (ETG)	A forum for targeted engagement with regulators and interested stakeholders through the EPP.
Export Cable Platform Search Area	The Export Cable Platform Search Area is located mid-way along the Offshore Export Cable Corridor and is the area of search for the Electrical Switching Platform (ESP).
Fish and Shellfish Ecology Study Area	The Fish and Shellfish Ecology Study Area for the Projects is defined as ICES Rectangles 36E9; 36F0; 37E9; 37F0; 37F1; 37F2; 38F0; 38F1; and 38F2. It covers a total of 26,858km <sup>2</sup> , and includes the Offshore Development Area with a minimum buffer distance of 7km.
Fisheries Liaison Officer (FLO)	Primary contact point between the fishing community and the Applicant, with responsibility for disseminating relevant Project information.
Fluvial Flooding	When flows within watercourses exceed the capacity of the watercourse causing out of bank flows.
glacial till	Poorly sorted, non-stratified and unconsolidated sediment carried or deposited by a glacier.
Glacial / Interglacial	A glacial period is a period of time within an ice age that is marked by colder temperatures and glacier advances. Interglacial correspond to periods of warmer climate between glacial periods. There are three main periods of glaciation within the last 1 million years, the Elsterian, the Saalian and the Weichselian which ended about 12,000 years ago. The Holocene period corresponds to the current interglacial.
Grade II Listed Building	A property or building listed as Grade II has particular historic and / or cultural significance and is subject to regulations that protect its unique character
Gravel	Loose, rounded fragments of rock larger than sand but smaller than cobbles. Sediment larger than 2mm (as classified by the Wentworth scale used in sedimentology).
Groundwater	Water stored below the ground in rocks or other geological strata.



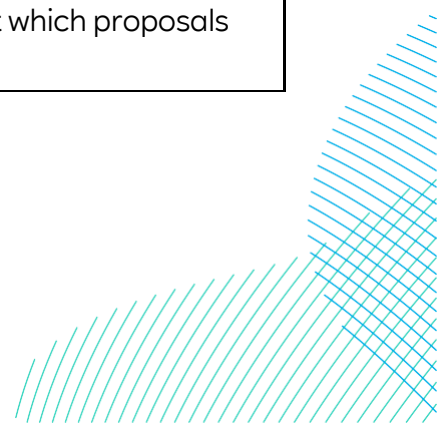
Term	Definition
Habitats Regulations	Conservation of Habitats and Species Regulations 2017 and Conservation of Offshore Marine Habitats and Species Regulations 2017.
Habitats Regulations Assessment (HRA)	The process that determines whether or not a plan or project may have an adverse effect on the integrity of a European Site or European Offshore Marine Site.
Haul Road	The track along the Onshore Export Cable Corridor used by traffic to access different sections of the onshore export cable route for construction.
Health	State of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity.
Heavy Goods Vehicle (HGV)	HGV is the term for any vehicle with a Gross Weight over 3.5 tonnes. This is also used as a proxy for HGVs and buses / coaches recognising the similar size and environmental characteristics of the respective vehicle types.
High Voltage Alternating Current (HVAC)	High voltage alternating current is the bulk transmission of electricity by alternating current (AC), whereby the flow of electric charge periodically reverses direction.
High Voltage Direct Current (HVDC)	High voltage direct current is the bulk transmission of electricity by direct current (DC), whereby the flow of electric charge is in one direction.
High water	Maximum level reached by the rising tide.
Historic seascape character	The attributes that contribute to the formation of the historic character of the seascape.
Horizontal Directional Drill (HDD)	HDD is a trenchless technique to bring the offshore cables ashore at the landfall and can be used for crossing other obstacles such as roads, railways and watercourses onshore.
Hydrodynamic	The process and science associated with the flow and motion in water produced by applied forces.
Impact	Used to describe a change resulting from an activity via the Projects, i.e. increased suspended sediments / increased noise.



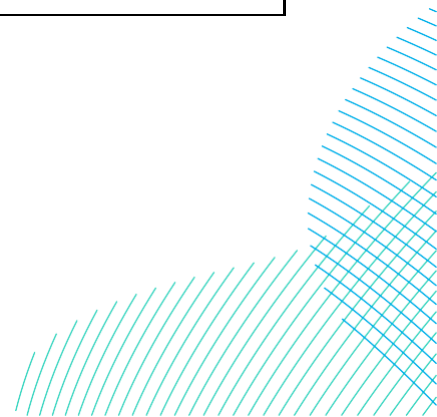
Term	Definition
In Isolation Scenario	A potential construction scenario for one Project which includes either the DBS East or DBS West array, associated offshore and onshore cabling and only the eastern Onshore Converter Station within the Onshore Substation Zone and only the northern route of the onward cable route to the proposed Birkhill Wood National Grid Substation.
International Council for the Exploration of the Sea (ICES) Statistical Rectangles	Defined areas of sea used for fisheries statistics (1 degree longitude by 0.5 degree latitude, equalling approximately 30 by 30 nautical miles).
Inter-Platform Cable Corridor	The area where Inter-Platform Cables would route between platforms within the DBS East and DBS West Array Areas, should both Projects be constructed.
Inter-Platform Cables	Buried offshore cables which link offshore platforms.
Intertidal	Area on a shore that lies between Mean High Water Springs (MHWS) and Mean Low Water Springs (MLWS).
Jointing Bays	Underground structures constructed at regular intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.
Landfall	The point on the coastline at which the Offshore Export Cables are brought onshore, connecting to the onshore cables at the Transition Joint Bay (TJB) above mean high water.
Landfall Zone	The generic term applied to the entire landfall area between Mean Low Water Spring (MLWS) and the Transition Joint Bays (TJBs) inclusive of all construction works, including the landfall compounds, Onshore Export Cable Corridor and intertidal working area including the Offshore Export Cables.
Landings	Quantitative description of amount of fish returned to port for sale – can be defined in terms of value or weight.



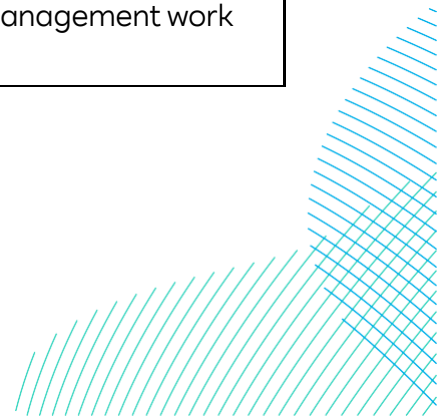
Term	Definition
Link Boxes	An underground metal box placed within a concrete pit where the metal sheaths between adjacent export cable sections are connected and earthed, installed with a ground level manhole to allow access to the link box for regular maintenance or fault-finding purposes.
Local Authority	The Local Authority is a body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and the Broads Authority, as set out in Section 43 of the Planning Act 2008. East Riding of Yorkshire Council (ERYC) is the Local Authority for the entirety of the Onshore Development Area.
Main Commercial Route	Defined transit route (mean position) of commercial vessels identified within each Shipping and Navigation Study Area.
Main River	Main Rivers are usually large rivers or streams that are designated under the Water Resources Act (1991) and are shown on the statutory Main River Map. They are managed by the Environment Agency, who carry out construction, maintenance and improvement works to manage flood risk.
Management Unit	Management units provide an indication of the spatial scales at which impacts of plans and projects alone, cumulatively and in-combination, need to be assessed for the key cetacean species in UK waters, with consistency across the UK.
Mean High Water Springs (MHWS)	MHWS is the average of the heights of two successive high waters during a 24 hour period.
Mean Low Water Springs (MLWS)	MLWS is the average of the heights of two successive low waters during a 24 hour period.
Mean Sea Level	The average level of the sea surface over a defined period (usually a year or longer), taking account of all tidal effects and surge events.
Mitigation Zone (MZ)	The area around each pile location in which it is predicted physical or permanent auditory injury is possible.
National Policy Statement (NPS)	A document setting out national policy against which proposals for NSIPs will be assessed and decided upon.



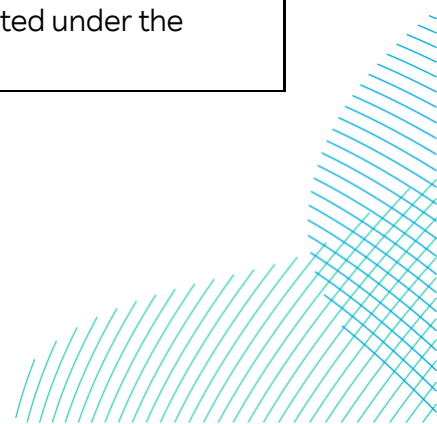
Term	Definition
Nationally Significant Infrastructure Project (NSIP)	Large scale development including power generating stations which requires development consent under the Planning Act 2008. An offshore wind farm project with a capacity of more than 100MW constitutes an NSIP.
Navigational Risk Assessment (NRA)	A document which assesses the hazards to shipping and navigation of a proposed Offshore Renewable Energy Installation based upon Formal Safety Assessment.
Nearshore	The zone which extends from the swash zone to the position marking the start of the offshore zone (~20m).
Numerical modelling	Refers to the analysis of coastal processes using computational models.
Offshore Converter Platforms (OCPs)	The OCPs are fixed structures located within the Array Areas that collect the AC power generated by the wind turbines and convert the power to DC, before transmission through the Offshore Export Cables to the Project's Onshore Grid Connection Points.
Offshore Development Area	The Offshore Development Area for ES encompasses both the DBS East and West Array Areas, the Inter-Platform Cable Corridor, the Offshore Export Cable Corridor, plus the associated Construction Buffer Zones.
Offshore Export Cable Corridor	This is the area which will contain the offshore export cables (and potentially the ESP) between the Offshore Converter Platforms and Transition Joint Bays at the landfall.
Offshore Export Cables	The cables which would bring electricity from the offshore platforms to the Transition Joint Bays (TJBs).
Offshore Renewable Energy Installation (OREI)	As defined by Marine Guidance Note 654 (Merchant and Fishing) Safety of Navigation: Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response (Maritime and Coastguard Agency, 2021). For the purposes of this report and in keeping with the consistency of the Environmental Impact Assessment, OREI can mean offshore wind turbines and the associated electrical infrastructure such as offshore substations.



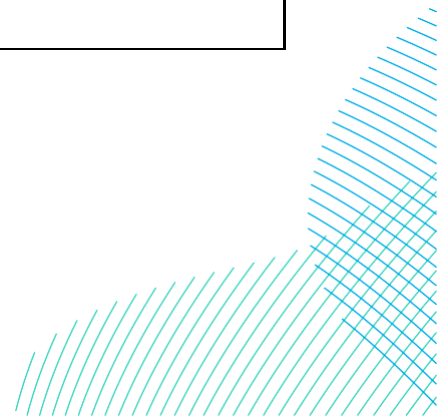
Term	Definition
Onshore Converter Stations	A compound containing electrical equipment required to transform HVDC and stabilise electricity generated by the Projects so that it can be connected to the electricity transmission network as HVAC. There will be one Onshore Converter Station for each Project.
Onshore Development Area	The Onshore Development Area for ES is the boundary within which all onshore infrastructure required for the Projects would be located including Landfall Zone, Onshore Export Cable Corridor, accesses, Temporary Construction Compounds and Onshore Converter Stations.
Onshore Export Cable Corridor	This is the area which includes cable trenches, haul roads, spoil storage areas, and limits of deviation for micro-siting. For assessment purposes, the cable corridor does not include the Onshore Converter Stations, Transition Joint Bays or temporary access routes; but includes Temporary Construction Compounds (purely for the cable route).
Onshore Export Cables	Onshore Export Cables take the electric from the Transition Joint Bay to the Onshore Converter Stations.
Onshore Grid Connection Points	The Onshore Grid Connection Points is the location where the electricity produced by the Projects would be transferred to the national grid. There are two Onshore Grid Connection Points, one for each Project, which will be located in the same place.
Onshore Substation Zone	Parcel of land within the Onshore Development Area where the Onshore Converter Station infrastructure (including the haul roads, Temporary Construction Compounds and associated cable routing) would be located.
Onward Cable Connection	Area of 400kV HVAC onshore export cable from the Onshore Converter Stations to the Proposed Birkhill Wood National Grid Substation.
Order Limits	The limits within which the Projects may be carried.
Ordinary watercourse	Rivers which are not Main Rivers are called 'ordinary watercourses'. Lead local flood authorities, district councils and internal drainage boards carry out flood risk management work on ordinary watercourses.



Term	Definition
Planning Inspectorate (PINS)	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects (NSIPs).
Population health	The health outcomes of a group of individuals, including the distribution of such outcomes within the group.
Preliminary Environmental Information Report (PEIR)	Defined in the EIA Regulations as information referred to in part 1, Schedule 4 (information for inclusion in environmental statements) which has been compiled by the Applicants and is reasonably required to assess the environmental effects of the development.
Principal Contractor	A contractor appointed under Regulation 5(1) (b) of the Construction (Design and Management) Regulations 2015. They have control over the construction phase of a project with several contractors.
Principal aquifer	These are layers of rock or drift deposits that have high intergranular and / or fracture permeability - meaning they usually provide a high level of water storage. They may support water supply and / or river base flow on a strategic scale. In most cases, principal aquifers are aquifers previously designated as major aquifers.
Project team	A multi-disciplinary team consisting of individuals from RWE who are ultimately responsible for the construction, operation and maintenance and decommissioning phases of DBS East and DBS West, who are supported by a wider group of contractors and sub-contractors.
Projects Design (or Rochdale) Envelope	A concept that ensures the EIA is based on assessing the realistic worst-case scenario where flexibility or a range of options is sought as part of the consent application.
Radio detection and ranging (Radar)	An object-detection system which uses radio waves to determine the range, altitude, direction or speed of objects.
Ramp-up	Ramp-up forms the second part of the soft-start procedure and follows on from the low-energy blows.
Ramsar Site	Wetlands of international importance, designated under the Ramsar Convention.

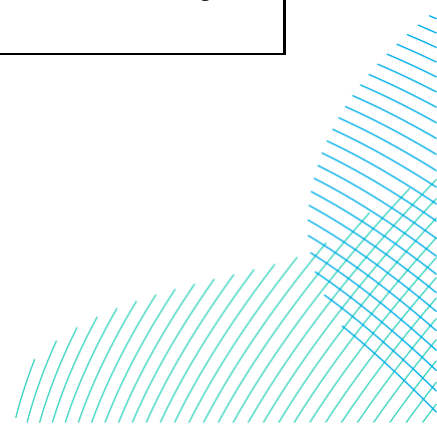


Term	Definition
Receptor	A distinct part of the environment on which effects could occur and can be the subject of specific assessments. Examples of Receptors include species (or groups) of animals, plants, people (often categorised further such as 'residential' or those using areas for amenity or recreation), watercourses etc.
Relevant Highway Authorities	The term relevant highway authorities for the Projects includes all highway authorities within the traffic and transport study area, namely, East Riding of Yorkshire Council, Hull City Council and National Highways.
Safety zones	Legislated under the Energy Act 2004, safety zones are rolling buffer areas which protect construction activities by preventing unauthorised vessels from entering their boundary.
Sand	Sediment particles, mainly of quartz with a diameter of between 0.063mm and 2mm. Sand is generally classified as fine, medium or coarse.
Sand wave	Bedforms with wavelengths of 10 to 100m, with amplitudes of 1 to 10m.
Scoping opinion	The report adopted by the Planning Inspectorate on behalf of the Secretary of State.
Scoping report	The report that was produced in order to request a Scoping Opinion from the Secretary of State.
Scour protection	Protective materials to avoid sediment erosion from the base of the wind turbine foundations and offshore substation platform foundations due to water flow.
Sea level	Generally, refers to 'still water level' (excluding wave influences) averaged over a period of time such that periodic changes in level (e.g. due to the tides) are averaged out.
Seabed features	Features seen on the seafloor in the sidescan sonar or multibeam bathymetry data which are interpreted to represent heritage assets, or potential heritage assets. Also includes magnetic anomalies which may represent shallow buried ferrous material of archaeological interest.

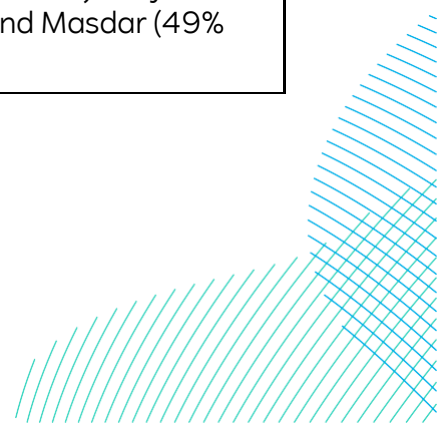




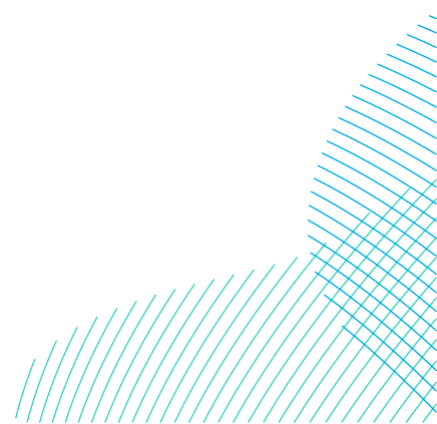
Term	Definition
Sediment	Particulate matter derived from rock, minerals or bioclastic matter.
Sediment transport	The movement of a mass of sediment by the forces of currents and waves.
Sequential Scenario	A potential construction scenario for the Projects where DBS East and DBS West are constructed with a lag between the commencement of construction activities. Either Project could be built first.
Setting	The NPPF identifies setting as that which encompasses an asset's surroundings in which it is experienced. The extent of setting is not fixed and can contribute both positively and negatively to the heritage significance of an asset.
Shipping and Navigation Study Area	A buffer of ten nautical miles applied around each Array Area. The Shipping and Navigation Study Areas for DBS East and DBS West are referred to as the 'DBS East Shipping and Navigation Study Area' and 'DBS West Shipping and Navigation Study Area' respectively.
Shore platform	A platform of exposed rock or cohesive sediment exposed within the intertidal and subtidal zones.
Short-term	Refers to a time period of months to years.
Significant wave height	The average height of the highest of one third of the waves in a given sea state.
Soft-start	The procedure used to commence piling at a lower hammer energy.
Source Protection Zone I	Inner protection zone - defined as the 50-day travel time from any point below the water table to the abstraction source. This zone has a minimum radius of 50 metres.
Source Protection Zone II	Outer protection zone - defined by a 400-day travel time from a point below the water table. This zone has a minimum radius of 250 or 500 metres around the abstraction source, depending on the size of the abstraction.



Term	Definition
Source Protection Zone III	Source catchment protection zone - defined as the area around an abstraction source within which all groundwater recharge is presumed to be discharged at the abstraction source.
Special Area of Conservation (SAC)	Strictly protected sites designated pursuant to Article 3 of the Habitats Directive (via the Habitats Regulations) for habitats listed on Annex I and species listed on Annex II of the Directive
Special Protection Area (SPA)	Strictly protected sites designated pursuant to Article 4 of the Birds Directive (via the Habitats Regulations) for species listed on Annex I of the Directive and for regularly occurring migratory species
Statutory consultation	The statutory consultation ran in two periods. The first period ran between 6th June and 17th July 2023, with a second period running between 4th August and 15th September 2023 to gather responses from third-parties missed during the initial consultation period. The PEIR was presented as part of this consultation.
Statutory Nature Conservation Bodies (SNCBs)	Comprised of JNCC, Natural Resources Wales, Department of Agriculture, Environment and Rural Affairs/Northern Ireland Environment Agency, Natural England and Scottish Natural Heritage, these agencies provide advice in relation to nature conservation to government.
Surface water flooding	Surface water flooding occurs when rainwater does not drain away through normal drainage systems or soak into the ground but lies on or flows over the ground instead.
Suspended sediment	The sediment moving in suspension in a fluid kept up by the upward components of the turbulent currents or by the colloidal suspension.
Temporary Construction Compound	An area set aside to facilitate construction of the Projects. These will be located adjacent to the Onshore Export Cable Corridor and within the Onshore Substation Zone, with access to the highway.
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).

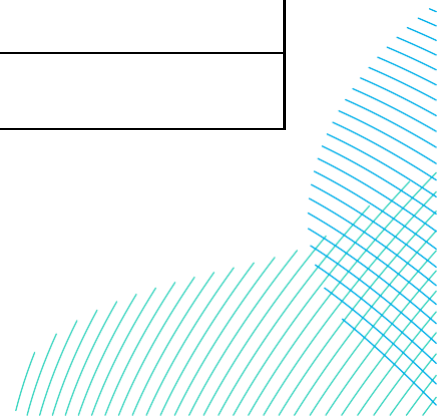


Term	Definition
The Projects	DBS East and DBS West (collectively referred to as the Dogger Bank South Offshore Wind Farms).
Tidal current	The alternating horizontal movement of water associated with the rise and fall of the tide.
Traffic and Transport Study Area (TTSA)	Area where potential impacts from the Projects could occur, as defined for the traffic and transport EIA topic.
Transition Joint Bay (TJB)	The Transition Joint Bay (TJB) is an underground structure at the landfall that houses the joints between the Offshore Export Cables and the Onshore Export Cables.
Transmission infrastructure	The structures and equipment required to convey electricity.
Trenching	Open cut method for cable or duct installation.
Vehicle (HGV, Traffic) trips	A vehicle movement (i.e. the arrival or departure from site) for the transfer of employees or delivery of goods.
Vessel Monitoring System (VMS)	Satellite tracking system using a device on a vessel which transmits the location, speed and course of the vessel.
Wave climate	Average condition of the waves at a given place over a period of years, as shown by height, period, direction etc.
Wave height	The vertical distance between the crest and the trough.
Wind turbine	Power generating device that is driven by the kinetic energy of the wind.

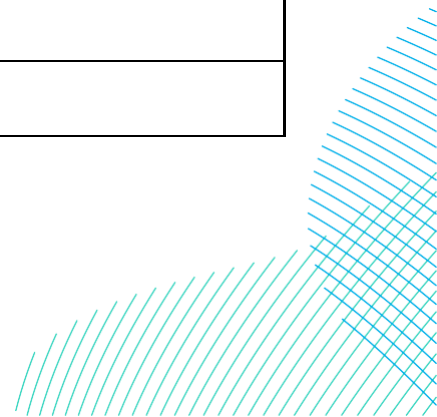


## Acronyms

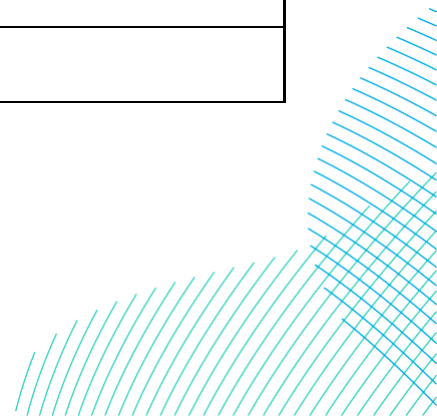
Term	Definition
AADT	Annual Average Daily Traffic
ACOMS	Airspace Coordination and Obstacle Services
AEZ	Archaeological Exclusion Zones
ALC	Agricultural Land Classification
ALO	Agricultural Liaison Officer
ALs	Action Levels
ATC	Air Traffic Control
ANSP	Air Navigation Service Provider
ASNW	Ancient Semi-Natural Woodland
ASR	Annual Status Report
ATS	Air Traffic Services
BATNEEC	Best Available Technology Not Entailing Excessive Costs
BDMP	Beach and Dune Management Plan
BGS	British Geological Survey
BMP	Beach Management Plan
BMV	Best and Most Versatile
BNG	Biodiversity Net Gain
BHA	British Helicopter Association
CAA	Civil Aviation Authority
CBRA	Cable Burial Risk Assessment



Term	Definition
CBS	Cement Bound Sand
CEA	Cumulative Effects Assessment
CEMHD	Chemicals, Explosives and Microbiological Hazards Division
CFWG	Commercial Fisheries Working Group
Cifa	Chartered Institute for Archaeologists
CIRIA	Construction Industry Research and Information Association
CNS	Communications, Navigation and Surveillance
CoCP	Code of Construction Practice
CP	Collector Platform
CRM	Collision Risk Modelling
CTMP	Construction Traffic Management Plan
DBD	Dogger Bank D
DBS	Dogger Bank South
DCO	Development Consent Order
Defra	Department for Environment, Food & Rural Affairs
DESNZ	Department for Energy Security and Net Zero
DML	Deemed Marine Licences
ECoW	Ecological Clerk of Works
ECP	England Coastal Path
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment



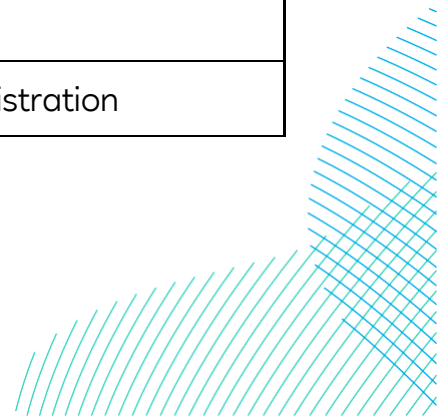
Term	Definition
EMF	Electromagnetic Field
EPR	Environmental Permitting Regulations
ERCoP	Emergency Response Cooperation Plan
ERL	Effects Range Low
ERYC	East Riding of Yorkshire Council
ES	Environmental Statement
ESP	Electrical Switching Programme
ETG	Expert Topic Group
FFC	Flamborough and Filey Coast
FLL	Functionally Linked Land
FLO	Fisheries Liaison Officer
FLOWW	Fishing Liaison With Offshore Wind and Wet Renewables Group
FRA	Flood Risk Assessment
FWEP	Flood Warning and Evacuation plan
GIS	Geographic Information System
HDD	Horizontal Directional Drill
HGV	Heavy Goods Vehicle
HMR	Helicopter Main Routes
HMRI	Helicopter Main Routing Indicator
HND	Holistic Network Design



Term	Definition
HoT	Heads of Terms
HPAI	Highly Pathogenic Aviation Influenza
HSC	Hazardous Substances Consent
HSE	Health and Safety Executive
HRA	Habitats Regulations Assessment
HRC	Household Recycling Centre
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
ICES	International Council for the Exploration of the Sea
IDB	Internal Drainage Board
IEMA	Institute of Environmental Management and Assessment
IFCA	Inshore Fisheries and Conservation Authorities
IHBC	Institute of Historic Building Conservation
IHLS	International Herring Larvae Surveys
IHO	International Hydrographic Organization
INNS	Invasive Non-Native Species
JB	Jointing Bay
JLAF	Joint Local Access Forum
JNCC	Joint Nature Conservation Committee
LAQM	Local Air Quality Management
LAQMTG	Local Air Quality Management Technical Guidance

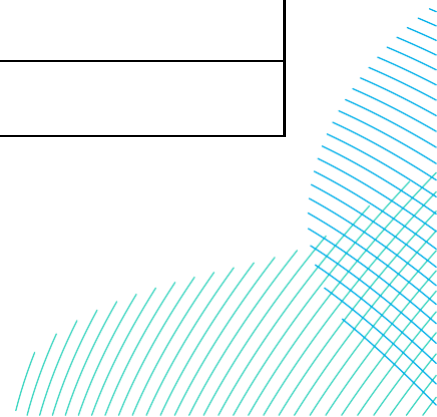


Term	Definition
LLFA	Lead Local Flood Authority
LMP	Lighting Management Plan
LWT	Lincolnshire Wildlife Trust
MCA	Maritime and Coastguard Agency
MCZ	Marine Conservation Zone
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Mammal Organisation
MOD	Ministry of Defence
MPAs	Marine Protected Areas
MPI	Multi-Purpose Interconnector
MRA	Mineral Resource Assessment
NATS	National Air Traffic Services
NE	Natural England
NFU	National Farmers Union
NGIH	National Grid Interconnector Holdings
NGOs	Non-Governmental Organisations
NGV	National Grid Ventures
NOAA	National Oceanic and Atmospheric Administration

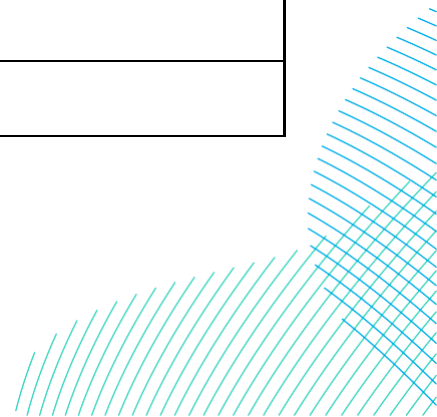




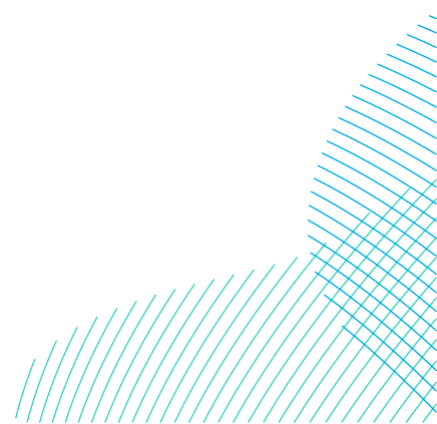
Term	Definition
NPG	Northern Power Grid
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NR	Network Rail
NRA	Navigation Risk Assessment
NRMM	Non-Road Mobile Machinery
NSIPs	Nationally Significant Infrastructure Projects
OCoCP	Outline Code of Construction Practice
OCP	Offshore Converter Platform
OCTMP	Outline Construction traffic Management Plan
OEMP	Outline Ecological Management Plan
OLMP	Outline Landscape Management Plan
OREI	Offshore Renewable Energy Installations
OSP	Offshore Substation Platform
OTNR	Offshore Transmission Network Review
OWF	Offshore Wind Farm
PAH	Poly Aromatic Hydrocarbons
PAWS	Plantation on Ancient Woodland Sites
PCBs	Polychlorinated Biphenyls
PEL	Probable Effects Level
PEI	Preliminary Environmental Information



Term	Definition
PEIR	Preliminary Environmental Information Report
PILs	Persons with an interest in the Land
PPS	Planning Policy Statement
PRoW	Public Right of Way
PSA	Particle Size Analysis
PTMP	Port Traffic Management Plan
PTS	Permanent Threshold Shift
RIAA	Report to Inform Appropriate Assessment
RRH	Remote Radar Head
SAC	Special Area of Conservation
SAR	Search and Rescue
SEL <sub>cum</sub>	Cumulative Sound Exposure Level
SEL <sub>ss</sub>	Single String Sound Exposure Levels
SEP & DEP	Sheringham Shoal & Dudgeon Extension
SGN	Scottish Gas Network
SIP	Site Integrity Plan
SNS	Southern North Sea
SoS	Secretary of State
SPA	Special Protection Area
SPZ	Source Protection Zone
SSC	Suspended Solid Concentrations



Term	Definition
SSSI	Site of Special Scientific Interest
SuDs	Sustainable Drainage
SWMP	Surface Water Management Plan
TCC	Temporary Construction Compounds
TEL	Threshold Effects Level
TJB	Transition Joint Bays
TTS	Temporary Threshold Shift
THC	Total Hydrocarbons
UKHO	UK Hydrographic Office
UWN	Underwater Noise
UXO	Unexploded Ordinance
VMS	Vessel Monitoring System
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
WTG	Wind Turbine Generator
ZOI	Zone of Influence



## Contents

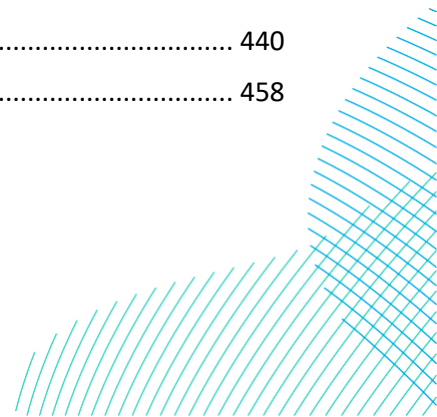
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1. This appendix sets out the statutory consultation responses from section 42 stakeholders, including landowners and Persons with an Interest in the Land (PIL’s) and non-statutory consultees that were consulted under section 47 that have been considered in the same regard as section 42 consultees. It also sets out the Applicants’ regard to those comments and identifies where a comment as resulted in a change to the Projects design and/or methodology..... 27
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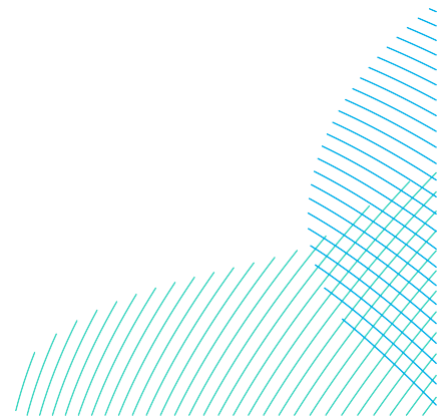
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## 1 Section 42 responses

### 1.1 Responses to the Statutory Consultation

1. This appendix sets out the statutory consultation responses from section 42 stakeholders, including landowners and Persons with an Interest in the Land (PIL's) and non-statutory consultees that were consulted under section 47 that have been considered in the same regard as section 42 consultees. It also sets out the Applicants' regard to those comments and identifies where a comment as resulted in a change to the Projects design and/or methodology.
2. Many of the issues raised in feedback, particularly from technical and statutory stakeholders, are technical issues regarding the Environmental Impact Assessment (EIA) and are addressed as part of the application documentation – particularly the Environmental Statement (ES) in Volume 7.
3. Where the issue is addressed fully within the ES, the Applicants' response indicates where further information can be provided. Due to the extent as to which the feedback received can be attributed to sections of the Environmental Statement, an indication of the ES Chapter theme to which the comment most relates is provided in the table.
4. The responses have been set out in the tables below by statutory consultation stage; Statutory Consultation (**Table 2-1**), Supplementary Statutory Consultation (**Table 3-1**) and Targeted Consultation (**Targeted Consultation Responses from Section 42 Consultees – Landowners and PILs**
5. Table 4-1).
6. Within the 'Project Change' column:
  - Y-D means there was a Project change made relating to design;
  - Y-M means there was a Project change made relating to methodology;  
and
  - N means there was no Project change made.



## 2 Statutory Consultation Responses from Section 42 Consultees

Table 2-1 Statutory Consultation Responses

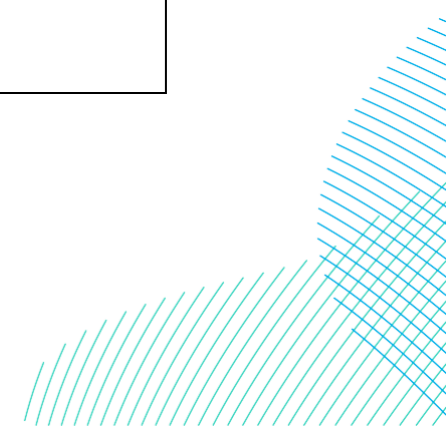
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SBN H00 1	07/10/2023	Beverley and North Holderness Internal Drainage Board (IDB)	Flood Risk and Hydrology	1. The Board wishes to state that, where possible, the risk of flooding should be reduced and that, as far as is practicable, surface water arising from a developed site should be managed in a sustainable manner to mimic the surface water flows arising from the site prior to the proposed development. This should be considered whether the surface water discharge arrangements from the site are to connect to a public or private sewer before out falling into a watercourse or to outfall directly into a watercourse.	<p>A Flood Risk Assessment (FRA) is included in <b>Volume 7, Appendix 20-4 (application ref: 7.20.20.4)</b> which considers surface water flooding and suitable mitigation including the development of a Drainage Strategy by the Principal contractor, based on <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b>. This will include measures to manage field drainage during construction and operation within the Onshore Development Area and surface water drainage during operation at the Substation Zone, including the implementation of Sustainable Drainage (SuDs). <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> was shared with the IDB and the Environment Agency for review in December 2023 and was updated to clarify that the greenfield runoff rates would be achieved and any new outfall locations would be agreed with the landowner, Lead Local Flood Authority or the IDB, depending on their location.</p> <p>In addition, a Surface Water Management Plan will be prepared by the Contractor prior to construction setting out the requirements for temporary drainage during construction including any dewatering requirements, as stated in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>, which is secured by requirement 19 in <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b>.</p> <p>Requirement 17 of <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> requires details of any foul water drainage system required during construction or operation to be submitted to and approved by the lead local flood authority, through consultation with the Environment Agency and relevant sewerage and drainage authorities. The exact details of any construction and operational welfare areas associated with the Projects are still to be determined. However, given the nature of the development, foul flows are likely to be minimal. It is anticipated that any foul water flows from the site will drain to a septic tank and be tankered away or drain to a package treatment plant prior to discharge to a nearby watercourse.</p> <p>Further measures to reduce flooding are also included in <b>Volume 7, Appendix 20-4 (application ref: 7.20.20.4)</b> and <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>. This includes the requirement for all ordinary water course crossings managed by the IDB to be agreed through method statements and include suitable measures to limit flooding including for example correctly sized over pumps. Feedback from the IDB was incorporated into the flood risk measures included in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>.</p>	Y

ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SBN H00 2	07/10/2023	Beverley and North Holderness Internal Drainage Board	Flood Risk and Hydrology	2. The applicant should be advised that the Board's prior consent is required for any development including fences or planting within 9.00m of the bank top of any watercourse (excluding Main River watercourses) within or forming the boundary of the site. Any proposal to culvert, bridge, fill in or make a discharge to the watercourse (excluding Main River watercourses) will also require the Board's prior consent.	Protective provisions have been included in <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> and shared with the IDB for agreement with the disapplication of the permitting regime. Should they not be agreed, a separate permit application would be made for IDB crossings.	Y
SBN H00 3	07/10/2023	Beverley and North Holderness Internal Drainage Board	Flood Risk and Hydrology	3. Any approved development should not adversely affect the surface water drainage of the area and amenity of adjacent properties. No development should be allowed until the Authority is satisfied that surface water drainage has been adequately provided for. The applicant does not state at this stage how surface water is to be managed.	<p><b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> including proposed measures for pre and post construction field drainage and drainage within the Onshore Development Area including SuDS at the Onshore Converter Station(s) was issued for review ahead of the Hydrology and Flood Risk Expert Topic Group (ETG) (07/12/23) and is included as part of the DCO application. One comment was received regarding the runoff rate from the Onshore Converter Stations from the review as part of the ETG.</p> <p>Requirement 16 of <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> states that works must not commence until a written plan for drainage during construction and operation of the relevant work has been submitted to and approved by the relevant planning authority, following consultation with the lead local flood authority and the Environment Agency.</p> <p>In addition, Surface Water Management Plan will be prepared by the Contractor prior to construction setting out the requirements for temporary drainage during construction including any dewatering requirements, as stated in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>, which is secured by requirement 19 in <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> and must be secured by the Relevant Planning authority in consultation with the Environment Agency and IDB, where relevant.</p>	N
SBN H00 4	07/10/2023	Beverley and North Holderness Internal	Flood Risk and Hydrology	The Board notes however that this is a Statutory Consultation for a Major Offshore/Onshore Wind Farm Development, Cable Route, Battery Storage and Associated	Flood risk from all sources, including drainage aspects of the Projects e.g. at the onshore converter station are considered within the FRA ( <b>Volume 7, Appendix 20-4 Flood Risk Assessment (application ref: 7.20.20.4)</b> ).	N

ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
		Drainage Board		Infrastructure. It is considered that this may enlarge the existing impermeable area on site and has the potential to increase the rate of surface water run-off from the site if this is not effectively constrained.		
SBN H00 5	07/10/2023	Beverley and North Holderness Internal Drainage Board	General	The Board has no objection to the principal of this development but suggests that any approval granted to the proposed development should include the following Conditions:	Suitable requirements for drainage are included in the <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> considering these points raised, as set out below.	N
SBN H00 6	07/10/2023	Beverley and North Holderness Internal Drainage Board	Flood Risk and Hydrology	<p>Drainage Works to be agreed- No development approved by this permission shall be commenced until the Local Planning Authority in consultation with the Internal Drainage Board has approved a Scheme for the provision of surface water drainage works. Any such Scheme shall be implemented to the reasonable satisfaction of the Local Planning Authority before the development is brought into use. The following criteria should be considered:</p> <ul style="list-style-type: none"> <li>Any proposal to discharge surface water to a watercourse from the redevelopment of a brownfield site should first establish the extent of any existing discharge to that watercourse.</li> <li>Peak run-off from a brownfield site should be attenuated to 70% of any existing discharge rate (existing rate taken as</li> </ul>	<p><b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> including proposed measures for pre and post construction field drainage and drainage including SuDS at the onshore converter station(s) was issued for review ahead of the ETG (07/12/23). One comment was received regarding the runoff rate from the Onshore Converter Stations.</p> <p>The detailed drainage design for elements of the Projects that are within the Internal Drainage District (IDD), i.e. the Onshore Export Cable Corridor, will be undertaken post-DCO and will take into account the criteria identified by the IDB, where relevant at this time.</p> <p>The principles set out in <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> will form the basis for the detailed drainage scheme for the Onshore Converter Station(s) as well as informing the pre and post construction land drainage, which would be submitted to East Riding of Yorkshire Council, as the Lead Local Flood Authority (LLFA), and the IDB prior to the commencement of construction of the Projects.</p> <p>A Surface Water Management Plan will be prepared by the Contractor prior to construction setting out the requirements for temporary drainage during construction, as stated in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>, to be secured as a requirement within the DCO.</p> <p>All riparian owners will be identified and consulted prior to commencement of construction. A summary of the surface water drainage provisions are provided in <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b>.</p> <p>Construction works in the IDB catchment are limited to the excavation and installation of the Onshore Export Cables, trenched and trenchless crossings, temporary construction compounds and the temporary Haul Road. During the</p>	N



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>140lit/sec/ha or the established rate whichever is the lesser for the connected impermeable area).</p> <ul style="list-style-type: none"> <li>• Discharge from “greenfield sites” taken as 1.4 lit/sec/ha (1:1yr storm).</li> <li>• Storage volume should accommodate a 1:30 year event with no surface flooding and no overland discharge off the site in a 1:100yr event.</li> <li>• A 30% allowance for climate change should be included in all calculations.</li> <li>• A range of durations should be used to establish the worst-case scenario.</li> <li>• The suitability of soakaways, as a means of surface water disposal, should be ascertained in accordance with BRE Digest 365 or other approved methodology. REASON: To ensure the development is provided with satisfactory means of drainage and to reduce the risk of flooding.</li> </ul>	<p>construction phase the Projects will include measures, outlined in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> and to be secured as part of the DCO, to ensure there is no impact on flood risk. The measures identified in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> include the need to undertake a survey of all drainage features along the Onshore Export Cable Corridor to identify appropriate site-specific measures for each of these.</p> <p>Once the Projects are constructed there will be no above ground infrastructure within the IDB catchment. The land, as well as the drainage, will be reinstated to ensure there is no flood risk impact.</p>	
SBN H00 7	07/10/2023	Beverley and North Holderness Internal Drainage Board	Flood Risk and Hydrology	Restrict Rate of Discharge - No development approved by this permission shall be commenced until a Scheme for the provision, implementation and maintenance of a surface water regulation system has been approved by and implemented to the reasonable	The strategy for controlling surface water runoff is detailed in <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> . The report gives details of the outline drainage strategy for the Onshore Converter Station(s) and the pre and post construction land drainage, located within the Onshore Development Area. This strategy will form the basis of the detailed drainage scheme that will be submitted to the relevant planning authority (ERYC), to be approved following consultation with the LLFA and the Environment Agency.	Y-D

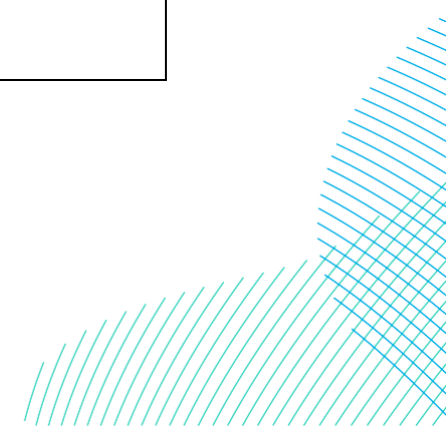


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				satisfaction of the Local Planning Authority in consultation with the Internal Drainage Board. The rate of discharge would not be expected to exceed that of a "greenfield site" taken as 1.4 lit/sec/ha. REASON: To prevent the increased risk of flooding.	In addition to the pre and post construction land drainage scheme described above, a Surface Water Management Plan (SWMP), setting out the requirements for temporary surface water drainage during construction would also be prepared by the contractor, should any temporary dewatering be required.  In response to this comment regarding the runoff rate from the Onshore Converter Stations, it was discussed further at the Hydrology and Flood Risk ETG in December 2023 and <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> was updated to provide further clarification.	
SBN H00 8	07/10/2023	Beverley and North Holderness Internal Drainage Board	Flood Risk and Hydrology	Drainage Routes - All drainage routes through the Site shall be maintained both during the works on Site and after completion of the works. Provisions shall be made to ensure that upstream and downstream riparian owners and those areas that are presently served by any drainage routes passing through or adjacent to the Site are not adversely affected by the development. Drainage routes shall include all methods by which water may be transferred through the Site and shall include such systems as "ridge and furrow" and "overland flows". The effect of raising Site levels on adjacent property must be carefully considered and appropriate measures taken to negate influences.	<b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> includes proposed measures for pre and post construction field drainage including to maintain or divert field drainage to an 'interceptor drain' where it interacts with the buried infrastructure at the Landfall Zone, Onshore Export Cable Corridor or the Substation Zone. Runoff rates for any new outfalls will meet the greenfield run off rate requirements to ensure that upstream and downstream riparian owners and those areas that are presently served by any drainage routes passing through or adjacent to the Site are not adversely affected by the Projects.  Any Overland flows would be controlled through the Surface Water Management Plan which will be prepared by the Contractor prior to construction setting out the requirements for temporary drainage during construction, as stated in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> , to be secured as a requirement 19 within the DCO.  All riparian owners will be identified and consulted prior to commencement of construction.  Site levels would be altered at the Onshore Converter Station(s), this would be considered as part of the detailed drainage strategy developed prior to construction. In addition, wording has been added to <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> to state that where soil storage in Flood Zones 2 and 3 is unavoidable, spoil storage areas will be located such that they don't block or divert existing surface water flow paths. Once the Projects are constructed there will be no above ground infrastructure within the IDB catchment. The land, as well as the drainage, will be reinstated to ensure there is no flood risk impact.	Y-D
SBN H01 2	07/10/2023	Beverley and North Holderness Internal	Flood Risk and Hydrology	No Storage of Materials - There shall be no storage of any materials including soil adjacent to the bank top of the watercourse. REASON: To ensure that there will	Stockpiles and storage of materials will be sited away from the bank top of any watercourses to ensure there is no impact on the nearby watercourses.	Y-D

ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
		Drainage Board		be no risk of the watercourse becoming blocked by debris from the stockpiles or bank slipping due to increased loading of the bank top.	<p>In addition, as noted above, where soil storage in Flood Zones 2 and 3 is unavoidable, spoil storage areas will be located such that they don't block or divert existing surface water flow paths. This detail was added following discussion at the ETG.</p> <p>Additionally, topsoil and subsoil will be stored in separate stockpiles in line with Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites PB13298, or the latest relevant available guidance.</p> <p>Once the stockpile has been completed the area should be cordoned off with secure fencing to prevent any disturbance or contamination by other construction activities. If the soil is to be stockpiled for more than six months, the surface of the stockpiles should be seeded with a grass/clover mix to minimise soil erosion.</p> <p>These measures are outlined in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>, which has been secured as a requirement of the DCO, to ensure there is no impact on flood risk.</p>	
SBN HO1 3	07/10/2023	Beverley and North Holderness Internal Drainage Board	Flood Risk and Hydrology	Flood Risk Assessment (FRA) - In accordance with Planning Policy Statement (PPS) 25 it is considered appropriate that a more detailed Flood Risk Assessment should be carried out for this proposed development.	The ES is supported by an FRA ( <b>Volume 7, Appendix 20-4 (application ref: 7.20.20.4)</b> ) that has been undertaken in accordance with current policy and guidance including National Policy Statements, National Planning Policy Framework (NPPF) and its supporting Planning Practice Guidance. It will be proportionate in scale and detail to the nature of the Projects and summarises flood risk both to and from it, based on the sources of flood risk outlined in NPPF.	N
SBN HO1 4	07/10/2023	Beverley and North Holderness Internal Drainage Board	Flood Risk and Hydrology	Drainage Risk Assessment - In accordance with PPS 25 it is considered appropriate that a Drainage Risk Assessment should be carried out for this proposed development.	The ES is supported by <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> that has been prepared in accordance with current policy and guidance including National Policy Statements, NPPF and its supporting Planning Practice Guidance as well as local requirements with regard to surface water drainage, as set out by East Riding of Yorkshire Council, in their role as the LLFA.	N
SBN HO1 6	07/10/2023	Beverley and North Holderness Internal Drainage Board	Flood Risk and Hydrology	PPS 25 Premise - The Board wishes to highlight the premise within PPS 25 that developers, where possible, reduce flood risk overall (paragraph 22) and that, as far as is practicable, surface water arising from a developed site should be managed in a sustainable manner to mimic the surface water flows arising from	<p>PPS25 was superseded by NPPF in 2012. As such the ES is supported by both a FRA and Outline Drainage Strategy that has been undertaken in accordance with current policy and guidance including NPPF and its supporting Planning Practice Guidance, the CIRIA SuDS Manual (C753) as well as local requirements with regard to surface water drainage, as set out by East Riding of Yorkshire Council, in their role as the LLFA.</p> <p>The ES is supported by <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> that has been prepared in accordance with current policy and guidance including National Policy Statements, NPPF and its supporting Planning Practice Guidance as well as local requirements with regard to surface water drainage, as set out by East</p>	N

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				the site prior to the proposed development (paragraph F6). This should be considered whether the surface water discharge arrangements from the site are to connect to a public or private sewer before out falling into a watercourse or to outfall directly into a watercourse.	Riding of Yorkshire Council, in their role as the LLFA. The principles set out in <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> will form the basis for the detailed drainage scheme for the onshore convertor station(s) as well as informing the pre and post construction land drainage, which would be submitted to East Riding of Yorkshire Council, as the LLFA, and the IDB prior to the commencement of construction of the Projects. A Surface Water Management Plan will be prepared by the Contractor prior to construction setting out the requirements for temporary drainage during construction, as stated in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> , secured as a requirement within the DCO.	
SBN HO1 7	07/10/2023	Beverley and North Holderness Internal Drainage Board	Flood Risk and Hydrology	The Board would however also like to take the opportunity to inform the applicant that the prior written consent of the Board (outside of the planning process) will be required for any proposed works or structures in, under, over or within 9 metres of the top of the bank of any Board maintained watercourse, or any ordinary watercourse, (excluding Main River watercourses), in the Board's district. Any proposals to culvert, bridge, fill in or make a discharge to any watercourse (excluding Main River watercourses), will also require the Board's prior written consent approval. Please also note that any consent application can take several months to be considered by the Board.	Protective provisions have been included in <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> and shared with the IDB for agreement with the disapplication of the permitting regime. Should they not be agreed, a separate permit application would be made for IDB crossings.	N
SBN HO1 8	07/10/2023	Beverley and North Holderness Internal Drainage Board	Flood Risk and Hydrology	The Board is also very anxious that any existing land drainage systems disturbed during the course of the works, particularly during installation of the new cabling are reinstated following consultation	The ES is supported by <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> that has been prepared in accordance with current policy and guidance including National Policy Statements, NPPF and its supporting Planning Practice Guidance as well as local requirements with regard to surface water drainage, as set out by East Riding of Yorkshire Council, in their role as the LLFA. The principles set out in <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> will form the basis for the detailed drainage scheme for the onshore convertor station(s) as well as informing	N

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				with the Board to reduce the risk of future flooding.	<p>the pre and post construction land drainage, which would be submitted to East Riding of Yorkshire Council, as the LLFA, and the IDB prior to the commencement of construction of the Projects.</p> <p>A Surface Water Management Plan will be prepared by the Contractor prior to construction setting out the requirements for temporary drainage during construction, as stated in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>, to be secured as a requirement within the DCO.</p> <p>All channels disturbed by trenching or the installation of temporary crossings will be made good and reinstated to their former condition. This is set out within <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> and will be secured as a requirement in the DCO.</p> <p>All channels disturbed by trenching or the installation of temporary crossings will be made good and reinstated to their former condition. This is set out within <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> and will be secured as a requirement in the DCO.</p>	
SBN H019	07/10/2023	Beverley and North Holderness Internal Drainage Board	Flood Risk and Hydrology	The Board would also strongly recommend that all watercourse cable crossings following consultation with the Board are installed by HDD drilling to reduce the risk of potential damage to the watercourse and to avoid disruption to the flow of the watercourse during construction.	<p>Crossing methods will be agreed with the relevant authority at the detailed design stage, to include the Environment Agency, Internal Drainage Board (IDB) and East Riding of Yorkshire Council (as the LLFA).</p> <p>The proposed crossing method is included in the <b>Obstacle Crossing Register (OCR) (Volume 7, Appendix 5-2 (application ref: 7.5.5.2))</b>. All Environment Agency Main Rivers will be crossed by trenchless crossing, whilst smaller drains and watercourses (i.e. Ordinary Watercourses) have been proposed to utilise an open cut crossing methodology.</p> <p>The following IDB drains will be crossed by open cut (trenching):</p> <ul style="list-style-type: none"> <li>• Dunnington Sewer;</li> <li>• Arnold and Riston Drain (note there is a preference for HDD at this location but all options are retained); and</li> <li>• South Bullock (N. Branch - Diggins Arms).</li> </ul> <p>There are two trenchless crossings of IDB drains:</p> <ul style="list-style-type: none"> <li>• Turf Gutter &amp; Eske River Side Drain; and</li> <li>• Skipsea Drain (West Branch).</li> </ul> <p>There are two haul road only crossings of IDB drains:</p> <ul style="list-style-type: none"> <li>• Storkhill Drain; and</li> </ul>	N



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					<ul style="list-style-type: none"> <li>South Bullock (S. Branch - Chalk Arm).</li> </ul> <p>There a further 15 crossings (trenched and HDD) within the IDB catchment. These are drains managed by riparian owners, not the IDB.</p>	
SBN H009	07/10/2023	Beverley and North Holderness Internal Drainage Board	Site Selection and Assessment of Alternatives	9 metre Maintenance Strip - A strip of land 9 metres wide adjacent to the top of both banks of all watercourses on Site shall be kept clear of all new buildings and structures (including gates, walls, fences and trees) unless agreed otherwise in writing with the Local Planning Authority in consultation with the Board. Ground levels must not be raised within this area. Access arrangements should be agreed with the Internal Drainage Board. REASON: To maintain access to the watercourse for maintenance or improvements.	As detailed in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> a 9m wide strip will be maintained during the construction phase to ensure the ongoing maintenance of IDB drains and this has been included in the design. Some IDB drains would be subject to open cut during construction, in these cases the crossing design and construction methodology would be agreed with the IDB and relevant authority prior to construction. <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> was updated in response to this comment.	Y-D
SBN H010	07/10/2023	Beverley and North Holderness Internal Drainage Board	Site Selection and Assessment of Alternatives	6 Meter Clear of Culvert - No development, including building, filling, tree planting, or any other permanent obstruction, shall be located over or within 6 metres measured from either outside edge of the pipe forming a culverted watercourse.  REASON: To ensure that access to the culvert is available for maintenance and prevent damage to the culvert.	As detailed in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> , a 6m wide strip from the outside edge of any pipe which is forming a culverted IDB watercourse will be maintained during both construction and once it is located in situ to enable access and to prevent damage. This consideration has been included in the design. Some IDB drains would be subject to open cut during construction, in these cases the crossing design and construction methodology would be agreed with the IDB and relevant authority prior to construction. <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> was updated in response to this comment.	Y-D
SBN H011	07/10/2023	Beverley and North Holderness Internal	Site Selection and Assessment	4 Meter Access Strip - A permanent 4 metre wide undeveloped strip shall be made available across the Site. Access	As detailed in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> , a permanent access routes will be designed into the Projects, including a minimum 4m wide access strip, where relevant. <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> was updated in response to this comment.	Y-D

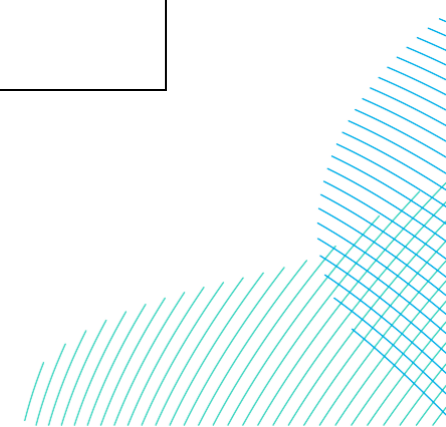
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		Drainage Board	of Alternatives	arrangements should be agreed with the Internal Drainage Board. REASON: To allow access to the watercourse for maintenance purposes.		
SBN H01 5	07/10/2023	Beverley and North Holderness Internal Drainage Board	Site Selection and Assessment of Alternatives	Location of Structures - The proposed structure is adjacent to a Board maintained watercourse and, as such, requires the formal Consent under the Land Drainage Act from the Internal Drainage Board.	Protective provisions have been included in the <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> and shared with the IDB for agreement with the disapplication of the permitting regime. Should they not be agreed, a separate permit application would be made for IDB crossings.	Y-M
SBB 001	17/07/2023	Beverley Butcher's	Site Selection and assessment of alternatives	No substantive detail regarding what could potentially be located on their property at White Hall farm within 4 substation scenarios	White Hall farm is located partially within Substation Zone 1. As described in Section 4.10 of <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> Substation Zone 1 is not being taken forward as part of the application and both Onshore Converter Stations will be located within Substation Zone 4. Further details regarding the types of equipment that would be located in an Onshore Converter Station are included in section 5.7.2 of <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> .	N
SBB 002	17/07/2023	Beverley Butcher's	Landscape and visual impact	Significant negative impact on residential and visual amenity of White Hall farm which is grade 2 listed property. It would have a severely detrimental effect on the capital value of the entire property	White Hall farm is located partially within Substation Zone 1. As described in section 4.10 of <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> Substation Zone 1 is not being taken forward as part of the application and both converter stations will be located within Substation Zone 4. There are not considered to be any significant environmental effects on White Hall farm following the refinement of the Projects design. A Landscape and Visual Impact Assessment is included in <b>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)</b> .	N
SBB 003	17/07/2023	Beverley Butcher's	Land Use	Actively discussing the potential for a solar PV installation on the same area of land which could be rendered not worth pursuing. It is likely that shadowing from the buildings could be a serious issue	White Hall farm is located partially within Substation Zone 1. As described in section 4.10 of <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> . Substation Zone 1 is not being taken forward as part of the application and both Onshore Converter Stations will be located within Substation Zone 4. Shadowing from the Onshore Converter Station buildings onto Zone 1 will therefore not occur.	N

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SBB 004	17/07/2023	Beverley Butcher's	Noise	Concerned at the level of electromagnetic fields caused by the proposed substation and noise both during construction and operation	<p>For onshore electrical infrastructure, the EMF risks are scoped out of the assessment on the basis that the Projects would adopt the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines (ICNIRP, 1998) and Government voluntary Code of Practice on EMF public exposure (Department for Energy and Climate Change, 2012). This is referenced within <b>Volume 8, Commitments Register (application ref: 8.6)</b> submitted alongside the DCO application.</p> <p>Potential noise impacts are assessed in <b>Volume 7, Chapter 25 Noise (application ref: 7.25)</b> of the ES. The assessment covers both the construction phase and operational phases. Noise and vibration effects can arise from construction traffic using the local highway network and from construction plant used to build the Onshore Export Cable Corridor. Operational noise effects can arise from the Onshore Converter Stations and associated plant.</p> <p>The assessment finds that potential effects during construction, including those from construction traffic are not considered to be significant with the implementation of the mitigation measures set out in <b>Volume 7, Chapter 25 Noise (application ref: 7.25)</b>. This includes the implementation of a Code of Construction Practice, in accordance with <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> submitted with the application.</p> <p>Noise effects during the operational phase (arising from the Onshore Converter Stations) have been assessed within the ES Chapter and are not considered to be significant. Operational noise will be managed by <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> Requirement 21 (Control of noise during the operational phase).</p>	N
SBB 005	17/07/2023	Beverley Butcher's	Landscape and visual impact	Any potential screening would not reach maturity for a great number of years	<p>The Landscape Mitigation Plan (<b>Volume 7, Figure 23-6 (application ref: 7.23.1)</b>) is considered to be standard mitigation for the Projects. However, it is recognised that mitigation planting will not be fully effective until plants begin to grow and mature. <b>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)</b> therefore reports on effects at year 1 following completion, when the effectiveness of planting will be least. This represents a worst case assessment. The LVIA also reports on effects at year 10, assuming that planting is maturing and beginning to be more effective in mitigating the effects. This assessment is the residual effect.</p>	N
SBB 006	17/07/2023	Beverley Butcher's	Site Selection and assessment	Consideration should be given to locating the substation in the very south western part of the zone	Substation Zone 1 presented at statutory consultation, is no longer included in the Onshore Development Area.	N



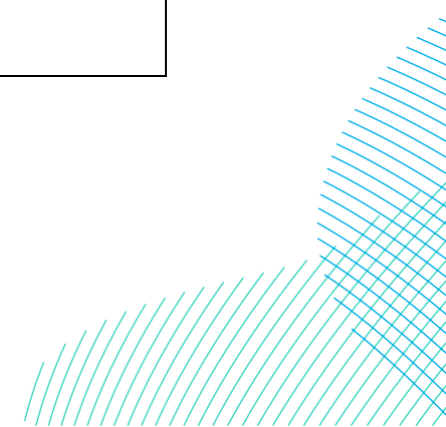
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			of alternatives			
SBR 001	16/07/2023	Beverley Ramblers – Ramblers Association	Site Selection and assessment of Alternatives	We would prefer to avoid another cable route from the coast to Beverley. We would prefer the route to go to the south of Beverley, using the same route as that which has been used for the Dogger bank site currently under construction. This would avoid tearing up more countryside North of Beverley.	<p>The Applicants considered options for the Onshore Export Cable Corridor that routed to the southeast of Beverley however these routes were not taken forward and routed to the north of Beverley was selected. Reasons for not selecting the Onshore Export Cable Corridor to the southeast of Beverley included needing to pass through residential gardens and / or common land. Further details of the Onshore Export Cable Corridor route selection process are set out in section 4.12 of <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>.</p> <p>Due to uncertainty about construction infrastructure requirements for other Projects, and the environmental and engineering constraints identified in the vicinity of other Projects, which have already been consented. It is not possible to locate the Projects together with Dogger Bank (A and B).</p> <p><b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>, which forms part of the embedded mitigation measures for the Projects (see Table 21-3) of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>, forms part of the DCO application. This includes measures to keep PRoW open during construction and will be agreed with the East Riding of Yorkshire Council prior to construction. Following construction, the Onshore Export Cable Corridor will be reinstated, a commitment has been made to reinstate between Jointing Bays within two years from the start of construction. All other areas will be reinstated, following the completion of construction.</p>	N
SBR 002	16/07/2023	Beverley Ramblers – Ramblers Association	Site Selection and assessment of Alternatives	We would prefer to keep the Substation Zone Option 1 as the preferred site. This would be alongside the existing site, keeping the sites close together.	Due to spatial constraints within Substation Zone 1, co-location of the Onshore Converter Stations within Substation Zone 1 was not considered possible. The site selection process did consider locating one HVDC Converter Station on Zone 1 and one on Zone 4 however following a detailed site selection process, that has considered environmental, engineering and land considerations, Substation Zone 1 was discounted from consideration and Substation Zone 4 selected for both Onshore Converter Stations. Further details on the Substation Zone selection process is detailed in section 4.10 of <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> .	N
SBR 003	16/07/2023	Beverley Ramblers –	Site Selection and assessment	The Minster Way foot path to the North of Beverley would be adversely affected by the scheme,	Details of PRoW, National Trails, Coastal Paths and Marked Routes present within the Onshore Development Area are included within Section 21.5 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> . An assessment of the potential impacts to these features during construction and operation of the Projects is included within	N

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		Ramblers Association	of Alternatives	if the cable route were to the North of Beverley.	Sections 21.6.1.6 and 21.6.2.5 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> respectively. The Minster Way foot path would remain open during construction with the measures set out in <b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> , therefore no significant effects were identified.	
SOW 001	25/03/2023	Bristow, European Operations, Humberside SAR Unit	Aviation and Radar	From a SAR Ops perspective I don't feel we need any more information at this point. It's our experience we are tasked more often during the windfarm construction phase due to increased numbers of personnel in the wind farm. Post completion our operations are only affected should we be tasked to operate within the windfarm boundary and this would be coordinated with Humber Coastguard referring to the Dogger Bank ERCoP.	Noted.	N
SOW 001		British Helicopter Association	Aviation and Radar	In March 2023 an email was issued to the British Helicopter Association (BHA) which provided information on the Projects and included details of oil and gas infrastructure in the vicinity of the DBS Array Areas. The email offered meetings with stakeholders and the opportunity to submit comments on potential impacts to their operations. The BHA kindly forwarded the email to relevant offshore helicopter operators and responses were received from Bristow and Uni-Fly.	Noted.	N
SOW 001	17/07/2023	Butt Farm (O White)	Land Use	The indicative substation temporary construction compounds (edged orange) directly adjoin our client's caravan	In the worst case sequential scenario construction works are to be completed for both Projects simultaneously in the first four years, with additional works in the Substation Zone and at Jointing Bays in the following two years. The maximum duration of effects is six years.	N



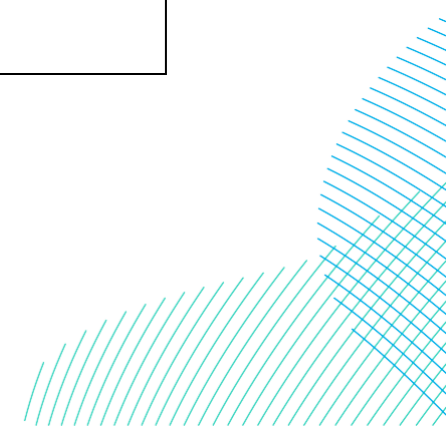
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				<p>and camping site (edged blue). The disturbance that the caravan and camping site will suffer is likely to be significant during both the construction phase, as well as during operation.</p>	<p>Moderate adverse temporary construction impacts are identified in section 23.6.1.2.3.1 of <b>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)</b>. However, on completion of all construction works, construction effects on the Butt Farm viewpoint would be superseded by the operational effects, which are assessed in section 23.6.2.3.1 as a significant residual adverse effect (moderate adverse). A significant adverse effect has also been identified in <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b> on Butt Farm campsite. By year 10, the mitigation planting to the north of the Onshore Converter Stations is expected to be effective in partly screening and filtering views of the Onshore Converter Stations, with vegetation expected to be around 8-10 m in height (modelled in the photomontage). The vegetation would largely screen the lower elements of the Onshore Converter Stations, however, the upper parts of the Onshore Converter Stations such as the roofs of the buildings would still be visible on the skyline. The amount of screening provided by the planting would continue to increase as the trees mature with age.</p> <p>Any reasonable loss of business would be considered by our lands team.</p> <p>Potential noise impacts are assessed in <b>Volume 7, Chapter 25 Noise (application ref: 7.25) of the ES</b>. The assessment covers both the construction phase and operational phase. Noise and vibration effects can arise from construction traffic using the local highway network and from construction plant used to build the Onshore Export Cable Corridor. Operational noise effects can arise from the Onshore Converter Stations and associated plant. The assessment finds that potential effects during construction, including those from construction traffic are not considered to be significant with the implementation of the mitigation measures set out in <b>Volume 7 Chapter 25 Noise (application ref: 7.25)</b>. This includes the implementation of a Code of Construction Practice (in accordance with <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> submitted with the application.</p> <p>Noise effects during the operational phase (arising from the Onshore Converter Stations) have been assessed within the ES Chapter are not considered to be significant. Operational noise will be managed by <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> Requirement 21 (Control of noise during the operational phase).</p>	
SOW 002	17/07/2023	Butt Farm (O White)	Noise	<p>During construction the noise and disturbance from vehicle movements and ongoing work is expected to be such that it will not be possible to operate the caravan and camping site without</p>	<p>Noise and air quality effects during construction, including those from construction traffic are not considered to be significant with the implementation of the measures set out in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>. Any reasonable loss of business would be considered by our lands team based on any evidence provided.</p>	N

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				significant negative impact on their business. If the Proposed Development goes ahead, we expect that there will be no other option than to close the caravan and camping site for the duration of construction and claim compensation for loss of income from the project		
SOW 003	17/07/2023	Butt Farm (O White)	Land and Visual Impact	The impact of the presence of the substation after construction, whichever scenario is chosen, is likely to also have an impact on the long term viability of the caravan and camping site due to the effect on the visual amenity of the area.	Moderate adverse temporary construction impacts are identified in section 23.6.1.2.3.1 of <b>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)</b> . On completion of all construction works, construction effects on the Butt Farm viewpoint would be superseded by the operational effects, which are assessed in section 23.6.2.3.1 as major adverse (significant) in year 1 following completion. A significant adverse effect has also been identified in <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b> on Butt Farm campsite. By year 10, the mitigation planting to the north of the Onshore Converter Stations is expected to be effective in partly screening and filtering views of the Onshore Converter Stations, with residual effects at the Butt Farm viewpoint assessed as moderate adverse at year 10. Vegetation is expected to be around 8-10 m in height (modelled in the photomontage). The vegetation would largely screen the lower elements of the Onshore Converter Stations, however, the upper parts of the Onshore Converter Stations such as the roofs of the buildings would still be visible on the skyline. The amount of screening provided by the planting would continue to increase as the trees mature with age. Any reasonable loss of business would be considered by our lands team.	N
SOW 004	17/07/2023	Butt Farm (O White)	Land and Visual Impact	In order to reduce the long term visual impact of the proposed substation, and to hopefully mitigate some of the financial loss that will be suffered by our Client's business, we would request a soil bund with planting be positioned on the northern boundary of the substation zone adjoining the caravan and camping site to give both a visual screen as well as some sound absorbing properties.	The largest structures within the Substation Zone would be the valve hall being 244m x 264m with an approximate height of 24m. <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b> has been developed for the Projects, reflecting the form and scale of the proposals, and the assessed landscape and visual effects. This includes proposed planting to the north of the site. However, it is recognised that mitigation planting will not be fully effective until plants begin to grow and mature. <b>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)</b> therefore reports on effects at year 1 following completion, when the effectiveness of planting will be least. This represents a worst-case assessment. The LVIA also reports on effects at year 10, assuming that planting is maturing and beginning to be more effective in mitigating the effects.	N

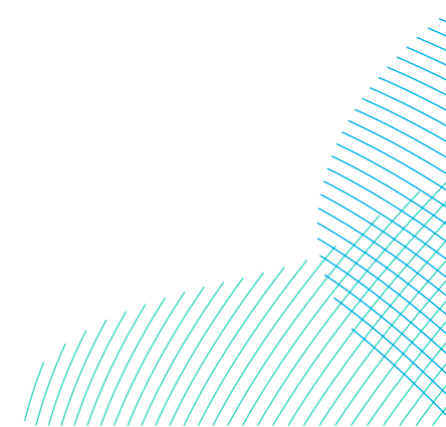


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				We also request that the proposed substation is sunk into the ground to use the natural slope of the land on which the substation zone is proposed on to help mask its presence	Bunding is considered in <b>Volume 8, Volume 8, Design and Access Statement (application ref: 8.8)</b> , as an option for the detailed design. However, to form a significant bund height a large area would be required at the base of the bund to allow an acceptable slope gradient. This would require more land to the north of the Substation Zone, closer to the campsite. A large, steep-sided bund is unlikely to reflect the natural slope of the land. Planting on raised bunds is also likely to be less effective, particularly on steep slopes, due to drainage issues, and the overall screening height may therefore be reduced. Some ground levelling will be required for the Onshore Converter Station(s), however it is not proposed to lower the ground level considerably.	
SOW 005	17/07/2023	Butt Farm (O White)	Land Use	The position of the proposed road will sever approximately 23 hectares of land from the main part of Butt Farm and, depending on the exact position of the road, will leave some areas which are impractical to farm with modern machinery.	Under a worst case scenario, the Substation Zone access road would be fenced for the entire duration of the construction works. This would equate to land being unavailable for agricultural use for up to 4 years for both Projects in isolation and concurrently. DBS East and DBS West sequentially would result in the land being unavailable for up to 6 years. By consulting with landowners and occupiers, maintaining access to severed land, appropriate timings of works and reinstatement of land to pre-construction conditions as soon as reasonably practicable, it is likely that the amount of land temporarily unsuitable for agriculture would be reduced.  Private agreements (or compensation in line with the compulsory purchase completion code) would be sought with relevant landowners / occupiers. <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b> has been developed for the Projects and includes areas of the Substation Zone which will be returned to agriculture, following construction.	N
SOW 006	17/07/2023	Butt Farm (O White)	Traffic and Transport	The proposed road improvements to the Jock's Lodge Junction on the A164 would seem an ideal opportunity to create an access point to serve to substation, rather than using a new junction off the A1079 which would only be accessible from the northbound carriageway.	There may be a temporal overlap during the first year of construction of the Projects and the final year of the junction improvements. Therefore, through discussions with East Riding of Yorkshire Council (ERYC) Highways it has been decided that a construction and operational access off the A1079 was the most preferable option from a traffic and transport perspective. Further information can be found in <b>ES Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> .	N
SOW 007	17/07/2023	Butt Farm (O White)	Traffic and Transport	Should the proposed access off the A1079 be created this will cause an increased security risk to Butt Farm as there is currently only one	The Onshore Converter Stations would not be manned; however, access would be required periodically for routine maintenance activities, estimated at an average of one visit per week. Monitoring of the onshore convertor stations would be done remotely using CCTV technology and other remote monitoring equipment. The	N

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				means of entering the property by utilising the farm drive from Victoria Road and across the A1079 flyover, directly past the farmhouse. The proposed new access will create a second route onto the farm which would most directly approach the rear of the farmstead.	security fencing installed during construction would remain in place throughout operation including a security gate installed at the access point off the A1079. Further information can be found in ES <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> .	
SCO 01	17/07/2023	Cadent	Consultation	1. On review of the consultation documentation and our GIS system we believe the project to be outside of our operational areas. If you believe that Cadent Gas is an interested party in this project, please can you forward details to assist in clarification?	Email response sent 31/07/2023 confirming that no Cadent assets or interests had been identified as being within the proposed project boundary.	N
SCA A00 1	14/07/2023	Civil Aviation Authority	Aviation and Radar	Aviation Obstacle Notification The CAA requires notification of a change to aviation obstacles if it or they are 100 metres or more above sea level, in accordance with Article 225A of the Air Navigation Order (2016). This is a recent addition to the Air Navigation Order legislation.	The requirements of Article 225A are noted and outlined in section 15.3.3.1.	N
SCA A00 5	14/07/2023	Civil Aviation Authority	Aviation and Radar	Aeronautical Obstacle Lighting and Marking A Lighting Management Plan (LMP) must be agreed and implemented in consultation with the CAA in order for the UK to meet its international obligations under the Chicago Convention. The CAA uses requirements set out in Article 223 of the Air Navigation Order (2016) as the basis for its	The requirement for an LMP is now included as standard mitigation in section 15.3.3.2 of <b>Volume 7, Chapter 15 Aviation and Radar (application ref 7.15)</b> . Lighting would be in accordance with Article 223 of the Air Navigation Order 2016.	N



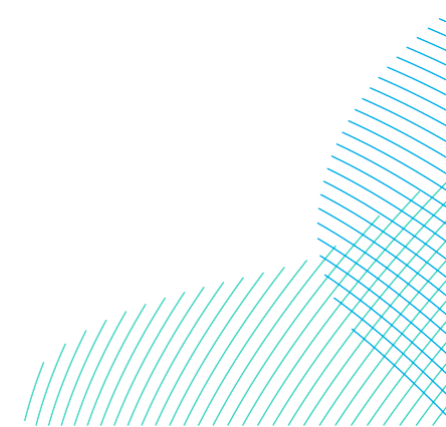
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				requirements. Appendix 1 gives further details of the Air Navigation Order Articles 223 and 225A.		
SCA A00 6	14/07/2023	Civil Aviation Authority	Aviation and Radar	Impacts on civil aviation monitoring systems Wind turbines located within the line-of-sight of surveillance systems (in particular, primary radar) can cause clutter and interference and can result in performance degradation. Radar line-of-sight analysis is theoretical; operationally there are other factors such as signal refraction, diffraction, attenuation and anomalous propagation within a given radar environment that can influence the probability of an operational wind turbine being detected. Cumulative impact of this and other developments should also be considered on surveillance systems. We note that the Preliminary Environmental Information Report covers this in detail and have not additional comments to make.	Noted.	N
SCA A00 7	14/07/2023	Civil Aviation Authority	Aviation and Radar	Helicopter Operations "This covers two aspects: (1) potential helicopter support for operations and maintenance of the wind farm itself; and (2) impact on offshore helicopter operations to existing platforms and installations".	Helicopter operations are discussed in sections 15.5.4 and 15.5.5 and assessed in sections 15.6.1.2, 15.6.1.3, 15.6.2.2, 15.6.2.3, 15.6.3.2, and 15.6.3.3 of <b>Volume 7, Chapter 15 Aviation and Radar (application ref 7.15)</b> . Helicopter Access is also detailed within the Helicopter Access Report ( <b>Volume 7, Appendix 15-3 (application ref: 7.15.15.3)</b> ).	N



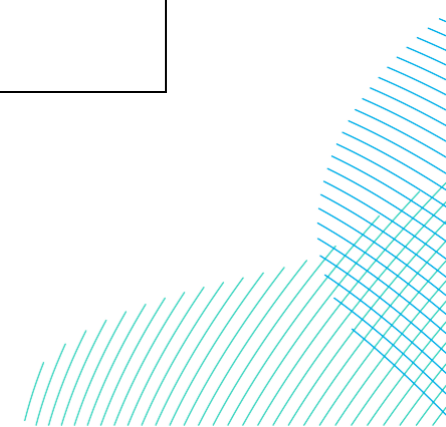
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SCA A008	14/07/2023	Civil Aviation Authority	Aviation and Radar	Requirements for winching operations should be discussed with appropriate helicopter operators well in advance. Where such operations are undertaken, additional platform design criteria, lighting on the wind turbines, obstacle clearance and marking of the blades may be required. This is detailed in CAA Publication (CAP) 437 – Standards for Offshore Helicopter Landing areas.	Noted. CAP 437 requirements will be adhered to and referenced in consultation between the Developer and the appropriate helicopter operators post-consent.	N
SCA A009	14/07/2023	Civil Aviation Authority	Aviation and Radar	All offshore helicopters operate with limited icing clearances which means that they must be able to descend to warmer air near the sea surface at any point on the route. Operation through a wind farm corridor is highly unlikely and it might be that they would have to route around the wind farm. This may impact fuel burn and load capacity. In addition, where wind turbines are located in the vicinity of existing platforms and installations that offshore helicopters operate to/from, consideration must be given to approach and take off, including in abnormal situations (e.g. one engine inoperative). Engagement with operators and duty holders as appropriate should be undertaken.	Noted. The four offshore platforms that are within 9 nautical miles (nm) of the Array Areas are detailed in section 15.5.5 of <b>Volume 7, Chapter 15 Aviation and Radar (application ref 7.15)</b> . A Helicopter Access Report ( <b>Volume 7, Appendix 15-3 (application ref: 7.15.15.3)</b> ) has been undertaken to determine any potential impacts and the report was issued to all relevant helicopter operators, via the British Helicopter Association, for their comment on 19/01/2024.	N
SCA A010	14/07/2023	Civil Aviation Authority	Aviation and Radar	The transit to and from offshore infrastructure is normally undertaken as an approximate direct route. However, Helicopter Main Routes (HMR) have been	Helicopter Main Routing Indicator (HMRI) 8 passes within 2nm of the DBS East Array Area, as detailed in section 15.5.4. The potential for wind turbines to be within 2nm of HMRI 8 has been highlighted to NATS as the Air Navigation Service Provider (Anglia Radar) and the opportunity for consultation offered (email to NATS Safeguarding March 2023).	N



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				established to allow helicopter operations to be undertaken when radar coverage is limited, particularly when helicopters seek icing avoidance. Helicopters may fly HMR to ensure airborne traffic avoidance. Significant obstacles, such as wind turbines, that encroach within a 2nm 'corridor' of an HMR, may mean that the required vertical separation between the helicopter and the obstacle can no longer be assured. This may result in cancellations of helicopter flights on certain occasions or impact fuel burn and load capacity. Engagement with operators should be undertaken.	NATS responded (March 2023) that they had no concerns and were happy to continue discussions if the Projects provided an update. The Applicants noted that there are no concerns regarding NATS radar impacts but highlighted the potential impact on HMRI 8 since NATS Anglia Radar as ANSP, provides ATS for HMRI users (email to NATS Safeguarding (email February 2024). NATS responded that as there are no concerns relating to CNS infrastructure and therefore the ability to undertake the ATC function for which they are licensed. The physical proximity of turbines to an HMR is generally not a concern for NATS but there may be concerns on the part of the helicopter operators, which may lead to proposals to alter the ATC function. Useful email contacts were provided, which the Projects have since contacted in February 2024.	
SCA A01 1	14/07/2023	Civil Aviation Authority	Aviation and Radar	In March 2023 an email was issued to MOD requesting further engagement to better understand potential mitigation options for the impact on RRH Staxton Wold, given that only a portion of the DBS West Array Area would be in RLoS of the radar .	Further emails were sent to the MOD on 30/10/2023, 07/12/2023, 09/01/2024 and 01/02/2024. To date no further response from the MOD has been received.	N
SCA A00 2	15/07/2023	Civil Aviation Authority	Aviation and Radar	Additional consideration of the aviation obstacle environment may be required during the initial build phase and the temporary use of cranes that may extend above a height of 100 metres or in the case of pre-built turbines being towed from shore to final generating position.	The notification of construction equipment is now included in the embedded mitigation outlined in section 15.3.3.1 of <b>Volume 7, Chapter 15 Aviation and Radar (application ref 7.15)</b> .	N

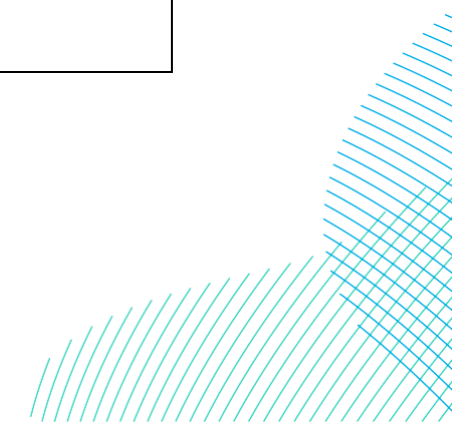


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SCA A00 3	16/07/2023	Civil Aviation Authority	Aviation and Radar	The CAA works closely with NATS Aeronautical Information Services (providing the relevant information to inform the required publication of UK en-route obstacles in the Aeronautical Information Publication) and the MoD Defence Geographic Centre (obstacle data that the CAA receives is shared with MoD and vice versa).	Noted	N
SCA A00 4	17/07/2023	Civil Aviation Authority	Aviation and Radar	To notify new or existing obstacles, changes to existing obstacles and failures of aviation lighting to CAA, please register for the Airspace Coordination and Obstacle Management Service (ACOMS) via the CAA customer portal.	Noted, the Projects will register when there is a requirement.	N
SDF 001	17/07/2023	Doggerland Foundation	Fish and Shellfish Ecology / Marine Mammals	1. Despite its severely degraded state, the Dogger Bank still supports endangered, threatened and protected species. So there is real hope for considerable recovery at scale. It is a spawning ground for sharks, rays, cod, mackerel, herring, whiting, common sole and sprat. It functions as a nursery and feeding ground for harbour porpoises, minke whales, grey seals, gannets, puffins, white-billed divers and other protected, threatened and endangered seabirds. The area supports other important ecological processes and functions such as sediment processing and carbon storage. Because of its properties as a relatively shallow, submerged sandbank with unique	Noted. The environmental impacts of construction, operation and decommissioning of the Projects in the array areas are considered in <b>Volume 7, Chapters 8-17</b> of the Environmental Statement ( <b>application ref: 7.8 –7.17</b> ). The impacts of the Projects on Dogger Bank SAC are assessed as part of <b>Volume 6, Report to inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> . Mitigation has been proposed to reduce environmental effects on the Dogger Bank to non-significant levels as far as is practicable. Where necessary, compensation has also been proposed for predicted effects on the Dogger Bank SAC.  Details of proposed mitigation measures are presented in <b>Volume 8, Commitments Register (application ref: 8.6)</b> . Compensation for effects in-combination with other projects identified by <b>Volume 6, Report to inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> on Dogger Bank SAC are outlined in <b>Volume 6, Appendix 3 Project Level Dogger Bank Compensation Plan (application ref: 6.2.3)</b> .	N



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				seabed structures, the presence of hydrographic fronts and very high primary production, the Dogger Bank has great potential to be restored and contribute to the mitigation of both the biodiversity and climate crisis.		
SDF 002	17/07/2023	Doggerland Foundation	Benthic Habitats	2. As of June 2022 finally the first real measures have been implemented to ban the bottom-towed fishing practices at the UK Dogger Bank SAC; a measure welcomed by nature conservation organisations across Europe that campaigned hard for real protection since the 1990s. But before nature has the opportunity to build up new ecological resilience from the 2022 fisheries closure, new destructive practices are allowed. To be replacing one activity with another detrimental, habitat-altering activity will be a regretful act. If no space is left in the UK side of the Dogger Bank to protect and restore nature, what is the point of having protected areas?	Noted. The environmental impacts of construction, operation and decommissioning of the Projects in the array areas are considered in <b>Volume 7, Chapters 8-17</b> of the Environmental Statement ( <b>application ref: 7.8 – 7.17</b> ). The impacts of the Projects on Dogger Bank SAC are assessed as part of <b>Volume 6, Report to inform Appropriate Assessment (RIAA) (application ref: 6.1)</b> . Mitigation has been proposed to reduce environmental effects on the Dogger Bank to non-significant levels as far as is practicable. Where necessary, compensation has also been proposed for predicted effects on the Dogger Bank SAC.  Details of proposed mitigation measures are presented in <b>Volume 8, Commitments Register (application ref: 8.6)</b> . Compensation for effects in-combination with other projects identified by the RIAA on Dogger Bank SAC are outlined in <b>Volume 6, Appendix 3 Project Level Dogger Bank Compensation Plan (application ref: 6.2.3)</b> .	N
SDF 003	17/07/2023	Doggerland Foundation	Fish and Shellfish Ecology / Marine Mammals	3. Renewable energy, such as wind technology, is clearly needed to mitigate effects of climate change, but so are effective and recovering MPAs. And the way offshore wind is being developed is causing harm to significant parts of marine natural systems: largescale infrastructure already underway and planned in the future in the UK	A robust assessment of the existing habitat and species that reside within the Dogger Bank SAC has been undertaken within <b>Volume 6, Report to inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> .  Where adverse effects on the Dogger Bank SAC have been identified compensation measures are proposed within <b>Volume 6, Appendix 3 Project Level Dogger Bank Compensation Plan (application ref: 6.2.3)</b> .	N

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				part of the Dogger Bank MPA will significantly modify the habitat and hydrology and harm threatened marine species (impacting fish at the base of the food chain, and harbour porpoise, displacement of bird migration routes and excluding important foraging grounds) and the natural ecological processes that are supposed to be protected here.		
SDF 004	17/07/2023	Doggerland Foundation	Cumulative Effects	4. Construction, operation and decommissioning of large-scale infrastructure such as wind energy on the Dogger Bank previously permitted via Article 6(3) appropriate assessment is highly contentious, based on a poor EIA and does not account for cumulative effects. Permits for the previously consented Dogger Bank projects should not have been granted according to the Habitats Directive. The habitat assessment done at the time was not according to government standards on (cumulative) environmental impact assessment. Also, remedial measures have not been taken, in terms of mitigation and compensation and we question the adequacy of monitoring and license conditions.	Noted.	N
SDF 005	17/07/2023	Doggerland Foundation	Cumulative Effects	5. In general, in-combination and cumulative impacts in the North Sea are not measured, underestimated and effectively ignored. They are not assessed	A robust assessment of the existing habitat and species that reside within the Dogger Bank SAC has been undertaken within <b>Volume 6, Report to inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> . Where adverse effects on the Dogger Bank SAC have been identified compensation	N



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				<p>against weak conservation objectives based on shifted baselines. The cumulative effects of wind farms together and in combination with other activities until 2030 are already now detrimental to carrying capacity of the North Sea ecosystem, and scaling up will further degrade the North Sea ecosystem carrying capacity. This will decrease the chances of meeting some significant biodiversity targets, such as Good Environmental Status (deadline 2020 not achieved). Meanwhile, the North Sea ecosystem is degraded and the Dogger Bank MPA remains in poor and 'unfavourable' condition. The structure, function, habitats, species and ecological processes are under pressure from centuries of overexploitation. They need time, space and quiet to recover and restore, which will not happen with wind energy development driven by lowest cost and what space is left; not accounting for actual impacts to biodiversity and nature restoration objectives. The windfarms planned in the UK part of the Dogger Bank are a testament of this.</p>	<p>measures are proposed within <b>Volume 6, Appendix 3 Project Level Dogger Bank Compensation Plan (application ref: 6.2.3)</b>.</p> <p>The Environmental Statement reports on broader environmental impacts relating to the marine physical environment and ecology (<b>Volume 7, Chapters 8-12 (application refs: 7.8-7.12)</b>). Where significant impacts are identified, relevant mitigation is proposed.</p> <p>Cumulative and / or In-combination assessments have been undertaken as part of the Habitats Regulations Assessment and Environmental Impact Assessment. The results of these assessments are presented in the reports referenced above, with relevant mitigation proposed where required. All assessments have been undertaken by appropriately qualified and experienced experts in their fields using best practice recognised in the UK and beyond.</p>	
SDF 006	17/07/2023	Doggerland Foundation	Site Selection and Alternatives	<p>6. We ask RWE to stop development of the Dogger Bank as offshore wind energy area. We ask RWE and the UK government allow this protected area real protection; to maximize the</p>	<p>The representations made are acknowledged. However, the Applicants have undertaken a comprehensive EIA (<b>Volume 7</b>) and RIAA (<b>Volume 6, Report to inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b>). for the Projects to identify, reduce, mitigate and compensate for the likely significant effects and / or adverse effects on site integrity of the Projects as far as is</p>	N

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				<p>benefits of MPAs to fix the biodiversity and climate crisis. To mitigate and adapt to climate change by promoting intact, complex ecosystems with high diversity and abundance of species. We ask that you work on solutions to both crises and not fix one by aggravating the other: wind energy inside a marine protected area is very difficult to justify in law and knowledge of natural ecosystem dynamics.</p>	<p>practicable. These assessments include assessments pertaining to cumulative and in combination impacts.</p> <p>Following the completion of the EIA the Applicants continue to see the Projects as being representative of a good opportunity to deliver a significant contribution to the achievement of the UK's climate goals. As such, consent for the Projects is being applied for. As part of the consenting process the many merits and benefits of the proposals will be weighed against the likely impacts of the Projects under the applicable National Policy Statements. The relevant SoS will subsequently form a view on whether or not consent for the Projects should be granted. <b>Volume 8, Planning Statement (application ref: 8.1)</b> prepared for the Projects provides a clear demonstration of how the proposed Projects satisfy relevant UK policies pertaining to the development of offshore windfarms in the UK.</p>	
SDF 007	17/07/2023	Doggerland Foundation	Cumulative Effects	<p>7. Specifically, we ask RWE to:</p> <p>Immediately stop wind development in the Dogger Bank; i.e. to stop developing new areas Dogger Bank South East and South West, to not build wind turbines in Dogger Bank D;</p> <ul style="list-style-type: none"> <li>• Allow areas Dogger Bank South East, South West and Dogger Bank D to be areas of (active) restoration for nature, without infrastructure development;</li> <li>• Steer clear of wind development inside protected and other vulnerable areas, considering the negative, underestimated impacts and the inability so far to fully account for and assess cumulative impacts to MPAs;</li> <li>• Stick to EC guidelines for cumulative EIAs and uphold the level of scrutiny in EIAs, HRAs and other impact assessments that need to be applied to any activity with likely (significant) effect, which has been explained and reviewed.</li> </ul>	<p>The representations made are acknowledged. However, the Applicants have undertaken a comprehensive EIA (<b>Volume 7</b>) and RIAA (<b>Volume 6</b>) for the Projects to identify, reduce, mitigate and compensate for the likely significant effects and / or adverse effects on site integrity of the Projects as far as is practicable. These assessments include assessments pertaining to cumulative and in combination impacts.</p> <p>Following the completion of the EIA the Applicants continue to see the Projects as being representative of a good opportunity to deliver a significant contribution to the achievement of the UK's climate goals. As such, consent for the projects is being applied for. As part of the consenting process the many merits and benefits of the proposals will be weighed against the likely impacts of the Projects under the applicable National Policy Statements. The relevant SoS will subsequently form a view on whether or not consent for the Projects should be granted. <b>Volume 8, Planning Statement (application ref: 8.1)</b> prepared for the Projects provides a clear demonstration of how the proposed Projects satisfy relevant UK policies pertaining to the development of offshore windfarms in the UK.</p> <p>The Applicants are not involved in the development of the Dogger Bank D offshore wind farm.</p>	N

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				In this respect, the PEIR documents are not up to standard.		
SDF 008	17/07/23	Doggerland Foundation	Cumulative Effects	Doggerland Foundation and other NGOs are developing a vision and plan to restore the Dogger Bank marine protected area to maximize its contribution to the North Sea MPA network: to combat the biodiversity crisis and restore the North Sea ecosystem, as that remains the intention with protecting this area	Noted.	N
SJLA F00 1	14/07/23	East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum	Land Use	<p>The RWE Dogger Bank South onshore cable corridor intersects 24 PRoWs (including the King Charles III England Coast Path), consisting of 19 footpaths and 5 bridleways. PRoWs are recorded on the Definitive Map held by the Definitive Map Team of the East Riding of Yorkshire Council.</p> <p>The JLAF does not object to the proposed development, but asks that the following issues be addressed during the review and deliberation of the Development Consent Order (DCO) application.</p>	<p>Details of PRoW, National Trails, Coastal Paths (including the King Charles III England Coast Path), Marked Routes and cycle routes (including national routes) present within the Onshore Development Area are included within section 21.5.2.3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>. An assessment of the potential impacts to these features during construction and operation of the Projects is included within sections 21.6.1.6 and 21.6.2.5 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> respectively.</p> <p><b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>, forms part of the embedded mitigation measures for the Projects (see Table 21-3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>, forms part of the DCO application.</p> <p><b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan (application ref: 8.9)</b> discusses:</p> <ul style="list-style-type: none"> <li>• The temporary management measures to be employed during the construction phases of the Projects;</li> <li>• Identification of which management measures will be applied to each recreational route that the Projects interact with;</li> <li>• Details of PRoW reinstatement following construction including consideration of settlement; and</li> <li>• Details of how these management measures will be communicated to the general public.</li> </ul> <p>A detailed Public Rights of Way Management Plan would be secured via the DCO and agreed with East Riding of Yorkshire Council prior to the construction of the Projects. The detailed management plan will build on the measures included within the Outline Public Rights of Way Management Plan that require confirmation in relation to</p>	N

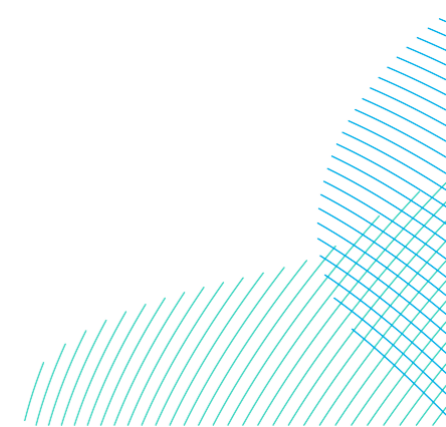
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					<p>impact avoidance, short-term measures to ensure minimal disturbance to Public Rights of Way users and maintenance of appropriate safety standards.</p> <p>No enhancement of PRow is proposed as the DCO application considered the NPS requirements and has not identified any significant effects with the measures proposed in the Outline Public Rights of Way Management Plan.</p> <p>All of these points have been reviewed with the JLAF at the relevant ETG in December 2023 and March 2024.</p>	
SJLA FOO 2	14/07/23	East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum	Land Use	<p>There is a need for specific details about PRow (Public Right of Way) diversions where the cable corridor intersects PRow. Currently, there are no details. The JLAF asks that temporary diversion routes be defined by the Applicant after consulting the East Riding of Yorkshire Council's Countryside Access Team. Permissions will need to be sought from landowners. The same procedure should be adopted where permanent PRow diversions are proposed except that, in these cases, the Applicant is asked to liaise with the Definitive Map Team of East Riding of Yorkshire Council. The Definitive Map Team will consult the JLAF for its collective opinion in order to avoid unintended complications along the proposed diversion route. In each and all cases, JLAF asks that diversions be in place before temporary or permanent closure is effected.</p>	<p>Details of PRow, National Trails, Coastal Paths (including the King Charles III England Coast Path), Marked Routes and cycle routes (including national routes) present within the Onshore Development Area are included within section 21.5.2.3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>. An assessment of the potential impacts to these features during construction and operation of the Projects is included within sections 21.6.1.6 and 21.6.2.5 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> respectively.</p> <p><b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>, forms part of the embedded mitigation measures for the Projects (see Table 21-3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>, forms part of the DCO application.</p> <p><b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan (application ref: 8.9)</b> discusses:</p> <ul style="list-style-type: none"> <li>• The temporary management measures to be employed during the construction phases of the Projects;</li> <li>• Identification of which management measures will be applied to each recreational route that the Projects interact with;</li> <li>• Details of PRow reinstatement following construction including consideration of settlement; and</li> <li>• Details of how these management measures will be communicated to the general public.</li> </ul> <p>A detailed Public Rights of Way Management Plan would be secured via the DCO and agreed with East Riding of Yorkshire Council prior to the construction of the Projects. The detailed management plan will build on the measures included within the Outline Public Rights of Way Management Plan that require confirmation in relation to impact avoidance, short-term measures to ensure minimal disturbance to Public Rights of Way users and maintenance of appropriate safety standards.</p> <p>All of these points have been reviewed with the JLAF at the relevant ETG in December 2023 and March 2024.</p>	Y-D



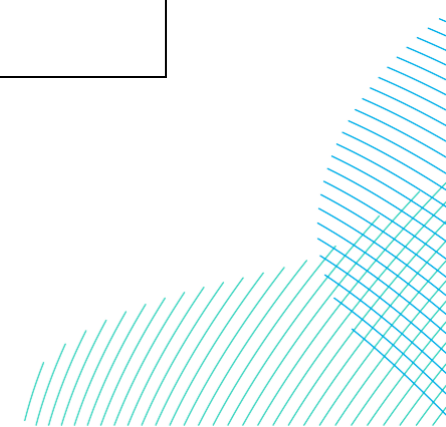
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					<p><b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> was updated to state that notification and signage would also be provided for the permanent diversion proposed and details were added to state that the Definitive Map Team of East Riding of Yorkshire Council would need to be consulted to agree the exact coordinates of the permanent diversion, once agreed so the legal right of way could be added to the Definitive Map. Further detail was also added to <b>Volume 2, Public Rights of Way Plan (application ref: 2.11)</b> and <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b>, in response to comments from the Definitive Map team at the ETG in March 2023 to include coordinates of the proposed permanent diversion.</p>	
SJLA F003	14/07/23	East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum	Land Use	Temporary closure of each PRoW where diversion cannot be implemented should be limited in time in order to minimise, as much as possible, the interruption of public rights of access and the physical and mental public health benefits that accrue to countryside access. The Applicant is asked to liaise with the East Riding of Yorkshire Council's Countryside Access Team regarding temporary closure of PRoWs.	<p>Details of PRoW, National Trails, Coastal Paths (including the King Charles III England Coast Path), Marked Routes and cycle routes (including national routes) present within the Onshore Development Area are included within section 21.5.2.3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>. An assessment of the potential impacts to these features during construction and operation of the Projects is included within sections 21.6.1.6 and 21.6.2.5 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> respectively.</p> <p><b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> forms part of the embedded mitigation measures for the Projects (see Table 21-3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>, forms part of the DCO application.</p> <p><b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan (application ref: 8.9)</b> discusses:</p> <ul style="list-style-type: none"> <li>• The temporary management measures to be employed during the construction phases of the Projects;</li> <li>• Identification of which management measures will be applied to each recreational route that the Projects interact with;</li> <li>• Details of PRoW reinstatement following construction including consideration of settlement; and</li> <li>• Details of how these management measures will be communicated to the general public.</li> </ul> <p>A detailed Public Rights of Way Management Plan would be secured via the DCO and agreed with East Riding of Yorkshire Council prior to the construction of the Projects. The detailed management plan will build on the measures included within the Outline Public Rights of Way Management Plan that require confirmation in relation to</p>	N

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					<p>impact avoidance, short-term measures to ensure minimal disturbance to Public Rights of Way users and maintenance of appropriate safety standards.</p> <p>All of these points have been reviewed with the JLAF at the relevant ETG in December 2023 and March 2024.</p>	
SJLA F004	14/07/23	East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum	Land Use	<p>The JLAF asks that the Applicant gives an outline schedule of the way the installation will proceed. It wishes to be assured that the work will progress on a 'rolling' geographical basis i.e. that work shifts progressively along the proposed corridor in defined lengths and that there is no intention to divert or close all affected PRowS from landfall to the converter stations proximal to the Creyke Beck sub-station for the duration of the installation.</p>	<p>Details of PRow, National Trails, Coastal Paths (including the King Charles III England Coast Path), Marked Routes and cycle routes (including national routes) present within the Onshore Development Area are included within section 21.5.2.3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>. An assessment of the potential impacts to these features during construction and operation of the Projects is included within sections 21.6.1.6 and 21.6.2.5 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>, respectively.</p> <p>As described in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>, the Applicants have committed to reinstating land between Jointing Bays within two years, any PRow closures would be temporary while measures to ensure a safe crossing of the Onshore Development Area are installed by the Contractors. Temporary PRow crossings may be in place at multiple locations along the Onshore Export Cable Corridor and Onward Cable Connection at the same time during construction, however as above, we intend to keep PRow open during that period through the implementation of temporary crossings. Any temporary diversion would be within the Onshore Development Area and kept as minimal as possible.</p> <p><b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> was updated following discussion on this point at the PRow ETG to confirm reinstatement between Jointing Bays within two years. It was also explained to the JLAF that in certain locations the haul road and Temporary Construction Compounds may need to stay in place for up to 6 years where access to Jointing Bays for the second Project are required in a sequential construction scenario.</p> <p>Additional text was also added to <b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> to confirm that in addition to Parish Councils the JLAF and local walking groups would be informed of any temporary closures or diversions of PRow in advance of any temporary closer or diversion of a PRow. The detailed Public Rights of Way Management Plan will also be agreed with the East Riding of Yorkshire Council, prior to construction.</p>	Y-D

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SJLA F005	14/07/23	East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum	Land Use	<p>The alignment of The King Charles III England Coast Path (ECP) – a new National Trail – is currently being established along the Holderness Coast and this intersects the planned landfall of the Dogger Bank South cable corridor. The ECP alignment agreements with cliff-top landowners allow for coastal erosion (which is estimated to average a rate of 2 m/year). The Applicant should consult with Natural England and ERYC's Countryside Access Team about the ECP alignment and issues regarding access, especially where cable installation involves trenching or any activity that weakens of the sea cliff. The ECP is not mentioned in the PEIR but JLAF considers that it should be recognised as an additional nationally important receptor when considering sensitivity and the magnitude of impact of the project.</p>	<p>Details of PRoW, National Trails, Coastal Paths (including the King Charles III England Coast Path), Marked Routes and cycle routes (including national routes) present within the Onshore Development Area are included within section 21.5.2.3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>. An assessment of the potential impacts to these features during construction and operation of the Projects is included within sections 21.6.1.6 and 21.6.2.5 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> respectively.</p> <p><b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan</b> of <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>, which forms part of the embedded mitigation measures for the Projects (see Table 21-3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>, forms part of the DCO application.</p> <p><b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan (application ref: 8.9)</b> discusses:</p> <ul style="list-style-type: none"> <li>• The temporary management measures to be employed during the construction phases of the Projects;</li> <li>• Identification of which management measures will be applied to each recreational route that the Projects interact with;</li> <li>• Details of PRoW reinstatement following construction including consideration of settlement; and</li> <li>• Details of how these management measures will be communicated to the general public.</li> </ul> <p>A detailed Public Rights of Way Management Plan would be secured via the DCO and agreed with East Riding of Yorkshire Council prior to the construction of the Projects. The detailed management plan will build on the measures included within the Outline Public Rights of Way Management Plan that require confirmation in relation to impact avoidance, short-term measures to ensure minimal disturbance to Public Rights of Way users and maintenance of appropriate safety standards.</p> <p>All of these points have been reviewed with the JLAF at the relevant ETG in December 2023 and March 2024. <b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan</b> of <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> was updated to provide further details of the King Charles III England Coast Path (ECP) and the requirement for the new PRoW to account for coastal erosion following the ETG in December 2023. There are no plans to close the King Charles III England Coast Path (ECP) during construction.</p>	Y-D

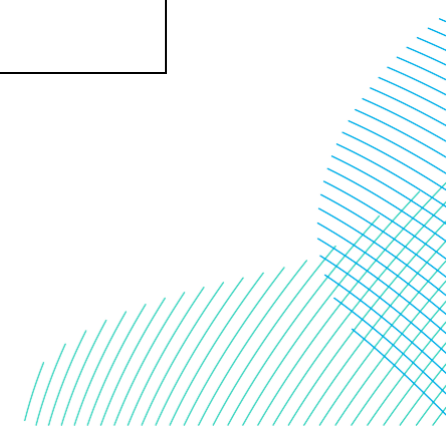


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SJLA F00 6	14/07/23	East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum	Land Use	<p>The Applicant, and/or subsequent owners of the cables, should be required to adopt medium-term responsibility for restoration of surface settlement where PRowS cross ground that has been disturbed. Given the easily-poached, heavy-clay soils of Holderness and typical dilated and consolidated soil bulk densities, soil settlement is eventually likely to be around 15 - 25 cm (6 - 10 inches). This will attract pools of water and plasticise the soil, resulting, de facto, in cul-de-sac PRowS because of unfavourable ground conditions, particularly in winter, thereby severely reducing usage and the public health benefits of countryside access. JLAF suggests a watch-period of at least seven years to allow time for soil settlement. With regard to this matter, the cable owner would best deal with the ERYC Countryside Access Team which, ordinarily, would receive reports of access issues from members of the public and/or be aware of such issues through the field experience of its own officers. These reports and observations could be evaluated and passed directly to the company for action. When ground restoration works take place, permissions will have to be sought beforehand and restoration carried out to standards set by ERYC's Countryside Access Team.</p>	<p>This point was reviewed with the JLAF at the relevant ETGs in December 2023 and March 2024. <b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> has been updated to address this comment and includes a requirement for the any subsidence reported to be investigated by the Applicants within seven years of reinstatement and repaired, if attributable to the Projects. PRow observations can be reported through the Agricultural Liaison Officer (ALO), East Riding of Yorkshire Council or directly to the Offshore Transmission Operator should any issued be identified following the completion of construction.</p>	Y-D

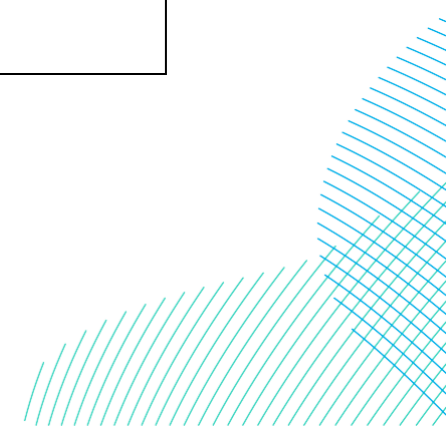


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SJLA F007	14/07/23	East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum	Land Use	The National Planning Policy Framework (2021 Revision, para. 100) indicates that development should enhance PRoWs affected. JLAF therefore requests that the DCO application clearly identifies how the project will enhance rights of way and public access in the onshore project area. The Applicant's PEIR refers to some mitigation measures for recreational routes but does not clearly identify potential enhancements. Alternatively, JLAF asks the Applicant to give an undertaking to provide a reasonable developer contribution (e.g. Section 106 or similar agreement) to East Riding of Yorkshire Council, this fund being used to deliver improvements to public rights of way and access in parishes crossed by the cable corridor, in accordance with NPPF para 100 and with Rights of Way Improvement Plan priorities in the East Riding.	No enhancement of PRoWs are proposed as the DCO application considered the National Policy Statement (NPS) requirements and has not identified any significance effects with the measures proposed in <b>Volume 8, Appendix C - Outline Public Rights of Way Management Plan</b> of <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> . This point has been reviewed with the JLAF at the relevant ETG in December 2023 and March 2024.	N
SERo Y001	21/07/23	East Riding of Yorkshire Council	Consultation	At this stage, East Riding of Yorkshire Council will not be commenting.	Noted - the Applicants have continued to have ongoing engagement with the East Riding of Yorkshire Council through ETGs, meetings and email.	N
SEIF CAO 01	06/05/2023	Eastern IFCA	Commercial Fisheries	We appreciate being contacted, but we will not be responding to the consultation because the development (wind farm array and export electricity cables) are not within and will not affect the Eastern IFCA district (which stretches from the south bank of	Noted.	N

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				<p>the Humber east of Cleethorpes to the River Stour on the Suffolk/Essex border, and covers coastal waters out to 6nm). I phoned the RWE DBS number and spoke to somebody to inform them that Eastern IFCA will not be responding.</p> <p>I would suggest that, if you have not already, please do consult with our colleagues at North-Eastern IFCA, as the proposed export cables will be routed through their district.</p>		
SEIO 03	14/07/23	Econergy International Ltd (White Hall Solar Farm)	Cumulative Effects	<p>Although we were ready and able to submit a planning application at the beginning of 2023, we made the decision to delay that submission by at least 12-months to align the planning consent with other development factors. We have conducted extensive public consultation and environmental and technical surveys in readiness of submitting planning consent. Although you may not see the application as submitted, this project is still progressing. We have also taken great pains to ensure we limit the visual impact of our scheme on local residents as much as possible.</p>	<p>White Hall farm is located partially within Substation Zone 1. As described in section 4.10 of <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> Substation Zone 1 is not being taken forward as part of the application and both Onshore Converter Stations will be located within Substation Zone 4. There are not considered to be any significant environmental effects on White Hall farm following the refinement of the Projects design. A Landscape and Visual Impact Assessment is included in <b>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)</b>.</p>	N
SEIO 01	14/07/23	Econergy International Ltd (White Hall Solar Farm)	Site Selection and Assessment	<p>We neither support nor object to the substation itself. However, the wider area (marked in orange in the plan below) covers land which we have an interest in. I understand</p>	<p>Noted. White Hall farm is located partially within Substation Zone 1. As described in section 4.10 of <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> Substation Zone 1 is not being taken forward as part of the application and both converter stations will be located within Substation Zone 4.</p>	N



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			of Alternatives	this orange area is allocated for environmental enhancement.		
SEIO 02	14/07/23	Econergy International Ltd (White Hall Solar Farm)	Site Selection and Assessment of Alternatives	We have been developing the site at White Hall Farm as a solar park. Our site boundary is attached. The orange shaded area overlaps the southern section of our development, and we would request that this area be precluded from your environmental enhancement boundary. The landholding in the attached site boundary is under an exclusivity agreement between us and the landowner and we have spent considerable time and effort in conducting detailed assessments of it.	The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> . White Hall Farm is no longer impacted by the Projects, as Zone 1 is no longer part of the Projects Design. Substation Zone 4 on balance of consultation feedback and other factors was deemed the preferred option.  We believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> , on balance achieves the optimum design.	N
SEIO 04	14/07/23	Econergy International Ltd (White Hall Solar Farm)	Site Selection and Assessment of Alternatives	4. We do have a concern about shading from the substation. We understand the indoor substation will be up to 27m high and thus has a potential to cast shadows across our solar park. This may also be the case for any trees used to screen the substation's eastern boundary. Can you provide assurances that this will not be the case or locate the substation as far west as possible to minimise the impact of any shade cast by the substation or associated screening plants?	White Hall Farm is no longer impacted by the Projects, as Substation Zone 1 and is no longer part of the Projects design. Further information on the site selection process can be found as part of <b>Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b> .  The Landscape Mitigation Plan ( <b>Volume 7, Figure 23-6 (application ref: 7.23.1)</b> ) is considered to be embedded mitigation for the Projects. However, it is recognised that mitigation planting will not be fully effective until plants begin to grow and mature. <b>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)</b> therefore reports on effects at year 1 following completion, when the effectiveness of planting will be least. This represents a worst case assessment. The LVIA also reports on effects at year 10, assuming that planting is maturing and beginning to be more effective in mitigating the effects.	N
SOW 001		Harbour Energy, Ineos and Neptune Energy	Aviation and radar	In March 2023 emails were issued to offshore platform operators Harbour Energy, Ineos and Neptune Energy providing information on the Projects and	Noted	N



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				offering meetings and the opportunity to ask further questions.		
SHL 011	17/07/2023	Haven Leisure Ltd	Site Selection and Assessment of Alternatives	Haven Leisure also requires further information on the nature of any impacts on any future use of Half Field should onshore cabling be routed through the site.	Following environmental, engineering, land and consultation feedback further refinement of the Projects landfall location concluded in the selection of the landfall adjacent to Skipsea (landfall 8) as outlined in <b>Volume 7, Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b> . The assessments within the Environmental Statement have been updated since the PEIR stage. Landfall 9 is no longer being considered so any direct impacts of Half Field have been removed from the Projects.	N
SHL 001	17/07/2023	Haven Leisure Ltd	Consultation	Extent of Consultation with Landowners  Formal statutory consultation was not undertaken in respect of the alternative sites assessment which led to the selection of Zones 8 and 9 as landfall sites. Haven Leisure was not involved in the earlier stages of non-statutory consultation despite direct impact on its interests in this area. The company is concerned at the extent of likely impacts and seek direct liaison with the DBS team to ensure it is appropriately represented in any final landfall selection process.	Following environmental, engineering, land and consultation feedback further refinement of the Projects landfall location concluded in the selection of the landfall adjacent to Skipsea (landfall 8) as outlined in <b>Volume 7, Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b> . The assessments within the Environmental Statement have been updated since the PEIR stage. Landfall 9 is no longer being considered so any direct impacts have been removed from the Projects.  We believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5, Project Description (application ref: 7.5)</b> , on balance achieves the optimum design.  Haven Leisure Ltd were consulted as part of the Projects statutory consultation in June 2023.	N
SHL 002	17/07/2023	Haven Leisure Ltd	Tourism and Recreation	Consideration of Far Grange as a Receptor  The consultation material (e.g. Consultation Brochure, Page 18) identifies the land adjacent to Zone 9 as a golf course rather than as a golf course forming part of the Far Grange Holiday Park. It is considered that the representation	Following environmental, engineering, land and consultation feedback further refinement of the Projects landfall location concluded in the selection of the landfall adjacent to Skipsea (landfall 8) as outlined in <b>Volume 7, Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b> . The assessments within the Environmental Statement have been updated since the PEIR stage. Landfall 9 is no longer being considered so any direct impacts have been removed from Far Grange.  Far Grange Holiday Park is identified as a receptor in the <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b> baseline (section 29.5.7) and within the assessment of effects on tourism and recreation (section 29.6). It is located on <b>Volume 7, Figure 29-2 (application ref: 7.29.1)</b> and is over 1km for the Onshore	N



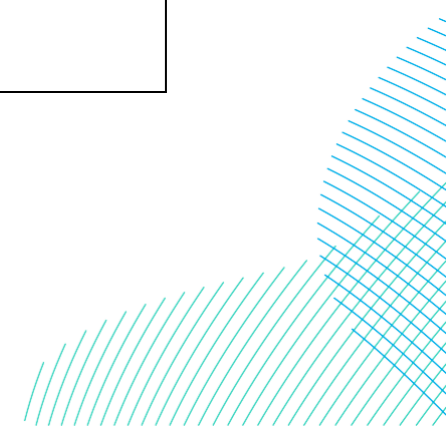
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				fails to take account of the true purpose of the golf course as part of the wider operation of Far Grange Holiday Park.	Development Area. No significant residual 'indirect' effects were identified in the ES during construction or operation on Far Grange, in relation to Land Use, Noise, Air Quality, Landscape and Visual or Traffic and Transport. Therefore, no significant effects on Tourism and Recreation were identified in the assessment.	
SHL 003	17/07/2023	Haven Leisure Ltd	Noise	The Preliminary Environmental Information Report ('PEIR') does not take into account the extant permission for the location of static caravans within the current 'Pitch and Putt'. For example, the assessment of noise impact during the construction period includes the Pitch and Putt within a zone of likely construction noise impact from works a Zone 9 but does not identify the area as a specified noise receptor and it has not been assessed.	Following environmental, engineering, land and consultation feedback further refinement of the Projects landfall location concluded in the selection of the landfall adjacent to Skipsea (landfall 8) as outlined in <b>Volume 7, Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b> . The assessments within the Environmental Statement have been updated since the PEIR stage. Landfall 9 is no longer being considered so any direct impacts have been removed from the Projects.  Far Grange was considered at PEIR stage due to being within 300m of a temporary compound option (receptors within 300m of construction works are scoped into the assessment). The compound option in proximity to Far Grange will not be taken forward, as Landfall 9 was not selected as the preferred (final) landfall location. Therefore, Far Grange is not considered as a receptor in <b>Volume 7, Chapter 25 Noise (application ref: 7.25)</b> as the nearest work site will be over 1km from noise sensitive uses of Far Grange (including the permitted extension).	N
SHL 004	17/07/2023	Haven Leisure Ltd	Air Quality	In addition, the air quality assessment identifies the potential for impact during the construction period within 350 metres of construction activities and which, in relation to Zone 9, would include part of Far Grange. Further analysis should be carried out to ensure that the low to medium risk of impact within that area is accurate given the nature of residents' occupancy.	Following environmental, engineering, land and consultation feedback further refinement of the Projects landfall location concluded in the selection of the landfall adjacent to Skipsea (landfall 8) as outlined in <b>Volume 7, Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b> . The assessments within the Environmental Statement have been updated since the PEIR stage. Landfall 9 is no longer being considered so any direct impacts have been removed from the Projects. Therefore, Far Grange is no longer within 350m of the Onshore Development Area and does not require consideration as a receptor in <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b> .	N
SHL 005	17/07/2023	Haven Leisure Ltd	Tourism and Recreation	The overall sensitivity of occupiers of Far Grange to impacts associated with the DBS must reflect the overall nature of occupancy at the site. In particular, as owner occupiers, visits to the site are typically longer and	Far Grange Holiday Park is identified as a receptor in the <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b> baseline (section 29.5.7) and within the assessment of effects on tourism and recreation (section 29.6). It is located on <b>Volume 7, Figure 29-2 (application ref: 7.29.1)</b> and is over 1km for the Onshore Development Area. No significant residual 'indirect' effects were identified in the ES during construction or operation on Far Grange, in relation to Land Use, Noise, Air	N

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				therefore those staying would experience impacts over longer periods (particularly during the construction period). Those staying at the site as part of their holiday would have an expectation of peace, quiet and as a means to enhance their overall wellbeing; this would be likely to be disrupted during the construction period.	Quality, Landscape and Visual or Traffic and Transport. Therefore, no significant effects on Tourism and Recreation were identified in the assessment.	
SHL 006	17/07/2023	Haven Leisure Ltd	Tourism and Recreation	Further to the above matters, the assessment of effects on tourism and recreation during the construction period and reported in the PEIR concludes a minor adverse and not significant impact. No specific reference to Far Grange (and all its operations) as a receptor is apparent within the PEIR. This needs to be re-examined. Haven Leisure would like to offer its assistance to provide accurate information on the nature of operations at Far Grange and ways in which impacts could potentially be mitigated for those staying at the site.	Far Grange Holiday Park is identified as a receptor in the <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b> baseline (section 29.5.7) and within the assessment of effects on tourism and recreation (section 29.6). It is located on <b>Volume 7, Figure 29-2 (application ref: 7.29.1)</b> and is over 1km for the Onshore Development Area. No significant residual 'indirect' effects were identified in the ES during construction or operation on Far Grange, in relation to Land Use, Noise, Air Quality, Landscape and Visual or Traffic and Transport. Therefore, no significant effects on Tourism and Recreation were identified in the assessment.	N
SHL 007	17/07/2023	Haven Leisure Ltd	Site Selection and assessment of alternatives	Impact on Half Field Half Field is located within a zone for the routing of the onshore cable corridor. It is understood that the exact routing and number of any required cabling and associated trenches is unknown at this stage and we appreciate the level of helpful information provided on likely construction	Following environmental, engineering, land and consultation feedback further refinement of the Projects landfall location concluded in the selection of the landfall adjacent to Skipsea (landfall 8) as outlined in <b>Volume 7, Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b> . The assessments within the Environmental Statement have been updated since the PEIR stage. Landfall 9 is no longer being considered so any direct impacts have been removed from the Projects, including Half Field. Please see <b>Volume 7, Chapter 4, Site Selection and Alternatives Considered (application ref: 7.4)</b> for further details.	N

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				impact in relation to the necessary works to lay cabling within that corridor.		
SHL 008	17/07/2023	Haven Leisure Ltd	Site Selection and assessment of alternatives	However, and should cabling necessarily run through Half Field, insufficient information is available on any long term and operational impacts on Haven Leisure. In particular, clarification is required on whether the routing of cables under the site creates any restrictions on options for the future use of Half Field and whether it would 'sterilise' the ability to use the site for any long term use. Haven Leisure seeks further engagement to clarify any direct and long term impacts on future uses at Half Field should this location be used for onshore cabling. We reserve the right to provide further commentary once we have an opportunity to review the outcomes of the additional assessment work.	Following environmental, engineering, land and consultation feedback further refinement of the Projects landfall location concluded in the selection of the landfall adjacent to Skipsea (landfall 8) as outlined in <b>Volume 7, Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b> . The assessments within the Environmental Statement have been updated since the PEIR stage. Landfall 9 is no longer being considered so any direct impacts have been removed from the Projects, including Half Field. Please see <b>Volume 7, Chapter 4, Site Selection and Alternatives Considered (application ref: 7.4)</b> for further details.	N
SHL 009	17/07/2023	Haven Leisure Ltd	Site Selection and assessment of alternatives	Summary Haven Leisure welcomes the opportunity to be involved as a key interested party in the ongoing development of the DBS proposals.	Noted.	N
SHL 010	17/07/2023	Haven Leisure Ltd	Site Selection and assessment	However, the company is concerned that sufficient assessment of its operation at Far Grange has not yet been carried out and wishes to have greater	Following environmental, engineering, land and consultation feedback further refinement of the Projects landfall location concluded in the selection of the landfall adjacent to Skipsea (landfall 8) as outlined in Chapter 4 Site Selection and Alternatives (Application ref:7.4). The assessments within the Environmental Statement have been updated since the PEIR stage. Landfall 9 is no longer being	N

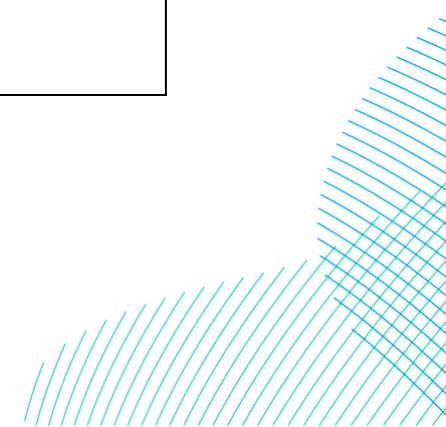
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			of alternatives	clarity on the impacts on those staying at the park, particularly during any period of construction. Given the importance of this work in determining any selection of final landfall solutions, it is considered that this work should be conducted urgently and prior to any choices being made in respect of Zones 8 and 9.	<p>considered so any direct impacts have been removed from the Projects, including Half Field. Please see <b>Volume 7, Chapter 4, Site Selection and Alternatives Considered (application ref: 7.4)</b> for further details.</p> <p>Far Grange is no longer within 350m of the Onshore Development Area and does not require consideration as a receptor in <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b>. In addition, Far Grange is not considered as a receptor in the <b>Volume 7, Chapter 25 Noise (application ref: 7.25)</b> assessment as the nearest work site will be over 1km from noise sensitive uses of Far Grange (including the permitted extension).</p> <p>Far Grange Holiday Park is identified as a receptor in the <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b> baseline (section 29.5.7) and within the assessment of effects on tourism and recreation (section 29.6). It is located on <b>Volume 7, Figure 29-2 (application ref: 7.29.1)</b> and is over 1km for the Onshore Development Area. No significant residual 'indirect' effects were identified in the ES during construction or operation on Far Grange, in relation to Land Use, Noise, Air Quality, Landscape and Visual or Traffic and Transport. Therefore, no significant effects on Tourism and Recreation were identified in the assessment at Far Grange.</p>	
SHL 012	17/07/2023	Haven Leisure Ltd	Consultation	The company therefore requests a meeting with the RWE team to discuss the points identified above. We reserve the right to make further comments during any future periods of consultation and in response to information provided to us in response to the issues raised in this letter.	<p>Landfall 9 is no longer being considered so any direct impacts have been removed from the Projects, including Half Field. Please see <b>Volume 7, Chapter 4, Site Selection and Alternatives Considered (application ref: 7.4)</b> for further details.</p> <p>The Applicants have therefore not taken up the offer to meet with Haven Leisure as they do not have a direct interest in the Projects.</p>	N
SHS E00 2	27/06/23	Health and Safety Executive	Land Use	Based on the information in Preliminary Environmental Information Report, Non-Technical Summary, Document Reference: 004300140, Revision 04 (28/04/2023), it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use	Noted.	

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				planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.		
SHS E00 3	27/06/23	Health and Safety Executive	Geology and Land Quality	3. Would Hazardous Substances Consent be needed? The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended. HSC would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in Schedule 1 of these Regulations. Further information on HSC should be sought from the relevant Hazardous Substances Authority.	The Projects are not expected to utilise any hazardous substances in volumes that will require Hazardous Substances Consent to be required.	N
SHS E00 4	27/06/23	Health and Safety Executive	EIA Methodology	4. Consideration of risk assessments Regulation 5(4) of the	Noted. As reported in section 6.7.6.1 of <b>Volume 7, Chapter 6 EIA Methodology (application ref: 7.6)</b> no significant risks from major accidents and disasters have been identified given the following:	N

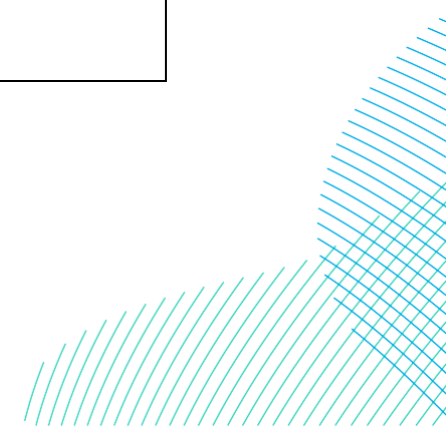


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				Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - Annex G - The Health and Safety Executive. This document includes consideration of risk assessments on page 3.	<ul style="list-style-type: none"> <li>A site selection process has been undertaken as referred to in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>, which took into account engineering and land use constraints in the vicinity of the Development Area;</li> <li>There are no large inventories of hazardous materials in the area; and</li> <li>Embedded mitigation measures for the Projects are proposed to reduce environmental, health and safety effects.</li> </ul>	
SHS E00 5	27/06/23	Health and Safety Executive	Offshore archaeology and cultural heritage	<b>Explosives Advice</b> CEMHD 7's response is no comment to make in regards to this development as there are no HSE licenced explosive sites in the vicinity of the proposed development.	Noted.	N
SHS E00 1	27/06/23	Health and Safety Executive	Site Selection and Assessment of Alternatives	1. According to HSE's records, the proposed project components (Dogger Bank South Offshore Wind Farms, Location of the onshore project area, Figure 1-2 (Drawing No. PC2340-RHD-ON-ZZ-DR-Z-0502) from the Preliminary Environmental Information Report, Non-Technical Summary, Document Reference: 004300140, Revision 04 (28/04/2023)) cross a number of major accident hazard pipelines,	Liaison with utilities providers is being undertaken as part of the DCO process. Details of mitigation measures to protect existing utilities are provided in Sections 21.6.1.5 and 21.6.2.4 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> .	N

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				<p>associated with the following operators:</p> <ul style="list-style-type: none"> <li>• National Grid Gas PLC.</li> <li>• Northern Gas Networks.</li> <li>• Ineos Manufacturing (Hull) Ltd</li> </ul> <p>The Applicant should make the necessary approaches to the relevant pipeline operators. There are three particular reasons for this:</p> <p>i) the pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline;</p> <p>ii) the standards to which the pipeline is designed and operated</p>		
SHE 001	17/07/23	Historic England	Project Description	<p>1. Project Summary</p> <p>We are aware that a project design envelope approach is still being used at this stage to provide flexibility in any consent obtained to take account of changes in available electricity generation and transmission technology. The PEI also explains that the impact assessment is based upon the scenario which results in the greatest potential for change, sometimes referred to as the 'worst-case' scenario. With DBS East and DBS West to be separate projects and separate commercial entities, but through a single DCO application.</p> <p>Although a single DCO application, separate Deemed Marine Licences</p>	Historic England's summary of the project details at Scoping Stage is acknowledged.	N

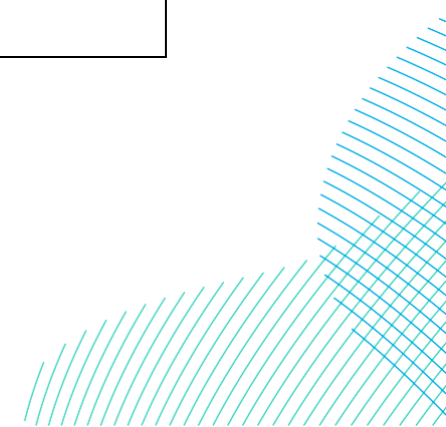


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				<p>(DMLs) will be requested as schedules to the DCO. Thereby covering the array areas and associated transmission infrastructure for each Project and allowing each to retain rights to their own particular assets should ownership of each Project change over time. Whilst also affording flexibility related to construction timings (individually (west first) or concurrently).</p> <p>As such, the DBS project proposals outline an area of development in the North Sea approximately 100km east from Flamborough Head to the DBS West boundary and 122km from DBS East, with a combined maximum number of 200 turbines, and including a maximum tip height above Mean High Water Springs of 450m. The foundations of the turbines have yet to be determined, and options of scour and cable protection have also been retained.</p> <p>Additionally, depending on how the Projects are developed, eight offshore substation/ converter/collector platforms may be required for connection via a 650km sequence of numerous buried cables. Utilising up to six buried export cables (totalling 1,028km), it is noted that the onshore grid connection points for the Projects have been determined by the Holistic Network Design (HND) process, with a new National Grid substation in the vicinity of the</p>		

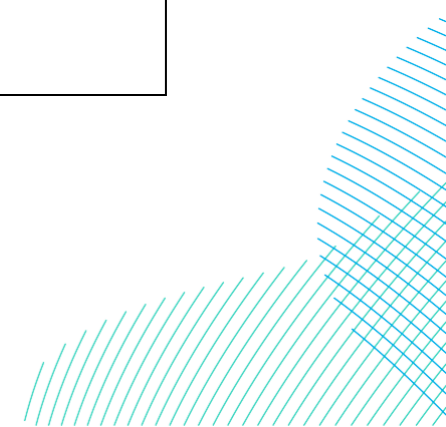




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				existing National Grid Creyke Beck substation. It is worth noting that Historic England's response is limited to our statutory remit for the historic environment. Our advice is therefore given in relation to the information currently available and may be subject to change as our understanding of the impact on heritage assets changes.		
SHE 002	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	2. Chapter 17: Offshore Archaeology and Cultural Heritage (Document Reference: 004300125-05, dated 26/04/2023) Due to the timing of the PEIR submission we note that the latest draft of the National Policy Statements EN-1, EN-3 and EN-5 (dated to March 2023) could not be utilised, with the early iterations dating to 2021 included only. However, we are pleased to see that the March 2023 drafts will be reviewed and incorporated into the final Environmental Statement (ES) (Chapter 3 - Policy and Legislation, para. 80).	The March 2023 drafts have been superseded by NPS adopted in January 2024. These revisions have been reviewed and incorporated into Table 17-4 ( <b>Volume 7, Chapter 17 offshore Archaeological and Cultural Heritage (application ref: 7.17)</b> ) accordingly.	N
SHE 003	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	3. In addition, we request where updates are carried out with regard to relevant policy, with respect to intertidal remains (or even those in the nearshore area), the East Riding Local Plan Policy, ENV3: Valuing our heritage, be considered also.	The East Riding Local Plan Policy, ENV3: Valuing our heritage has been listed as an additional relevant policy in section 17.4.1 of <b>Volume 7, Chapter 17 offshore Archaeological and Cultural Heritage (application ref: 7.17)</b> . Policy ENV3: Valuing our heritage is also included in Table 1-2 of <b>Volume 7, Chapter 3 Policy and Legislative Context (application ref: 7.3)</b> .	N

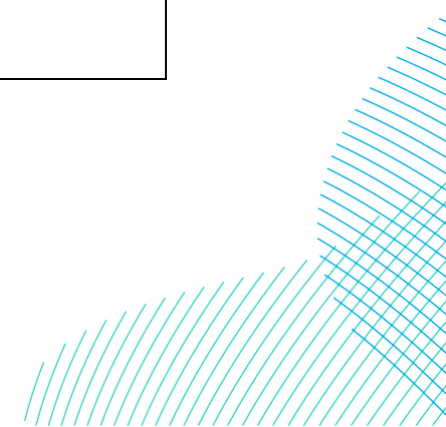


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SHE 004	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	4. Prior to submission (but after the Scoping consultation) the Applicant clarified that only the marine geotechnical data acquired from the Offshore Development Area in 2022 would be integrated for the PEIR characterisation (communicated through the ETG meetings (para. 92)). As the marine geophysical survey data - in the form of sidescan sonar, multibeam bathymetry, sub-bottom profiling and magnetometer - was yet to be assessed and interpreted by an archaeological contractor. In doing so we acknowledge this approach, noting the specific processes the archaeological geophysicists were working to, and how the survey findings will be integrated more broadly into an updated ES Chapter 8 - Marine Physical Environment (Chapter 8, para. 33).	Noted.	N
SHE 005	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	We do however feel that such an approach is not without risks given it presents additional pressures on explaining and understanding development impacts - typically made apparent at this stage - to that at the formal application. Furthermore, it is applying an approach that is relatively untested, which may place an emphasis toward larger sites and features, out with of a greater seabed landscape perspective, and perhaps applying less consideration of outlying or	This risk is acknowledged and further clarification on the nature of this risk has been provided through the ETG meetings (10/05/2023 and 20/09/2023) and in the ES (section 17.4.7 of <b>Volume 7, Chapter 17 offshore Archaeological and Cultural Heritage (application ref: 7.17)</b> ). The approach is considered suitable for the characterisation of offshore archaeology and cultural heritage for EIA purposes across these large areas, on the basis that only a small percentage of the seabed within the project areas will be taken forward for development following refinement of the design. Project layouts will be designed taking account of the distribution of archaeological features and the commitment to micro-siting where possible and this refined area will be subject to full archaeological assessment post-consent. This commitment is captured in <b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b> submitted alongside the ES and DCO application.	N



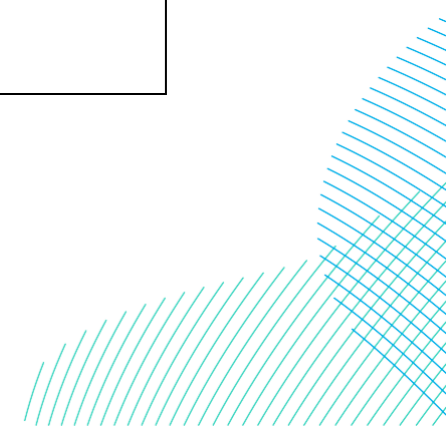
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				relatively isolated smaller anomalies against considerations into site specific bedforms.		
SHE 006	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	Moreover, although as experienced curators that are used to assessing development impacts (risk), managing uncertainty and newly discovered heritage assets, from the perspective of the EIA process it at present reduces accuracy in how the Cultural Heritage Impact Assessment functions against set principles (see IEMA, IHBC and Cifa, 2021 Principles of Cultural Heritage Impact Assessment in the UK).	A precautionary approach has been applied in assessing impacts against the worst case scenario (section 17.6 of <b>Volume 7, Chapter 17 offshore Archaeological and Cultural Heritage (application ref: 7.17)</b> ). This assumes that, if any seabed features (known or potential) are directly impacted, key elements of an asset's fabric and / or setting could be lost or fundamentally altered, such that the asset's heritage significance is lost or severely compromised. The need for further investigation to reduce uncertainty, once project layouts have been refined, is a fundamental principal of the approach to site investigations post-consent. The commitment to further investigation, and the approach to mitigation, is set out in <b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b> submitted alongside the ES and DCO application.	N
SHE 007	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	5. With regard to how the individual components and impacts are assessed we found it difficult to determine consistent use of specific measurements/dimensions/area extent between Chapter 17's Table 17-2 'Realistic Worst Case Design Parameters' and those in Chapter 5 - Project Description. Could the Table be checked for accuracy and consistency please?	The Realistic Worst Case Design Parameters have been updated in Table 17-1 of <b>Volume 7, Chapter 17 Offshore Archaeological and Cultural Heritage (application ref: 7.17)</b> .	N
SHE 008	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	6. In paragraph 27 it is stated that "the avoidance of AEZs, and features of possible archaeological interest, has not been embedded in the design of the wind farm boundaries or offshore cable corridors to date (over and above the requirement to avoid historic wrecks as far as possible as a	The cable corridors assessed for the PEIR were 2km in width with a 4km landfall. The routes have been refined with the removal of route options and a reduced landfall area, although the corridors taken forward to the ES remain 2km wide across the majority of their length, including a construction buffer. In addition, the number of cables required for the Projects has been reduced from six to four. Further details relating to project development since PEIR are presented in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application reference no. 7.4)</b> .	N

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				<p>principal of site selection). However, the parameters of the Projects are sufficiently wide to accommodate micro-siting as part of the cable route refinement and wind farm design (which will be progressed post consent)". As such we understand this is in part related to the fact marine geophysical survey data has yet to be integrated into the early project planning stage. Additionally, however, we would like to have it clarified if the present Offshore Development Area buffers for the export cables are going to be revised or amended in any way at the ES stage? The reason being is that they appear to be of an approximate width of 250m (within the supporting figures (17-1a to 1e)), which if all six export cables are to be utilised does appear to leave limited buffer coverage to account for impact close to the edge of the focus of the Offshore Development Area and surrounding seabed.</p>		
SHE 009	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	<p>7. We are pleased to see that the setting of marine heritage assets have been considered, including how they may be experienced, with the reference to The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (2nd Ed., Historic England 2017) welcomed. This is because we are of the opinion that where a heritage</p>	Noted.	N

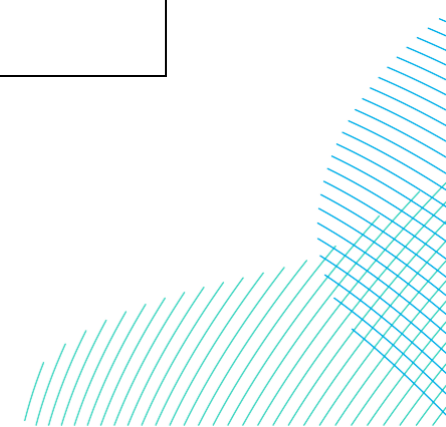


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				asset's remains may reside are generally more than just a product of happenstance. Especially when they have performed activities in episodes of armed conflict or been places and settlements now since lost due to rising sea levels and coastal erosion.		
SHE 010	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	8. We note from paragraph 77 that the initial interpretation of the geotechnical survey undertaken within the DBS array areas in 2022 may be subject to change pending further geotechnical surveys. Is this also the case for the inclusion of sub-bottom survey data as part of this wider assessment? Building toward an effective and as accurate as possible deposit model? We further request that all such proposed work should take care to consider the recently updated North Sea Prehistory Research and Management Framework ( <a href="https://researchframeworks.org/nsprmf/">https://researchframeworks.org/nsprmf/</a> ).	The preliminary deposit model included in the PEIR has been updated with the results of the assessment of sub-bottom-profiler data and geoarchaeological assessment (section 17.5.1, Table 17-9 of <b>Volume 7, Chapter 17 offshore Archaeological and Cultural Heritage (application ref: 7.17)</b> ). All further investigation and analysis will take account of the recently updated North Sea Prehistory Research and Management Framework in defining the scope and setting objectives for each stage of work as captured in <b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b> submitted alongside the ES and DCO application.	N
SHE 011	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	We would also recommend that the geoarchaeologists are involved in the planning of future geotechnical surveys, to account for the need of specific techniques of scientific dating for instance. Whilst also being allowed direct access to all cores acquired as it is better to record and assess continuous core sequences rather than isolated deposits as this	These recommendations were captured in the approach to the geoarchaeological assessment of geotechnical data set out in a geoarchaeological method statement issued to Historic England on 04/05/2023 and discussed in the ETG meeting on 10/05/2023. The recommendations are also included in <b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b> submitted alongside the ES and DCO application which sets out the approach to geoarchaeological assessment post-application/post-consent.	Y-M

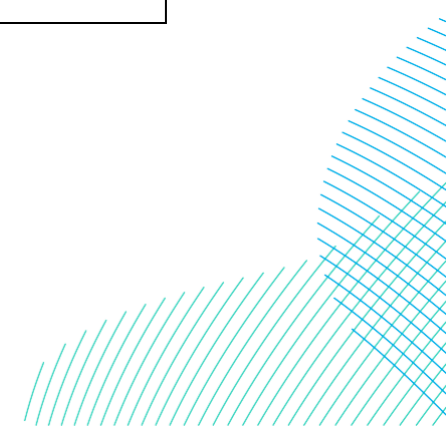
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				allows for greater reliability and confidence in the resulting conclusions.		
SHE 012	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	9. For the benefit of consistency section 17.4.7 'Assumptions and Limitations' should incorporate detail on the approach taken toward marine geophysical survey data processing, assessment and interpretation. In particular at the ES stage.	Further consideration of the limitations of the approach to the archaeological assessment of geophysical data have been included in the ES (section 17.4.7 of <b>Volume 7, Chapter 17 offshore Archaeological and Cultural Heritage (application ref: 7.17)</b> ).	Y-M
SHE 013	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	10. Section 17.5.2.3 'Importance of Heritage Assets' – as alluded to within the Marine Policy Statement 2011 and outlined in relevant Historic England revised 2017 guidance (Ships and Boats: Prehistory to Present – Selection Guide) there is the potential for instances where a vessel's importance may be strengthened by an association with other vessels of a similar type. Or a wider spatial context which reflects their broader functional use or purpose, can also contribute to the story of a seascape and distinctive identity. Therefore, the importance of the wreck SS Feltre may be enhanced as additional elements, sites and objects are discovered through planned pre-construction survey work.	Noted. Additional clarification has been added to section 17.5.2.3 of <b>Volume 7, Chapter 17 offshore Archaeological and Cultural Heritage (application ref: 7.17)</b> . The relevance of 'group value' is also a consideration of CEA in section 17.8 of <b>Volume 7, Chapter 17 offshore Archaeological and Cultural Heritage (application ref: 7.17)</b> .	Y-M
SHE 014	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	What is more, the marine environment is also unique in that the majority of the individual heritage assets that reside within it, such as ships and aircraft remains'	Noted.	N



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				- due to their transient nature - retain stories of the crew, vessel construction, trade, immigration, emigration and conflict. These individual elements therefore have the potential to also link numerous geographical locations, both on land and at sea. Shipwreck sites in particular hold a degree of significance in many ways, to many places.		
SHE 015	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	In addition, we do however accept PEI has acknowledged that the cultural significance of sites or objects yet to be discovered may be clearer when further examined post-consent (e.g. through ground-truthing investigations) by Remotely Operated Vehicles (ROV) and / or diver surveys. Which can attain greater understanding as to the character, nature and extent, and preservation of selected features - to enable their cultural significance to be better described to inform any requirements for further work on a case by case basis (para. 183).	Noted.	N
SHE 016	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	Adding to this important point we would however state that when establishing AEZs for maritime and aviation heritage assets, their specific tolerances to change (within the environment they are situated) can vary, and it is not always possible to measure or account for such factors without appropriate survey and	Noted. The approach to establishing and monitoring AEZs has been set out in <b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b> submitted alongside the ES and DCO application.	N

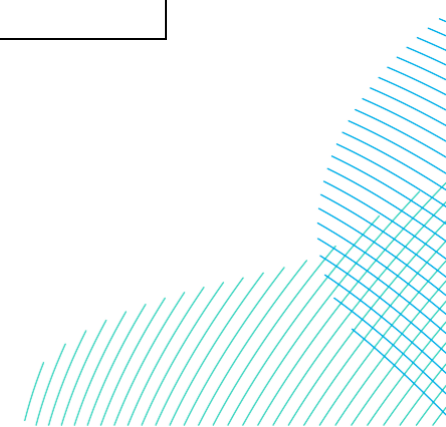


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				<p>investigative data – whilst also balancing adequate seabed space for the development. Consequently, understanding the significance of individual heritage assets (where possible) and the potential ensuing development impacts depends on how detailed the provision to attain targeted information can be from the outset; incorporating archaeological advice. The individual AEZs that are then implemented are done so to work as effectively and proportionately as possible during construction, operation and decommissioning. With the provision of post-construction monitoring that follows, utilising acquired high resolution acoustic images in which to determine change against the previously recorded baseline conditions, for instance in relation to the impacts potentially caused by changes to bedload sediment transport and seabed morphology (Impact 04) (Chapter 8 – Marine Physical Environment).</p>		
SHE 017	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	<p>11. As a specific comment - How close is the planned Offshore Development Area export cable route from the recorded position of the HMS Falmouth? And have any potentially associated remains been observed within the 2022 marine geophysical survey data?</p>	<p>HMS Falmouth is located approximately 1125m to the south-east of the cable corridor. No potential associated remains have been observed within the 2022 marine geophysical data.</p>	N

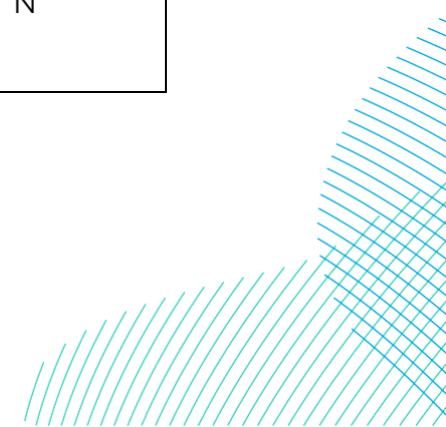




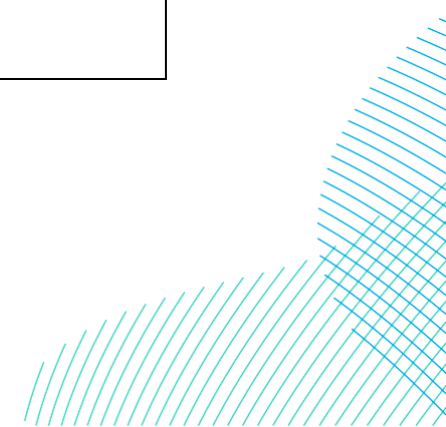
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SHE 018	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	12. It is noted that Section 17.5.4 'Historic Seascape Character' provides a table (Table 17-15 'Summary of Historic Seascape Character Types') - which summarises the character types - such as fishing, military and industry, etc. - with a qualification of perceptions of change. As such we note this was carried out in clear reference to the consolidated national Historic Seascape Character GIS dataset (para. 150).	Noted.	N
SHE 019	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	13. The attention paid to how to engage with local communities made in Section 17.5.5 'Future Trends' (specifically para. 157) is also welcome. As such it would be further welcomed if this could be elaborated on, with regard to beneficial effects from the development (draft EN-3, para. 3.8.191, March 2023). Thereby raising awareness of particular discoveries, or new evidence where possible, that is very much educational as well as topical. For instance, especially where medieval remains may have been recorded nearshore, or where ancient landscapes may have been mapped and interpreted, revealing evidence of past abrupt climatic changes, that have been picked up in the development surveys and analysis - all in conjunction with the infrastructure drive to decarbonise.	Depending upon the significance of the results of the archaeological assessments, consideration will be given to implementing a programme of public outreach and community engagement (see section 10.4 of <b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b> ).	N



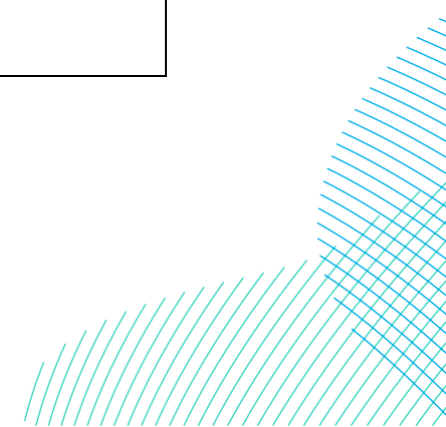
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SHE 021	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	14. As detailed within paragraph 134, there are records for towns lost along the Holderness Coast due to sustained coastal erosion. In respect to identifying this potential prior to impact, such as those indicated in para. 190, it is worth noting that nearshore access for survey vessels may not be able to incorporate techniques conducive to the recording of objects on the seabed that may relate to this potential. Therefore, as para. 286 details, when the final design and layouts are confirmed discussion with local experts and your marine archaeological contractor, the local authority and Historic England will be important in addressing such potential.	Noted. Requirements for further investigation are set out in <b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b> submitted alongside the ES and DCO application.	N
SHE 022	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	Furthermore, whilst more modern wreck sites may not hold value or interest as reflected in Historic England's Conservation Principles: For the Sustainable Management of the Historic Environment (Consultation Draft, 2017), they perhaps may in time. And it is likely due to the circumstances of their loss they would retain emotive and sensitive attachments to people and coastal communities. Ideally, also, the ES should make reference to the above document for clarity.	Noted. Reference has been added to the Conservation Principles document in the ES ( <b>Volume 7 Chapter 17 Offshore Archaeology and Cultural Heritage (application ref 7.17)</b> ).	Y-M
SHE 023	17/07/23	Historic England	Offshore Archaeology	15. Paragraph 184 sets out that the approach to the implementation of all mitigation	<b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b> covers both Projects (DBS East and DBS West). However, DBS East and DBS West will have separate deemed marine licences and, therefore, separate obligations	N



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			and Cultural Heritage	measures will be set out in an Outline WSI (Offshore), to be submitted alongside the ES and DCO application. And be prepared in accordance with industry standards and guidance including Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects (The Crown Estate, 2021). As such we welcome this commitment, as we feel its clear inclusion with the DMLs attached to any DCO will enable it to function effectively, throughout the duration of the two projects. We do however request clarification that both DBS West and DBS East will have separate project WSIs?	to provide detailed offshore WSIs (post-consent) which should be prepared in accordance with <b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b> which covers both Projects.	
SHE 024	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	16. With regard to the content of the WSI. In order to fully account for impacts to heritage assets discovered in the pre-construction planning and clearance work that pose a development constraint, the offshore Outline WSI should consider in greater detail the appropriate mechanisms to ensure effective archaeological work is supported through a phased approach. Furthermore, should the remains investigated under such provisions prove to be of possible national importance - an extension of the period of time available must be afforded for a more detailed evaluation, in doing so this will enable a clearer understanding of their significance and likely extent. The results would therefore	Noted. The phased approach to investigation is detailed in <b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b> including provision for sufficient time to allow for investigation should remain of possible national importance be identified. The presumption will be in favour of avoidance, although it is recognised that there may be occasions where a proportionate evaluation may be required to inform the nature and extent of an AEZ, for example. When avoidance is not possible then a programme of further investigation would be agreed through engagement with Historic England and in accordance with a final, agreed WSI and accompanying method statements (as set out in <b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b> ).	N

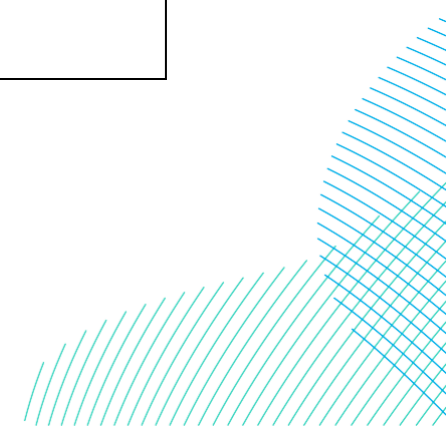


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				inform where a need to potentially preserve such remains in situ is necessary (through a revised engineering design where feasible), or allow a period commensurate with the construction timetable, for archaeological works in accordance with Chartered Institute for Archaeologists (CIfA) standards and guidance, and other relevant expert advice.		
SHE 025	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	Furthermore, ideally a recommended strategy for heritage assets (such as artefacts, structure, deposits of archaeological interest) encountered early on in the design planning phase - that are potentially likely to be impacted or pose a constraint - should be considered a priority to limit delay in carrying out necessary archaeological work. This is to account for discrete and sensitive remains and deposits, so that they can be protected and/or sampled in a timely manner in order to mitigate any damage, degradation or the potential loss of the remains - such as outcropping palaeolandscape deposits and features.	Noted. This is captured in <b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b> .	N
SHE 026	17/07/23	Historic England	Offshore Archaeology and Cultural Heritage	17. Should you and/or your archaeological contractor be considering utilising the strategy of an offshore Watching Brief, we recommend that this is captured within the WSI in accordance with	Noted. This is captured in <b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b> .	N



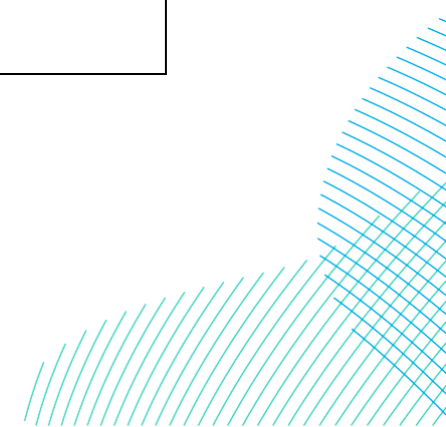
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				the standards and principles outlined by the ClfA (ClfA, Standard and Guidance for an Archaeological Watching Brief (2014, updated 2020)).		
SHE 027	17/07/23	Historic England	Onshore Archaeology and Cultural Heritage	18. Chapter 22 - Onshore Archaeology and Cultural Heritage (Document Reference: 004300131, dated 25/04/2023) General points: We do not see anything within the PEIR on Outreach or Engagement.	Based on ETG feedback it was agreed that a dedicated Archaeology/Cultural Heritage page would be provided on the Projects website during archaeological works, as well as providing information and updates in the Projects newsletter. This dedicated page and specific updates within the Projects newsletter have been tied into the wider community engagement work outlined in <b>Volume 8, Outline Onshore Written Scheme of Investigation (application ref: 8.14)</b> . The Applicants will also include information at local community outreach events. The Projects will continue to work with the ETG to ensure Outreach and Engagement is appropriately undertaken throughout the Projects' lifecycles.  Details on further outreach and engagement is outlined within <b>Volume 8, Outline Onshore Written Scheme of Investigation (application ref: 8.14)</b> submitted as part of the DCO application.	Y-M
SHE 029	17/07/23	Historic England	Project Description	20. Table 22-2 Decommissioning: we note that there is no final decision on decommissioning. We welcome further clarification on this matter, in order to better understand the impact of the proposal.	No final decision regarding the final decommissioning policy for the onshore project infrastructure including landfall, Onshore Export Cable Corridor and Onshore Converter Stations has yet been made. It is also recognised that legislation and industry best practice change over time. However, it is likely that the onshore project equipment, including the cable, will be removed, reused or recycled wherever possible and the transition bays and cable ducts being left in place. The detail and scope of the decommissioning works has been determined by the relevant legislation and guidance at the time of decommissioning and has been agreed with the regulator. It is anticipated that for the worst case scenario, the impacts will be no greater than those identified for the construction phase. A decommissioning plan for the onshore works would be submitted prior to any decommissioning commencing.	N
SHE 031	17/07/23	Historic England	Onshore Archaeology and Cultural Heritage	22. 22.4.3 Impact assessment methodology: we have to repeat our discomfort with the methodology. We do not agree with 'significance of effect', preferring instead to see 'effect on significance'. We do not agree with	The word 'significance' has different particular meanings in the EIA context and the cultural heritage context. The Projects are required by the EIA Regulations to assess the significance of effects on environmental receptors. The predicted level of effect on the significance of a cultural heritage receptor is reflected in the magnitude of impact specified in the assessment. The level of importance assigned to Grade II Listed Buildings has been revised within the ES chapter.	N

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				table 22-7. Grade II buildings are nationally important.		
SHE 032	17/07/23	Historic England	Onshore Archaeology and Cultural Heritage	<p>23. Table 22-11 Summary of Potential Archaeological remains to date: we do not agree with the Perceived Heritage Importance category. 'Perceived' by who? A local community might consider the heritage asset critical to their place. Because there are no high level research questions in the PEIR document, the assessment of archaeological remains as presented has to be inaccurate, because it /they are not related to any questions. Once you have the research questions you can then reassess the importance and potential against those questions. For example, it might be critically important to understand how the British defensive mentality changed in WW2 from strong points and stop lines to a decision to prevent landings on beaches and thereby not allowing a possible beachhead to be developed. It has been argued that it was only when the Free Polish Forces were based in Britain that their experience of trying and failing to stop Blitzkrieg was reflected in British coastal defensive practice. I would also argue that the Table and perceived Heritage Importance is skewed towards the older assets - merely because they are old, rather than being related to the questions they can answer. This failing is repeated</p>	<p>The word 'perceived' has been used to imply the very sentiment expressed by Historic England that perception of heritage importance is subjective and that the PEIR assessments were a reflection of the importance assessed using professional judgement within the framework set out in the assessment methodology. Subsequent to the submission of the PEIR, an archaeological Research Agenda has been developed to inform this process of valuation and was approved by the ETG in the Trial Trenching WSI. The Projects will work collaboratively with the ETG to ensure the Agenda is responsive and adaptive to ongoing survey and evaluation work. Assessments of heritage importance have been reviewed and amended within the ES where appropriate in the light of emerging information.</p>	Y-M



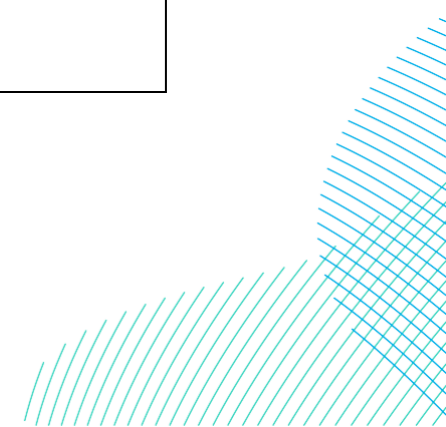
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				in 22.5.8 onwards and table 22-12.		
SHE 033	17/07/23	Historic England	Onshore Archaeology and Cultural Heritage	24. 22.5.10: Heritage Importance. We are aware that importance and significance are used interchangeably, but this section refers to non-designated assets – therefore assets that are not nationally important. It would be much more useful if this section was about the significance of the non-designated assets.	As set out in the Impact Assessment Methodology (section 22.4.3 of <b>Volume 7, Chapter 22, Onshore Archaeology and Cultural Heritage (application ref: 7.22)</b> significance has been used here, in line with the Principles of Cultural Heritage Assessment, to refer to the heritage values and interests inscribed on heritage assets, while importance has been consistently used to refer to the relative value of identified heritage assets in policy.	N
SHE 034	17/07/23	Historic England	Onshore Archaeology and Cultural Heritage	25. 22.7.1 Potential effects during construction: We disagree with the terminology as it downplays the seriousness and harm of impacts on setting, which contributes to significance. The division between direct / physical and Indirect / non-physical is not helpful. An impact on setting can be harmful and a direct impact on the significance of the asset. The authors of the text have used standard formats and not really thought deeply about the proposed scheme, its impacts, challenges and opportunities.	The characterisation of effects as direct/indirect and physical/non-physical has been used solely to describe an effect pathway. The assessment criteria at Table 22-8 (section 22.4.3 of <b>Volume 7, Chapter 22 Onshore Archaeology and Cultural Heritage (application ref: 7.22)</b> clearly set out, in line with policy, that change to setting or indirect physical change can be as harmful and direct physical disturbance.	N
SHE 035	17/07/23	Historic England	Onshore Archaeology and Cultural Heritage	26. 22.7.2 Potential effects during operation, para 280: the use of 'effect on heritage significance' is welcome here, but it does stand out because it seems to run counter to the approach used in the rest of the document.	As set out in the Impact Assessment Methodology (section 22.4.3 of <b>Volume 7, Chapter 22 Onshore Archaeology and Cultural Heritage (application ref: 7.22)</b> this approach is consistent with the rest of the assessment, which uses 'significance' in its policy sense to allow the magnitude of any effects on heritage assets to be understood and to allow the policy importance of that asset to be considered in coming to a view on the significance of the effect in EIA terms.	
SHE 036	17/07/23	Historic England	Onshore Archaeology	27. We acknowledge that the proposed scheme preliminary	We welcome the invitation to engage further and have maintained engagement through the ETG and on an ad-hoc basis through the development of the EIA.	N

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			and Cultural Heritage	design is ongoing and will continue to be influenced by environmental factors to avoid or reduce effects. Therefore, given the additional work to be integrated and explained we would welcome continued discussions with you and respective stakeholders to fully understand the schemes assessment of impacts on the historic environment.		
SHE 037	17/07/23	Historic England	Onshore Archaeology and Cultural Heritage	28. As set out in our detailed advice above, we have made a number of comments and recommendations about various aspects of the project. We would like to see these effectively addressed and we would be pleased to provide further, and continuing, advice in future meetings and in advance of the submission of the ES.	We welcome the invitation to engage further and have maintained engagement through the ETG and on an ad-hoc basis through the development of the EIA.	N
SHE 028	17/07/23	Historic England	Site Selection and Assessment of Alternatives	19. 22.3.1 para 6: we note that there continue to be two possible landfall options. We welcome further clarification on this matter, in order to better understand the impact of the proposal.	As the EIA has progressed, further route refinement and micro-siting has been carried out, informed directly by the results of ongoing archaeological surveys i.e. geophysical survey to ensure areas of high archaeological potential are avoided, wherever possible within the confines of engineering and other environmental constraints. Only one landfall zone has been taken forward at application stage. Archaeology and cultural heritage considerations formed an important part of the site selection process.	N
SHE 030	17/07/23	Historic England	Site Selection and Assessment of Alternatives	21. 22.3.22, para 12 onwards: we note that there are two possible electrical solutions, with a number of final scheme permutations (para 12). We welcome further clarification on this matter in order to better understand the impact of the proposal. This is also related to	There is one electrical solution being considered for DBS West and DBS East, HVDC. Four export cables offshore are required for two HVDC projects. The two HVDC convertor stations would be located within the Onshore Substation Zone.	N





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				paras 282 to 287 where the potential significance of effect varies from 'medium adverse to 'moderate to major'.		
SHE 020	17/07/24	Historic England	Offshore Archaeology and Cultural Heritage	Therefore, any such discoveries are likely to be of interest to the public and provide excellent opportunities to engage effectively with local communities through outreach and educational programmes. Additionally due to the scale of the project proposed spanning both on and offshore, there could be the potential to bring about opportunities to understand a broader collective understanding of heritage, be it prehistory or military remains for instance, which could be drawn upon and expressed for communities and the broader region to learn about.	A commitment to exploring opportunities for community engagement is integrated with the proposed programme of public outreach for onshore archaeology, as set out in <b>Volume 8, Outline Onshore Written Scheme of Investigation (application ref: 8.14)</b> , and is included in section 10.4 of the <b>Volume 8, Outline Written Scheme of Investigation (Offshore) (application ref: 8.22)</b>	Y-M
SHC COO 1	17/07/23	Hull City Council	Traffic and Transport	1. Chapter 24 - Traffic and Transport  The methodologies identified in the Transport Assessment (TA) and the Preliminary Environmental Information Report (PEIR) are supported in light of the stated commitment to propose that a Construction and Operational Phase Port Traffic Management Plans (PTMP) requirement, covering trip-generating offshore aspects of the development be imposed upon the Development Consent Order.	The Applicants welcome confirmation from Hull City Council that the methodologies are supported and that terrestrial traffic movements associated with the offshore construction and operation of the Projects can be dealt with by means of a DCO Requirement.	N

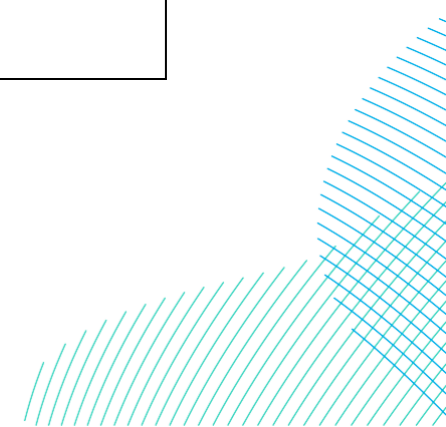


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SHC C00 2	17/07/23	Hull City Council	Traffic and Transport	The provision of an Outline Construction Traffic Management Plan (OCTMP) to form the basis of a final CTMP, updated and populated to take into account currently unknown aspects such as source of materials, and construction programme/phasing, is supported.	The Applicants welcome confirmation that Hull City Council supports the provision of an OCTMP. <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> is submitted in support of the DCO application.	N
SHC C00 3	17/07/23	Hull City Council	Traffic and Transport	There is currently no information available to identify how the capacity assessments referenced in paragraph 224 are to be undertaken, If junction capacity assessments are to be undertaken on any identified sensitive junctions, peak hour traffic turning count surveys will need to be needed to inform assessment.	Following the Section 42 comments the Applicants have engaged further with Hull City Council at an ETG (06/09/2023), during this meeting (detailed later within this Table 24-1-1) the approach to the assessment of driver delay was agreed. Section 24.6.1.6 of <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> includes details of the agreed approach to the assessment of driver delay.	Y-M
SHC C00 4a	17/07/23	Hull City Council	Air Quality	2. Chapter 26 – Air Quality  Further information on junction assessment, and clarification on the source of materials and routes taken by vehicles, as well as potential cumulative impacts with other developments will be key to ascertaining air quality impacts within the city of Hull.	<b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> provides more in-depth information on the junctions analysed in the traffic model, details on materials and routes taken by vehicles and cumulative effects. The approach to junction capacity assessments has also been agreed with the relevant highway authorities.  Relevant discussion for the air quality assessment is provided in <b>Volume 7, Air Quality (application ref:7.26)</b> , section 26.6.	N
SHC C00 4b	17/07/23	Hull City Council	Air Quality	Paragraph 102 states that 2019 PM10 and PM2.5 monitoring data for the Hull City Council is not available to facilitate model verification. In fact, data sets are available for Hull Freetown	In the Annual Status Report (ASR) for Hull City Council 2022, data pertaining to PM10 and PM2.5 monitoring has been reported. However, the available data for PM2.5 is limited to a single monitoring site, while two sites provide data for PM10.  Unfortunately, no monitoring data for PM2.5 is available for the year 2022 within the study area, rendering it unsuitable for deriving the verification factor.  From professional experience and analysis conducted have led to the determination that the verification factor derived for PM10 is not deemed robust for use in the	N

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				(PM2.5), Holderness Rd (PM10) and Hull Myton (PM10).	current context. This conclusion stems from the fact that out of the two monitoring sites considered, only one is within the study area for PM10. Unfortunately, due to the inadequate number of monitoring sites available for verification, determining a reliable verification factor for PM10 has proven unfeasible.  Therefore, the derived NOx adjustment factor has been applied to the modelled PM10 and PM2.5 concentrations to provide a conservative assessment, in accordance with the guidance in LAQM TG(22) (Defra, 2022b).	
	17/07/23	Hull City Council	Noise	The proposed assessment methodology for construction traffic noise is supported	Noted with thanks.	N
SHC COO 5	17/07/23	Hull City Council	Traffic and Transport	3. OCTMP - The OCTMP identifies that the HGV deliveries will be controlled with a booking system (Para 24) which is welcomed. Para 25 identifies that an indication of when peak deliveries may occur within the construction programme identifying indicative profiles for monthly deliveries per link for the construction duration will be provided to the relevant highway authorities. Will this be a cumulative assessment taking account of how many accesses are in operation at any one time on the link / route or numbers on the link associated with individual access points? Is it also anticipated that the daily profile of deliveries will be evenly spaced through the month?	<b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> outlines that: "To provide the relevant highway authorities with an indication of when peak deliveries may occur within the construction programme, the final CTMP would also be updated to include indicative profiles for monthly deliveries per link for the construction duration".  In deriving these numbers an even profile of deliveries throughout the month would be assumed.	Y-M
SHC COO 6	17/07/23	Hull City Council	Traffic and Transport	4. OCTMP - Should Para 29 identify that HGV's will not be permitted 'to access or egress a site' outside of the normal working hours (07:00 to 19:00 hours Monday to Saturday)?	<b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> outlines that: "With the exception of the essential activities, HGV construction traffic movements will not be permitted outside of the normal working hours (0700 hours and 1900 hours Monday to Saturday). This would not preclude HGV travel to and from the site	N

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					of the relevant work via the wider highway network which may occur prior to or after the normal working hours" The Applicants consider that the text is correct.	
SHC C00 7	17/07/23	Hull City Council	Traffic and Transport	5. OCTMP - Para 53 – It would be helpful to understand what 25% of the peak daily LV demand may equate to in trip-generation terms, to have confidence that such a figure would not cause an issue with some of the more sensitive junctions, especially during the AM and PM peak periods.	Following the Section 42 consultation comments the Applicant has engaged further with Hull City Council at an ETG (06/09/2023), during this meeting (detailed later within this Table 24-1-1) the approach to the assessment of driver delay was agreed. Section 24.6.1.6 of <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> includes details of the agreed approach to the assessment of driver delay.	Y-M
SHC C00 8	17/07/23	Hull City Council	Traffic and Transport	6. OCTMP - Para 56 – Identifying a maximum response time for the road sweeper to be in attendance following notification of detritus /other material being deposited on the public highway would better ensure that safety concerns are addressed promptly.	<b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> submitted with the DCO application outlines that the approach to managing detritus and other material being deposited would be agreed with the relevant highway authority as part of developing the final CTMP.	Y-M
SHC C00 9	17/07/23	Hull City Council	Traffic and Transport	7. OCTMP - Para 102 – If the sign in/out sheet also captured employee's origin (place from which daily travel commenced, e.g., post code), this would better inform targeted travel planning measures	<b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> submitted with the DCO application includes a commitment to also capture the employee's origin as part of the sign-in process.	Y-M
SHA P00 1	16/07/23	Humber Archaeology Partnership	Consultation	1. Question 12 - They are too technical for most people. The entire system needs to be simpler, plainer and less bureaucratic. As the system is ,it is easy to avoid scrutiny by obscuring issues through sheer repetitive verbiage. The mapping to could be improved, clearer, less technical	The Projects have worked with the ETG to ensure transparency, clarity and consistency to support decision making on the Projects. The clarity of mapping has been reviewed and updated in the ES. A specific heritage viewer is being developed to help facilitate information sharing.	Y-M

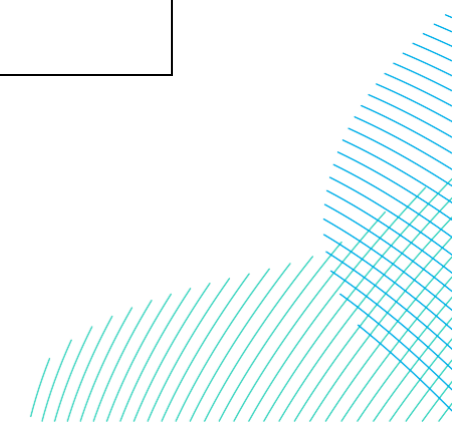
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				and helping to explain rather than merely illustrative.		
SHA P00 2	16/07/23	Humber Archaeology Partnership	Onshore Archaeology and Cultural Heritage	<p>2. Question 13 - These comments relate solely to the onshore archaeology section. The parameters are explained and the methodology for assessment is clearly laid out for a specialist. The section does what it is supposed to do in a PIER report. There are three issues that I have with the section. During the desk-based assessment there is no evidence that the CiTiZAN database was used. This contains information on the archaeology of the coast, especially military remains, that are not necessarily contained in the Humber HER or national heritage databases. This should be consulted. The strategy for prioritising geophysical survey in relation to the more fixed needs of structures at the land fall and substation (start and end of the onshore cable route) makes sense. Unfortunately you have not been able to do this, so that we are already having to consider trial trenching in priority areas where geophysics has yet to be undertaken. It is not good enough to abandon a strategy just because it is difficult to achieve. Access issues are a problem for you to resolve not an excuse not to follow your own strategy and not to do the best for the heritage resource. There is a lot of emphasis</p>	<p>The CiTiZAN database was used but is not directly referenced in the Onshore Chapter or Appendices at the PEIR stage. The Applicants Onshore and Offshore Archaeology and Cultural Heritage consultants worked together to scope and combine the heritage walkovers for both the onshore and intertidal environments and ensured any relevant CiTiZAN records not on the Humber Historic Environment Record or national datasets were visited and recorded. CiTiZAN is referenced in the <b>Volume 7, Chapter 17, Offshore Archaeology and Cultural Heritage (application ref: 7.17)</b>. The Onshore Development Area has been reviewed against all available data including assets recorded on the CiTiZAN database that may interact with the project. With regard to the strategy of geophysical survey, the Projects have had to be responsive to the availability of access to land under third-party ownership which is mainly driven by a number of factors including land use, ground conditions and crop cover and is out with any direct control of the Applicants. The Projects and their archaeological contractors AOC Archaeology have done all they can to foster good working relationships with landowners, whilst still prioritising access to areas of permanent infrastructure and potential archaeological pinch points. RWE/RHDHV/AOC Archaeology have kept the ETG updated on the progress of geophysical survey and presented the results at ETG on the 19<sup>th</sup> January and 10<sup>th</sup> of May 2023. The ETG have collaborated with the Projects to devise a suitable strategy for Trial Trenching to enable the Projects to be responsive to the availability of land access and geophysical survey data. The Projects will not be trial trenching areas without geophysical survey data. With regard to research framework, the Projects have refined this based on ETG feedback and based on ETG input have provided an updated Research Agenda within the Trial Trenching WSI. This Research Agenda was approved by the ETG via emails and a meeting on the 1<sup>st</sup> of August 2023. The Research Agenda will continue to be reviewed and updated as the Projects progress. The Projects are grateful to the ETG for their ongoing guidance and advice.</p>	Y-M



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				<p>on assessing significance against local and regional research priorities but no evidence of how you will do this. The Yorkshire research framework is out of date, does not hardly mention Holderness and was never accepted by Yorkshire's local authority curators because it was inadequate for their purposes and lacked the involvement of the wider archaeology community. Local research objectives for Holderness can be defined but to do so will need close consultation between Historic England, Humber Archaeology Partnership and the project's archaeologists. The definition of objectives and questions should use the results of previous linear infrastructure projects in Holderness (including Dogger Bank) along with the research framework for the Yorkshire Wolds as their basis. Also relevant topics from period research frameworks and major research projects such as that on the Roman countryside.</p>		
SLW TOO 1	17/07/23	Lincolnshire Wildlife Trust	Cumulative Effects	<p>1. There are a few critical points regarding the PEIR that LWT would like to highlight as areas that will need further evaluation by the Applicants with regards to impacts and mitigation. We appreciate that these have been appropriately flagged by the Applicant in the PEIR, but we will nonetheless be closely monitoring progress</p>	<p>The timescales for the Projects are presented in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>.                      Cumulative (in-combination) effects on the Dogger Bank SAC are assessed in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment Habitats Regulations Assessment (application ref: 6.1)</b>.                      Impacts on fish species, including effects on nursery and spawning grounds and the impacts of noise on fish, are considered within the fish chapter (<b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b>, section 10.5.3.2.). The</p>	N

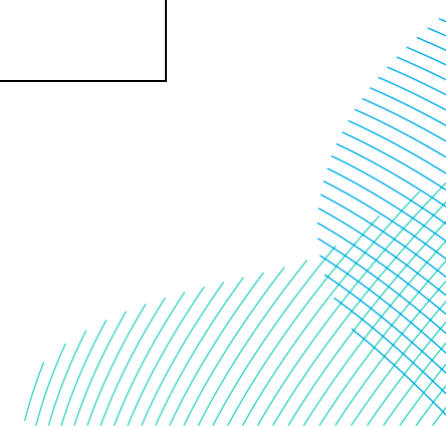
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				<p>against these key issues going forward. Our main concerns are:</p> <ul style="list-style-type: none"> <li>• Timescales for these Projects</li> <li>• Cumulative impacts to the Dogger Bank SAC</li> <li>• Impacts to important nursery/spawning grounds for sandeel, herring, and other important ecological and commercial fish species</li> <li>• Proper assessment and commitment to Biodiversity Net Gain</li> <li>• The proper evaluation of dredging impacts and disposal of dredged material</li> <li>• Modelling the impacts of noise and cumulative noise</li> </ul>	<p>distribution of the species has been established using the methodology described within Latta <i>et al.</i> (2014).</p> <p>The impacts of noise on marine mammals have been assessed in <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b>.</p> <p>BNG proposals are summarised in <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> of the ES and detailed in <b>Volume 7, Appendix 18-10 Biodiversity Net Gain Strategy (application ref: 7.18.10)</b>.</p> <p>Dredging effects on ecological receptors are considered in the following <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8), Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b> and <b>Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b>.</p>	
SLW TOO 3	17/07/23	Lincolnshire Wildlife Trust	HRA	<p>3. Derogation and Timescales</p> <p>As DBS will be aware, the Crown Estate, in their Round 4 Plan-Level HRA, concluded that the possibility of an 'Adverse Effect on Site Integrity' (AEOSI) as a result of the Round 4 plan cannot be ruled out for two of the protected sites forming part of the 'national site network'. These are the Flamborough and Filey Coast SPA (due to the potential impact on the kittiwake feature) and the Dogger Bank SAC (due to the likely impact on the sandbank feature of that site). Furthermore, proposed development works are anticipated to impact several other designated areas, including Southern North Sea SAC, Flamborough Head SAC, Greater</p>	<p>It should be noted that following amendments to the Projects Offshore Development Area, no direct effects will result from the Projects on the Flamborough Head SAC or Holderness Offshore MCZ. Assessments of potential adverse effects on site integrity are provided in the <b>RIAA (application ref:6.1)</b> for all listed sites, or in <b>Volume 8, Stage 1 Marine Conservation Zone Assessment (application ref: 8.17)</b> with regards to the MCZs listed.</p> <p>A detailed derogation case is provided with this application in Volume 6, Habitats Regulations Derogation: Provision of Evidence (application ref: 6.2) and its associated appendices that detail the compensation plans for Guillemot and Razorbill, Kittiwake and the Dogger Bank.</p>	N

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				<p>Wash SPA, Holderness Offshore MCZ and Holderness Inshore MCZ.</p> <p>LWT echoes and strongly supports Natural England's concerns voiced in their response to the DBS Scoping Report:</p> <ul style="list-style-type: none"> <li>• 'Given the planned submission timescales for this project (PEIR, Q2 2023; DCO Q1, 2024), we are concerned that it will not be possible for robust derogations cases to be developed by the point of application.' We do not feel that the Applicant is allowing for enough time to properly assess the various aspects of these Projects, and their potential harm on receptors.</li> </ul>		
SLW TOO 4	17/07/23	Lincolnshire Wildlife Trust	Cumulative Effects	<p>4. Cumulative Impacts on the Dogger Bank SAC</p> <p>While the Applicant outlines the need and methodology for a Cumulative Effects Assessment (CEA) in Chapter 6, Subsection 7.4., LWT would like to flag concern for the level of detail and consideration given to the CEA within the PEIR and so far throughout the pre-application process. Within the Planning Inspectorate's Advice Note Seventeen, Paragraph 2.1 clearly outlines that, 'The scale and nature of NSIPs will typically dictate a broad spatial and temporal zone of influence (ZOI)'. Furthermore, Paragraph 2.2 states that, 'Stages 1-2 should be ideally undertaken</p>	<p>Noted. A full Cumulative Effects Assessment with regard to the Dogger Bank SAC is included within <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b>.</p>	N

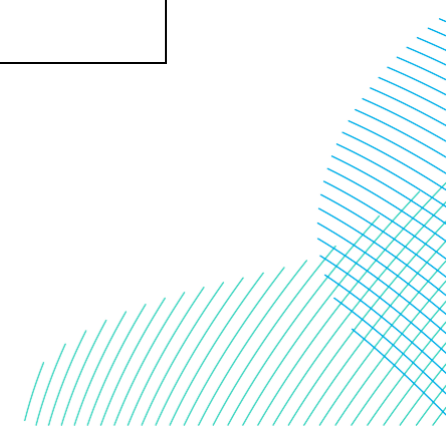




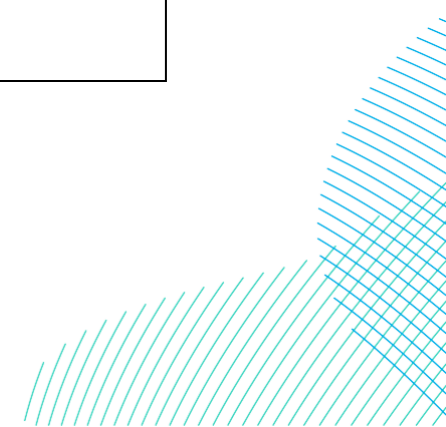
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				<p>early in the pre-application phase and ideally before requesting a Scoping Opinion. Applicants should make use of the EIA scoping process to provide information on the CEA and ensure that it is appropriate, focussed and proportionate.'</p> <p>While LWT understands that Advice Note Seventeen does leave some contingency for open interpretation on appropriate CEA timelines, we nonetheless interpret the wording from Paragraphs 2.1 and 2.2 as impetus on developers to begin a broad CEA process early to ensure due diligence and best practice. Therefore, we are disappointed with the decision taken by the Applicant to wait until the later stages of the EIA and ES to appropriately conduct a CEA, as stated in Section 6.7.4.3, Paragraph 80: 'The available information regarding many other projects is continually changing as they move through the development process, for example, the Outer Dowsing PEIR (by Q2 2023), the decision on Hornsea Project Four (Q3 2023), and the Sheringham Shoal and Dudgeon Extension Projects examination (Q3 2023). The information that is made public from these and other relevant projects will alter the details presented in the CEA for the Projects. As such, a final CEA will be included in the later stages of the</p>		



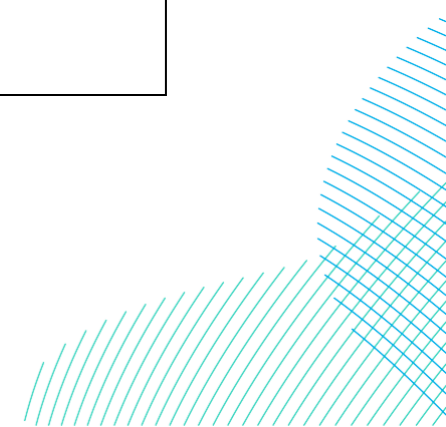
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				EIA and completed and reported on in the ES, when the main assessments of the DBS East and/or DBS West proposals have been undertaken and the extent to which other plans, programmes or projects might lead to cumulative effects can be fully considered.'		
SLW TOO 5	17/07/23	Lincolnshire Wildlife Trust	Cumulative Effects	LWT would have welcomed the opportunity to review an early CEA from the Applicant, which would have afforded us the opportunity to provide valuable feedback on potential cumulative impacts to this important region of the North Sea. Given that the Applicant intends for the ES to accompany the application for DCO in Q1 of 2024, LWT is concerned with the limited amount of time remaining (PEIR concluding in Q3 2023) to conduct an appropriate 7cumulative effects assessment—and feedback from concerned parties, such as LWT—that will be required for an NSIP of this scale and magnitude. While details from the highlighted NSIPs (Outer Dowsing, Hornsea Project Four, Sheringham Shoal and Dudgeon Extension Projects, Dogger Bank A, Dogger Bank B, Dogger Bank C, Dogger Bank D, and Sofia Offshore Wind Farm) will be important to include in the CEA, LWT believes that there are enough past and ongoing activities that could have been included in an initial CEA. This	A full cumulative effects section with regards to Infrastructure and Other Users is presented in section 16.7 within <b>Volume 7, Chapter 16 Infrastructure and Other Users (application ref: 7.16)</b> .  Potential cumulative effects in relation to the Dogger Bank SAC is detailed in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> that accompanies this application.	N



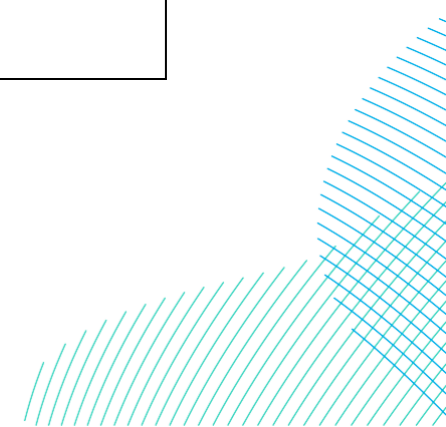
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				<p>includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>• Past damage from bottom-towed fishing gear, which resulted in an MMO byelaw in 20221.</li> <li>• Oil and gas developments – at the moment, a considerable number of oil and gas developments overlap the Dogger Bank SAC, including fields, pipelines, wells and associated infrastructure. Decommissioning is ongoing.</li> <li>• Other past/ongoing wind farms (listed above)</li> <li>• Aggregate extraction – a proposal for licensing one area for aggregate extraction overlaps the Dogger Bank SAC.</li> <li>• Telecommunications cables – at least four telecommunications cables currently cross through the Dogger Bank SAC.</li> </ul> <p>Importantly, the JNCC has determined that the Dogger Bank SAC Annex 1 sandbank feature is currently in unfavourable condition, and advises a restore objective for the extent, distribution, structure and function of the feature<sup>2</sup>. Given the current unfavourable condition status of the Dogger Bank SAC, the past and ongoing activities to the region, and plans for future development and NSIPs (such as these Projects), LWT strongly advises a thorough, detailed and comprehensive CEA to be conducted by the Applicant and provided as soon as possible.</p>		



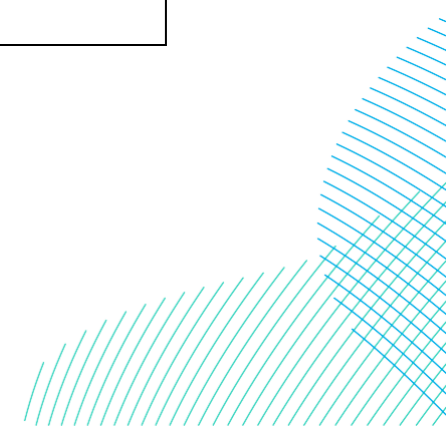
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SLW T00 6	17/07/23	Lincolnshire Wildlife Trust	Fish and Shellfish Ecology	5. Impacts to Sandeel Nursery and Spawning Grounds As the Applicant will be aware, the Dogger Bank is the largest sandbank in UK waters and is home to a variety of species which live both on and within the sand sediment. Among these, sandeel species, predominately lesser sandeel <i>Ammodytes marinus</i> , are a key component of this marine ecosystem and is an important prey species for many seabirds and marine mammals. While little is known about their distribution beyond fishing grounds, statistical models have been used to predict the distribution of seabed habitat that is suitable for buried <i>A. marinus</i> in only two main areas: 1) the northern part of the North Sea (including Dogger Bank) and 2) the northern parts of the Celtic Seas region around the west coast of Scotland, Northern Ireland and Republic of Ireland.	Sandeel have been included within the assessment of all impacts throughout the chapter, and are included within the 'Demersal Fish' receptor group ( <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.5.3.2.). The distribution of the species has been established using the methodology described within Latto <i>et al.</i> (2014). Sandeel presence within the region has been verified via drop down video.	N
SLW T00 9	17/07/23	Lincolnshire Wildlife Trust	Benthic Habitats	The sandbank communities are not expected to be fully recovered yet from the impacts from historic bottom trawling, but are expected to start recovering following removal of this pressure. Full recovery is based on the resilience of the feature (medium for subtidal sand) and would not be expected for 2-10 years and only where it is not hindered by other pressures.' While the Dogger Bank sandeel population (sandeel stock 1r) is	Information provided is acknowledged, noting that the approach to sandeel fisheries management falls outside the scope of this EIA chapter. The Projects have sought to minimise likely footprints to the greatest extent possible since PEIR. Details of the seabed footprints of the Projects are presented in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> .	Y-D



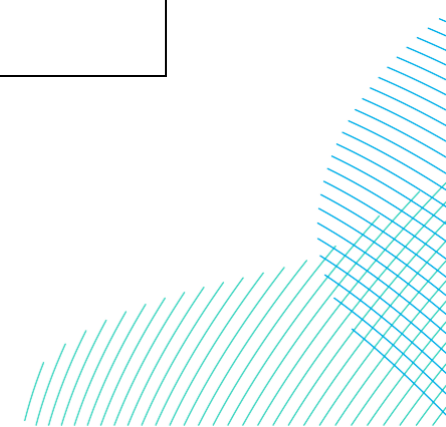
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				<p>technically sufficiently abundant to support a fishery, stock 1r has repeatedly fallen below biological reference points (mainly recruitment) since 2004, indicating that the Dogger Bank sandeel stock is in poor condition. The MMO attributes this to the short-lived nature and high variability of recruitment patterns driven by several natural factors. Consequently, the UK Government and Defra are considering the closure of commercial sandeel fisheries. While focus has remained on fishing gear and practice, management and regulatory bodies have also identified wind turbine development in the area as a negative impact on the Dogger Bank sandeel population<sup>2</sup>. The in-combination impacts of these various practices is only now being considered in a holistic manner through the assessment of zoned and/or adaptive management approaches. However, given the vulnerability and importance of the Dogger Bank sandeel stock 1r, LWT hopes that the appropriate management strategies can be implemented before irreparable damage occurs.</p>		
SLW T01 1	17/07/23	Lincolnshire Wildlife Trust	Benthic Habitats	<p>According to the PEIR documents, roughly the entire DBS West array (estimated at 95.3% in Table 10-15) rests within areas that the Applicant has identified as high spawning potential for sandeel</p>	<p>The assessment of Temporary Habitat Disturbance (<b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b>, section 10.6.1.1.) has been revised to include a recovery period for the benthic fish receptor group, which includes sandeel, of 2-10 years as described within the Joint Nature Conservation Committee (2022) Supplementary Advice on Conservation Objectives for Dogger Bank Special Area of Conservation referenced.</p>	Y-M



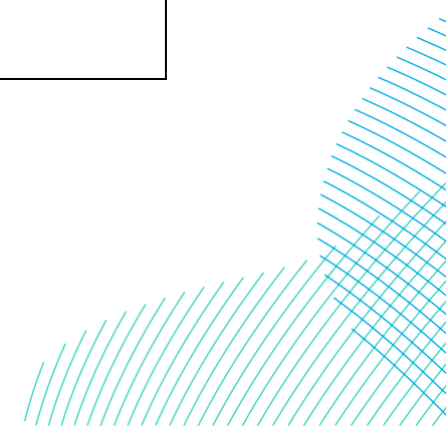
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				<p>(Figure 10-5). Worst-case scenario estimates (Table 11-2) place the direct habitat loss within the DBS West array around 3,813,562m<sup>2</sup>, which would equate to a loss of roughly 3,634,324m<sup>2</sup> of high-spawning-potential habitat. In Section 104 of Chapter 10, the Applicant claims that 'these are a species of national importance that are anticipated to recover to baseline levels within 1 - 7 years'. Unfortunately, this claim was not referenced in the PEIR documents. Upon examining the literature, LWT found reference to a similar timeframe in van Deurs <i>et al.</i> (2012) (i.e., 1-7 years). However, the context of that study and these Projects are completely different. Van Deurs <i>et al.</i> (2012) states that the study area was 'a sink rather than a source for <i>A. marinus</i>'<sup>5</sup>. In contrast, these Projects are expected to negatively impact an important source—as outlined by the 95.3% overlap of DBS West and estimated loss of roughly 3,634,324m<sup>2</sup> of habitat considered to have high spawning potential—for <i>A. marinus</i> recruitment. We could not find reference for the short- and long-term impacts of offshore development on sandeel spawning and/or nursery habitat (i.e., source habitat). Therefore, the assumption and claim of recovery within 1-7 years following these</p>		



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				Projects (Section 104) is misleading and unsubstantiated.		
SLW T01 2	17/07/23	Lincolnshire Wildlife Trust	Benthic Habitats	LWT would refer to the information above, and strongly disagrees with this claim and justification for the lowering of appraised sensitivity to habitat disturbance by the Applicant, as outlined in Section 202 of Chapter 10: 'The low magnitude of impact for DBS West (as the worst case scenario footprint assigned to both DBS East and DBS West, as well as the worst case for sandeel and Atlantic herring spawning), combined with the medium sensitivity of effect for the demersal fish, and pelagic fish receptor groups with demersal spawning, results in the assessment that permanent loss of habitat and / or change in habitat type as a result of changes in substrate has a minor adverse effect, and is therefore not significant in EIA terms.'	The assessment of Permanent Loss of Habitat ( <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.6.2.1.) has been revised to include a recovery period for the receptor group including sandeel of 2-10 years as described within the Joint Nature Conservation Committee (2022) Supplementary Advice on Conservation Objectives for Dogger Bank Special Area of Conservation referenced.	Y-M
SLW T01 3	17/07/23	Lincolnshire Wildlife Trust	Benthic Habitats	Characteristics of this species, including short lifespan, high site-fidelity, and high variability of recruitment, suggest that an impedance of this length and magnitude to an important source habitat (i.e., habitat with high spawning potential) could have serious consequences on the health and resilience of the Dogger Bank sandeel population. LWT would therefore advise careful	Consideration as to the sensitivity of the species as well as related economic and ecological importance has been given for each relevant impact throughout the chapter, as defined within Table 10-6.	N

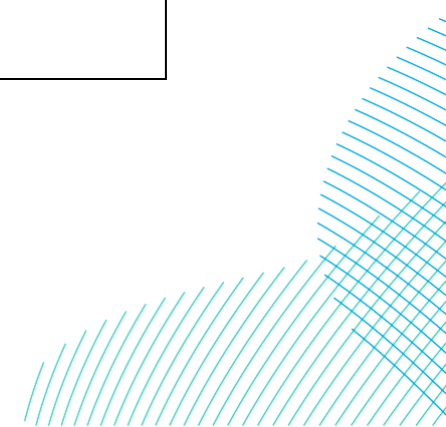


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				<p>consideration for the direct and cumulative impacts of this development on this ecologically and economically important fish species.</p> <p>Furthermore, LWT would recommend that any assessments and/or decisions should factor-in ongoing measures aimed at improving population health and resilience for sandeel (e.g., Defra's ongoing consultation on spatial management measures for industrial sandeel fishing<sup>6</sup>). Lastly, LWT would expect that any perceived and/or anticipated impacts to the Dogger Bank sandeel population will be carefully considered within the mitigation hierarchy, and that proper due diligence is given to each level of the hierarchy (i.e., avoidance first, then embedded mitigation measures, and compensation only as a last resort).</p>		
SLW T01 4	17/07/23	Lincolnshire Wildlife Trust	Benthic Habitats	<p>7. Dredging and Disposal of Dredged Material</p> <p>Section 143 of Chapter 9 estimates a worst-case scenario of 100,413,040m<sup>3</sup> from across the development area, with an undecided disposal site. This estimate suggested a very substantial amount of: 1) direct damage to benthic features and species, 2) disposal material, and 3) resuspended sediment and subsequent deposition. To complicate matters, the Applicant</p>	<p>Following refinement of the Projects' design envelope, the maximum sand wave material to be dredged / relocated across the Offshore Development Area has been reduced to 67,247,545m<sup>3</sup>.</p> <p>The impact of increased SSC (including deposition) has been assessed in sections 9.6.1.2 (construction) and 9.6.3.2 (operation) of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b> and considered to be minor adverse significance. Impacts are expected to be localised and short-term around the point of discharge, with negligible changes in seabed level expected due to deposition. In addition, a search for additional data on sandeel populations within the Dogger Bank has been conducted. Findings within both published and grey literature have been included within the fish and shellfish baseline and were determined appropriate to supplement the approach undertaken to date (see <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b>).</p>	Y-D

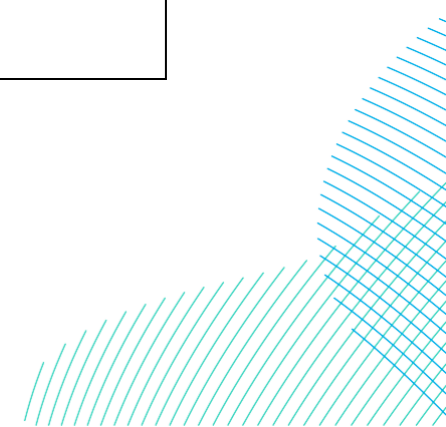




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				<p>has referenced the Dogger Bank C and Sofia projects which 'were granted a disposal licence across the entirety of their respective array areas'. LWT is concerned with the redeposition of sediment across Annex 1 sandbank habitat within the Dogger Bank SAC, as this would greatly impact benthic and pelagic communities that rely on this unique and important ecosystem. The Applicant has highlighted this issue in Section 126 of Chapter 10:</p> <ul style="list-style-type: none"> <li>• 'For demersal and pelagic species, an increase in SSC and sediment settlement will have the greatest effects upon spawning, particularly for maturing eggs and early-stage larval development. Sediment deposition can smother demersal eggs and larvae. Whereas sediments suspended in the water column, are known to adhere to pelagic eggs and increase the egg sinking rates. Both demersal and pelagic eggs and larvae are at increased risk of oxygen starvation in these scenarios, which may impact recruitment of the local population if activity overlaps spawning seasons.</li> </ul>		
SLW T01 5	17/07/23	Lincolnshire Wildlife Trust	Fish and Shellfish Ecology	<p>Given the above concerns for direct impact and loss of important spawning habitat for sandeel, LWT would recommend minimising the need for dredging within the Dogger Bank SAC (avoidance) and</p>	<p>Impacts on dredging and sediment redeposition are included within the assessments of Temporary Habitat Disturbance (<b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b>, section 10.6.1.1.) which includes the total footprint of seabed disturbance during Project Construction and total volume of sediment to be dredged and relocated, and the assessment of Increase in Local Suspended</p>	N

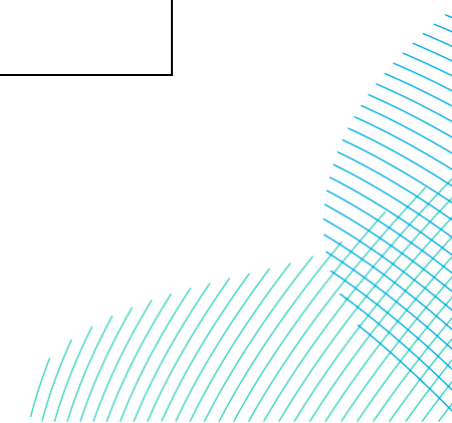


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				mitigating the disposal of dredged material either outside of the SAC or outside of important spawning seasons for both sandeel and Atlantic herring. We anticipate a full evaluation of the impacts of dredging and sediment redeposition on these and other receptors in the ES, as well as due diligence towards the mitigation hierarchy for any projected impacts.	Sediment Concentrations and Sediment Settlement ( <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.6.1.2.).	
SLW T01 6	17/07/23	Lincolnshire Wildlife Trust	Cumulative Effects	8. Modelling the Impacts of Noise and Cumulative Noise LWT appreciates the worst-case scenario parameters, which includes noise impacts and thresholds, that is provided for fish, shellfish and marine mammals in Chapter 11, Table 11-2. However, LWT was disappointed not to find noise propagation modelling in Chapter 11: Marine Mammals nor Chapter 25: Noise. We believe that this evaluation could be greatly improved by modelling species distributions based on current data in conjunction with noise propagation models based on the location and time of year of the construction phase. This type of investigation might be used to quantify potential risk to sensitive species based on the anticipated timing of construction and predicted habitat use, and therefore would be a valuable tool for avoiding/mitigating impacts (e.g., timing construction based on	The underwater noise modelling has been updated for the ES and is presented in <b>Volume 7, Appendix 11-3 Underwater Noise Modelling Report (application ref: 7.11.11.3)</b> with assessments included in section 11.6 and 11.7 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> .  The assessment in <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> has included the application of population modelling (where appropriate) and Dose Response Curves for respective species.	Y-M

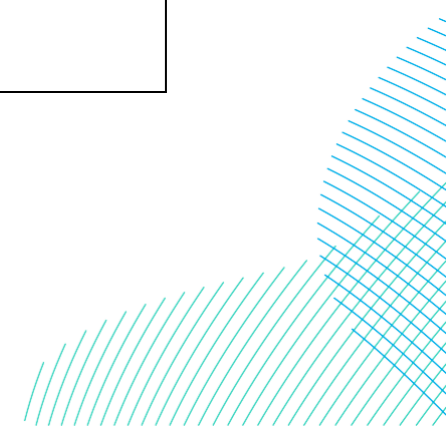


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				anticipated risk and interaction with sensitive species). This sort of exercise may also be applied for other important impacts, such as sediment redeposition and demersal spawning periods.		
SLW TO1 7	17/07/23	Lincolnshire Wildlife Trust	Cumulative Effects	LWT also highlight that there is significant potential for construction timelines to overlap with other noisy activities in the region, and therefore there is significant potential to exceed the area-based noise thresholds for the Southern North Sea SAC. These thresholds have already been close to being exceeded due to current, and much lower, levels of activity. We urge that collaboration between regulators and other developers (including those from other industries) will be paramount to ensuring that these thresholds are not exceeded, and no adverse impact on the harbour porpoise population of the Southern North Sea SAC occurs. Therefore, due to their likely requirement, the use of mitigation and noise abatement technologies should be explored as soon as possible.	<p>A CEA has been carried out in section 11.8 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> and has included the latest information available for construction timelines to overlap with other noisy activities in the region.</p> <p>In relation to the SNS SAC the potential cumulative effects are assessed in the <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b>. As outlined in section 11.7 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b>, a SNS SAC Site Integrity Plan (SIP) would be prepared which will set out the approach to deliver any project mitigation, such as the requirement for any noise abatement technologies, or management measures to reduce the potential for any significant disturbance of harbour porpoise in relation to the SNS SAC conservation objectives.</p> <p>The SIP would be an adaptive management tool, which can be used to ensure that the most adequate, effective and appropriate measures, if required, are put in place to reduce the significant disturbance of harbour porpoise in the SNS SAC.</p> <p>The <b>Volume 8, In Principle SIP (application ref: 8.26)</b> has been developed with the DCO application and is based upon the best available information and methodologies at the time of writing. Consultation will be undertaken during development of the <b>Volume 8, In Principle Site Integrity Plan for the Southern North Sea Special Area of Conservation (application ref: 8.26)</b> with relevant stakeholders, including regulators and other developers and would be finalised prior to construction.</p>	N
SLW TO1 8	17/07/23	Lincolnshire Wildlife Trust	Consultation	9. Future Endorsement and Final Remarks LWT will consider endorsement of DBSOWF provided that the above concerns are addressed appropriately. LWT request a meeting with DBS to discuss the	Noted, engagement with the Lincolnshire Wildlife Trust has continued throughout the ETG process following PEIR submission and pre-DCO submission.	N

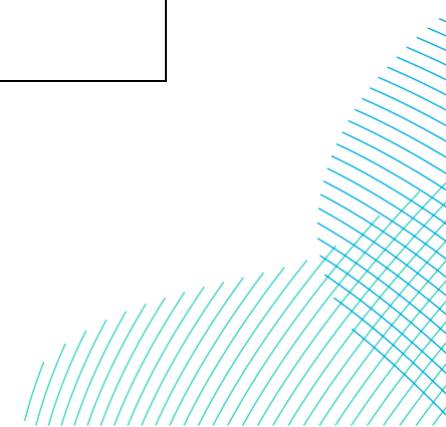
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				<p>issues detailed in this response. LWT will continue to work with the developers during the planning process to ensure the correct data is gathered and assessed in order to address our concerns.</p>		
SLW T01 8a	17/07/23	Lincolnshire Wildlife Trust	Terrestrial Ecology and Ornithology	<p>6. Biodiversity Net Gain Biodiversity Net Gain (BNG) is an approach to development that aims to leave the natural environment in a measurably better state than beforehand, through assessing habitats to quantify the impact on biodiversity. Schedule 15 of the Environment Act 2021 makes provision about biodiversity gain in relation to development consent for nationally significant infrastructure projects (NSIPs), but implementation details are not yet clear and not likely to come into force until November 2025. Regardless, LWT urges all developers, whether working on local developments or NSIPs, to follow the net gain approach and demonstrate at least a 10% measurable net gain in biodiversity within proposals for developments. LWT would urge proper, detailed assessment of BNG (terrestrial, intertidal and marine), using the appropriate metrics, going forward. For reference, the main requirements for BNG include:</p> <ul style="list-style-type: none"> <li>• Minimum 10% gain required, calculated using the Biodiversity Metric</li> </ul>	<p>BNG proposals are summarised in <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> of the ES and detailed in <b>Volume 7, Appendix 18-10 Biodiversity Net Gain Strategy (application ref: 7.18.10)</b>.</p>	N



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				<ul style="list-style-type: none"> <li>• Approval of a biodiversity plan</li> <li>• Habitat is secured for at least 30 years via planning obligations and/or conservation covenants.</li> </ul> We will be monitoring assessment and delivery of BNG (terrestrial, intertidal and marine) going forward.		
SLW TOO 2	17/07/23	Lincolnshire Wildlife Trust	Site Selection and Assessment of Alternatives	2. Project Overview and Marine Environment Receptors The Dogger Bank South Offshore Wind Farms is a large Nationally Significant Infrastructure Project that intends to deliver 200 turbines within the Dogger Bank region of the southern North Sea. The offshore area includes DBS East and DBS west arrays, where the wind turbines would be located, and the offshore export cable corridors that connect the array areas to the landfall. According to the information provided in the PEIR, the Projects are likely to overlap with important protected areas and features, including but not limited to the Dogger Bank SAC, Southern North Sea SAC, Flamborough Head SAC and SSSI, Dimlington Cliff SSSI, the Holderness Offshore MCZ, Holderness Inshore MCZ, the Flamborough and Filey Coast SPA, Greater Wash SPA, and Humber Estuary SPA.	Impacts of the proposed works on, and any relevant mitigation and compensation requirements for, National Site Network Sites are outlined in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> , with impacts on Marine Conservation Zones considered within <b>Volume 8, Stage 1 Marine Conservation Zone Assessment (application ref: 8.17)</b> .	N
SLW TOO 7	17/07/24	Lincolnshire Wildlife Trust	Fish and Shellfish Ecology	It has been well-documented that declines in sandeel populations have negative consequences on	Information provided is acknowledged, noting that the international approach to sandeel fisheries management falls outside the scope of this EIA chapter.	N

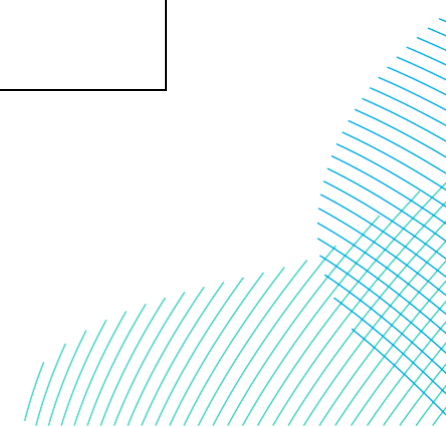


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				<p>several seabird and marine mammal species due to loss of prey. Moreover, the importance of the North Sea sandeel stock has been recognised by the UK Government, as demonstrated by the MMO's Bottom Towed Fishing Gear Byelaw in 20221, recent sandeel consultation on management practices (March-May 2023), and Defra's request for advice on the ecosystem risks and benefits of full prohibition of industrial sandeel fishing in UK waters of the North Sea (ICES Area IV). In a press release published today, the government has announced that it is: 'Publishing a summary of responses to a consultation on spatial management of sandeels, with a majority of respondents being in favour of the option to fully close industrial sandeel fishing in English waters of the North Sea.' (Marine Management Organisation (2022). Decision document: Dogger Bank SAC. <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069134/Dogger_Bank_SAC_Decision_Document.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069134/Dogger_Bank_SAC_Decision_Document.pdf</a> 3 Department for Environment, Food &amp; Rural Affairs and The Rt Hon Thérèse Coffey MP (2023). UK Government seizes post-Brexit freedoms for fishing industry. <a href="https://www.gov.uk/government/news/uk-government-seizes-post-">https://www.gov.uk/government/news/uk-government-seizes-post-</a></p>		



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				brexit-freedoms-for-fishing-industry)		
SLW T00 8	17/07/25	Lincolnshire Wildlife Trust	Fish and Shellfish Ecology	Crucially, the JNCC raised clear concerns for the health and status of the Dogger Bank SAC, and its dependent communities, in their Supplementary Advice on Conservation Objectives for Dogger Bank Special Area of Conservation: 'The sandbank communities are not expected to be fully recovered yet from the impacts from historic bottom trawling, but are expected to start recovering following removal of this pressure. Full recovery is based on the resilience of the feature (medium for subtidal sand) and would not be expected for 2-10 years and only where it is not hindered by other pressures.' (Joint Nature Conservation Committee (2022). Supplementary Advice on Conservation Objectives for Dogger Bank Special Area of Conservation. <a href="https://data.jncc.gov.uk/data/26659f8d-271e-403d-8a6b-300defcabcb1/dogger-bank-saco-v2.pdf">https://data.jncc.gov.uk/data/26659f8d-271e-403d-8a6b-300defcabcb1/dogger-bank-saco-v2.pdf</a> )	The assessment of Temporary Habitat Disturbance ( <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.6.1.1.) has been revised to include a recovery period for the receptor group including sandeel of 2-10 years as described within the Joint Nature Conservation Committee (2022) Supplementary Advice on Conservation Objectives for Dogger Bank Special Area of Conservation referenced.	N
SLT0 01	17/07/2023	Los Trustee's	Land Use	100m cable corridor and temporary construction compound includes a significant amount of land identified for household recycling centre which must not be located on land within the proposed HRC	The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> . We believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> , on balance achieves the optimum design. The electrical infrastructure technology included in the Projects design is HVDC, this	N

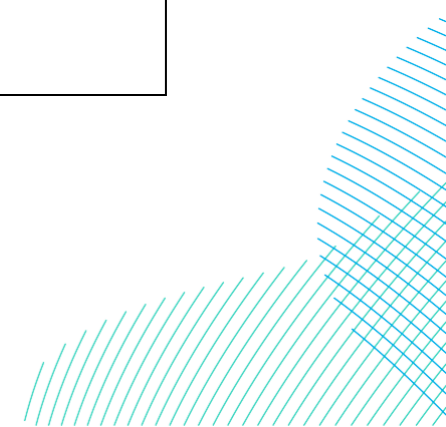
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					has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. This has allowed southern railway option to be discounted moving cable corridor north of constraint and therefore removing the potential impact on land within the proposed HRC. There would be a temporary construction impact across a 75m corridor - the Projects would be sterilising 24m corridor during operation that would return to productive agricultural use and any reasonable loss of development will be a compensable matter.	
SLT002	18/07/2023	Los Trustee's	Site Selection and Assessment of Alternatives	RWE do not know whether one HVAC and one HVDC or two HVDC projects and what the minimum and maximum easement widths will be	The electrical infrastructure technology included in the Projects design is HVDC, this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m as detailed in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> .  There will be a temporary construction impact across a 75m corridor. The permanent easement of the Onshore Export Cable Corridor is 24m during operation and any reasonable loss of development will be a compensable matter.	N
SLT003	19/07/2023	Los Trustee's	Consultation	Request to meet DM & RWE representatives in due course to discuss proposals	Noted. Discussions have been held with Los Trustee's as part of ongoing Landowner Engagement.	N
SMM0001	17/07/2023	Marine Management Organisation	Policy and Legislative Context	Chapter 3 4.1. Section 1.4.3.1.2 outlines the objectives of the East Inshore and East Offshore Marine Plans and key associated policies which may be relevant to the Projects. However, the chapter does not consider whether the Projects are in accordance with relevant policies, or explain if and how the Projects will help achieve plan objectives. This should be included in the ES as a table for ease of review.  4.2. As an area of the offshore export cable route lies within the North East Marine Plan area, the North East Inshore and North East	<b>Volume 8, Policy Compliance Assessment Tables (application ref: 8.2)</b> provide details on how the Projects comply with those of the relevant Marine Plans noted in this comment.	N



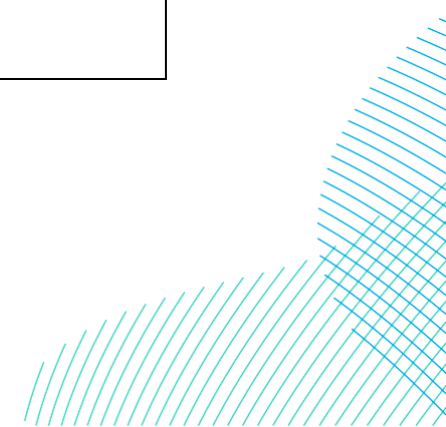


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				Offshore Marine Plan Policies will need to also be considered in the ES.		
SMM 000 2	17/07/2023	Marine Management Organisation	Project Description	Chapter 5 6.1. Within the project description it would be beneficial to outline what section of the works will be applied for under each of the proposed Deemed Marine Licences; separated out per marine licensable activity according to the Marine and Coastal Access Act 2009, Section 66.	As noted within <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> a total of five deemed Marine Licences are being applied for. Deemed Marine Licences 1 and 2 cover the generating assets for DBS East and West respectively, deemed Marine Licences 3 and 4 cover the transmission assets for DBS East and West respectively and deemed Marine Licence 5 covers the inter-platform cabling.	Y-M
SMM 000 3	17/07/2023	Marine Management Organisation	Project Description	6.2. Table 5-2 Offshore Scheme Summary states that there will be a total combined number of 11 offshore platforms. However it also states that there will be a maximum of 6 platforms in each area (6 in DBS East and 6 in DBS West), which is 12 in total. The ES should provide clarification of the total number of offshore platforms.	Following the removal of HVAC technology from the Project envelope, the maximum number of platforms has been reduced to eight for DBS East and DBS West combined, comprising: <ul style="list-style-type: none"> <li>• Three Offshore Converter/Collector Platforms in DBS East Array Area;</li> <li>• Three Offshore Converter/Collector Platforms in DBS West Array Area;</li> <li>• One accommodation platform in either DBS East or West Array Area; and</li> <li>• One electrical switching platform in either DBS East or West Array Area or within the Export Cable Corridor Platform Area of Search.</li> </ul> <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> has been updated to reflect the refinement in platform numbers	N
SMM 000 4	17/07/2023	Marine Management Organisation	Project Description	6.3. Further on, section 5.4.4 states that there will be up to eight OSPs/Offshore Converter Platforms (OCPs)/Collector Platforms (CPs), depending on how the Projects are developed (four located in DBS EAST and four in DBS West). The final number of OPSs/OCPs/CPs should be clarified and confirmed in the ES.	Following the removal of HVAC technology from the Projects design envelope, there will be a maximum of six OCP/CPs for DBS East and DBS West combined. As OSPs would only have been required if using HVAC technology, they reference to such platforms have been removed from the design envelope and chapter.	N

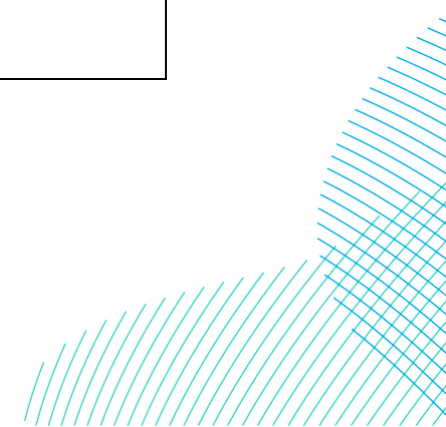
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SMM 000 5	17/07/2023	Marine Management Organisation	Marine Physical Environment	Chapter 8 8.1. The MMO agrees with the majority of the scoping of receptors and processes. The Applicant has made a reasonable case for omitting re-powering from the scope of this application – however, as noted in the application, this could involve replacement of everything except cables, and therefore a potential to repeat many impacts after 30 years. The ES should note this in the assessments, as a foreseeable potential frequency of impact occurrence (akin to the assessment of decommissioning - this is not specifically considered in detail, but the application notes that impacts will be of similar magnitude to installation).	If the specifications and designs of the new turbines and/or foundations were outside the existing maximum design scenario, or the impacts of constructing, operating, and decommissioning them were to fall outside those considered in this ES, repowering would require further consent (and EIA).  Given the uncertainty regarding the technical specifications around any potential repowering and therefore potential levels of impacts, reference to repowering has not been made in this ES.	N
SMM 000 7	17/07/2023	Marine Management Organisation	Marine Physical Environment	Cumulative impacts 8.3. In relation to Section 8.7.5, Potential Effects During Operation, it is not particularly useful to the understanding of geomorphic impacts to express changes to hydrodynamics in purely percentage terms (e.g., 7% decrease in tidal currents). The key process to understand is any changes in net volumes of sediment supply upstream and downstream along major transport pathways. For example does the associated reduction in sediment transport rate result in new 'gradients' in transport across any features or significant transport	Changes to hydrodynamics were assessed in section 8.7.4.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and quoted as a percentage change from baseline condition and also expressed in terms of the maximum change to current velocity. When quantifying changes to hydrodynamics it is appropriate to express this as both a value and a percentage change.  Changes in net volumes of sediment supply and sediment transport pathways are assessed separately in section 8.7.4.4 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> . A reduction in sediment transport potential is predicted as a result of lower current velocities associated with changes in wave and tidal regime (see sections 8.7.4.1 and 8.7.4.2 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> ). These changes have been confined to local areas around each individual foundation due to localised wave shadow and wake effects. Given their limited geographical extent, this is not expected to change significant sediment transport pathways or gradients which could lead to removal or additional of sediment from any particular area, changing the net volumes of sediment supply. If individual sedimentary features such as sand waves are present within the area	N



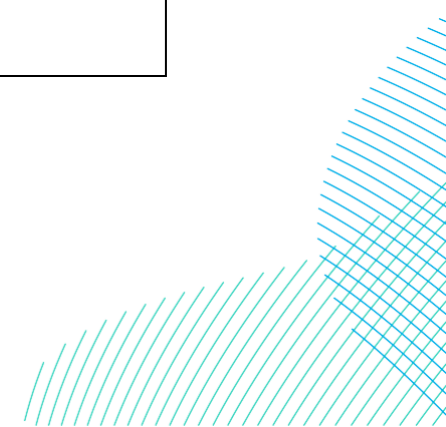
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				<p>pathways. Consideration should be given as to whether sediment will be progressively removed from areas where the transport rate increases in the direction of transport. The size of the sedimentary features may mean that any eventual impacts due to small changes may take years or decades to be manifest. As the projects have an (initial) lifetime of 30 years, and there are many adjacent developments of similar nature which may be introducing their own gradients, this should be discussed in the cumulative impacts assessment. This is particularly important to consider since there is no specific modelling identifying sediment transport changes.</p>	<p>affected by the wave shadow or wake, there is potential for these individual features to be affected by changes in bedload sediment transport due to changes in wave and tide regime. However, a review of project specific bathymetry data has not identified any sand waves within the Array Areas. Therefore, the effect of infrastructure on sand waves has not been assessed.</p> <p>The cumulative effects of changes in hydrodynamic regime have been assessed in section 8.8.4 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. No overlapping effects are predicted between adjacent projects, therefore no cumulative changes in net sediment transport are expected.</p>	
SMM 000 8	17/07/2023	Marine Management Organisation	Marine Physical Environment	<p>8.4. The cumulative impact assessment appears to be based on the temporal overlap of activities i.e., defining simultaneous, or in-combination impacts, rather than cumulative. Table 8-61 does not refer to the Dogger Bank sites already present. A cumulative assessment of coastal process impacts should map the impact zones of all developments (past and anticipated future), defined using the same expert judgment method applied for the projects against the transport pathways already mapped for the PEIR. This map should be assessed in the way</p>	<p>When assessing cumulative effects during construction, temporal overlap in activities is required to cause a cumulative effect as once the construction activity ceases, suspended sediment concentrations return to baseline conditions with a period of hours so there is no potential for overlap with other construction activities unless they occur within the same timeframe (of the order of hours) (see <b>Volume 7, Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b>).</p> <p>With regards to cumulative effects during operation, the assessment requires each individual project to be constructed to understand how the effects increase cumulatively until all projects are built and there is temporal overlap in their presence. Table 8-62 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> has been updated to include other Dogger Bank Projects.</p>	Y-M



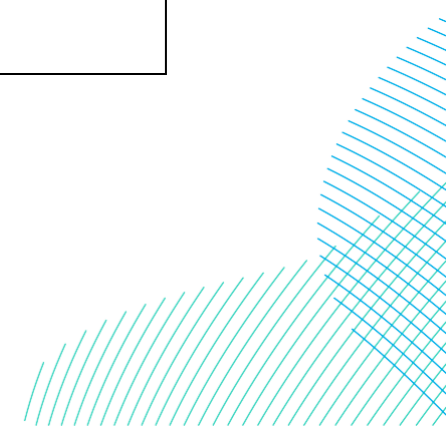
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				discussed in Paragraph 2.1 (in terms of potential changes to transport rate gradients).		
SMM 000 9	17/07/2023	Marine Management Organisation	Marine Physical Environment	<p>Mitigation</p> <p>8.1. Embedded mitigation for coastal process impacts (Section 8.3.3) includes a pollution (spill) control plan, turbine spacing to avoid overlapping wakes, scour protection (though this is largely mitigation of engineering risk), drilled foundations where possible to minimise sediment deposition, cable burial (micrositing) and Horizontal Directional Drilling (HDD) at the coast. All impact estimates being assessed already reflect these measures (i.e., 100 million metres cubed (m<sup>3</sup>) of sediment excavation for sand wave levelling is already accounting for the embedded mitigation). Further mitigation is not proposed. However, Section 8.9 contains proposals for an In Principle Monitoring Plan, to include pre- and post-cable installation monitoring of sand waves. It would be of value to provide more information on the timing of these proposed surveys, and the expectations (what the monitoring is intended to observe), including explanation should the observations not meet these expectations. The expressed intention is to monitor bed recovery in Holderness Inshore Marine Conservation Zone (MCZ)</p>	<p>Further information regarding post-construction monitoring has been included within the section 8.9 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and <b>Volume 8, In Principle Monitoring Plan (application ref: 8.23)</b>.</p> <p>It should be noted that the Projects no longer directly interact with the Smithic Bank sandbank feature or the Holderness Offshore MCZ, with the Projects now only having potential indirect effects on these features. As the Offshore Export Cable Corridor Construction Buffer Zone overlaps with the Holderness Inshore MCZ, there still exists the potential for direct impacts from anchoring events during cable installation activities. Further details on the site selection and impacts to the MCZs are detailed in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> and <b>Volume 8, Stage 1 Marine Conservation Zone Assessment (application ref: 8.17)</b>.</p>	N



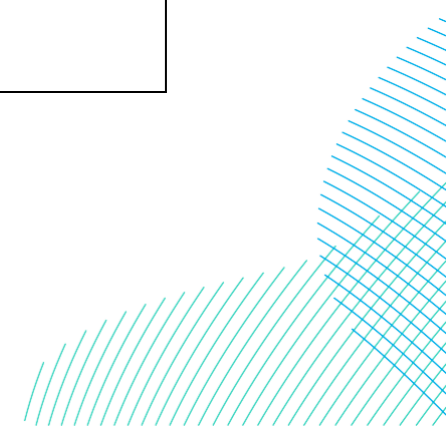
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				and Smithic bank, plus scour impacts, implying potentially extensive surveying, interpretation and reporting requirements. The ES should discuss what mitigation would be applied if recovery is not observed.		
SMM 001 0	17/07/2023	Marine Management Organisation	Marine Physical Environment	Other Comments 8.2. The MMO notes that Paragraph 158 indicates that the HDD ducts for the export cable landfall may exit into the intertidal zone. An assessment of the impacts on local transport is indicated. However, the MMO is not certain that this includes the potential impact of shoreline retreat. Shoreline retreat is described as possibly the greatest rate in the UK and shown in Table 8-20 to reach up to 1.5m per year or more.	The design of the trenchless duct locations includes an assessment of shoreline retreat to ensure the ducts on both the landward and seaward side are not affected by the retreating coast which would cause an engineering risk. This is outlined in section 8.3.3 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> .  Enhanced shoreline retreat is also assessed within section 8.7.3.9 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> .	Y-M
SMM 001 4	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.6. Paragraph 209 of Chapter 8 discusses the 'Significance of Effect - DBS East or DBS West in Isolation'; interruption to Longshore Transport in a sparsely-sedimented, eroding shoreline area may be more likely to have a lasting fingerprint (compared to a more sediment-rich setting), rather than less as stated. The MMO recommends the assessment of impact not be based on this assumption, since shoreline impacts at eroding sites frequently vary over scales of tens of metres alongshore and the true exposure	Following further review of the potential construction methodology for the Projects, cofferdams have been removed from the Projects design envelope.	Y-D



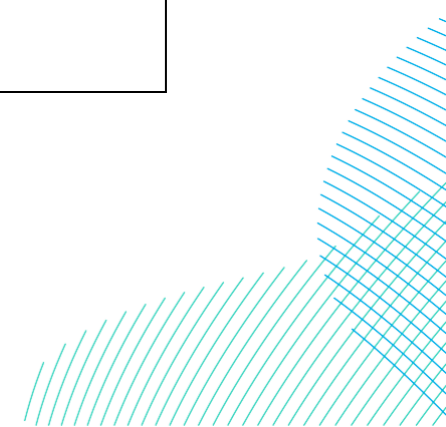
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				to impact may depend on highly localised details of the transport and sediment supply. Such information is not available in this case.		
SMM 001 6	17/07/2023	Marine Management Organisation	Marine Physical Environment	Sediment Sampling and Disposal 8.9. Section 8.4.1. states that site specific data will be included in the ES, indicating that data was not available for the production of this PEIR chapter and therefore the same information in the scoping report was included in the interim. Sample sites for the nearshore are presented in Figure 8-8 and the data in Table 8-16, however, the PEIR states that the sediment data available shows that for all parameters the contaminant concentrations are likely to be low, indicating a minimal risk to the water column if suspended, this would also be relevant to translocated/redeposited sediments.	The marine physical processes baseline in section 8.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> has been updated with project specific data.	N
SMM 001 7	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.10. This should be caveated that the borehole data for arisings would need to be individually assessed to determine if the same level of contaminants was found at depth in fine sediments.	Given drilled piles would only release geological material (i.e., uncontaminated material) depth samples are not generally collected for offshore windfarms in relation to sediment contaminant assessments.	N
SMM 001 8	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.11. Worst case scenarios have been provided for transport and contamination levels of material for both the export cable corridor (ECC) and within the array as a result of various aspects of the	Noted	N



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				construction operation and decommissioning e.g. bed levelling, trenching, jetting or dredging of sand waves. The use of Cefas Action levels, Convention for the Protection of the Marine Environment of the North-East Atlantic (OSPAR) sediment quality guidelines for the assessment of impacts of the transport and deposition of the sediments including potential impacts on water quality, is appropriate.		
SMM 0019	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.12. Sediment contaminant data from Dogger Bank A, B, C and Sofia from 2011 and 2012 are cited as other available data and information (Table 8-7) as outlined in Figure 8-8. Please note these are not considered timely under OSPAR, however, due to the nature and location of the material they are a useful indication of the cable area.	Noted. Site specific data is now available and has been included within <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> .	Y-M
SMM 0020	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.13. Chapter 9 provides more timely data and information for use in physicochemical characterisation. Whilst the temporal and spatial coverage appears appropriate, these appear to be surface only samples and no information from samples at depth have been provided e.g. to look at potential contamination from arisings for any drilled piles or from areas where there has been potential spills would still require additional testing.	Site specific data is now available and is included within the ES. Given drilled piles would only release geological material (i.e. uncontaminated material) depth samples are not generally collected for offshore windfarms in relation to sediment contaminant assessments.	N

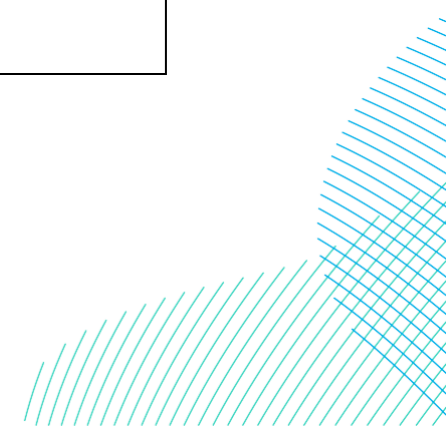


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SMM 002 1	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.14. Information on contaminants in boreholes should also be provided for completeness.	Site specific data is now available and is included within the ES. Given drilled piles would only release geological material (i.e. uncontaminated material) depth samples are not generally collected for offshore windfarms in relation to sediment contaminant assessments.	N
SMM 002 2	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.15. Table 8-15 and 8-16 provide levels of trace heavy metals in samples from the array and export cable sites for Tranche A windfarm sites, however, to be able to accurately assess the levels against Cefas action levels and use the data with confidence, the actual laboratory and method of extraction and analysis should be provided and should be in line with the MMO approved laboratories. A list of MMO approved laboratories can be found here: <a href="https://www.gov.uk/guidance/marine-licensing-sediment-analysis-and-sample-plans">https://www.gov.uk/guidance/marine-licensing-sediment-analysis-and-sample-plans</a> . This should be similar to the detail of information provided in Chapter 9 or at least reference to the information provided.	Site specific data is now available and is included within the ES. Particle Size Analysis) was conducted by Fugro and Total Hydrocarbons, P, metals, organotins, and PCBs were analysed by SOCOTEC as per MMO requirements.	N
SMM 002 3	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.16. Figure 8-8 indicates sediment contaminant sample locations which were undertaken for Dogger Bank A and B and the ECC. Chapter 9.2 of the draft ecology benthic monitoring report provides consideration of 197 sampling stations to provide coverage of DBS and the ECC. Fauna and particle size distribution were collected using a 0.1 m <sup>2</sup> Hamon grab and the chemistry	Site specific data is now available and is included within <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> .	N

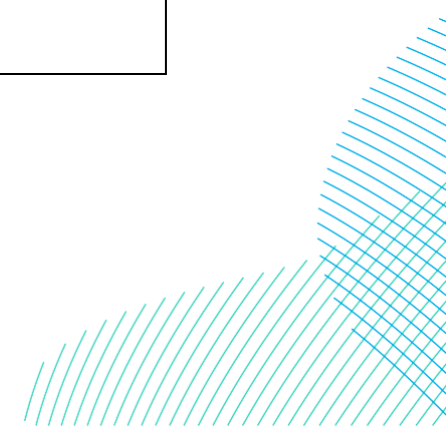




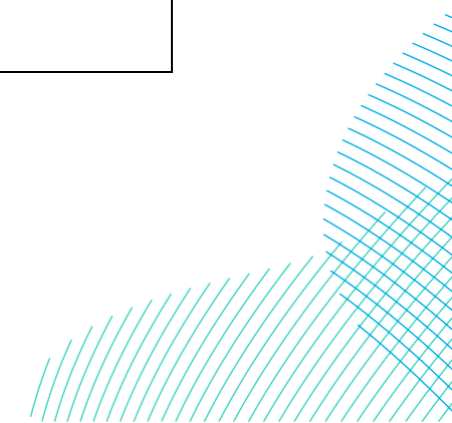
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				samples collected using a 0.1 m <sup>2</sup> Day grab. It should be noted that the aliquot for particle size analysis (PSA) should be from the same sample used for chemical sampling, however the method followed here is for standard offshore monitoring and therefore done for different purposes.		
SMM 002 4	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.17. The report provides results for 20 sample sites across the array and 10 sample sites for the export cable which appear to provide good spatial coverage. The sediment samples were analysed for total hydrocarbons (THC), 22 individual poly aromatic hydrocarbons (PAHs), metals, polychlorinated biphenyls (PCBs) and organotins (di and tri-butyl tin).	Noted	N
SMM 002 5	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.18. The results of these analysis have been compared to OSPAR effects range low (ERL), the National Oceanic and Atmospheric Administration (NOAA) effects range median (ERM) and Cefas Action Levels (ALs) as well as Canadian Sediment Quality Guideline threshold effects level (TEL) and probable effects level (PEL).	Noted	N
SMM 002 6	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.19. The interpretation using these comparisons is that the levels are generally low with levels of total hydrocarbons and PAHs at the array being generally lower	Noted	N



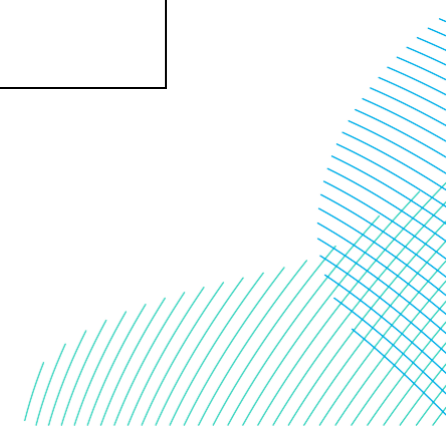
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				than the ECC. Considering that the ECC is likely to comprise material with more fines than the array due to being closer to the shore, this is not unexpected. Levels for metals indicated three stations with arsenic levels above the Cefas action level one with the remaining concentrations for individual contaminants below this. For PCBs the sum of the 25 congeners were all below Cefas Action Levels at all stations as were the levels of organotins.		
SMM 002 7	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.20. PSA was conducted by Fugro and THC PAHs metals organotins and PCBs were analysed by SOCOTEC, therefore, the provision of data for use with the assessment appear appropriate and proportionate.	Noted	N
SMM 002 8	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.21. Table 8-6 shows Cefas Action Levels. This table is incorrect. Mercury levels quoted as Action level 1 of 40 milligrams per kilogram (mg/kg) and Action Level 2 as 400 mg/kg these should be 0.3 mg/kg and 3 mg/kg respectively.	This has been amended within Table 8-5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> .	Y-M
SMM 002 9	17/07/2023	Marine Management Organisation	Marine Physical Environment	Table 8-2 states that an explanation regarding the use of Cefas action levels is provided in section 8.4.1 and that site specific data will be included with the ES that were not available for the production of the PIER chapter, and therefore the same	This has been amended to refer to section 8.4.1.2 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> .	y-m



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				information as presented in the scoping report is included here in the interim. However, section 8.4.1 is Policy, legislation and guidance and does not have a such a description. This should be amended to 8.4.1.2 for clarity where there is an adequate comment on Cefas Action Levels at Paragraph 29 of the chapter.		
SMM 003 0	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.23. The MMO is of the opinion that, although material will be maintained within the same area, a designation of a disposal site will be required for these works. This site would cover the array and cable areas, in order to comply with the UK's obligations under OSPAR and the London Convention and Protocol.	See <b>Volume 8, Disposal Site Characterisation Report (application ref: 8.18)</b> for information regarding the Projects disposal site designation.	N
SMM 003 1	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.24. Please note, this would only be required were it is anticipated that material will be removed from the water, however briefly this may be (i.e. bed levelling works carried out by means of plough dredging for example, may not be subject to the requirement of a disposal site, whereas removal via trailer suction dredging, for example, for release at the sea-surface would be subject to this requirement). In line with this requirement, annual disposal returns must be submitted to the MMO during the project's construction. A Site Characterisation Report must be submitted to enable the MMO to	See <b>Volume 8, Disposal Site Characterisation Report (application ref: 8.18)</b> for information regarding the Projects disposal site designation.	N

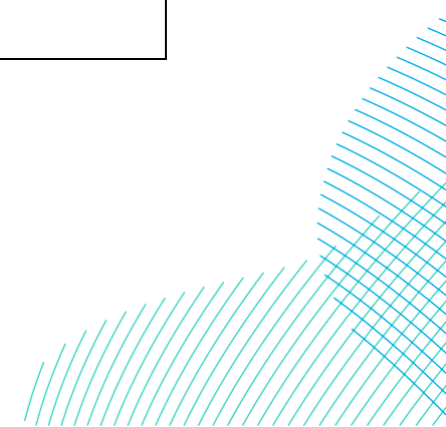


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				designate one or more disposal sites.		
SMM 003 2	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.25. Drill arisings must be included within the Chapters and be included in any disposal site worst case scenario figures.	Noted, where relevant estimated drill arising figures are included with the ES and associated reporting.	Y-M
SMM 003 3	17/07/2023	Marine Management Organisation	Benthic Habitats	The MMO does not have any concerns regarding the scoping out of the potential impact of invasive non-native species (INNS) associated with the construction and decommissioning phases. The MMO agrees the impact of INNS (and colonisation introduced substrate) will be assessed as part of the operation phase of the development.	Noted. As agreed, the impact of INNS (and colonisation of introduced substrate) is assessed as part of the operation phase of the development within section 9.6.3.5 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9).</b>	N
SMM 003 4	17/07/2023	Marine Management Organisation	Benthic Habitats	9.2. Similarly, impacts to the intertidal zone have been scoped out of the operational phase of the Projects as HDD will be used to install the cable and therefore, its presence will not lead to any operational impacts (providing the cable is sufficiently buried).	Noted	N
SMM 003 5	17/07/2023	Marine Management Organisation	Benthic Habitats	9.3. Due to the distance from the nearest economic exclusive boundary (40 km) and the confinement of changes in seabed morphology to the immediate vicinity of the Projects infrastructure, transboundary effects on benthic receptors have been scoped out of the assessment and the MMO agrees with this conclusion.	Noted	N

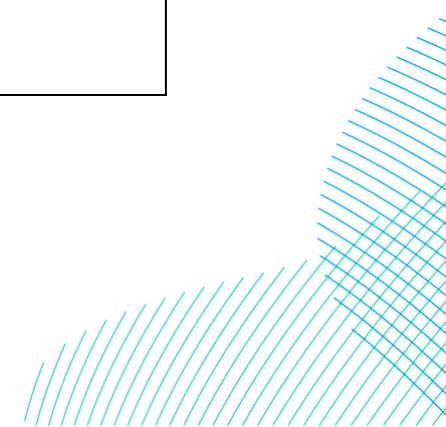


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SMM 003 6	17/07/2023	Marine Management Organisation	Benthic Habitats	9.4. The MMO agrees with scoping out heat emissions from operational cables.	Noted	N
SMM 003 7	17/07/2023	Marine Management Organisation	Benthic Habitats	9.5. One of the recommendations in Kirchgeorg <i>et al.</i> 2018 was to consider corrosion protection systems during Environmental Impact Assessment (EIA) for offshore wind platforms and to develop monitoring strategies to determine the long-term environmental impact of the introduction of paint flakes into the marine environment around OWFs. 9.6. The MMO recommends that consideration is given to the impact of paint flakes (as microplastic pollution), originating from maintenance and operation (specifically application, cleaning and scarping off of corrosion resistant paints) of the Projects, on benthic receptors. It would be useful to provide an estimate of the quantity of paint expected to be used during the lifetime of the Projects and the percentage of that which may be expected to result in microplastic pollution, this would inform the in-principle monitoring plan accordingly.	<p>Any paint utilised for the Projects will be approved for use in the marine environment by the relevant bodies.</p> <p>It is unclear how an assessment of paint flakes could be undertaken. These will be shed throughout the life of the Projects and as fine particles, most will enter the water column and be distributed by currents across a wide area. Given that these will be light (see <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.9)</b> for discussion of fine particulates) it is unlikely they would fall out of suspension in proximity to the turbines and build up over time in the array areas. In addition, flakes would not be released as a plume (as per SSC increases from construction or maintenance activities) so the assessment would be of individual particles, released episodically.</p> <p>Every painted structure in the sea will be likewise shedding paint, this is not unique to offshore wind foundations, therefore singling this out as a specific effect for a project EIA does not seem proportionate.</p> <p>The Applicants suggested this should be considered through broadscale research rather than EIA. This was agreed with by stakeholders at the Marine Physical Processes and Benthic Ecology ETG held on the 29th January 2024, with Cefas stating that any type of chemical should be considered early in the Project Environmental Management Plan. The <b>Outline Project Environmental Management Plan (application ref: 8.21)</b> includes paints within section 4.2 Chemical Risk Assessment. A PEMP, or PEMPs will be required for MMO approval prior to commencement of construction in line with conditions of the DMLs.</p>	N
SMM 003 8	17/07/2023	Marine Management Organisation	Benthic Habitats	9.7. Similarly, Kirchgeorg <i>et al.</i> 2018 mentions the release of metals from sacrificial anodes, which may result in potential impacts to benthic receptors within the DBS arrays (and therefore within the Dogger Bank SAC). The	Ebeling <i>et al.</i> , (2023) investigated the potential metal emissions from galvanic anodes in offshore wind farms into the North Sea sediments. Sediment samples from different German North Sea OWFs were taken between 2016-2022, and analysed for their mass fractions of metals and their isotopic composition of Strontium. Results showed that mass fractions of the legacy pollutants cadmium, lead and zinc were mostly within the known variability of North Sea sediments. At the current stage the analysed gallium (Ga) and indium (In) mass fractions as well as Ga/In ratios do not	N

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				MMO recommends that the potential increase in sediment contamination is considered as part of the monitoring for the Projects, particularly given the number and concentration of OWF projects in the Dogger Bank area.	point towards an accumulation in sediments caused by galvanic anodes used in OWFs. The Applicants have therefore not included monitoring of this in the IPMP.  This approach was agreed with stakeholders at the Marine Physical Processes and Benthic Ecology ETG held on the 29th January 2024.	
SMM 003 9	17/07/2023	Marine Management Organisation	Benthic Habitats	9.8. Chapter 9 of the PEIR acknowledges that the introduction of hard substrate into an otherwise sedimentary habitat may have detrimental effects on the existing benthic assemblages due to the colonisation of infrastructure, such as foundations, by hard-bottom or intertidal communities not usually present in the Dogger Bank region. However, the PEIR only presents the magnitude of impact and significance of effect for recruitment of invasive non-native species (INNS) on the Projects infrastructure. The MMO recommends that consideration is given to the effect of colonisation of the Projects by hard-bottom and intertidal species within the ES and that their presence is monitored accordingly throughout the lifetime of the Projects. The MMO notes that the Habitats Regulations Screening document referenced in Paragraph 9 specifically includes this pressure as 'Physical change (to another seabed type / to another sediment type)'.	The potential for colonisation of Projects' infrastructure by non-INNS species is considered in section 9.6.3.5 of <b>Volume 7, Chapter 9, Benthic and Intertidal Ecology (application ref: 7.9)</b> .  In addition, <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> has been submitted alongside the ES.	N



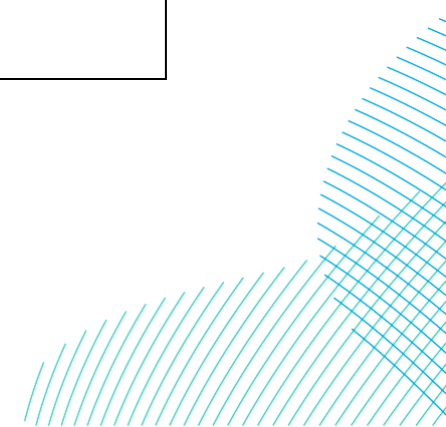
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SMM 004 0	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	Chapter 10 - MMO content with detail 11.1. The Applicant has defined a broad study area for the characterisation of fish and shellfish ecology and the key demersal, pelagic and migratory species, as well as several important elasmobranch species, have been generally well characterised. Generally, appropriate data sources have been used to characterise fish receptors in the region including the use of spawning and nursery ground data from Coull <i>et al.</i> , (1998) and Ellis <i>et al.</i> , (2012). The MMO welcomes this and has split up comments on this chapter in to general comments, habitat suitability assessments, including herring and sandeel, temporary habitat loss/disturbance, underwater noise, unexploded ordnance (UXO), mitigation and cumulative effects.	Noted	N
SMM 004 1	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.2. In PEIRs for projects of this nature and scale, it is helpful to present summary table within the fish ecology chapter which clearly outlines which impacts have been scoped in/out of further assessment for each stage of the development (construction, operation and decommissioning), since the scoping stage consultation. Doing so provides a concise way of determining whether likely impacts to fish	A table indicating the scoping of impacts has been included within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.6.	Y-M



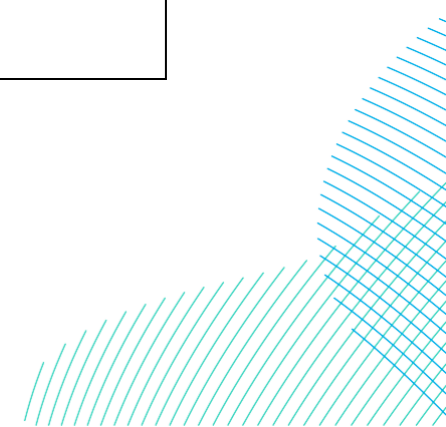
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				receptors have been appropriately scoped in/out. It would be helpful if this information could be provided in the ES.		
SMM 004 2	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.3. The overall presentation of the fish and shellfish ecology chapter is somewhat fragmented. The supporting information and evidence is not always clearly signposted in the main chapter.	Formatting of the chapter has been updated since the PEIR, with signposting added where appropriate.	Y-M
SMM 004 3	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.4. From the information presented in Table 10-2, in which likely impacts are presented in the context of the 'realistic worst case design parameters', it is the MMO's understanding that the following impacts have been scoped into the construction and operation phases: *please see table in response*	Noted	N
SMM 004 4	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.5. Likely impacts to fish and fish ecology arising during decommissioning should be included in the impact assessment. Table 10-2 sets out the reason for a full assessment not being included. While the MMO appreciates that the full extent of decommissioning works will not be finalised until much closer to the time, it is important that potential likely impacts be assessed, nonetheless.	It is anticipated that for the worst case scenario, the impacts will be no greater than those identified for the construction phase, as stated within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.3.2. and section 10.6.3. The impact assessment for the construction phase should therefore be used for the decommissioning phase.	N
SMM 004 5	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.6. An outline of the works anticipated during the decommissioning phase, and the	A table indicating the scoping of impacts has been included within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.6.	N



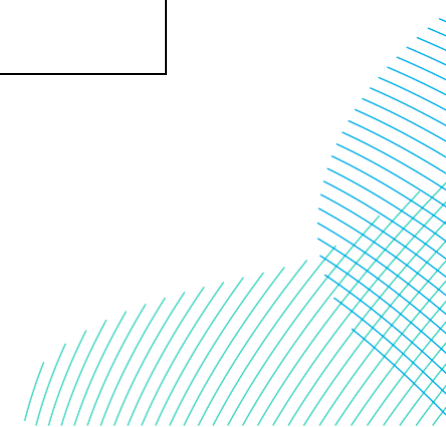
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				likely impacts thus arising, have been provided within PEIRs for other wind farm projects of a similar size. It is understood that this information is indicative given that the period of decommissioning will not occur for 30+ years, however this information is necessary for a complete assessment. The MMO expects amendments to be made within the ES, incorporating a table which clearly outlines the likely impacts to fish at each stage of the development, and whether these have been scoped into/ or out of further assessment. Such a table is necessary to outline the information presented in Table 10-2 more clearly.	It is anticipated that for the worst case scenario, the impacts will be no greater than those identified for the construction phase, as stated within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.3.2. and section 10.6.3. The impact assessment for the construction phase should therefore be used for the decommissioning phase.	
SMM 004 6	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.7. The assessment of the significance of impacts for the DBS OWFs in Section 10.6 presents assessments based on two development scenarios; one where DBS East and West are developed concurrently, and the second where DBS East and West are developed 'in isolation'. The scenario where DBS East and West are developed 'in isolation' simply refers to a staggered implementation of the two projects, where construction of the first begins two years prior to construction commencing on the second. In terms of assessing the significance	The 'in isolation' scenarios assessed refers to a scenario where only a single windfarm is developed. The 'together' scenario refers to a scenario where both sites are developed (either sequentially, or concurrently, with the worst case of the two assessed on an impact by impact basis), as is described within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.3.2.3. Where the potential advantages of a sequential approach have been discussed when compared to a concurrent construction programme, additional text has been added to the impact assessment to highlighting the requirement for an overlap of a minimum of 3 years.	Y-M



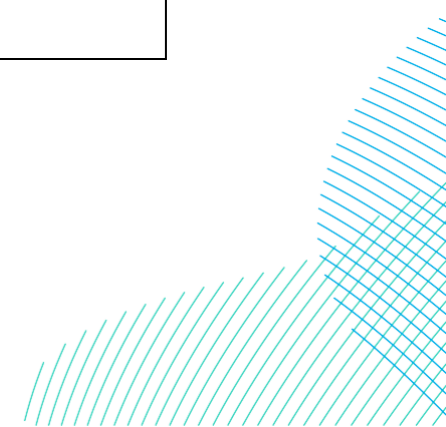
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				<p>of impacts to fish receptors, the MMO does not agree that the impacts can be considered less severe as a result of this two-year staggered-start approach, as there will still be up to three years where both projects are being developed simultaneously. This should be stated clearly in the assessment of impacts to fish ecology.</p>		
SMM 004 7	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	<p>11.8. Tables within the Fish and Shellfish Ecology Appendix have been provided which detail the ecology of fish and elasmobranch species identified as being potentially present within the Fish and Shellfish Ecology Study Area. Figures indicating the presence of spawning and nursery grounds (as per Ellis <i>et al.</i>, (2012)) have also been provided in the volume of figures. For ease of interpretation given the volume of information provided, it would be useful to have a table presented within the main Fish and Shellfish Ecology chapter, which presents a list of species as per Ellis <i>et al.</i>, (2012), and indicates via tick boxes whether the spawning and/or nursery grounds of each species overlaps with the Fish and Shellfish Ecology Study Area. A column in this table indicating the periods of spawning activity for fish species identified would also be helpful, and in doing so would draw this information</p>	<p>A table has been added to <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b>, section 10.5.2. presenting the requested information.</p>	Y-M



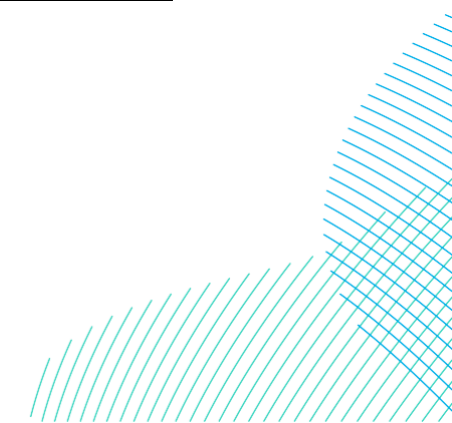
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				together in one place in the main Fish and Shellfish Ecology chapter.		
SMM 004 8	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.9. Although this doesn't change the outcome of the impact assessment, the MMO would not anticipate albacore tuna ( <i>Thunnus alalunga</i> ) to be a significant species scoped into an assessment in the central North Sea, as this does not normally form part of their distribution. Bluefin tuna ( <i>Thunnus thynnus</i> ) have also been identified as seasonal visitors to the North Sea.	Noted	N
SMM 004 9	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	Habitat suitability assessments 11.10. Habitat suitability assessments for herring and sandeel are presented within Chapter 10. For herring and sandeel, a 'heat' map output has been provided to indicate areas of seabed with the potential to provide sandeel habitat or herring spawning habitat, following the MarineSpace (2013a and 2013b for herring and sandeel respectively) methodologies. This is appropriate.	Noted	N
SMM 005 0	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.11. Tables 10-15 and 10-16 display the calculated total areas in km <sup>2</sup> of potential habitat for sandeel and potential spawning habitat for herring, which overlap with the project boundaries. Please note that the MMO does not support the calculation of quantified areas of potential	Additional text has been added to the paragraphs preceding these tables to provide additional context surrounding the caveats that must be considered when utilising the quantification of modelled extents. Further, these values have been included within the baseline only, and have not been used directly to draw conclusions regarding impact significance.	Y-M



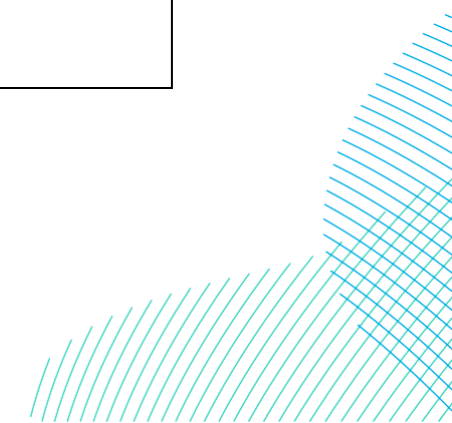
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				<p>sandeel habitat and potential herring spawning habitat. Doing so likely over- or under-represents the area of suitable habitat available, as well as assumes that;</p> <p>a) The total area of suitable habitat is explicitly known and that sandeel populations will remain at comparable densities.</p> <p>b) Herring populations will spawn across the same area every year, within in a reduced area. When in fact herring will return to a broad area to spawn annually but will not spawn over the whole spawning ground each year.</p> <p>This means the relative importance of a particular spawning area to the overall reproductive success of the population will vary between years and therefore calculations of total area (or percentage area) of spawning habitat should be treated with caution as they are not truly reflective of the potential impacted area.</p>		
SMM 005 1	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	<p>Atlantic Herring 11.12. A 'heat' map of potential herring spawning habitat has been provided in Figure 10-7. The MMO notes from Table 10-5, that ICES International Herring Larvae Survey (IHLS) data for the years 2010-2022 has been used to inform the 'heat' map and agrees this is appropriate.</p>	Noted	N



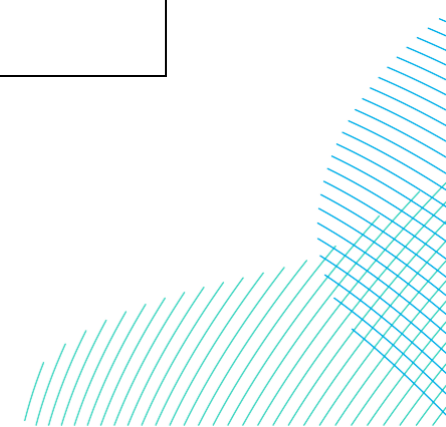
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SMM 005 2	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.13. Given the extent of the noise-generating activities proposed and noting that the ECC passes through the Banks herring spawning ground at Flamborough Head, it will be helpful if the individual data layers (e.g. sediment data, 10 years of amalgamated IHLS data) are presented in mapped form in the ES. This information will be necessary to refine any temporal or spatial restrictions placed on the Projects to protect spawning herring from disturbance by the Projects works.	Layers can be found within <b>Volume 7, Figures 10-7a to 10-7g (application ref: 7.10.1)</b> .	Y-M
SMM 005 3	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.14. The Applicant's heat map of potential herring spawning habitat (Figure 10-7) clearly demonstrates that the ECC is set to be laid directly through an area of seabed with high and very high potential as herring spawning habitat. With this in mind, I have made a preliminary recommendation that a temporal restriction on construction activities which interact with the seabed along the ECC (including seabed preparatory works, cable trenching etc) is necessary during the herring spawning season (which for the Banks herring population is August - October inclusive). Please see the mitigation section for further comments.	This preliminary recommendation has been acknowledged, and no piling works along the ECC during the Banks herring population spawning season (August-October) has been included as embedded mitigation throughout this assessment. Following completion of sediment plume modelling and quantification of seabed disturbance, and the assessment of the impacts related to these components of the construction phase of the Projects within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.6 determining no significant effect, and so restrictions on construction activities as a whole has not been included within embedded mitigation.	N



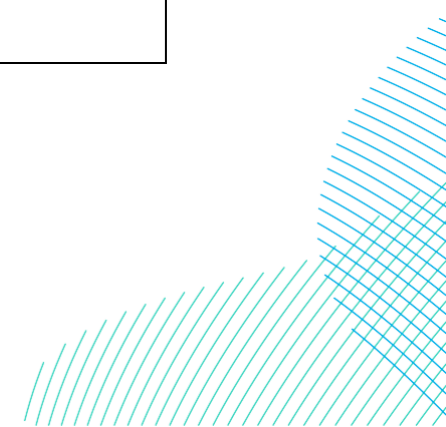
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SMM 005 4	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	Sandeel 11.15. The sandeel habitat suitability assessment refers to both sandeel spawning habitat, and sandeel supporting habitat interchangeably. Figure 10-5 is labelled 'Sandeel spawning potential across the fish and shellfish study area'. The method described by Latta <i>et al.</i> , (2013) for assessing sandeel habitat suitability was used to produce Figure 10-5, which is appropriate. The 'heat' map output, which is based on a suite of data, indicates areas of seabed with higher or lower suitability to support sandeel habitat, not spawning potential.	Acknowledged and revised.	Y-M
SMM 005 5	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.16. Sandeel are demersal spawners and their eggs form batches which attach to the seabed, sandeel larvae are planktonic for approximately 3-months, before settling down into the seabed. Sandeel display a high level of site fidelity and so importance is placed on maintaining suitable habitat, as sandeel spawn in and within the vicinity of the sediments which they inhabit.	This additional context has been included within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.5.3.2.3.	Y-M
SMM 005 6	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.17. Paragraph 66 states: 'the DBS West Array Area is predominantly classed as having a high potential for sandeel spawning, with a number of localised areas of medium	Acknowledged and revised to state that this is referring to sandeel habitat, in line with the Latta <i>et al.</i> (2014) methodology.	Y-M



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				<p>potential – the largest of which is located in the south-eastern corner of the Array Area. The DBS East array is predominantly of a medium potential for sandeel spawning, with the exception of the north-western corner which is classed as high potential'</p> <p>This paragraph and Figure 10-5 should be amended within the ES to describe suitable areas as sandeel habitat and sandeel spawning.</p>		
SMM 005 7	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	<p>11.18. The sources used to inform the sandeel habitat suitability assessment are generally suitable for contributing to the formation of the potential habitat 'heat' map (Figure 10-5). British Geological Survey (BGS) sediment data, vessel monitoring system (VMS) fishing data, and Inshore Fisheries and Conservation Authorities (IFCA) data for the east coast indicating fishing catch are suitable for use in the formation of sandeel habitat suitability 'heat' map, as per the MarineSpace (2013a) methodology. However, the limitations associated with some of these data sources should be acknowledged.</p>	<p>Additional text has been included within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b>, section 10.5.3.2.3. to note these limitations.</p>	Y-M
SMM 005 8	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	<p>11.19. For example, VMS data used to inform the sandeel heat map should be selected on the basis that the fishing gear is appropriate to target the species,</p>	<p>VMS data used in this assessment is limited to demersal gear types. Additional text has been included within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b>, section 10.5.3.2.3. to note these limitations.</p>	Y-M

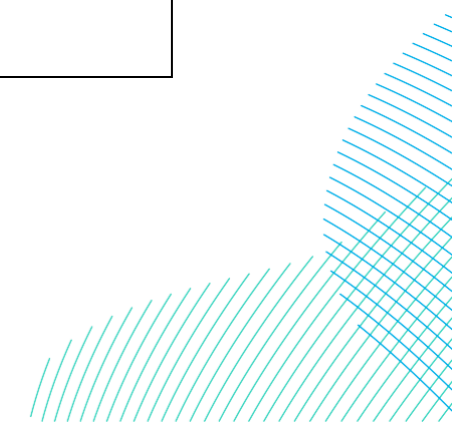


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				<p>i.e., VMS data for bottom trawled gear rather than pelagic gear. Further, in 2022, the MMO introduced a byelaw to protect important habitats and species within the Dogger Bank Special Area of Conservation (SAC) which prohibits bottom towed fishing across the whole SAC (MMO, 2022). With this in mind, it should be noted that the coverage of VMS data used in the 'heat' map, is likely to change compared to what has typically been observed over the years because commercial fishing fleets using bottom towed gear targeting sandeel (and other demersal species) on the Dogger Bank will be excluded from the area. As the new byelaw has only just come into force, VMS data for fishing activity on the Dogger Bank in recent years will still be relevant to the assessment. The full utility and limitations of the data which underpin this assessment should be acknowledged within the Fish Ecology chapter.</p>		
SMM 0059	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	<p>11.20. Whilst the MMO supports the approach to mapping sandeel habitat suitability using the MarineSpace (2013b) method, it should be recognised that this method only shows habitat suitability but does not provide any indication of the distribution or abundance of sandeels across the Dogger Bank or the Projects array areas. Some additional data</p>	<p>Project specific data has been incorporated into the sandeel heatmap. These data indicate the locations across the Development Area where sandeel were identified within drop-down video transects. Collected in 2022, these data are of high spatial and temporal resolution, and enhance the characterisation of sandeel habitat in the area as requested. Consideration of IBTS data has been given throughout the chapter via its incorporation into the baseline. However, the spatial resolution of these data when compared to that provided by the project specific data is not determined as likely to provide additional value.</p>	Y-M/N

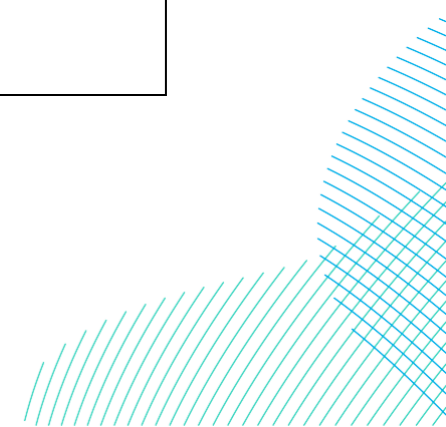




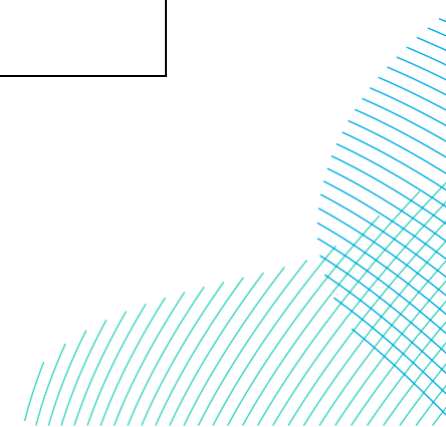
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>sources that should be used to enhance the characterisation of sandeel habitat in the array area are:</p> <ul style="list-style-type: none"> <li>• Sandeel dredge surveys of the former Dogger Bank Zone undertaken to inform the Dogger Bank Creyke Beck OWF ES (now referred to as Dogger Bank A &amp; B OWFs). These have some potential to support the discussion on sandeel habitat for the ES (please see Figures 1-3 in Annex 1) as the data contain catch rates for Raitts, smooth and lesser sandeels and demonstrated that high abundances were found around particular areas (and potentially features) of the Dogger Bank. The MMO caveat to this by acknowledging the vintage of this data.</li> <li>• International Bottom Trawl Survey (IBTS) catch data for sandeels from the Q1 and Q3 surveys. These should be used to better inform the environment for sandeels at the DBS array sites. Whilst the gear type is not intended to target sandeels, the data often show larger catch rates of sandeel around Dogger Bank. The surveys are undertaken annually and form part of a long time series, so long-term and recent data are available to download from ICES' data portal 'DATRAS': <a href="https://www.ices.dk/data/data-portals/Pages/DATRAS.aspx">https://www.ices.dk/data/data-portals/Pages/DATRAS.aspx</a></li> </ul>		



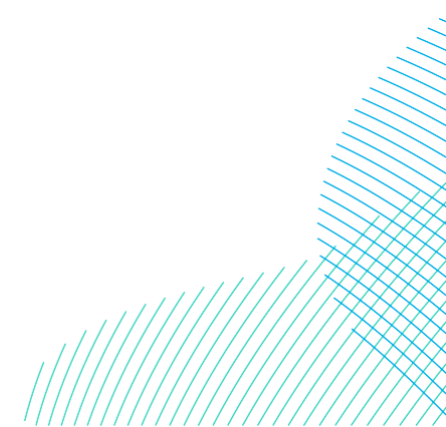
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SMM 006 0	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.21. Given the high conservation importance of sandeel due to their sensitivity to seabed disturbance, and their importance as prey species for bird species within the region, coupled with the high spawning potential in the DBS West array site, the MMO believes it would be prudent to consider pursuing other data that are available to provide a more detailed picture of sandeel abundance around Dogger Bank, for example by identifying those areas or seabed features where sandeel catch rates have historically been more prevalent.	Consideration has been given to site-specific benthic survey data within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , sections 10.5.1., 10.5.3.2.3., and 10.5.3.3.3. Sandeel presence as identified within the 2022 benthic fauna survey is compared with modelling after Latto <i>et al.</i> (2013) within <b>Volume 7, Figure 10-5 (application ref: 7.10.1)</b> .	Y-M
SMM 006 1	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	Temporary habitat loss/disturbance 11.22. Impacts from 'Temporary Habitat Disturbance' have been considered as likely to occur during seabed preparation works and/or installation of Projects infrastructure, but 'specifically during wind turbine or offshore platform foundation, scour protection, and transmission cable installation, along with rock placement activities as part of any cable stabilisation work' (Section 10.6.1.1). Whilst it is appropriate to scope in Temporary Habitat Disturbance as an impact pathway from activities such as cable trenching, whereby the disturbance caused is indeed temporary, it is not appropriate for activities such as the placement of	The worst case scenario table and subsequent assessment of this impact has been adapted to ensure that only temporary impacts are assessed within this section, with the impact of foundations and rock/scour protection being assessed within Permanent Habitat Loss.	Y-M



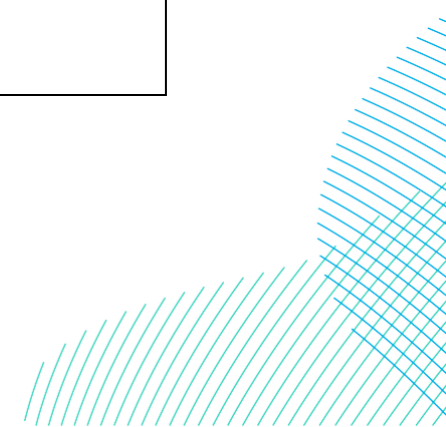
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				foundations or rock/scour protection.		
SMM 006 2	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.23. The MMO notes that in the assessment of impacts to fish during the operational phase, the presence of foundations and scour and cable protection have been considered to cause permanent habitat loss. The MMO would highlight that from the moment turbine and OSP foundations and scour protection are installed, the habitat lost under their footprint cannot be recovered unless commitment is made to fully removing such infrastructure during decommissioning. Therefore, during construction, the placement of foundations or rock/scour protection causes permanent habitat loss, and as foundations remain present during the operational phase, impacts from permanent habitat loss persist.	Additional text has been added to both <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , sections 10.6.1.1. (Temporary Habitat Disturbance) and 10.6.2.1. (Permanent Loss of Habitat) to clarify that that this impact will occur from the moment of installation. Assessment of this impact remains within the Operational phase of the chapter, alongside this signposting, as impacts may last throughout the lifetime of the Projects.	Y-M
SMM 006 3	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.24. The definitions of what activities may cause temporary and permanent habitat loss should be amended within the ES, and permanent loss of habitat should be scoped in as an impact arising from the construction phase. The MMO also recommends that impacts to fish arising from temporary habitat loss be scoped into the operational stage, as there is potential that cable maintenance activities (such as	Definitions of activities causing temporary habitat disturbance and permanent habitat loss have been revised in line with other comments received. Permanent Habitat Loss remains within the operations section of the chapter for consistency across the industry, however additional paragraphs have been added to both <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , sections 10.6.1.1. (Temporary Habitat Disturbance) and 10.6.2.1. (Permanent Loss of Habitat) to clarify that that this impact will occur from the moment of installation.  Temporary habitat disturbance has been scoped into the operational phase of the project, and is assessed within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.6.2.2. (Temporary Habitat Disturbance to Fish and Shellfish Species and Spawning and / or Nursery Grounds, Including Direct Damage from Repair and Maintenance)	Y-M



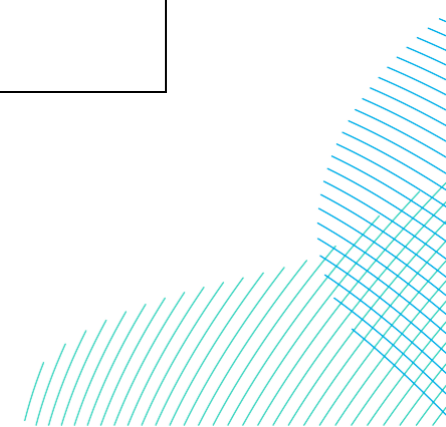
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				repair and reburial) will create habitat loss and/or disturbance temporarily.		
SMM 006 4	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	Underwater Noise (UWN) 11.25. In providing UWN comments relating to fish the MMO has reviewed 'Appendix 11-2 - Underwater Noise Modelling Report (Volume III)', further general comments on this report can be found in Section 14 of this document.	Noted	N
SMM 006 5	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.26. The Applicant has acknowledged that installation of foundations within the DBS OWFs may lead to injury and/or disturbance to fish species due to underwater noise during pile driving. UWN modelling has been presented based on worst-case scenarios of a 17m diameter monopile installed with a maximum hammer energy of 7000 kilojoules (kJ) over a maximum duration of 5 hours and 20 minutes for a single pile, and for a 4.2m diameter pin pile installed with maximum hammer energy of up to 3,000kJ over a maximum duration of 3 hours and 20 minutes for a single pile. Scenarios covering a single pile installation, multiple sequential pile installations, and simultaneous multiple location installation have been considered.	Noted	N



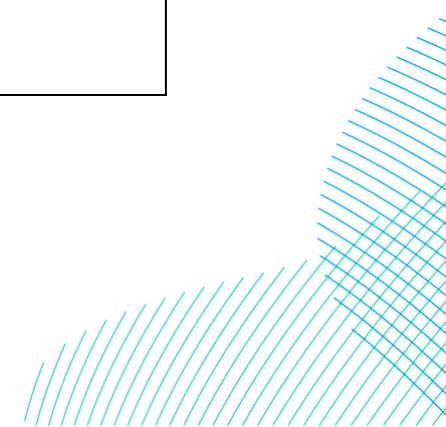
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SMM 006 6	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	<p>11.27. In Section 4.2.2 of the Modelling Report the Applicant has outlined two concurrent piling scenarios. These are as follows:</p> <ul style="list-style-type: none"> <li>• Monopile foundation concurrent piling scenario:                             <ul style="list-style-type: none"> <li>o Two sequentially installed piles at DBS East: South location,</li> <li>o Two sequentially installed piles at DBS West: West location,</li> <li>o A single pile installed at the DBS East/West: Centre location.</li> </ul> </li> <li>• Pin pile jacket foundation concurrent piling scenario:                             <ul style="list-style-type: none"> <li>o Four sequentially installed piles at DBS East: South location,</li> <li>o Four sequentially installed piles at DBS West: West location,</li> <li>o Four sequentially installed at the DBS East/West: Centre location.</li> </ul> </li> </ul>	Noted	N
SMM 006 7	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	<p>11.28. These scenarios are somewhat open to misinterpretation and additional clarification as to how piling will be undertaken under each scenario would be helpful. For example, the MMO understands the concurrent monopile scenario to mean that piling will be undertaken at each of the three locations concurrently, where one pile is installed at each location and then a second pile is installed at the DBS East, South and DBS West, West locations after the first piles are installed. In this sense, the maximum number of monopiles being installed at once is three. This should be clarified in Section</p>	Additional clarification has been added within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.6.1.4.	Y-M



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				4.2.2 of the UWN modelling report, and be restated clearly in the fish ecology chapter, as on first read it appears that five monopiles would be installed concurrently.		
SMM 006 8	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.29. Both fleeing and stationary fish receptors have been included in the underwater noise (UWN) modelling. As standard, the MMO does not support the use of a fleeing receptor for fish in underwater noise modelling as it is overly simplistic and assumes that all fish will flee from the source of impact. This overlooks factors such as fish size and mobility, philopatric behaviours (foraging, reproductive or migratory) which may cause an animal to remain/return to the area of impact.	Although both fleeing and stationary fish receptors are included in the UWN modelling, the assessment of impacts of UWN on fish and shellfish receptors assumes a stationary receptor.	N
SMM 006 9	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.30. Appropriate thresholds for mortality and potential mortal injury, recoverable injury, and temporary threshold shift (TTS) for fish in each hearing group have been used in the underwater noise (UWN) modelling, as per the pile driving threshold guidelines described by Popper <i>et al.</i> (2014). The Applicant states that the worst-case scenario for the assessment of impacts from impulsive UWN has been based on stationary fish with a swim bladder used in hearing (highest hearing sensitivity).	Noted	N



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SMM 007 0	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.31. A key aspect of the UWN modelling for the Projects will be whether the predicted range of effect overlaps the herring spawning ground near Flamborough Head. Given the specific spawning habitat requirements of herring and their sensitivity to underwater noise, the MMO recommends that you model and present (in mapped form) additional noise modelling for the received levels of single strike sound exposure levels (SELss) at the Flamborough Head herring spawning ground based on the 135 decibels (dB) (SELss) startle response (as per Hawkins <i>et al.</i> (2014)), in order to predict the range of effect for behavioural responses in herring. This is particularly important as UWN propagating from the location of the Projects in the central North Sea has potential to create an acoustic barrier to herring as they follow their migration clockwise through the central North Sea (Cushing, 2001).	Modelling of the 135 dB SELss contour has been performed and added to <b>Volume 7, Figure 10-8</b> and <b>Figure 10-9 (application ref: 7.10.1)</b> . It is described in <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.5.3 and assessed in section 10.6.1.4.	Y-M
SMM 007 1	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.32. The MMO notes from Figures 10-8 and 10-9 (Chapter 10), that the UWN contour for 186 dB cumulative sound exposure level (SELcum) (indicating the likely range of effect for Temporary Threshold Shift (TTS) in fish with high hearing sensitivity as per Popper <i>et al.</i> , (2014)) shows overlap with areas of medium	This preliminary recommendation has been acknowledged, and no piling works along the ECC during the Banks herring population spawning season (August-October) has been included as embedded mitigation throughout this assessment. Following completion of sediment plume modelling and quantification of seabed disturbance, and the assessment of the impacts related to these components of the construction phase of the Projects within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.6 determining no significant effect, and so restrictions on construction activities as a whole has not been included within embedded mitigation.	Y-D

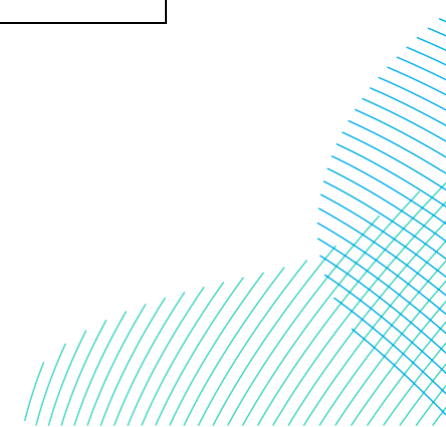


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				potential for herring spawning. With this in mind, it may be necessary to temporally restrict piling activities to periods outside of the herring spawning season (which for the Banks herring is August – October, inclusive).		
SMM 007 2	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.33. The 135-dB threshold is based on research by Hawkins <i>et al.</i> , (2014a), who exposed wild schooling sprat to short sequences of repeated impulsive playback sounds at different sound pressure levels, to resemble that of a percussive pile driver. The MMO recognises that this may be a conservative threshold as the Hawkins study was carried out in Lough Hyne, which is an enclosed, quiet coastal sea loch, where fish were not accustomed to heavy disturbance from shipping and other sounds (Hawkins <i>et al.</i> , 2014a). However, given an absence of other peer-reviewed empirical evidence of behavioural responses in clupeid fishes to support an alternative threshold for impulsive noise, Hawkins <i>et al.</i> , (2014a) is currently considered the best available scientific evidence by the MMO, and as such 135dB is deemed an appropriate threshold for modelling behavioural responses.	This impact has been assessed within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.6.1.4.	Y-M
SMM 007 3	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.34. However, further UWN modelling is needed to predict the range of behavioural effects for	This impact has been assessed within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.6.1.4.	Y-M

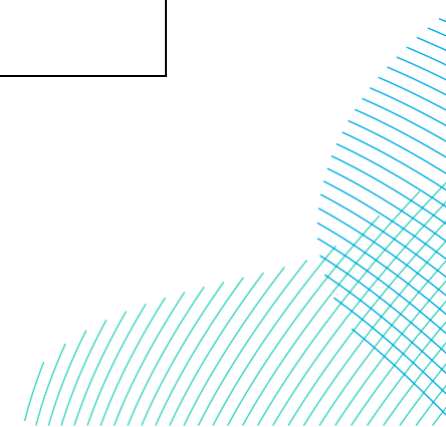


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				hearing-sensitive fish, as well as additional modelling of the range of effect for piling at the OSP on the ECC and to determine whether such restrictions are needed.		
SMM 007 4	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.35. The MMO notes that the Projects design includes an offshore platform (OSP) along the export cable. The location of this OSP is not indicated on any Figures in the PEIR. The MMO expects to see UWN modelling to predict the range of effect from piling at the OSP location to be presented for review in the ES, taking into account the need for modelling of the 135dB threshold for behavioural responses in herring.	Additional modelling and consideration has been given to piling associated with the OSP along the export cable route within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.6.1.4.	Y-M
SMM 007 5	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.36. Please note - even if this modelling is provided a threshold approach may not be agreed for the Projects and noise abatement and/or mitigation in the form of a seasonal restriction will likely still be required.	Noted	N
SMM 007 6	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.37. The MMO notes in Figures 10-8 and 10-9, that the legend for hearing thresholds in fish is expressed as 'decibel hearing threshold (dBht) Level'. However, the UWN modelling report does state that the modelling has been undertaken using unweighted metrics (rather than dBht). Therefore, the thresholds levels in Figures 10-8 and 10-9 should be corrected to 'dB Level'.	The reference to dBht has been removed in <b>Volume 7, Figure 10-8</b> and <b>Figure 10-9 (application ref: 7.10.1)</b> . It is confirmed that UWN modelling for Fish & Shellfish is unweighted and does not use the dBht approach. Full units have been added to the legends for clarity.	Y-M

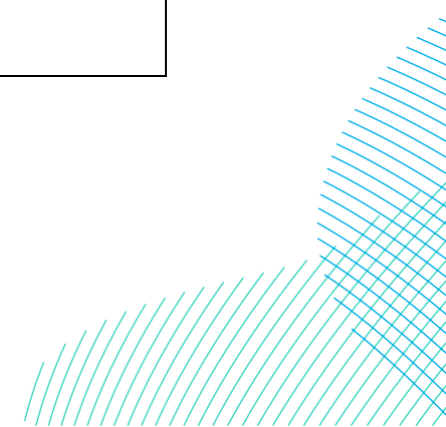
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SMM 007 7	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	Unexploded ordnance (UXO) 11.38. The MMO notes clearance of any UXO (if required) will likely be the subject of a separate marine licence application. The MMO would highlight that there may be a requirement for UXO surveys and UXO detonation to be two separate licences, to provide further detail in an UXO detonation application. In a UXO detonation licence the MMO expects to see supporting evidence and an appropriate assessment of impacts to fish from UXO to be presented for review when this application is submitted.	Noted	N
SMM 007 8	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	Mitigation 11.39. Given the ECC route passes through areas of 'high' and 'very high' potential spawning habitat for herring, the MMO considers it necessary for a temporal restriction to be placed on construction activities which interact with the seabed along the ECC route (including seabed preparatory works, cable trenching etc) during the Banks herring spawning season (August - October, inclusive). Activities such as trenching and cable burial cause direct disturbance to the seabed and are likely to cause direct harm to adult herring engaged in spawning, as well as herring eggs and early	This preliminary recommendation has been acknowledged, and no piling works along the ECC during the Banks herring population spawning season (August-October) has been included as embedded mitigation throughout this assessment. Following completion of sediment plume modelling and quantification of seabed disturbance, and the assessment of the impacts related to these components of the construction phase of the Projects within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.6 determining no significant effect, and so restrictions on construction activities as a whole has not been included within embedded mitigation.	Y-D



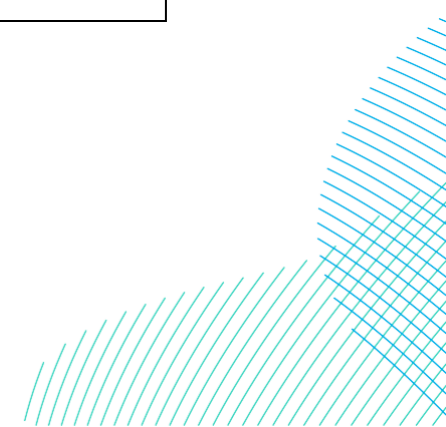
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				developmental stage (yolk-sac) larvae.		
SMM 0079	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	11.40. There is potential for this restriction to be applied spatially as well as temporally, given that the areas of the cable route offshore are not situated in the herring spawning ground. The MMO requests site of the individual data layers used in the 'heat' map for herring which will enable us to interrogate data on sediment suitability and larvae abundance in more detail for use when applying a restriction spatially. With this in mind, it would be useful if to indicate kilometre point distances along the ECC on the maps so that any potential restriction could be applied to specific points along the cable.	Kilometre points have been added to <b>Volume 7, Figure 10-5</b> and <b>Figures 10-7a-g (application ref: 7.10.1)</b> , relating to potential habitat and spawning potential for sandeel and herring respectively.	Y-M
SMM 0080	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	Cumulative Impacts 11.41. An outline of likely cumulative effects associated with the Projects has been presented in Section 10.7 of chapter 10. A high-level list of other projects which have been screened into further assessment is provided in Table 10-23, however no preliminary assessment for fish receptors giving magnitude and significant of cumulative effect (for example, cumulative underwater noise (UWN) arising the various Dogger Bank OWF projects) has been provided. For Projects of this size and scale, at this stage in the	An assessment of cumulative effects relating to Fish and Shellfish Ecology is presented within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.7.	Y-M



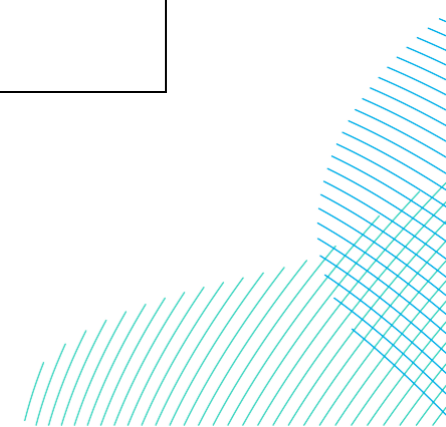
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				consenting process, the MMO expects a more detailed assessment than has been provided and this should be updated in the ES.		
SMM 008 1	17/07/2023	Marine Management Organisation	Marine Mammals	Chapter 11 12.1. All relevant / applicable marine mammal functional hearing groups have been considered in the underwater noise modelling assessment. Furthermore, all fish groups have been considered as per Popper <i>et al.</i> (2014). The marine mammal species scoped into the PEIR assessment, which sit within these four hearing groups, are harbour porpoise, white-beaked dolphin, bottlenose dolphin, common dolphin, minke whale, grey seal and harbour seal. The MMO defers to Natural England to ensure that all relevant marine mammal species have been scoped in.	Noted	N
SMM 008 2	17/07/2023	Marine Management Organisation	Marine Mammals	12.2. The MMO believes that all relevant impacts have been scoped in for assessment. Specifically, the potential effects of auditory injury (Permanent Threshold Shift, PTS) and TTS and disturbance resulting from the following activities, have been considered: <ul style="list-style-type: none"> <li>• Piling,</li> <li>• Other construction activities including seabed preparations, rock placements and cable installation,</li> </ul>	Noted	N



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<ul style="list-style-type: none"> <li>• Construction vessels,</li> <li>• Noise from operational wind turbines and O&amp;M activities and vessels</li> </ul>		
SMM 008 3	17/07/2023	Marine Management Organisation	Marine Mammals	12.3. Chapter 12 Marine Mammals confirms that a Marine Mammal Mitigation Plan/Protocol (MMMP) for piling will be developed in the pre-construction period and based upon best available information, methodologies, industry best practice, latest scientific understanding, current guidance and detailed project design. The MMMP for piling will be developed in consultation with the relevant Statutory Nature Conservation Bodies (SNCBs) and the MMO, detailing the proposed mitigation to reduce the risk of any physical or permanent auditory injury (PTS) to marine mammals during all piling operations.	Noted	N
SMM 008 4	17/07/2023	Marine Management Organisation	Marine Mammals	12.4. This will include details of the embedded mitigation, for the soft-start and ramp-up, as well as details of the proposed mitigation zone and any additional mitigation measures required in order to minimise potential impacts of any physical or PTS. A Draft MMMP will be submitted with the DCO application and the MMO welcomes early engagement of this document.	Noted	N

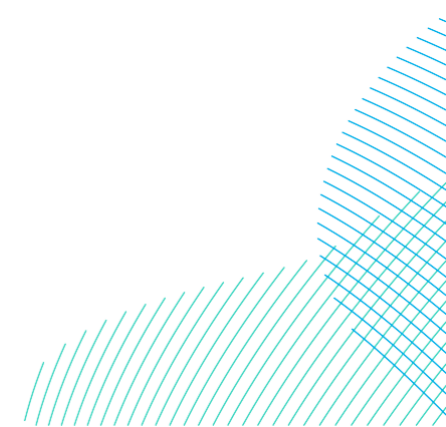


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SMM 008 5	17/07/2023	Marine Management Organisation	Marine Mammals	12.5. The MMO notes Paragraph 239 states that 'the use of noise abatement technology will also be considered if required when taking into account wider cumulative effects in the wider North Sea area'.	Noted	N
SMM 008 6	17/07/2023	Marine Management Organisation	Marine Mammals	12.6. The PTS and TTS predictions for a 7,000 kilojoule (kJ) hammer energy indicate that the standard mitigation measures which are typically employed for offshore wind farm developments (such as a monitoring zone, soft-start piling and acoustic deterrent devices) will not suffice. Given the availability of effective alternatives to unmitigated piling – i.e. measures to reduce noise at source, also known as noise abatement – it will be difficult for unmitigated pile driving to be justified on the basis that there are no realistic alternatives. It is therefore clear that noise abatement measures will be required for this development, in order to reduce the risk of potential impact on marine receptors.	Acknowledged. Changes in the Projects' Design Envelope have reduced the maximum hammer energy from 7000KJ to 6000KJ. Revised underwater noise modelling has been undertaken and is available in <b>Volume 7, Appendix 11-3 Underwater Noise Modelling Report (application ref: 7.11.11.3)</b> and included in the assessment in section 11.6 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> .  In the <b>Volume 8, Outline Marine Mammal Mitigation Protocol (application ref: 8.25)</b> all suitable mitigation options have been considered, including the use of noise abatement measures.	Y-D
SMM 008 7	17/07/2023	Marine Management Organisation	Marine Mammals	12.7. The MMO would highlight that given the wider context of the current ramp up of offshore wind development at unprecedented scale in the North Sea it is vital that these discussions begin as soon as possible. To ensure adequate preparations are made and potential delays avoided, it is	Noted	N



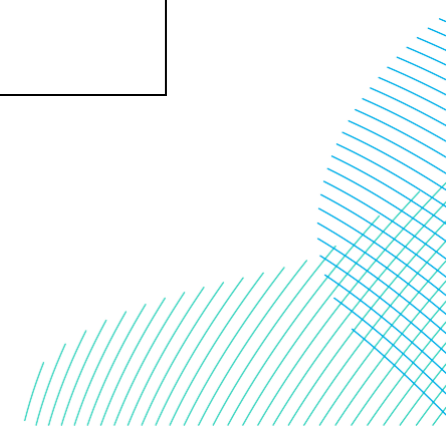
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				therefore in the applicant's interest to plan for noise abatement measures at the earliest opportunity and to incorporate such measures into any future MMMP.		
SMM 008 8	17/07/2023	Marine Management Organisation	Marine Mammals	12.8. In addition to this the MMO supports the development of a document or similar to manage noise within the North Sea. For the Southern North Sea SAC (SNS), this could be in the form of a Site Integrity Plan (SIP) for piling and UXO clearance. The document will set out the approach to deliver any project mitigation or management measures to reduce the potential for any significant disturbance from noise and specifically disturbance to harbour porpoise in relation to the SNS SAC conservation objectives. The MMO highlights there is a number of industry wide discussions in relation to noise management and any changes to the approach to noise management will be discussed with the Applicant to be taken into account within their Application.	As outlined in section 11.7 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11), Volume 8, In Principle Site Integrity Plan for the Southern North Sea Special Area of Conservation (application ref: 8.26)</b> has been prepared. Consultation has been undertaken and will continue during development of the final SIP with relevant stakeholders, including regulators and other developers. The Applicants welcome discussions with the MMO on the industry wide discussions in relation to noise management and any changes to the approach to noise management that would need to be taken into account with development of the final SIP and MMMP as required.	N
SMM 008 9	17/07/2023	Marine Management Organisation	Marine Mammals	12.9. Please review the reference to 1.53 km for harbour porpoise in Paragraph 183. Table 11-20 suggests a maximum PTS range of 770 m this will need to be updated in the ES.	Noted. This has been amended with new underwater noise modelling within the new PDE parameters, therefore updated estimated impact ranges can be found in Table 11-21 section 11.6.1.1.2.1.1 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> .	Y-M

ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SMM 009 0	17/07/2023	Marine Management Organisation	Marine Mammals	12.10. In relation to Section 11.6.1.2.2.1 - The MMO appreciates that disturbance is difficult to assess, however, the MMO does not agree with using TTS thresholds as a proxy to assess the potential for disturbance, as this can underestimate the potential risk. In this instance, significant TTS ranges (particularly for minke whale) have been predicted for the 7,000 kJ hammer.	Noted. The best approach for assessing disturbance (particularly minke whale) was discussed in the ETG with stakeholders in September 2023. As TTS was not accepted as a proxy for minke whale by the MMO, but was accepted by Natural England, another approach was to use the 30km disturbance range from Richardson <i>et al.</i> (1999), presented in Table 11-40, section 11.6.1.2.2.13 <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> . The final approach to the assessment for disturbance was presented at the ETG held in January 2024 and no further comments on this topic have been received.	Y-M
SMM 009 1	17/07/2023	Marine Management Organisation	Marine Mammals	12.11. Paragraph 368 states: "It is important to note that PTS is unlikely to occur in marine mammals, as the modelling indicates that the marine mammal would have to remain less than 100m for 24 hours for any potential risk of PTS (Appendix 11-2). Therefore, PTS as a result of construction activity, other than piling, is highly unlikely and has not been assessed further"  This statement/conclusion is incorrect. The modelling is based on a fleeing receptor, and, therefore, the receptor is simply at risk if they are within 100 m of the source when they start to move away (fleeing is about the receptor starting position). Please correct this within the ES.	This has been amended in section 11.6.1.32 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> modelling indicates that the marine mammal would have to be within 100m of the activity at its onset to be at potential risk of PTS.	Y-M

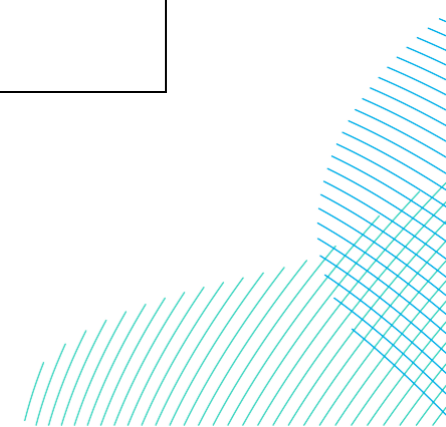




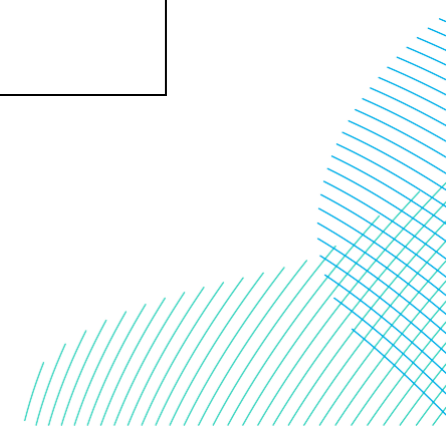
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SMM 009 2	17/07/2023	Marine Management Organisation	Marine Mammals	<p>Appendix 11.2 General Comments</p> <p>13.1. The MMO notes that there is quite a large variability in the predictions, based on the maximum, mean and minimum values presented in the results tables. With the assumed Source Levels (noting these are not particularly large, considering a hammer energy of 7,000 kJ, and a 17m diameter monopile), the predictions look plausible / reasonable. For these kind of predictions (e.g., a PTS range of 20 km, and a TTS range of 82 km etc.) much depends on the Received Levels far beyond 750 m. Therefore, monitoring at large ranges during the construction phase would be required to validate these predictions, otherwise it is rather speculative, and small changes in propagation assumptions can have large effects on these long-range predictions. This should be reflected within the ES.</p>	<p>Acknowledged, monitoring at large ranges during the construction phase would be required to validate any predictions from the underwater noise modelling in <b>Volume 7, Appendix 11-3 Underwater Noise Modelling Report (application ref: 7.11.11.3)</b>. The monopile sizes have reduced since the PEIR, from 17m to 15m and consider a reduced hammer energy of 6,000kJ. The proposed approach would be agreed and outlined, where relevant, in <b>Volume 8, Outline Marine Mammal Mitigation Protocol (application ref: 8.25)</b> and <b>Volume 8, In Principle Monitoring Plan (application ref: 8.23)</b>.</p>	N
SMM 009 3	17/07/2023	Marine Management Organisation	Marine Mammals	<p>13.2. With reference to Table 5-2 in Section 5.1, while the single strike sound exposure levels (SELss) at 750m seem reasonable, the corresponding peak sound pressure levels (SPLpeak) at 750m seem low (by 10-15 dB), in the context of Lippert <i>et al.</i> (2015). For example, using the Lippert formula, 180 SELss translates to 180*1.4-</p>	<p>The method used for the underwater noise modelling has been described in <b>Volume 7, Appendix 11-3 Underwater Noise Modelling Report (application ref: 7.11.11.3)</b>. The most recent measured data from piling in the North Sea (2023, for pin piles ~2.4m diameter, max energy ~1900 kJ, OWF name redacted) showed a difference between the max SPLpeak and SELss of ~21dB at 750m. The difference between the SPLpeak and SELss prediction used in the underwater noise modelling for the Projects was ~19dB. The prediction presented in Lippert <i>et al.</i> 2015 of 32 dB have been deemed potentially excessive and therefore has not been used within the ES.</p>	N



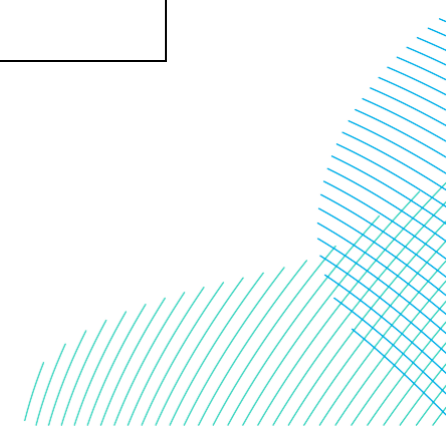
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				40 = 212 dB SPLpeak, while the assessment predicts less than 200 dB. This should be reviewed and updated within the ES		
SMM 009 4	17/07/2023	Marine Management Organisation	Fish and Shellfish Ecology	<p>Section 2.2 Analysis of environmental effects</p> <p>13.3. For the assessment of the cumulative sound exposure, a fleeing animal receptor has been assumed for marine mammals, with 'fleeing' speeds of 3.25 m/s for low-frequency cetaceans and 1.5 m/s for all other receptors. For fish receptors, both a fleeing and stationary animal model has been assumed. Please note that the MMO is not aware of empirical evidence to support fleeing in fish, and therefore the predictions based on a stationary receptor will be the most appropriate/relevant and this should be reflected within the ES.</p> <p>13.4. Fleeing assumptions can have a significant effect on the assessment outcomes. For example, as per Table 5-7, maximum Temporary Threshold Shift (TTS) ranges of 39 km are predicted for a stationary (fish) receptor, whereas for a fleeing (fish) receptor, a range of 29 km is predicted.</p>	Although both fleeing and stationary fish receptors are included in the UWN modelling, the assessment of impacts of UWN on fish and shellfish receptors assumes a stationary receptor.	N
SMM 009 5	17/07/2023	Marine Management Organisation	Marine Mammals	Section 4 Modelling methodology 13.5. The general approach and methodology to the underwater	Noted	N



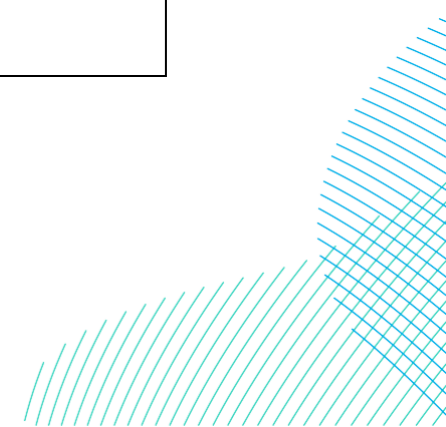
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				<p>noise modelling is largely appropriate, and effort has been undertaken to produce an informative report, along with details of the input parameters used in the modelling. The assessment refers to appropriate noise exposure criteria for marine receptors.</p> <p>The MMO welcomes this clarification, and acknowledges the drive for reducing unnecessary conservatism in modelling. Allegedly, the current version of INSPIRE should produce more realistic predictions.</p>		
SMM 009 9	17/07/2023	Marine Management Organisation	Marine Mammals	<p>"13.8. The MMO notes Section 4.1 states:                      'The current version of INSPIRE (version 5.2) is the product of re-analysing all the impact piling noise measurements in Subacoustech Environmental's measurement database and cross-referencing it with blow energy data from piling logs.... the current version of INSPIRE attempts to calculate closer to the average fit of the measured noise levels at all ranges'."</p> <p>The MMO welcomes this clarification, and acknowledges the drive for reducing unnecessary conservatism in modelling. Allegedly, the current version of INSPIRE should produce more realistic predictions.</p>	Noted	N



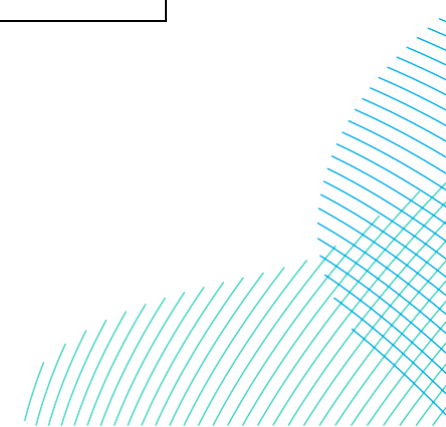
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SMM O10 0	17/07/2023	Marine Management Organisation	Marine Mammals	<p>Section 5.2 Monopile foundations 13.9. The MMO notes that for a Single Monopile the following maximum Permanent Threshold Shift (PTS) (SELcum) injury ranges in marine mammals are predicted:</p> <ul style="list-style-type: none"> <li>• 19 km for low frequency cetaceans (i.e., minke whale),</li> <li>• 11 km for very-high frequency (VHF) cetaceans (i.e., harbour porpoise), and</li> <li>• 1.8 km for phocid pinnipeds (i.e., seals)</li> </ul> <p>13.10. TTS ranges of 81 km, 54 km and 30 km were predicted for LF Cetaceans, VHF cetaceans and phocids respectively.</p> <p>13.11. For fish, a maximum range of 40 km (stationary receptor) was predicted for TTS using the Popper <i>et al.</i> (2014) criteria, as well as potential mortal injury (3.9 km) and recoverable injury (6.6 km).</p> <p>13.12. It is expected that up to two monopile foundations can be installed within a 24 hour period. Maximum PTS (SELcum) injury ranges in marine mammals are predicted:</p> <ul style="list-style-type: none"> <li>• 20 km for low frequency cetaceans (i.e., minke whale),</li> <li>• 11 km for very-high frequency (VHF) cetaceans (i.e., harbour porpoise), and</li> <li>• 1.8 km for phocid pinnipeds (i.e., seals)</li> </ul>	Noted	N



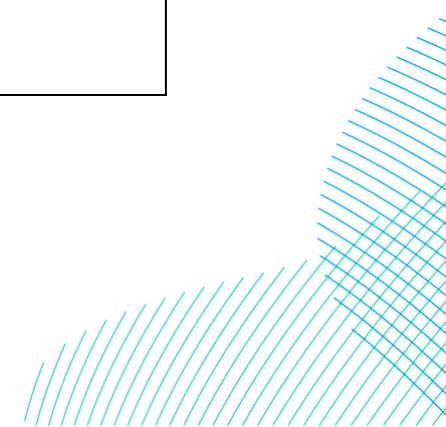
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>13.13. TTS ranges of 82 km, 57 km and 33 km were predicted for LF Cetaceans, VHF cetaceans and phocids respectively.</p> <p>13.14. For fish, a maximum range of 52 km (stationary receptor) was predicted for TTS using the Popper <i>et al.</i> (2014) criteria, as well as potential mortal injury (5.9 km) and recoverable injury (9.6 km).</p>		
	17/07/2023	Marine Management Organisation	Marine Mammals	<p>13.15. For marine mammals, the predicted ranges are similar to those predicted for a single monopile, although an increase in the predicted ranges can be seen in some cases. The time it takes to install one monopile is 5 hours 20 minutes. Therefore, by the time the subsequent pile is installed, the fleeing receptor (in the case of marine mammals) is at such a distance that the additional exposure is minimum (assuming the animal continues to flee throughout the piling period). However, when considering a stationary animal (as in the case of fish), the ranges are increased because the receptor is receiving noise from double the number of strikes.</p>	Noted	N
SMM 010 2	17/07/2023	Marine Management Organisation	Marine Mammals	<p>Section 5.3 Pin pile jacket foundations</p> <p>13.16. The predicted ranges for a single pin pile are smaller than</p>	Noted	N



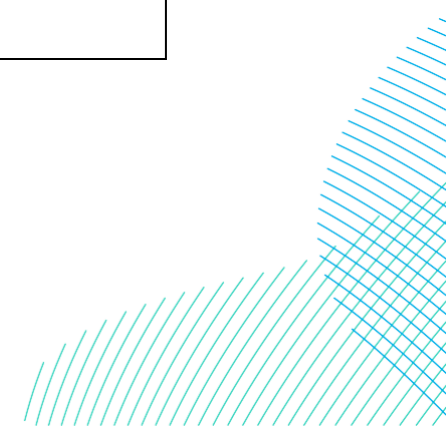
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				those predicted for the monopile foundations, which is expected.		
SMM O10 3	17/07/2023	Marine Management Organisation	Marine Mammals	13.17. For consecutive pin piles (4 piles in a 24-hour period). as with the monopile scenario, there is a slight increase in some of the predicted ranges for marine mammals. However, when considering a stationary animal (as in the case of fish), the ranges are significantly increased.	Noted	N
SMM O10 4	17/07/2023	Marine Management Organisation	Marine Mammals	Section 5.4 Concurrent location piling The assessment considers the cumulative exposure of simultaneous monopiles and jacket pin piles at the DBS East and DBS West and centre modelling locations. These locations were chosen as they have the potential for the largest 'spread' in terms of underwater noise propagation (as they are the two furthest apart locations). The modelling includes two monopiles being installed sequentially at DBS East and DBS West at each location and a single monopile at the centre location at the same time, and four jacket pin piles being installed sequentially at each of the three locations at the same time. The ES should contain detailed information on how this simultaneous piling assessment has been carried out, including fleeing animal assumptions.	Acknowledged. The underwater noise modelling assessment for calculation of noise exposure from multiple piling sources active simultaneously is undertaken by first generating a sound field surrounding the sources, combining noise radiating from each piling location. The animal noise exposure is calculated assuming the animal begins at each one of the piling locations in sequence. The radius of impact (whether for stationary or fleeing) is then calculated, in the same way as for single pile locations, but of course with a greater overall spread of noise, both spatially and, potentially, temporally. This process is repeated at the starting position of each noise source, representing all of the potentially worst case locations. This results in an output for each of the piling locations. For each assessment metric (e.g. LF cetacean SELcum PTS), these results are overlaid and a combined contour drawn around the perimeter to calculate the total maximum cumulative impact area.	N



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SMM O10 5	17/07/2023	Marine Management Organisation	Marine Mammals	<p>Section 6 Other Noise Sources 13.19. Both a fleeing and stationary marine mammal receptor have been considered, and all sources have been assumed to operate for 24 hours to give a worst-case assessment of noise, which is appropriate. For a fleeing animal, small effect ranges (largely &lt;100m, with a few exceptions) have been predicted for other sources of noise (i.e., cable laying, suction dredging, trenching, vessel noise etc.). A fleeing animal receptor has been assumed for all marine mammals, and therefore the predicted effect ranges are minimal. Small effect ranges (&lt; 50 m) are predicted for fish receptors.</p> <p>13.20. For VHF cetaceans, the TTS range for rock placement is 990 m, 110 m for cable laying, and 230 m for cable laying.</p> <p>13.21. Section 6.2 Operational WTG noise states 'Figure 6-2 Predicted unweighted SPLRMS from operational WTGs with power outputs of small and large turbine options using the calculation from Tougaard <i>et al.</i> (2020).</p>	Noted	N
SMM O10 6	17/07/2023	Marine Management Organisation	Marine Mammals	13.22. This formula represents a statistical model that was used to assess the correlation between SPL and various parameters (distance, wind speed, turbine size) for the data in the Tougaard study.	Acknowledged. The concern here for operational underwater turbine noise is acknowledged and the potential weakness in estimation of the noise level at 1m and in the far field may well be reasonable. It is however important to note that the noise level at 1m and in the far field are not important in and of themselves: the noise level at 1m is only used as a means to calculate ranges of impact at a greater distance,	N

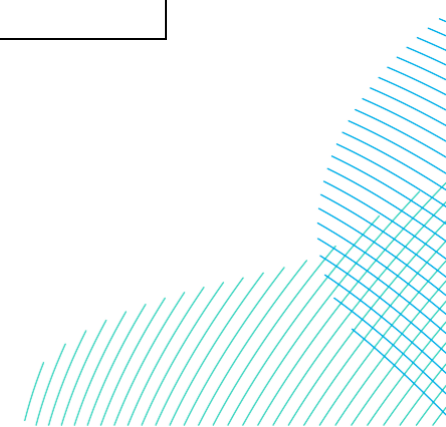


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				<p>However, the MMO considers is that this is not suitable for estimation of the sound levels at 1m in a bespoke model, or as substitute for modelling the propagation loss to the far field. In particular, in terms of estimating propagation, the use of the formula would imply a loss of 23.7 log R, which is unrealistically large, and thus will lead to underestimation of the levels in the far field.</p>	<p>and since the operational noise levels are relatively low, this never reaches distances that could be considered 'far-field'.</p>	
SMM 010 7	17/07/2023	Marine Management Organisation	Marine Mammals	<p>Section 6.3 UXO clearance</p> <p>13.23. The maximum equivalent charge weight for the potential UXO devices that could be present within the DBS site boundary has been estimated as 698 kg + 0.5 kg donor (which equates to 698.5 kg). This has been modelled alongside a range of smaller devices. In addition, low-order clearance / deflagration has been assessed, intended to result in a 'low burn' of the explosive material in UXO, which destroys, but does not detonate, the internal explosive. A charge weight of 250 g has been assumed for this assessment.</p> <p>13.24. The MMO notes that this is a change from recent (previous) noise assessments where a charge weight of 0.5 kg for low-order clearance was assumed (rather than 0.25 kg).</p>	<p>This has been reviewed and a net weight of 0.25g for low order clearance has been used to assess for any potential impacts to marine mammals along with a 698g + donor charger for high order as a worst case alongside the EDR approach for disturbance, which is presented in in <b>Volume 7, Appendix 11-6 Unexploded Ordnance Clearance Information and Assessment (application ref: 7.11.11.6)</b>.</p> <p>For calculation of the scenario using deflagration, it is anticipated that the initial shaped charge is the greatest source of noise (Cheong <i>et al.</i> 2020). A prediction of this impact is based on a charge weight of 250g. The worst case scenario would of course be a high order detonation with maximum pressures from complete detonation of the UXO, and this has also been used in the calculation of impact for comparison. Further information has been provided in <b>Volume 7, Appendix 11-3 Underwater Noise Modelling Report (application ref: 7.11.11.3)</b>.</p>	N

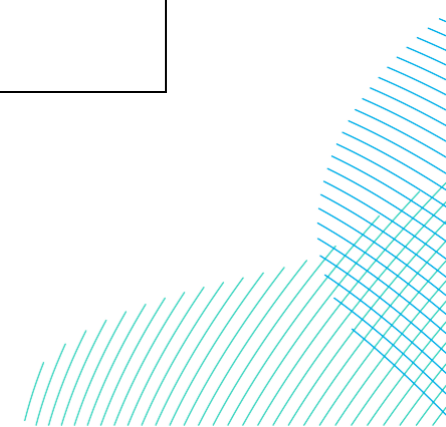




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SMM 0109	17/07/2023	Marine Management Organisation	Marine Mammals	13.26. To estimate the potential impact from UXO detonation, an attenuation correction has been added to the Soloway and Dahl (2014) equations for the absorption over long ranges (i.e., of the order of thousands of metres), based on measurements of high intensity noise propagation taken in the North Sea and Irish Sea. The maximum PTS range calculated (based on the worst-case UXO) is 13 km for VHF cetaceans (SPL <sub>peak</sub> criteria) (with a TTS range of 25 km). For fish, the maximum range is 890 m. The MMO has conducted a spot check of the worst-case predictions which look reasonable (a PTS prediction of ~14 km for VHF cetaceans assuming the methodology from Soloway and Dahl and no attenuation correction).	Noted	N
SMM 0110	17/07/2023	Marine Management Organisation	Marine Mammals	Appendix 11.3 14.1. Appendix 11.3 provides a helpful high-level summary of the underwater noise modelling (full details are in Appendix 11.2). An assessment of potential effects (and magnitude) has also been undertaken in this appendix, based on density estimates and reference populations, and the MMO defers to Natural England for comments on the suitability of the data presented for marine mammals.	Acknowledged. This document has been removed from the Appendices and the assessments in <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> have been updated accordingly.	Y-M

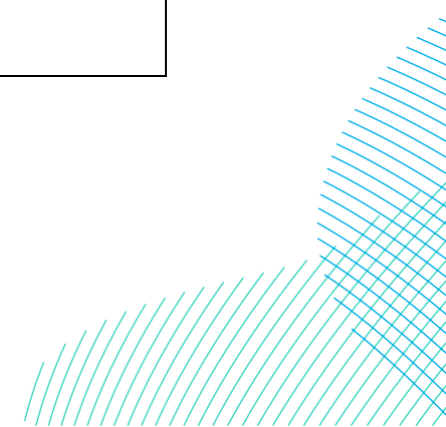


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SMM O11 3	17/07/2023	Marine Management Organisation	Marine Mammals	14.4. Paragraph 77 and 78 - There appears to be a discrepancy between this document and Appendix 11.2. Paragraph 77, for example, states that 'for the cumulative exposure ranges for these noise sources it has been assumed that the noise will be present for 12 hours within a 24 hour period'. However, Appendix 11.2 states that 'for SELcum calculations in this section, the duration the noise is present also needs to be considered, with all sources assumed to operate constantly for 24 hours to give a worst-case assessment of the noise'. This should be clarified in the ES.	This has been amended with the new underwater noise modelling results in <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> and <b>Volume 7, Appendix 11-3 Underwater Noise Modelling Report (application ref: 7.11.11.3)</b> .	Y-M
SMM O11 6	17/07/2023	Marine Management Organisation	Commercial Fisheries	Chapter 13 16.1. The MMO recommends early engagement with National Federation of Fishermen's Organisations (NFFO) and local harbour authorities and fishermen is encouraged, including the early engagement with a Fisheries Liaison Officer.  The MMO will maintain a watching brief on any-thing that may fall within the MMO's remit - such as DML conditions.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss key issues. Meetings were undertaken in January, July and November 2023, and a separate meeting was held with the NFFO in December 2023, to provide the latest project updates and to discuss outcomes of the PEIR (see <b>Volume 5, Consultation Report (application ref: 5.1)</b> for further information.	N
SMM O11 7	17/07/2023	Marine Management Organisation	Commercial Fisheries	Chapter 14 17.1. The MMO defers to the Maritime and Coastguard Agency and Trinity House and relevant Harbour Authority's regarding the	Noted	N

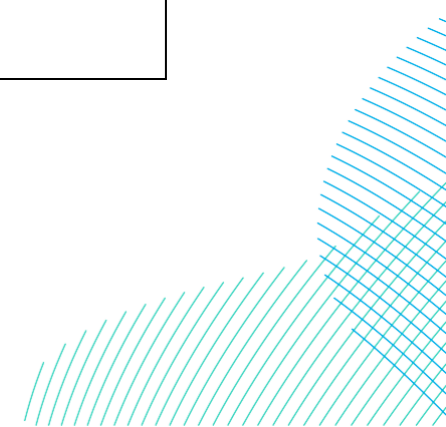


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				potential impacts on shipping and navigation that may occur because of the Projects. 17.2. The MMO will maintain a watching brief on anything that may fall within the MMO's remit - such as DML conditions.		
SMM 0118	17/07/2023	Marine Management Organisation	Commercial Fisheries	Chapter 15 18.1. The MMO has no comments to make regarding this chapter.	Noted	N
SMM 0119	17/07/2023	Marine Management Organisation	Commercial Fisheries	Chapter 16 10.1.1. The MMO has no comments to make regarding this chapter.	Noted	N
SMM 0120	17/07/2023	Marine Management Organisation	Commercial Fisheries	Chapter 17 20.1. The MMO defers to Historic England regarding the potential impacts to offshore archaeology that may occur because of the North Falls OWF. 20.2. The MMO will maintain a watching brief on anything that may fall within the MMO's remit - such as DML conditions.	Noted	N
SMM 0121	17/07/2023	Marine Management Organisation	Commercial Fisheries	Chapter 18 21.1. The MMO has no comments to make regarding this chapter.	Noted	N
SMM 0122	17/07/2023	Marine Management Organisation	Geology and Land Quality	Chapter 19 22.1. Chapter 19, Paragraph 10.7 states that for HDD there may be a requirement to dig pits to hold drilling fluids onshore. Clarification should be provided on whether this is to be above or below MHWS. This is required as the report does not	Detail is provided on the exit pits in <b>Volume 7, Chapter 5, Project Description (application ref: 7.5)</b> , they may be located above or, below MLWS depending on the trenchless technology selected e.g. a long or a short HDD.	N

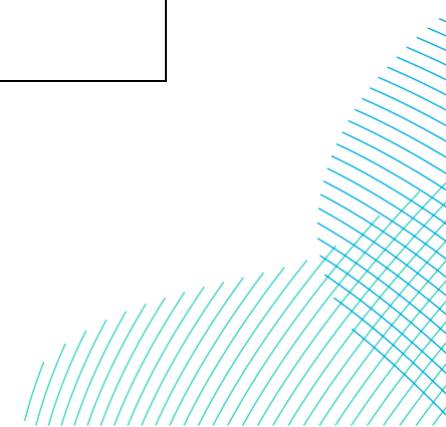
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				clearly indicate which works will be onshore and which will be on land (e.g., Figure 9-1a shows onshore works but does not indicate where MHWS is within this, Figure 19-2a shows onshore buffer zone in the sea).		
SMM 012 3	17/07/2023	Marine Management Organisation	Geology and Land Quality	22.2. Chapter 19, Paragraph 108 describes the potential risk from HDD of contamination of aquifers and potential for other fluids from the activity released to the environment, mitigation measures include bunding and appropriate storage. The assessment should also consider the types, quantity, and characteristics of chemicals to be used and their fate and effects in the environment including breach and potential loss of drill strings etc of the activity to ensure that the most appropriate chemicals and methodology are used to reduce the risk of hazardous materials entering the marine environment. Please engage with the MMO as soon as possible in regard to chemical use.	Chemicals will be selected at the detailed design stage to reduce the risk of hazardous materials entering the marine environment. Measures protective of controlled waters, including marine, against potential contamination are included within <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> . The Outline Code of Construction Practice (OCoCP) also includes measures to be implemented should an uncontrolled leak of hazardous material occur.	N
SMM 012 4	17/07/2023	Marine Management Organisation	Geology and Land Quality	22.3. Geological impacts as identified in Chapter 19 are largely terrestrial concerns. Table 19-10 lists seven sensitive sites including Withow Gap Skipsea SSSI cliff face exposures. Impacts to Withow Gap Skipsea SSSI (19.6.1.6) is reduced to minor adverse, but associated impacts inland remain major. The only mitigation proposed is	Refinement of the Onshore Development Area has resulted in the landfall option that interacts with the SSSI being withdrawn. Further information is provided in <b>Volume 7, Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b> .	N



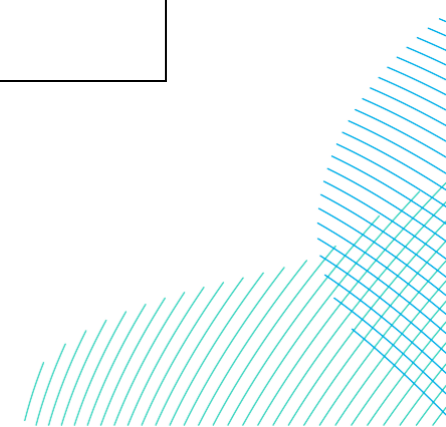
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				<p>avoidance (Table 19-15). HDD of the landfall site is proposed to mitigate cliff face impacts, and Chapter 20 indicates that no additional impacts to this coastal location would arise from mitigated inshore watercourse crossings. Although associated impacts inland remain major and the proposal to possibly exit in the intertidal zone is not aligned with avoidance of impact to designated sites, it would be of value to assess whether the landfall infrastructure could begin to affect natural cliff retreat at this location.</p>		
SMM 012 5	17/07/2023	Marine Management Organisation	Marine Physical Environment	<p>HRA 34.2. Table 4-1 states that PAH contamination is screened out for the operational phase, however as there is a possibility of fluids entering the marine environment these should be considered. For example hydraulic fluids used on the OWF, even in a 'closed' system, where top up is required may have the potential to be released into the marine environment. Whilst the risk may indicate that it is low, because there is potential for these chemicals and pollutants (from use and discharge as a result of operation and maintenance activity) reaching the marine environment this should be scoped in.</p> <p>34.3. The MMO is content that the</p>	<p>Polyaromatic hydrocarbon (PAH) contamination during the operation and maintenance phase of the Projects has been screened in for assessment for the Dogger Bank SAC in section 6.4.2.4.1 of <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b>.</p> <p>Potential effects of synthetic compound contaminants (including pesticides, antifoulants, pharmaceuticals) have been screened in for assessment for the Dogger Bank SAC in section 6.4.2.7.1.</p> <p>Seabed surface disturbance and changes in water clarity during the operation and maintenance phase of the Projects have been assessed within sections 6.4.2.1.1 and 6.4.2.2.1 respectively.</p> <p>Potential effects of heavy metal contamination are assessed in section 6.4.2.4.1.</p> <p>Potential effects of hydrocarbon contamination during all phases of the Projects lifespan are assessed in section 6.4.2.4.1.</p>	Y-M



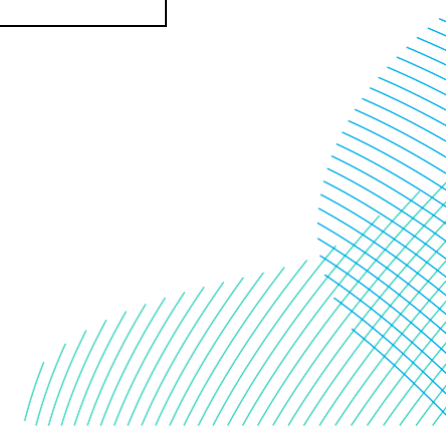
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				<p>synthetic compound contaminants have been scoped out for operation and decommissioning but are scoped in as part of the assessment for operation and maintenance. However, the table also suggest that the effects of transition elements and organo-metals like tributyl tin contamination are not relevant to the Projects activities. Many inorganic chemicals may be used offshore e.g., for cementing drilling and cleaning purposes, it is unclear here why the effects of the potential release of these chemicals in the marine environment are not relevant and the MMO suggest they are scoped in for consideration.</p> <p>34.4. Table 4-1 (and Section 4.1) has screened out seabed surface disturbance and changes in water clarity as impacts during operations and maintenance. The MMO does not consider that either can be screened out without further justification. Wakes in the lee of OWF foundations are likely to maintain sediment suspension in the water column at levels above those experienced in the absence of the OWF. However, the same table does indicate the consideration of smothering, seabed type change and siltation rate changes during operations, which would appear to be related.</p>		



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				<p>You should clarify how changes to siltation and smothering occur without related changes to suspension and water clarity. Based on recent evidence (e.g., Forster, 2018; Schultze <i>et al</i>, 2020; Christiansen <i>et al</i>, 2023), vertical sediment distribution changes in subsurface wakes should be considered as an impact throughout the operations phase.</p> <p>34.5. The document correctly identifies that UWN generated by construction activities has the potential to displace fish from supporting habitats or migratory routes by acting as an acoustic barrier. UWN is screened out as a likely significant effect on migratory fish as it is considered that the range of impact for TTS would be 48km from the source, and as the Projects are located more than 100km from the coast, a pathway for potential impacts does not exist. The MMO notes that this statement is supported with a footnote stating; 'there are no numerical criteria available for behavioural effects on fish from underwater noise, therefore TTS range is used as a proxy here for behaviour'. This is not entirely accurate. Whilst the MMO agrees that there is no known numerical threshold for behavioural responses in fish (except for the recommended 135dB for clupeids), it should be understood</p>		

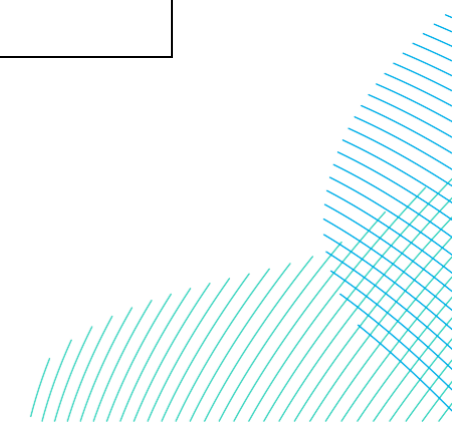


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>that TTS and behavioural responses are not the same thing. TTS is a physical effect which causes a temporary reduction in hearing sensitivity caused by exposure to intense sound and is not the same as a behavioural response. This should be corrected in the ES.</p> <p>34.6. Although Paragraph 80 provides consideration of the release of fines on water quality, and Paragraph 81 considers release of hydrocarbons as a result of the construction activity, there is mention of the quality of the sediments and potential for release of other contaminants (e.g., heavy metals) from sediment at depth (e.g., the drill arisings), this should be included for completeness. The MMO notes the comments in Paragraph 87 regarding the potential of plastic pollution as a result of paint flakes and welcome the comments on this topic.</p> <p>34.7. The document scoped out the inclusion of hydrocarbons during operation activities. This, as well as all chemicals used and or discharged that may come into to contact the marine environment - should be considered within the assessment for all stages of the OWF lifetime.</p>		

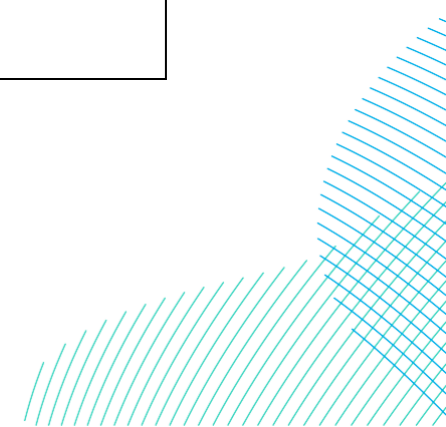




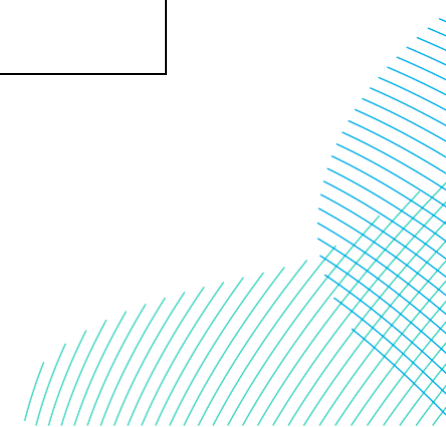
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SMM 0126	17/07/2023	Marine Management Organisation	Marine Physical Environment	<p>MCZ</p> <p>35.2. It is indicated in the document that no Advice on Operations is available for the Holderness Inshore MCZ. As such, there exists no information detailing the sensitivities of the designated features of the Holderness Inshore MCZ specifically. Proxies have been used to determine the sensitivity of the sites features and pressures. The MMO is content that at this moment in time this an acceptable approach to managing and identifying the pressures which could be possible faced. As there may be unidentified issues within the proxy information, the MMO recommends trying to identify the sensitivity of the Holderness Inshore MCZ features to potential pressures before works are undertaken.</p> <p>35.3. The pressures from the introduction of chemicals have been screened out as best practice mitigation measures for pollution control are to be embedded in the design. This seems appropriate, however the use of chemicals during construction operation and decommissioning should be considered in line with OSPAR OWF guidance. All those chemicals used and discharged including paints and coatings, where there is a pathway to come</p>	<p>35.2 Following the submission of the MCZA Screening report, Advice on Operations for the Holderness Inshore MCZ were made available, and have been used to inform this assessment. Further information is available in <b>Volume 8, Stage 1 Marine Conservation Zone Assessment (application ref: 8.17)</b>.</p> <p>35.3 Noted with thanks, potential impacts of chemical contamination during the operation and maintenance stage of the Projects is assessed in <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p> <p>35.4 Potential impacts of chemical contamination during the operation and maintenance stage of the Projects have been assessed in <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. Impacts on MCZs is available in <b>Volume 8, Stage 1 Marine Conservation Zone Assessment (application ref: 8.17)</b>.</p>	Y-M



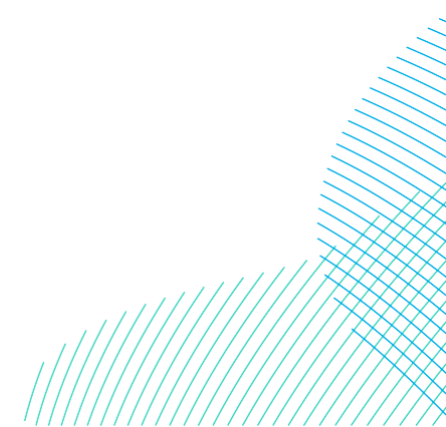
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>into contact with the marine environment including those chemicals used in closed systems where there maybe draw down (e.g. not skipped and shipped) be notified and assessed for their fate and potential effect on receptors. The potential discharge of chemicals from construction cleaning maintenance operation and decommissioning like cements dyes rigwash paints and coatings etc. should be included for consideration within the ES.</p> <p>35.4. The MCZ screening describes mitigation for hydrocarbons in terms of pollution control e.g., spills however the use of all chemicals and the potential for contact or release in the marine environment from the construction operation maintenance and decommissioning activities should also be considered.</p>		
SMM 001 1	17/07/2023	Marine Management Organisation	Marine Physical Environment	<p>8.3. Table 8-20 provides a valuable assessment of potential future cliff retreat of up to (an extreme) of 326 metres (m). Associated retreat of the intertidal can also be expected, potentially exposing the cable ducts. Sections 8.7.4.4 to 8.7.4.9 assesses excavation of the HDD exit pit during the construction phase only; but a cable landfall structure in the intertidal may need to be designed to allow for shoreline retreat. The ES assessment should account for</p>	<p>A baseline understanding of platform lowering has been included in section 8.5.16 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. Any changes in beach elevation due to cable installation at the landfall is assessed in section 8.7.3.9 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	N



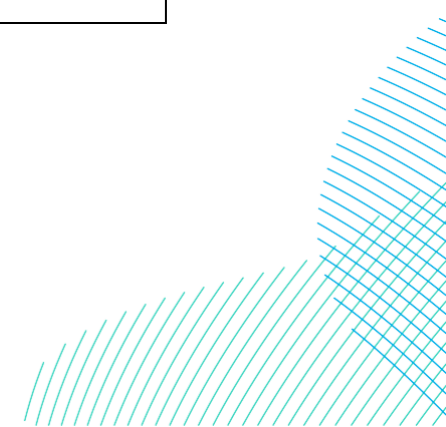
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				a potentially larger exposure during the latter part of the site life.		
SMM 001 5	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.7. Section 8.7.5.5 identifies the impact on sediment transport of cable protection measures. The PEIR asserts that sediment will build a ramp and pass over any obstruction. However, this would take a finite period of time, resulting in potential stripping of sediment downstream while the ramp is incomplete, which may result in new sedimentary features for a distance downstream (akin to the formation of large bedforms). Any observational evidence of such ramps from existing installations should be included in the ES to support your assessment.	An assessment of the effects of cable protection measures is outlined in section 8.7.4.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> . There is no observational evidence from other projects that show formation of new sedimentary bedforms downstream of cable protection measures.	N
SMM 009 6	17/07/2023	Marine Management Organisation	Marine Mammals	The MMO agrees with the report that at the time of writing, Southall <i>et al.</i> (2019) and Popper <i>et al.</i> (2014) represent the most up-to-date and authoritative criteria for marine mammals and fish respectively.	Noted	N
SMM 010 8	17/07/2023	Marine Management Organisation	Marine Mammals	13.25. Low-yield clearance is also considered. Section 6.3.1.3 explains that the low-yield clearance is associated with the HYDRA UXO clearance system developed by EORCA UK. As with the low order deflagration technique, this involves the use of a small charge to initiate destruction of the UXO, avoiding a much louder detonation of	Noted	N



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				the main explosive. Unlike deflagration, the HYDRA uses shaped charges to produce high pressure water jets that disintegrate the explosive material. The donor charge is predicted to be 750 g.		
SMM O11 1	17/07/2023	Marine Management Organisation	Marine Mammals	14.2. Table 11.14 - The magnitude of effect for TTS (temporary hearing loss) from the cumulative exposure of one monopile in a 24-hour period, has been assessed as Negligible or Low for all marine mammal species. As an example, for harbour porpoise, an estimated 0.974% of the North Sea Management Unit reference population (based on the SCANS-III density estimate) ate) is at risk. However, this equates to 3,374 individual harbour porpoises at risk, so the numbers are far from insignificant. It is vital that appropriate mitigation is put in place to reduce the risk of potential impact on sensitive marine receptors, especially considering the anticipated ramp up of offshore wind development across UK waters.	Acknowledged. <b>Volume 8, Outline Marine Mammal Mitigation Protocol (application ref: 8.25)</b> and <b>Volume 8, In Principle Site Integrity Plan for the Southern North Sea Special Area of Conservation (application ref: 8.26)</b> outline the proposed mitigation to reduce the risk of significant impacts to marine mammals and potential management measures.	Y-M
SMM O11 4	17/07/2023	Marine Management Organisation	Marine Mammals	14.5. Table 11-24 - Please could you explain how the impact area of 3.32 km <sup>2</sup> and 0.12 km <sup>2</sup> was derived.	The potential impact area for Temporary Threshold Shift (TTS) from other construction activities when assessing all activities together, is based on the assumption all four activities occur at the same time and the impact area from each individual activity has been summed to provide the potential overall impact area.	N



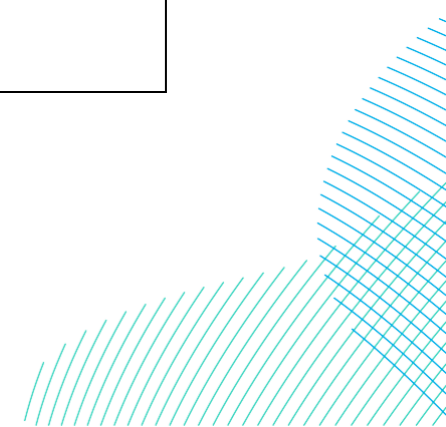
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SMM 0127	17/07/2023	Marine Management Organisation	Marine Physical Environment	<p>8.8. It would be of value to indicate how the worst-case scenarios for construction quantities (Table 5-3) were determined. This is because the ES will be limited to the stated values, and works which exceed these estimates will not be covered by the ES assessments. The calculated impacts are very large but it would be of value to review the ES to understand the expected 'margin of error' allowed for in such large values. In particular those for:</p> <ul style="list-style-type: none"> <li>• sand wave levelling - 9 kilometres squared (km<sup>2</sup>), 100 million metres cubed (m<sup>3</sup>) of sediment extraction, and then additional re-disposal, within nominally protected areas;</li> <li>• cable protection - unburied cable estimates of ~415 km and 136 cable crossings amounting to an affected area of 5 million metres squared (m<sup>2</sup>); and</li> <li>• scour protection</li> </ul> <p>In addition estimates of quantities of reworking based on typical maintenance or cable exposure from existing operational sites should be considered.</p>	<p>Table 8-1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> has been updated to reflect a refined project design envelope and any reference to these values has also been updated in the relevant section of the text.</p> <p>Survey data have been used to generate estimates of maximum parameters for sand wave levelling. Scour protection, cable protection and crossing estimates are all reasonable worst case figures based on the Applicants knowledge of the site and experience of developing offshore wind projects, as are the quantities suggested for maintenance works.</p>	Y-M
SMM 0012	17/07/2023	Marine Management Organisation	Marine Physical Environment	<p>8.4. Plate 8-4 (showing the Flamborough Front) is low resolution and shows the whole UK coastline. To support the accompanying text, in the ES the</p>	<p>Plate 8-4 has been replaced with <b>Volume 7, Figure 8-10 (application ref: 7.8.1)</b> which is of higher resolution and includes the Projects' Offshore Development Area.</p>	Y-M



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				image should focus on the area of relevance at a legible resolution.		
SMM 009 7	17/07/2023	Marine Management Organisation	Marine Mammals	13.6. Figure 4-1 shows a comparison between example measured impact piling data and modelled data using INSPIRE version 5.2. Firstly, the pile sizes used in this comparison are much smaller than the proposed 11 or 17 m diameter for the Projects (i.e., 6.0 m, 1.8 m, and 5.3 m pile).	This is correct and has been noted by the MMO previously on other projects. The only possible direct validation for modelled data is against measurements of circumstances that have already occurred, and there are no available noise data for driving piles 11-15m in diameter, for which predictions must be based on extrapolation.	N
SMM 011 2	17/07/2023	Marine Management Organisation	Marine Mammals	14.3. Table 11-32 - There appears to be a minor discrepancy for White beaked dolphin in this table (12.57 km <sup>2</sup> ). Please review the table and ensure this reflects information throughout the document for the ES.	All impact ranges and impact assessments have been updated in the section 11.6 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> due to the changes in the PDE and the updates in the underwater noise modelling results.	N
SMM 011 5	17/07/2023	Marine Management Organisation	Marine Mammals	14.6. Could explanation be provided on how the impact areas were derived in km <sup>2</sup> ? For example: Table 11-6, 11-7, 11-10, 11-11, 11-15, 11-19, 11-20.	The impact areas presented in the mentioned tables were derived from the underwater noise modelling for the relevant scenario.	N
SMM 001 3	17/07/2023	Marine Management Organisation	Marine Physical Environment	8.5. Worst-case scenario estimates for the construction period indicate seven years in total. The MMO recommends commenting on the confidence in this and whether delays and (for example) a 10-year construction period would affect your assessments.	The seven-year construction estimate represents a worst-case timeline for sequential construction activities for DBS East and DBS West, see Volume 7, Chapter 5 Project Description (application ref: 7.5) for further discussion of construction timelines for the Projects. This estimate is based on the Applicants' previous experience of developing large-scale offshore wind projects in the North Sea.	N

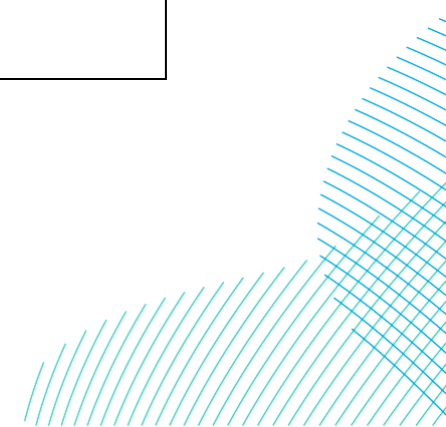
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SMM 009 8	17/07/2023	Marine Management Organisation	Marine Mammals	13.7. Secondly, providing the hammer energies as well as pile diameter would be helpful - it is very unlikely that the hammer energies will be close to the proposed 7,000 kJ hammer energy for the Projects. Thirdly, further evidence is required in terms of the single strike sound exposure level (SELs) and not just the SPL <sub>peak</sub> . The MMO recommends these points should be addressed in the ES.	Acknowledged. Changes in the Projects' Design Envelope have reduced the maximum hammer energy from 7,000kJ to 6,000kJ. Revised underwater noise modelling has been undertaken and is available in <b>Volume 7, Appendix 11-3 Underwater Noise Modelling Report (application ref: 7.11.11.3)</b> and included in the assessment in section 11.6 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> .	Y-M
SMM 000 6		Marine Management Organisation	Marine Physical Environment	8.2. The description of physical process influence on habitat assessments provided in the benthic habitats Chapter 9 are consistent with the physical processes Chapter 8. However, it should be noted that the physical process impacts are generalised (i.e., estimated based on an 'expert judgement' application of impacts approximated on the basis of other locations) and so are not site specific to the same extent and resolution that habitat distribution has been surveyed.	The marine physical processes baseline in section 8.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> has been updated with project specific data and the results from marine physical processes numerical modelling (see <b>Volume 7, Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b> ) The assessment of significance has been updated where appropriate.	Y-M
SMC A00 2	26/06/2023	Maritime & Coastguard Agency	Shipping and Navigation	2. Layout We appreciate that the layout as presented currently is indicative of a 'worst case' as described in section 6.2 (figures 6.2 and 6.3) of the NRA. The turbine layout design will require MCA agreement prior to construction to minimise the risks to surface vessels, including rescue boats, and Search and	Noted.	N

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				Rescue aircraft operating within the site. As such, MCA will seek to ensure all structures are aligned in straight rows and columns, including any platforms. Any additional navigation safety and/or Search and Rescue requirements, as per MGN 654 Annex 5, will be agreed at the approval stage.		
SMC A00 3	26/06/2023	Maritime & Coastguard Agency	Cumulative Effects	3. Cumulative Impacts Chapter 6 states that a Cumulative Effects Assessment will be included, and Section 13 of the NRA includes a Cumulative and Transboundary Overview. Figure 13 of this section illustrates the scoped in developments. The inclusion of 6 developments in addition to the baseline case as presented in table 13.1 is welcomed. Areas of particular focus will be the Dogger Bank A Offshore Windfarm which lies 4nm to the north of the DBS windfarms and the Cavendish Oil and gas platform which lies 1.6nm to the south and is located within the export cable corridor. Detailed consultation with relevant stakeholders at the Hazard Workshop and, if necessary, before and beyond it will be required.	These developments have been considered as part of the baseline assessment in section 14.6 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> . Consultation is ongoing with all third parties with whom the Projects are likely to interface.	N
SMC A00 4	26/06/2023	Maritime & Coastguard Agency	Shipping and Navigation	4. Hydrographic Survey Data MGN 654 requires that hydrographic surveys should fulfil the requirements of the International Hydrographic	Hydrographic surveys will be undertaken at all relevant project stages in line with MGN 654 noting that compliance with MGN 654 is included as a mitigation embedded in the design in section 14.3 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> . The results of these surveys will be reported in line with the requirement of MGN 654.	N

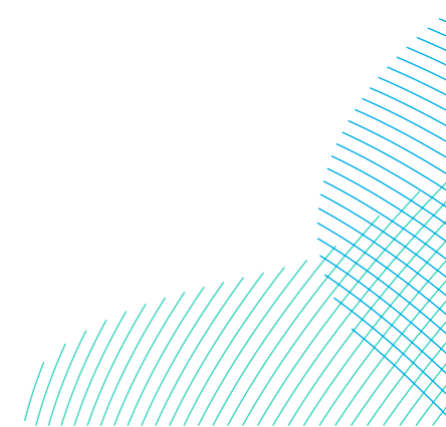




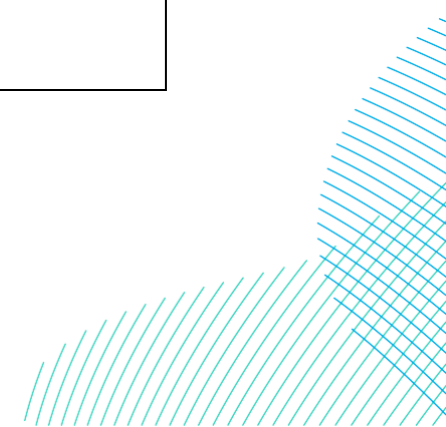
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager and the UKHO. Further information can be found in MGN 654 Annex 4 supporting document titled 'Hydrographic Guidelines for Offshore Developers', available on our website:  <a href="https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping">https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping</a>. This includes surveys during the pre-construction, post-construction and post-decommissioning stages.</p>		
SMC A00 5	26/06/2023	Maritime & Coastguard Agency	Shipping and Navigation	<p>5. Cable Routes                      Particular attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary. Owing to the large volume of traffic including deeper draft vessels landward of the array areas, particular attention to burial depths and protection measures (if needed) will be required. It is noted in section 15, paragraph 388 of the NRA that the Cable Burial Risk Assessment (CBRA) will be carried out to inform this and the target burial depth is 0.5-1.0m. If cable protection measures are required</p>	<p>Noted. As detailed in section 14.3.2.2 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b>, HVAC technologies have been removed from the Projects design envelope. Further details regarding potential electromagnetic Interference are provided in section 13.6 of <b>Volume 7, Appendix 14-2 Navigation Risk Assessment (application ref: 7.14.14.2)</b>. A preliminary cable burial risk assessment has been undertaken and is provided as support information in <b>Volume 8, Cable Statement (application ref: 8.20)</b>.</p>	Y-D



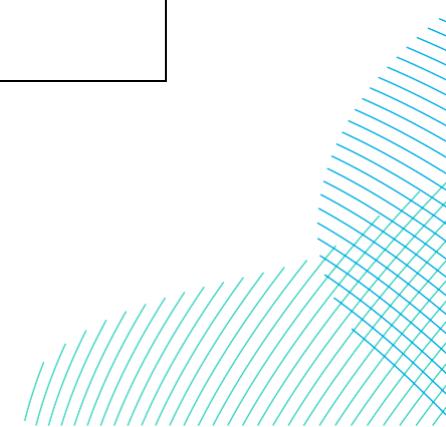
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>e.g. rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase, such as at the HDD location. It is noted that both High Voltage Direct Current (HVDC) and High Voltage Alternating Current (HVAC) transmission infrastructure are to be used. Regarding HVDC there is a potential impact on ships compasses from the electro-magnetic field generated. A pre-construction compass deviation study will be required on the expected electro-magnetic field, and we would be willing to accept a three-degree deviation for 95% of the cable route. For the remaining 5% of the cable route no more than five-degree deviation will be attained. If this requirement cannot be met, further mitigation measures may be required including a post installation deviation survey of the cable route. This data must then be provided to the MCA and UKHO, as a precautionary notation may be required on the appropriate Admiralty Charts regarding possible magnetic anomalies along the cable route.</p>		



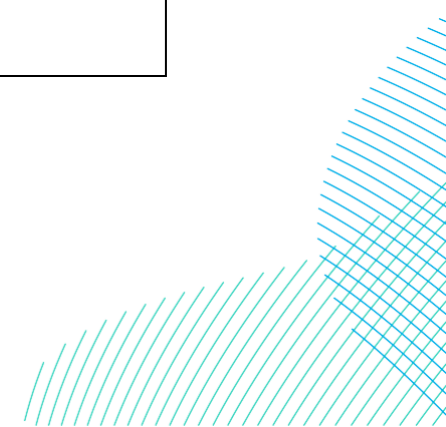
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SMC A00 7	26/06/2023	Maritime & Coastguard Agency	Shipping and Navigation	7. Emergency Response An Emergency Response Cooperation Plan is required to meet the requirements of MGN 654 Annex 5 and will need to be in place prior to construction. The ERCoP is an active operational document and must remain current at all stages of the project including during construction, operations & maintenance and decommissioning. A SAR checklist will be discussed as the project progresses to track all requirements detailed in MGN 654 Annex 5.	Marine coordination would be implemented to manage project vessels throughout construction and maintenance periods, and will be detailed in one or more Emergency Response Cooperation Plans (ERCoPs) produced in compliance with MGN654. The Applicants have committed to this through the following Deemed Marine Licences (DMLs) within <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> : <ul style="list-style-type: none"> <li>DML 1 &amp; 2 - Condition 18</li> <li>DML 3 &amp; 4 - Condition 16</li> <li>DML 5 - Condition 12</li> </ul>	N
SMC A00 8	26/06/2023	Maritime & Coastguard Agency	Shipping and Navigation	The CEA should take the Dogger Bank A Offshore Windfarm and Cavendish platform developments into consideration.	These developments have been considered as part of the baseline assessment in section 14.6 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> .	N
SMC A00 9	26/06/2023	Maritime & Coastguard Agency	Shipping and Navigation	Hydrographic surveys fulfilling the requirements of the International Hydrographic Organization (IHO) Order 1a standard should be undertaken.	Hydrographic surveys will be undertaken in line with MGN 654 noting that compliance with MGN 654 is included as a mitigation embedded in the design in section 14.3 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> .	N
SMC A00 1	26/06/23	Maritime & Coastguard Agency	Shipping and Navigation	1. Navigation Risk Assessment (NRA) and MGN Checklist – General Comments Dogger Bank South windfarm is considered in three distinct sections namely, Dogger Bank Southeast, Dogger Bank Southwest (referred to collectively as Dogger Bank South Offshore Windfarms) and the Offshore Export Cable Corridor. A full marine traffic survey of 28 days duration has been	Noted with thanks, engagement on the topic of Shipping and Navigation has continued following the publication of PEIR, with relevant comments being considered as part of the development of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> .	N



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				<p>undertaken as per MGN 654 requirements for each of these sections in summer and winter of 2022. The general dates of the surveys are presented in Table 14.5 and more specifically in Table 5.1 from Appendix 14-1, Navigation Risk Assessment (NRA). Chapter 14 Paragraph 30 highlights that the first winter vessel traffic survey was carried out pre-construction of Dogger Bank A and therefore this survey is considered as a secondary source only. The MCA is encouraged by the inclusion of commercial/established route identification along with predicted potential diversions of these routes post construction as presented in Figure 10.2 and 14.1 of the NRA respectively. It is noted that since the scoping report the export cable corridor has been refined with only one landfall area now being considered. We note under Chapter 14, paragraph 228 of the PEIR that "the consultation effort is not yet complete. In particular, a Hazard Workshop with relevant stakeholders in which the impacts associated with the DBS array areas and offshore export cable corridor (including potential platforms) has not been undertaken." We also note that Section 18, paragraph 472 of the NRA states; "Although this NRA considers the requirements of the MGN 654 Checklist (see Appendix</p>		

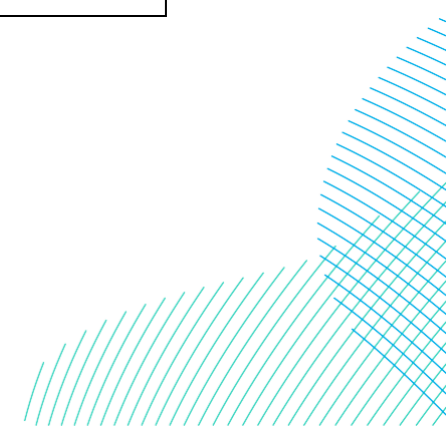


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				A), it is acknowledged that various additional steps will be required post PEIR to ensure a comprehensive NRA is submitted at the ES stage." The MCA agrees with the 12 steps identified in this paragraph and recognises that these have led to 8 outstanding items on the MGN 654 Checklist which are highlighted in table A-1 from Appendix A to the NRA. We expect further engagement with relevant stakeholders, the completion of a Hazard Identification Workshop and the NRA to be updated with the additional data incorporated. The MCA will provide further comments once this is completed.		
SMC A00 6	26/06/28	Maritime & Coastguard Agency	Shipping and Navigation	6. Safety Zones Safety zones during the construction, maintenance and decommissioning phases as presented in section 6, table 6.5 are supported, however it should be noted that operational safety zones may have a maximum 50m radius from the individual turbines. A detailed justification would be required for a 50m operational safety zone, with significant evidence from the construction phase in addition to the baseline NRA required supporting the case.	Noted	N
SMC A01 5	09/10/2023	Maritime & Coastguard Agency	Shipping and Navigation	Second Hazard Workshop feedback from the MCA: Preference for displacement and collision risk to be considered	This has been applied to the hazard log in Appendix B of <b>Volume 7, Appendix 14-2 Navigational Risk Assessment (application ref: 7.14.14.2)</b> .	N



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				separately in the hazard log with the most likely consequence for collision risk still being a collision.		
SMC A01 0	09/10/2023	Maritime & Coastguard Agency (and Trinity House)	Shipping and Navigation	Clarity should be made between the rationale behind which array layout is worst case for each impact.	The array layout defined as worst case for each impact has been outlined in section 6 of <b>Volume 7, Appendix 14-2 Navigational Risk Assessment (application ref: 7.14.14.2)</b> .	Y-M
SMC A01 1	09/10/2023	Maritime & Coastguard Agency (and Trinity House)	Shipping and Navigation	A commitment to a desk-based High Voltage Direct Current (HVDC) engineering study should be made in the NRA.	Necessity of a desk-based study has been described in section 13 of <b>Volume 7, Appendix 14-2 Navigational Risk Assessment (application ref: 7.14.14.2)</b> .	N
SMC A01 2	09/10/2023	Maritime & Coastguard Agency (and Trinity House)	Shipping and Navigation	Agree that the worst case location of the ESP should be at the southern edge of the export cable platform search area.	This has been applied for the allision modelling in section 16 of <b>Volume 7, Appendix 14-2 Navigational Risk Assessment (application ref: 7.14.14.2)</b> .	Y-M
SMC A01 3	09/10/2023	Maritime & Coastguard Agency (and Trinity House)	Shipping and Navigation	It is a reasonable assumption that vessels on Route 9, unlike Route 8, will around the DBS array areas given the ability to passage plan and the available sea room to the north	Route 9 has been deviated around the DBS array areas as shown in section 15 of <b>Volume 7, Appendix 14-2 Navigational Risk Assessment (application ref: 7.14.14.2)</b> .	N
SMC A01 4	09/10/2023	Maritime & Coastguard Agency (and Trinity House)	Shipping and Navigation	Acknowledge that the gap between DBS West and Dogger Bank A abides by the 20-degree rule from MGN 654, and all parties agree that no further detailed assessment is required.	The compliance of the gap between DBS West and Dogger Bank A with MGN 654 is discussed in section 14.6 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> .	N
SMO 04	17/07/2023	Mewburn - Landowner (Alnwick agent)	Site Selection and Assessment of Alternatives	This land is being used for a ground source heat pump system coupled to a farmhouse included with the wider holding. Corridor needs to be moved eastwards.	The electrical infrastructure technology included in the Projects design is High Voltage Direct Current (HVDC), this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. The Applicants are unable to route further east due to other constraints further South on the route. There would be a temporary construction impact across a 75m corridor. The Projects would have a permanent easement of up to 24m during	N

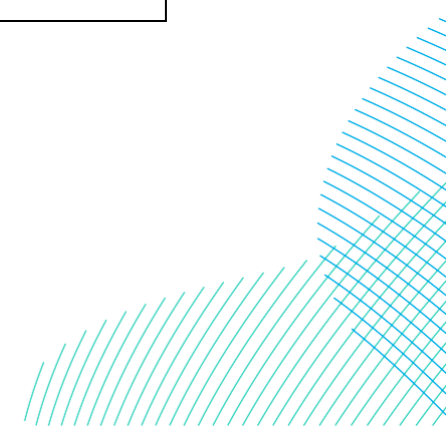
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					<p>operation that would return to productive agricultural use and any reasonable loss of development will be a compensable matter.</p> <p>The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>. The Applicants believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>, on balance achieves the optimum design however we would seek to avoid further constraints including a ground source heat pump system at detailed design. The details of which remain unknown, but we would look to mitigate by design by using trenchless crossing techniques if there was a conflict at the detailed design stage.</p>	
SMO 05	17/07/2023	Mewburn - Landowner (Alnwick agent)	Site Selection and Assessment of Alternatives	Corridor needs to be moved eastwards to adjoin the field boundary to mitigate severance issues and long-term impact of the scheme.	<p>The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>. The Applicants are unable to route further east due to other constraints. There would be a temporary construction impact across a 75m corridor. The Projects would have a permanent easement of up to 24m during operation that would return to productive agricultural use and any reasonable loss of development will be a compensable matter.</p> <p>By consulting with landowners and occupiers, maintaining access to severed land, appropriate timings of works and reinstatement of land to pre-construction conditions as soon as reasonably practicable, it is likely that the amount of land temporarily unsuitable for agriculture would be reduced.</p> <p>Private agreements (or compensation in line with the compulsory purchase completion code) would be sought with relevant landowners / occupiers.</p> <p>By consulting with landowners and occupiers, maintaining access to severed land, appropriate timings of works and reinstatement of land to pre-construction conditions as soon as reasonably practicable, it is likely that the amount of land temporarily unsuitable for agriculture would be reduced.</p> <p>Private agreements (or compensation in line with the compulsory purchase completion code) would be sought with relevant landowners / occupiers.</p> <p>We believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>, on balance achieves the</p>	N



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					optimum design however we would seek to avoid further constraints at detailed design.	
SMO 06	17/07/2023	Mewburn - Landowner (Alnwick agent)	Site Selection and Assessment of Alternatives	No compounds to be placed on this land parcel at the landowners request. Landowners have suffered significantly as a consequence of the Dogger Bank A and B Scheme and are resistant to this scheme and any further compounds.	No temporary construction compounds are proposed within this landholding.	N
SMO 07	17/07/2023	Mewburn - Landowner (Alnwick agent)	Cumulative Effects	Cumulative impact on this landowner is significant with the fields immediately to the west impacted by Dogger Bank A and B Scheme and other land included with the holding impacted by the Hornsea 4 Scheme.	The Projects are in direct collaboration with all other developers in the vicinity and will agree Statements of Common Ground at the earliest opportunity to mitigate the impact on landowners. The cumulative impact of temporary land use during construction are assessed in section 21.8 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> .	N
SME 001	13/07/23	Molescroft Farms Ltd	Land Use	The field shown at point 1 on the attached plan to the north of Molescroft Farm, will shortly be developed for use as a children's play centre and hence we request that the pipeline route runs north of this field boundary so this field remains unaffected and hence the disruption to this part of my client's business is minimised.	The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> . We believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> , on balance achieves the optimum design.  The electrical infrastructure technology included in the Projects design is High Voltage Direct Current (HVDC), this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. This has allowed southern railway option to be discounted moving cable corridor north of constraint and therefore removing the potential impact on land within the proposed development. There would be a temporary construction impact across a 75m corridor. The Projects would be sterilising 24m corridor during operation that would return to productive agricultural use and any reasonable loss of development will be a compensable matter.	N
SME 002	13/07/23	Molescroft Farms Ltd	Land Use	Fields marked on the plans at point 2 are currently being promoted for solar development - Heads of	The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> .	N

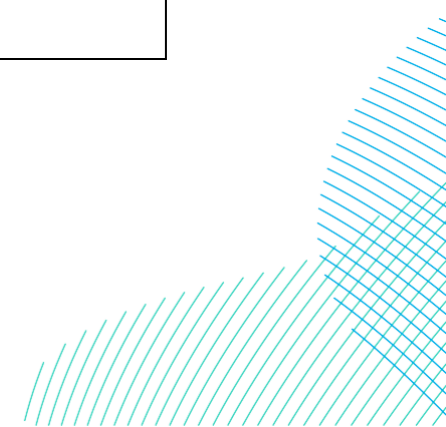


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				Terms for this are just being agreed at the present time.	<p>We believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>, on balance achieves the optimum design.</p> <p>We are working with numerous solar developers across the Project development envelope and will work with the landowner to mitigate the impact during temporary construction. We are already committed to trenchless technique e.g. HDD under the railway which may represent an opportunity to be extended to further mitigate solar interactions. Southern Railway option has been discounted, as has the eastern access road.</p>	
SME 003	13/07/23	Molescroft Farms Ltd	Land Use	We are very concerned about the impact of the pipeline splitting and going north and south across the railway around Carr Farm and strongly request that it only runs along the northern route around Carr Farm not the southern route as well.	The electrical infrastructure technology included in the Projects design is High Voltage Direct Current (HVDC), this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. This has allowed southern railway option to be discounted moving the Onshore Export Cable Corridor north of constraint and therefore removing the potential impact on land within the proposed development. There would be a temporary construction impact across a 75m corridor. The Projects would be sterilising 24m corridor during operation but, that would return to productive agricultural use and any reasonable loss of development will be a compensable matter.	N
SME 004	13/07/23	Molescroft Farms Ltd	Land Use	The fields shown at point 3 and 4 on the attached plan are dog walking fields that are in constant use and a very profitable part of my client's business –hence we request that if the pipeline has to cross these fields that it is bored under these fields 3 and 4 to minimise the disturbance and disruption to this part of the business. If these dog fields had to be closed for any length of time it would have a significant long-term impact on the business as clients would find alternative dog fields to use and would not return to use these ones as in our experience people are creatures of	The electrical infrastructure technology included in the Projects design is High Voltage Direct Current (HVDC), this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. This has allowed southern railway option to be discounted moving the Onshore Export Cable Corridor north of constraint and therefore removing the potential impact on land and business enterprise. The field nearest the railway is proposed for a trenchless crossing reception pit and so there would be a temporary construction impact across a 75m corridor. The Projects would be sterilising 24m corridor during operation that would return to productive agricultural use and any reasonable business loss will be a compensable matter.	N

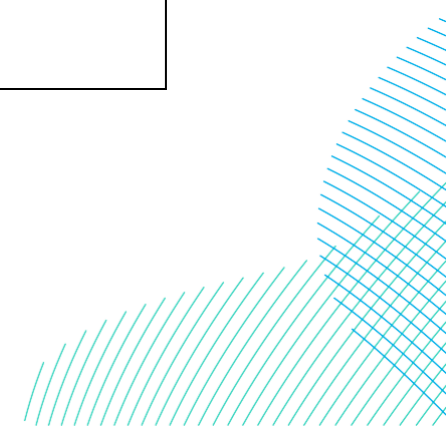


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				habit and like going to the same dog walking field all the time.		
SME 005	13/07/23	Molescroft Farms Ltd	Land Use	Fields marked as point 5 on the attached plan will shortly be promoted for commercial/industrial development. We appreciate that it may be difficult for the proposed route to avoid these fields entirely but request that the pipeline route is pushed further north crossing part of the old Leconfield airfield so that only the northern section of these fields are affected and hence the southern parts of the fields could still be developed for commercial development.	The electrical infrastructure technology included in the Projects design is High Voltage Direct Current (HVDC), this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. This has allowed southern railway option to be discounted moving the Onshore Export Cable Corridor north of constraint and therefore removing the potential impact on land within the proposed development. Unfortunately we must cross the railway, perpendicular to the railway which doesn't allow the opportunity to move the cable corridor further north into the fields adjoining Leconfield Airfield. There would be a temporary construction impact across a 75m corridor. The Projects would be sterilising 24m corridor during operation that would return to productive agricultural use and any reasonable loss of development will be a compensable matter.	N
SME 006	13/07/23	Molescroft Farms Ltd	Land Use	The fields marked as point 6 on the plans will shortly be developed by Beverley Town Football Club with new all-weather pitches covering it - Heads of Terms are currently being agreed. If the pipeline route goes only north of Carr Farm, then the football club can be avoided.	The electrical infrastructure technology included in the Projects design is High Voltage Direct Current (HVDC), this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. This has allowed southern railway option to be discounted moving the Onshore Export Cable Corridor north of constraint and therefore removing the potential impact on the proposed Beverley Town Football Club land. There would be a temporary construction impact across a 75m corridor. The Projects would be sterilising 24m corridor during operation that would return to productive agricultural use and any reasonable loss of development will be a compensable matter.	N
SME 007	13/07/23	Molescroft Farms Ltd	Land Use	The fields marked as point 7 on the plans are potential residential development land and hence we request that the pipeline route is pushed as far north and west as possible to minimise the loss of this residential development land.	The electrical infrastructure technology included in the Projects design is High Voltage Direct Current (HVDC), this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. There would be a temporary construction impact across a 75m corridor. The Projects would be sterilising 24m corridor during operation that would return to productive agricultural use and any reasonable loss of development will be a compensable matter. Unfortunately, we can only consider developments that have progressed planning consent. We have considered all those projects which have a planning application submitted that are registered in ERYC Planning Portal. These are set out in set out in <b>Volume 7, Chapter 6 EIA Methodology (application ref: 7.6)</b> .	N

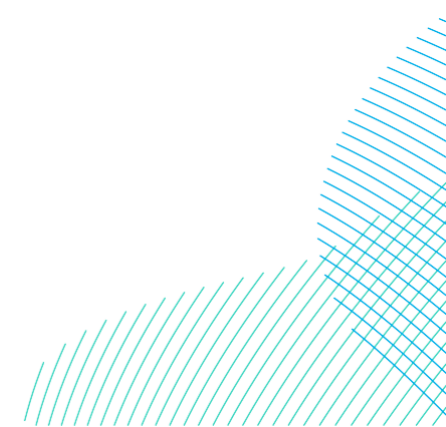
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SME 008	13/07/23	Molescroft Farms Ltd	Land Use	The field marked as point 8 has very strong residential development potential with developers actively interested in this land. Discussions on options and joint venture agreements for this land are currently underway. We therefore request that the pipeline route is moved further west to try and reduce the amount of loss of residential development land.	The electrical infrastructure technology included in the Projects design is High Voltage Direct Current (HVDC), this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. There would be a temporary construction impact across a 75m corridor. The Projects would be sterilising 24m corridor during operation that would return to productive agricultural use and any reasonable loss of development will be a compensable matter. Unfortunately, we have not been able to accept the proposal to move the cable corridor further West, as we are constrained by Hornsea 4 offshore windfarm's onshore cable corridor. We can also only consider developments that have realistic hope value of obtaining planning consent. We have considered all those projects which have a planning application submitted that are registered in ERYC Planning Portal. These are set out in set out in <b>Volume 7, Chapter 6 EIA Methodology (application ref: 7.6)</b> .	N
SNF UO1 0	17/07/2023	National Farmers Union	Land Use	Impact on Agricultural Businesses – Table 21-11 within chapter 21 of the PIER (Land Use), indicates that 68.40% of the onshore export cable corridor is located within Grade 2 agricultural land, whereas 29.20% is located within Grade 3 land. The proposed onshore substation zone is also located within 100% Grade 2 agricultural land and this area of land will be acquired permanently and removed from agricultural production. The NFU prefers to see infrastructure schemes avoiding best and most versatile (BMV) land but does understand that for linear schemes this is very difficult especially when there is a fixed end point. Due to the amount of BMV agricultural land being impacted on a temporary basis it is important that the reinstatement and aftercare of the soils is carried out to a high specification and at	Mitigation measures associated with BMV land are outlined in section 21.6.1.3.5 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> . Pre-construction surveys will be undertaken to define the current baseline environment, this will help inform a SMP which will set out the procedures for the appropriate handling of soils. <b>Volume 8, Appendix A - Outline Soil Management Plan (OSMP)</b> is included in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> . An Agricultural Land Classification (ALC) Survey of the Substation Zone was completed in January 2024 and has informed the OSMP, this has confirmed the area is grade 3b and not BMV. A survey of the Onshore Export Cable Corridor and Landfall Zone will be completed in Spring/Summer 2024 to inform the detailed SMP which will be drafted prior to construction.	N



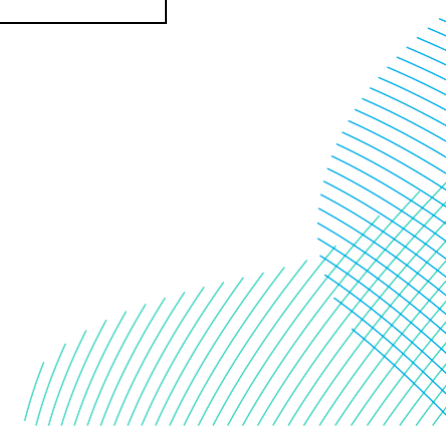
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				the right time to achieve favourable results.		
SNF U00 1	17/07/23	National Farmers Union	Land Use	<p>Consultation with Landowners – The NFU understands that some meetings have been taking place on farm, and these meetings have provided affected landowners and occupiers with some details of the project build. The NFU feels that it would be beneficial to hold meetings for all landowners and occupiers along with their agents to update them on the project build. One-to-one meetings on farm are essential to understanding how businesses will be impacted and what mitigation measures or timings of the works need to be incorporated into the scheme design and programme at the outset to reduce the impact.</p> <p>The NFU would also like to see discussions regarding private agreements taking place as early as possible so as to enable these discussions to progress ahead of the submission of the DCO.</p>	<p>Prior to the Statutory Consultation commencing, all affected landowners were invited to attend private briefings about the potential impacts the Projects could have and how to engage with the consultation. On site consultation meetings continue regarding project design routeing and siting, which has seen significant positive change to the project design envelope. Template HoT for Option / Deed of Grant have been issued to land agents with a number of discussions held in person with agents to develop the template HoT. Populated HoT's being issued to a landowners in June 2024. Liaison is ongoing regarding project development and private agreements.</p>	N
SNF U00 2	17/07/23	National Farmers Union	Land Use	<p>Substation Locations – The Project Description states that an onshore export cable corridor will link the landfall with the newly constructed onshore substations. RWE should already be in full negotiations with the landowners affected by the proposed sites for all the substations, and if not, should make such engagement a</p>	<p>Ongoing development of the project design envelope in line with statutory consultation feedback, site investigation and negotiation of a grid connection offer has cumulated in both projects being developed to use High Voltage Direct Current (HVDC) technology. Stakeholder feedback also allowed the decision to co-locate both HVDC Converter Stations on Zone 4, South West of Beverley, near to the village of Bentley. The Onshore Export Cable Corridor has been reduced to 75m as part of making this technology choice which in turn will reduce the land take and impact on impact landowners.</p> <p>Landowners and Agents have been kept informed of progress to date and the Projects held an agents briefing session to aide discussion and plan ahead.</p>	N



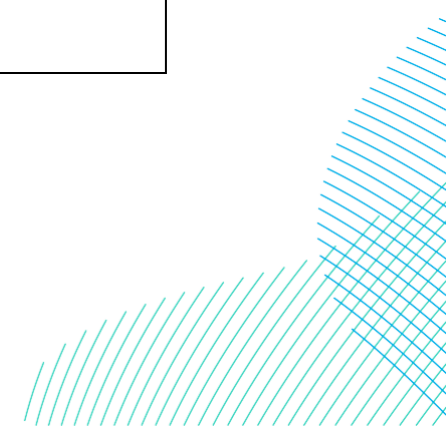
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				priority.to make sure that voluntary agreements are reached.		
SNF U00 3	17/07/23	National Farmers Union	Land Use	Cumulative Impact – Section 21.6.1.5 within Chapter 21 of the PIER, states that the onshore export cable corridor crosses the Dogger Bank A and B offshore wind farm underground cable route and is adjacent to the indicative cable route for the Hornsea Project Four offshore wind farm. If not already, RWE should be in contact with Orsted and collaborating with them to make sure all measures which might reduce the impact on agricultural land and agricultural operations are in place. This will ensure that the cumulative impact and burden on owner/occupiers is reduced.	Interaction between the Projects and other onshore cable routes has been discussed within section 21.7 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> . Liaison with other developers will be undertaken as part of the DCO process.	N
SNF U00 4	17/07/23	National Farmers Union	Land Use	Easement – The PIER (Chapter 5, Project Description) outlines that the Project has an indicative operational life of 30 years and 32 years if a sequential build. Please can you confirm the length of easement you are seeking landowners through voluntary agreements? The NFU strongly feels that the easement term should not exceed the operational lifetime of the scheme.	The Onshore Converter Station(s) may be used as a Substation or Converter Station site after decommissioning of the Projects or it may be upgraded for use by another offshore wind project. This would be subject to a separate planning application. Therefore, the Projects are seeking Easements for 99 years in line with other offshore wind farm promoters, which will include appropriate mechanisms for termination. No decision has been made regarding the final decommissioning plan for the Onshore Converter Station(s), as it is recognised that industry best practice, rules and legislation change over time.  The Projects are seeking 2x 12m easements within a 75m construction corridor. The length of the Onshore Export Cable Corridor is 32km with a further 2.5km on Onward Cable Connection to the proposed new National Grid Substation at Birkhill Wood. The permanent easement of the Onward Cable Connection is up to 32m. Further detail is provided in <b>Volume 7, Chapter 5 Project Description (Application ref: 7.5)</b> .	N



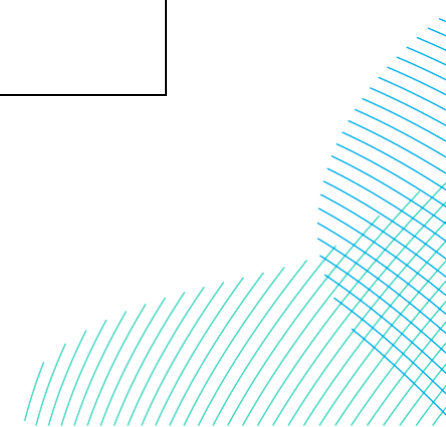
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SNF U00 5	17/07/23	National Farmers Union	Land Use	The NFU understands from the PIER (Chapter 21: Land Use – Table 21.2) that the maximum cable depth will be 2m and the indicative cable depth will be 1.6m. Please can you confirm what the depth from the top of the protective tile to the surface of the soil is? It is imperative that the cables are laid at a minimum depth of 1.2m to the top of the tile to ensure there is sufficient distance between the cables and farming operations.	The Onshore Export Cables would be either laid directly in trenches or pulled through pre-installed ducts. Cable ducts are generally laid in trenches at a maximum cable depth 2m, indicatively at a cable depth at 1.6m with a minimum cover of 1.2m to the top of the protective tile. Alternatively they would be installed in HDD bores and then the cables are pulled through. The cables installed onshore for the Projects generally include the onshore transmission cables, fibre optic communications cables and Earthing Continuity Cables. Further detail is provided in <b>Volume 7, Chapter 5 Project Description (Application ref: 7.5)</b> .	N
SNF U00 6	17/07/23	National Farmers Union	Land Use	Link Boxes – It is stated that there will also be up to 343 link boxes approximately every 750m along the cable corridor. It is noted that where possible, the link boxes will be located adjacent to field boundaries and accessed via manhole covers at ground level. The NFU would like to see that landowners are consulted on the location of the link boxes to minimise the impact on agricultural operations. It is essential that any link boxes located within agricultural fields are at ground level and marked appropriately in consultation with the landowner/occupier to avoid further disruption to agricultural operations. Above ground infrastructure within fields would increase the area of land taken out of agricultural production due to	The number of jointing bays (JB) required would be dependent on the lengths of cable sections being used, the location of obstacle crossings requiring a trenchless crossing e.g. HDD, and a number of factors including topography, bends within the cable route, and the maximum pulling tension of the cable. JB's generally comprise a cast in situ concrete slab base and backfilled with CBS and/or sand and natural soil arisings. The JB's may also have concrete blockwork walls and precast concrete roof sections and, if required, the walls and roof would generally only be added after pulling and jointing of the cables. The JB's are buried at a depth to allow land to return back to typical agricultural use. However, each JB is usually accompanied by a link box to allow testing and monitoring of cable joints. The link boxes are generally much smaller in footprint than the JB's however these are generally at a much shallower depth with a manhole inspection cover at the surface. The above ground infrastructure would be up to 2.5 x 4m and landowners would be consulted on location of link box's and they would be places in field margins wherever possible. Further detail is provided in <b>Volume 7, Chapter 5 Project Description (Application ref: 7.5)</b> .	N



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				machinery having to work around them.		
SNF U00 7	17/07/23	National Farmers Union	Project Description	Cable Corridor – The NFU understands from the PIER that the working corridor is to be 100m and up to 250m wide where trenchless techniques are used. Please can you provide more why such a wide working corridor is needed for trenchless techniques on this scheme?	<p>The Projects are proposing a 75m wide Onshore Export Cable Corridor for the purposes of the ES assessment (expanding to 90m at trenchless crossing locations). The Onshore Export Cable works includes all the infrastructure necessary to connect the Offshore Export Cables via TJBs at the Landfall Zone to the Onshore Converter Station(s) in the Substation Zone and Onward Cable Connection to the proposed National Grid substation at Birkhill Wood. The onshore cable works include:</p> <ul style="list-style-type: none"> <li>• Initial site investigation works;</li> <li>• Site survey and environmental pre-construction activities such as authorised vegetation clearance required in preparation for construction;</li> <li>• Construction of access to the cable corridor infrastructure;</li> <li>• Temporary strip and storage of topsoil for agricultural areas;</li> <li>• Construction of Main and Satellite Temporary Construction compounds (TCC);</li> <li>• Construction of cable jointing bays;</li> <li>• Construction of temporary haul roads to facilitate the Onshore Export Cable installation;</li> <li>• Excavation of trenches and installation of cable ducts (where used);</li> <li>• Installation of below ground chamber at the jointing bays/link box locations, required to provide;</li> <li>• Maintenance and inspection access to the cable system;</li> <li>• Laying or pull-in of high voltage cables within duct or direct lay in trench;</li> <li>• Backfilling of jointing bays and cable trenches with suitable material for electrical performance and protection of cables;</li> <li>• Reinstatement works; and</li> <li>• Design and construction of crossings or protective measure required due to close proximity or crossing of export cable to existing infrastructure and natural features. This includes roads, railways, rivers and streams. This may be achieved by construction of culverts/cable structures of trenchless methods including HDD or other appropriate methodologies.</li> </ul>	N
SNF U00 8	17/07/23	National Farmers Union	Project Description	Heat Dissipation – Heat dissipation, which can impact the land for the lifetime of the project, is a concern among farmers	The transmission of electricity results in small energy losses in the form of heat dissipation. However, the design of the onshore cable system would seek to minimise any energy losses.	N

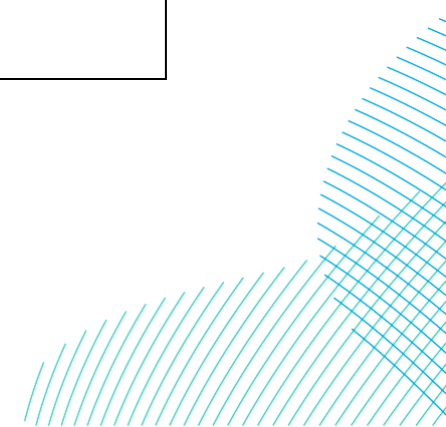


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				<p>affected by the scheme. We have seen examples of heat dissipation on previous underground cable schemes and they can have a significant impact on the crops growing in affected fields, such as crops growing at different rates, significantly complicating agricultural operations. The PIER states that the effects of soil heating are only likely to occur directly above the onshore export cables. Based on the study of agricultural land, up to 1,321.28ha is potentially affected should the Projects be taken forward it also states that the potential impact of any potential soil heating on agricultural production may negatively affect crop growth.</p> <p>The Pier states that the design of the onshore cable system seeks to minimise any energy losses. Depending on the thermal resistivity of the soil and the height of the water table, it is likely that a stabilised backfill such as cement bound sand (CBS) would be required to encase the cable ducts</p> <p>Please can you confirm the measures taken to reduce the impact of heat dissipation on the scheme?</p>	<p>Depending on the thermal resistivity of the soil and the height of the water table, it is likely that a stabilised backfill such as cement bound sand (CBS) would be required to encase the cable ducts. This is commonly used to ensure that the thermal conductivity of the material around the cables is of a known consistent value for the length of the installation. CBS has a low thermal resistance to conduct the heat produced during electricity transmission. Any effect on soil heating would be highly localised to the area immediately surrounding the cable system. Where laid in trenches, cables would be buried at an indicative depth of 1.6m, with the principal root growth zone generally accepted to be within the first 50mm of the soil from the surface. In addition, the use of CBS would remove any material heat transfer from the cables to the surrounding environment.</p> <p>Operation of the onshore cable would result in no change in the temperature at the ground surface or first 50mm of soil. Overall, therefore no impact is anticipated. As detailed in section 21.6.2.6 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>.</p>	
SNF U009	17/07/23	National Farmers Union	Terrestrial Ecology and Ornithology	Biodiversity Net Gain – The NFU notes in section 18.4.7 within Chapter 18 of the PIER that RWE is	Noted. BNG proposals are included within <b>Volume 7, Appendix 18-10 Biodiversity Net Gain Strategy (application ref: 7.18.18.10)</b> . The overall approach to BNG is based on habitat loss which will be reinstated between Jointing Bays, within two years	N



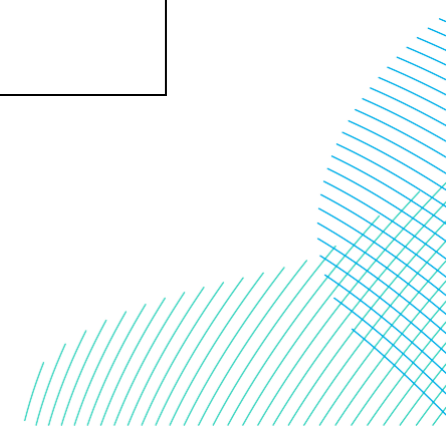


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				<p>'cognisant of the good practice in respect of BNG and will align where practicable with the ten principles developed by CIEEM, IEMA and CIRIA.' Principle 5 is to make a measurable Biodiversity Net Gain contribution, while principle 8 is to ensure net gain generates long-term benefits. Please can you confirm whether RWE is intending to deliver Biodiversity Net Gain on the project? The NFU does not support compulsory acquisition if any agricultural land for the purposes of delivering biodiversity net gain. If the project needs to acquire additional land to deliver such gain, then this should be acquired through voluntary negotiations.</p>	<p>from the start of construction and all Temporary Construction Compounds and Haul Roads which will be removed and habitats reinstated when construction has been completed. A Landscape Management Plan, which seeks to balance landscaping, biodiversity and the return of areas to agriculture within the Substation Zone is included in <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b>. This also includes landscaping along the Onshore Export Cable Corridor to replant hedgerows. The Applicant will be seeking to achieve no net loss and a net gain, where possible. Opportunities to achieve this are being developed outside of the Onshore Development Area working with partners and projects to identify suitable habitats to achieve this through agreements with landowners and consultation with the Local Planning Authority.</p>	
SNF UO1 1	17/07/23	National Farmers Union	Land Use	<p>The NFU also feels strongly that the impact the project will have on agricultural businesses needs to be considered in the development of the project. Section 21.6.1.2.5 within Chapter 21 of the PIER (land use) states that access to severed land will be maintained where practicable, subject to individual agreements with landowners and occupiers. In the worst-case scenario, the onshore export cable corridor would be fenced for the entire duration of the construction works, which could be between 33 and 57 months. There must be discussions with landowners and occupiers on timings of construction, including how access</p>	<p>Refinement of the Onshore Development Area has led to a reduction in the area of agricultural land that may be impacted by the Projects on a temporary or permanent basis. The impact assessment has been updated to reflect both the refinement of the Onshore Development Area and embedded mitigation measures including the reinstatement of land between Jointing Bays within two years of the start of construction (see Table 21.3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>). Additional mitigation measures including ongoing liaison with landowners / occupiers, will be implemented where practicable to reduce the potential impacts further (see section 21.6 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>).</p>	N

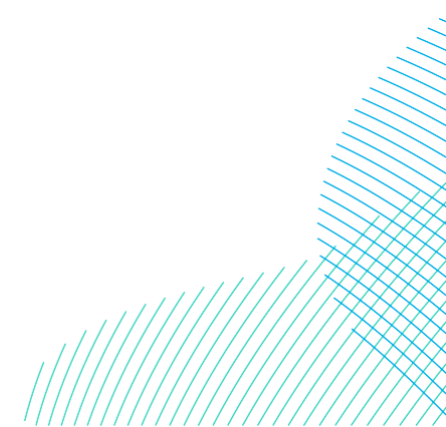


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				will be achieved across the working strip so that agricultural businesses maintain access to all land on the holding. This will help to reduce disruption to Agri holdings. We also note that within Section 21.6.1.4, the refinement of the Onshore Development Area will take into consideration land parcels managed under agri-environment agreements, with a view to avoid these areas where possible.		
SNF U01 2	17/07/23	National Farmers Union	Land Use	Outline Code of Construction – The NFU notes and is pleased to see that an Outline Code of Construction Practice has been prepared and will be submitted with the DCO application. At section 21.6.1.1.5, it states that RWE will appoint an Agricultural Liaison Officer (ALO) and/or a land drainage consultant to develop both pre and post-construction drainage plans. The NFU is pleased to see this, but it is essential and a preference that you appoint a local drainage consultant as the ALO will only be able to coordinate works with the consultant, contractor and the farmer. We also note that the outline Code of Construction Practice (COCP) has a section at 4.3 covering Agricultural Operations and that the ALO will gather information on existing agricultural management and soil/land conditions to be verified and recorded within a detailed pre	An Agricultural Liaison Officer (ALO) from Dalcour Maclaren has been deployed by the Projects throughout 2023-2024 to oversee the intrusive and non-intrusive survey campaign across the summer, which has been welcomed by affected landowners and will continue to engage throughout development and construction of the Projects.  Land Drainage Consultancy Ltd have also been appointed to develop conceptual pre- and post-construction drainage plans that will be shared with the main works contractor once appointed to implement where reasonably practicable. These will be developed with landowners and agents outside the limitations of the DCO and will be agreed by private treaty, committed to as part of the Option Agreements. <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> is included with the application. Pre-construction drainage would be installed to manage water coming from existing underground land drainage pipes which would be affected by the installation of the new Onshore Export Cables. Following installation of the Onshore Export Cables, the post-construction drainage program would commence to ensure that soils affected by the Onshore Export Cable corridor are left in a condition that enables a return within the affected fields to full agricultural production. Where necessary, post-construction drains may be installed, typically parallel to the Onshore Export Cable Corridor. <b>Volume 8, Appendix A - Outline Soil Management Plan (OSMP)</b> is included in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> .	N

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				<p>-construction condition survey. The ALO will help with agreeing reinstatement measures during construction and following completion of works. The NFU is pleased to this that this will be carried out but further details are required. We note that at section at 4.1 covers Soil Management. The NFU is pleased to see that this section has been included but the detail is lacking on what will be needed in a pre-soil statement and how after care will be carried out. This work is essential and the NFU has specific wording that it would like to see agreed, which covers practical matters and forms an interface document. The NFU would welcome the opportunity to engage with RWE on this and for the wording to be included within the Outline Code of Construction, so that it is taken forward and becomes binding on contractors under the Code of Construction. The NFU wording covers the following:</p> <ul style="list-style-type: none"> <li>a) Role of an Agricultural Liaison Officer</li> <li>b) Records of Condition</li> <li>c) Biosecurity</li> <li>d) Irrigation</li> <li>e) Agricultural Land Drainage</li> <li>f) Treatment of Soils</li> <li>g) Agricultural Water Supplies</li> </ul>		
SNF U01 3	17/07/23	National Farmers Union	Land Use	NFU Engagement – We would like to engage further with RWE on behalf of members that may be	The Applicants wish to thank the NFU for a detailed feedback submission which has been considered in the development of the Projects. The lands team have held a number of Landowner interest Group (LiG) meetings	Y-M



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				affected by the proposed scheme. The NFU would like to arrange a meeting with the project team as soon as possible to discuss and obtain further information on the points raised in this consultation response, specifically link boxes, the easement, construction width and construction programme.	including representation from the NFU from the release of HoT stage (Q1 2024) and have been able to agree a template set of HoT with the LIG who represent a large percentage of affected landowners on the cable corridor. RWE welcome NFU to provide precedent positions / clauses agreed with other developers to get ahead of the curve with regard to negotiations for HoT. NFU can provide certain wording including the interface document.	
SNFF 000 1	18/07/2023	National Federation of Fishermen's Organisations	Fish and Shellfish Ecology	1) The following comments are in reference to the Fish and Shellfish Ecology chapter of the PEIR, Chapter 11, Volume I and the Fish and Shellfish Ecology Technical Report, Appendix 11.1, Volume III.	Noted.	N
SNFF 000 2	18/07/2023	National Federation of Fishermen's Organisations	Fish and Shellfish Ecology	We welcome the approach taken within this chapter to assess impacts for all of the potential construction scenarios for both developments.	Noted	N
SNFF 000 3	18/07/2023	National Federation of Fishermen's Organisations	Fish and Shellfish Ecology	We are concerned with many of the data sources used to characterise the baseline environment within this chapter, however. Landings data have been presented to aid in characterising the fish and shellfish baseline environment, but only from the UK fleet. The Dogger Bank region supports a significant number of vessels from the EU fleet and inclusion of their data within the PEIR would further enhance the characterisation of the baseline environment.	UK fleet landings data have been investigated within this chapter alongside International Bottom Trawl Data and the Project specific benthic survey data in order to establish species present within the region. As non-UK fleet data is not considered likely to identify additional common species within the region these data are not considered within this chapter, but have been investigated in detail within <b>Volume7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> .	N



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SNFF 000 4	18/07/2023	National Federation of Fishermen's Organisations	Fish and Shellfish Ecology	2) The decision to aggregate the landings data for the reference period into a total value/tonnage does not accurately represent the inter-annual variation in these fisheries. Fisheries Dependent Data are also strongly influenced by factors outside of stock dynamics (e.g. spatial and legislative restrictions) and should be treated with caution. As these data are a primary source used to characterise the fish and shellfish baseline environment in the PEIR, we would expect to see a more precautionary approach taken when assessing potential impacts to the receptors identified.	When establishing a baseline for Fish and Shellfish Ecology exact tonnage and value of individual fisheries, the identification of specific species present is the primary extract of the landings data datasets. To avoid confusion landings values have been excluded from <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.5.2. Further consideration as to tonnage and value of fisheries is given in <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> .	N
SNFF 000 5	18/07/2023	National Federation of Fishermen's Organisations	Fish and Shellfish Ecology	3) There are no site-specific surveys undertaken to aid in characterising the fish and shellfish baseline environment here. A desk-based study should address the pedigree of data being used, including the specific spatial and temporal characteristics of the examples cited. For example, more caution is needed in using Roach <i>et al.</i> , (2022) with regard to impacts on lobster, since the habitat found in the study site in that paper is very different from that observed at the Dogger bank region.	A number of fish and shellfish species were identified during the site-specific benthic ecology surveys. All fish and shellfish species identified within these surveys have been included within their receptor groups, as presented within <b>Volume 7, Appendix 10-2 Fish and Shellfish Ecology Technical Appendix (application ref: 7.10.10.2)</b> . Findings made within Roach <i>et al.</i> (2022) have not been used in the determination of impact throughout the report, however acknowledgement of the differences in habitat type have been included within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.5.3.4.2.	N
SNFF 000 6	18/07/2023	National Federation of Fishermen's Organisations	Fish and Shellfish Ecology	4) The reliance of offshore wind impact assessments on Coull <i>et al.</i> , (1998) and Ellis <i>et al.</i> , (2012) has been called into question in nearly all our responses to offshore	Both Coull <i>et al.</i> , 1998, and Ellis <i>et al.</i> , 2012 are the most informative studies published to date on spawning extent of fish species in UK waters, however additional text has been added to <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.5.2. to acknowledge time since publication. Through this report they have been complimented by baseline data from additional	N

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				development licensing and planning reports. These data are 25 and 12 years old respectively, but seem to be used as a 'gold standard' to assess impacts on spawning and nursery grounds. We would expect to see a more precautionary use of these data, based on those papers' well described limitations.	sources, and the modelling of herring and sandeel habitat and spawning grounds as described within Reach <i>et al.</i> , 2014. The use of these papers has been complimented by the MMO in received comments.	
SNFF 000 7	18/07/2023	National Federation of Fishermen's Organisations	Fish and Shellfish Ecology	5) There is minimal site-specific and contemporary data here that can support the assessments made within this chapter and few precautions taken when assessing impacts and drawing conclusions, suggesting an insufficiently robust approach.	Fish and shellfish species identified within the site-specific benthic ecology surveys have been included within the Fish and Shellfish Ecology baseline, with information on these species provided within <b>Volume 7, Appendix 10-2 Fish and Shellfish Ecology Technical Appendix (application ref: 7.10.10.2)</b> .	N
SNFF 000 8	18/07/2023	National Federation of Fishermen's Organisations	Fish and Shellfish Ecology	6) Minimal data has been presented in the PEIR with regards to potential impacts to fish and shellfish (excluding elasmobranch) receptors, yet any proposed impacts have been assessed as being 'negligible'/'minor adverse' in all cases, with no mitigation proposed. A paucity of data and evidence should lead to caution when assessing impacts to the described receptors. Acknowledging the limitations of the data but subsequently ignoring them and treating that data as concrete evidence, with no caveats, misinforms the assessment of the impacts and calls into question their validity.	Additional data relevant to fish and shellfish species identified within the site-specific benthic ecology surveys have been included within the Fish and Shellfish Ecology baseline, with information on these species provided within <b>Volume 7, Appendix 10-2 Fish and Shellfish Ecology Appendix (application ref: 7.10.10.2)</b> . Assessment of impacts have been made using available data and established approaches, as defined within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.4.2.	N

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SNFF 0009	18/07/2023	National Federation of Fishermen's Organisations	Fish and Shellfish Ecology	7) Projects scoped into the cumulative assessment did not include the Hornsea Four project. The construction period for Dogger Bank South is likely to overlap with pre-construction and construction of Hornsea Four, so cumulative impacts with this development should be scoped in.	Hornsea Four has been included within the cumulative assessment within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.7.2.	Y-M
SNFF 0010	18/07/2023	National Federation of Fishermen's Organisations	Fish and Shellfish Ecology	8) The assessment of the impacts of fisheries exclusion and potential increased effort in surrounding areas is welcome. There is very little evidence presented to support the conclusions drawn in this section, however. Spill-over and fishing the line effects needs to be assessed correctly, with supporting examples relevant to what is likely to be observed at this particular site, if the assessment is to have validity.	As the array falls within the Dogger Bank SAC Bylaw (bottom-towed fishing gear) area, it is not possible for fishing the line to occur. A full assessment of impacts on commercial fisheries is considered within <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> .	N
SNFF 0011	18/07/2023	National Federation of Fishermen's Organisations	Fish and Shellfish Ecology	9) We are concerned with the lack of fish and shellfish species monitoring proposed. The justification given is that landings data will highlight any impacts of the development on the populations in the region. As described earlier, fisheries dependent data is influenced by many factors and should be interpreted with caution when used solely to assess impacts at a site/stock level. Additionally, the spatial restriction on fisheries in the region from other developments and legislative restrictions will	A requirement for Fish and Shellfish monitoring was not determined as being necessary during the scoping stage of the Projects following public consultation. IBTS data, and fish and shellfish observations made during the site specific benthic monitoring surveys, have been used to supplement fisheries landings data to ensure that non-commercial species are included within this assessment. The overlap with spawning grounds is considered minor at a population level, as is determined within the assessment of Permanent Loss of Habitat. Whilst the array may be located within spawning/nursery grounds of a given species, it does not encroach across any spawning/nursery grounds as a whole. The footprint of the Projects (where there is direct interaction with the seabed) comprises only a portion of the overall Offshore Development Area as a whole, further reducing interaction with spawning/nursery grounds. As impacts on fish and shellfish are determined to be negligible or minor, no further monitoring is proposed during or following construction.	N

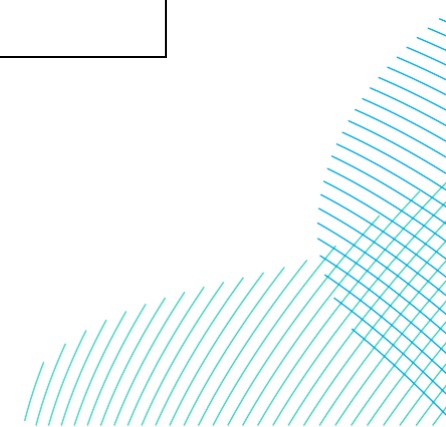
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				influence these data and may mask a signal of an impact/effect from the development. The proposed development completely overlaps key spawning and nursery grounds for several key species, yet impacts to these receptors has been assessed as minor adverse at worse due to the impact being a localised effect. The evidence does not support this assumption.		
SNFF 001 2	18/07/2023	National Federation of Fishermen's Organisations	Fish and Shellfish Ecology	10) The PEIR highlights the importance of the region to shellfish species (crab, lobster and scallop), however no evidence as to their distribution in the region is presented. We would expect to see this information included in the analysis.	The presence of these species is noted within the region, and they have been included within the Shellfish receptor group as presented within <b>Volume 7, Appendix 10-2 Fish and Shellfish Ecology Technical Appendix (application ref: 7.10.10.2)</b> .	N
SNFF 001 3	18/07/2023	National Federation of Fishermen's Organisations	Fish and Shellfish Ecology	We acknowledge the difficulties with the lack of site-specific, contemporary data, but we would expect to see some element of precaution taken when assessing impacts on fish and shellfish ecology, especially when that assessment is informed by studies which employed methodologies inappropriate to this task.	Additional site-specific and contemporary data relevant to fish and shellfish species identified within the benthic ecology surveys have been included within the Fish and Shellfish Ecology baseline, with information on these species provided within <b>Volume 7, Appendix 10-2 Fish and Shellfish Ecology Technical Appendix (application ref: 7.10.10.2)</b> . The assessment of impact is described within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.4. To ensure a precautionary approach, a worse case scenario is assessed for all impacts, as described within <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> , section 10.3.2.	N
SNFF 001 4	18/07/2023	National Federation of Fishermen's Organisations	Commercial Fisheries	11) The following comments are in reference to the Commercial Fisheries chapter of the PEIR, Volume I, Chapter 14 and the Commercial Fisheries Technical Baseline Report, Volume III, Appendix 14.1. The proposed Dogger Bank South	These comments are noted. <b>Volume 8, Outline Fisheries Liaison and Co-existence Plan (application ref: 8.28)</b> has been submitted as part of the application process). Responses on the outline plan have been requested from commercial fisheries stakeholders in consultation with the CFWG and those identified in the fisheries baseline study. Assumptions and limitations of the assessment are presented in section 13.4.6 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> .	N



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				wind farm and export cable sites support a diverse and economically important fishing fleet. This is well characterised within the PEIR. We welcome also the inclusion of fisheries-based data within the PEIR and the commitment to the development of a Fisheries Liaison and Co-Existence Plan. We would like to see the latter developed with all fisheries stakeholders in the region. The PEIR addresses data limitations and presents the fisheries baseline well within this context.		
SNFF 001 5	18/07/2023	National Federation of Fishermen's Organisations	Commercial Fisheries	The assessment of potential impacts makes several assumptions and conclusions that we disagree with when reviewing the data presented and feedback from our members in the region, however.	Noted	N
SNFF 001 6	18/07/2023	National Federation of Fishermen's Organisations	Commercial Fisheries	12) Section 13.6.1 assesses impacts to the receptors and assigns a level of significance in EIA terms. It is this assessment that is of concern. An economic loss to a receptor of 5-20% is assessed as being a low impact and 20-50% as a medium impact. An economic loss of up to 50% would result in business failure of any fisheries business. This must surely be a high impact. This would need a far greater level of mitigation than what is proposed within the PEIR. The proposed mitigation	In response to consultation with the CFWG, the low magnitude of impact definition has been updated within Table 13-11 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> to cover a potential loss of revenue of between 5-10%, while the medium magnitude of impact definition now covers a potential loss of revenue of between 11-50%. Estimated percentage reduction in annual value of landings valuations are informed by expert judgement that is based on data analysis, stakeholder feedback, the array layouts presented and how these may affect fishing activity.  Effects of moderate adverse significance are predicted for the inshore static gear vessels and dredge vessels during construction and decommissioning for loss or restricted access to fishing grounds within the Offshore Export Cable Corridor. Additional mitigation includes cooperation agreements and associated disruption payments in accordance with FLOWW guidance. If successfully implemented, these	Y-M

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				(embedded and additional) would not be acceptable in the context of up to a 50% loss of earnings.	measures would reduce the significance of effect to minor adverse which is not significant in EIA terms. These impacts are presented within section 13.6.1.1.4 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> and additional mitigation measures are detailed within section 13.6.1.1.5 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> .	
SNFF 001 7	18/07/2023	National Federation of Fishermen's Organisations	Commercial Fisheries	13) The proposed mitigation measure of developing co-existence methods with those receptors most affected may actually not be possible. For example: the inshore dredge sector has been assessed as medium sensitivity, however the target burial depth of cabling is 0.5-1.0 m, which is very shallow and may deter the dredge fleet from fishing in the region during the operational phase, resulting in exclusion and a lack of co-existence. We would expect to see the potential economic losses to fishing businesses assessed in relation to their resilience to the predicted economic losses occasioned by the development.	The dredge penetration depth of 20cm has been reported through Project-specific stakeholder engagement, cables have been buried at a minimum depth of 0.5m is not expected to deter the scallop dredge fleet from such sites. A minimum burial depth of 0.5m for cables is standard across all OWF projects in the UK. The Applicants have committed to the development of a cable burial plan, to outline target cable burial depth, cable protection and monitoring of cables. The cable burial plan would be secured through a condition in the marine licence. Potential loss or damage to fishing gear due to snagging during operation has been assessed within the ES for the dredge fleet receptor group separately, within section 13.6.2.4 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> . In response to consultation with the CFWG, the low magnitude of impact definition has been updated in the ES, to cover a potential loss of revenue of between 5-10%, while the medium magnitude of impact definition now covers a potential loss of revenue of between 11-50%. As such, potential economic losses to commercial fisheries have been assessed accorded to these revised definitions.	N
SNFF 001 8	18/07/2023	National Federation of Fishermen's Organisations	Commercial Fisheries	Table 13-3: it is unclear what is meant by best practice with regards to fisheries liaison. We would expect to see the most recent FLOWW guideline referred to here, for greater clarity, for example.	The most recently available FLOWW best practise guidance with regards to fisheries liaison has been adhered to with the ES. Updated FLOWW best practise guidelines are expected to be released in 2024, which would be reviewed and adhered to throughout the Project's lifetime where possible. Table 13-3 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> has been updated to include a cross-reference to the FLOWW best practice guidelines outlined in section 13.4.1.2 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> . <b>Volume 8, Outline Fisheries Liaison and Co-existence Plan (application ref: 8.28)</b> has been submitted as part of the application process. Responses on the outline plan have been requested from commercial fisheries stakeholders in consultation with the CFWG and those identified in the fisheries baseline study.	N

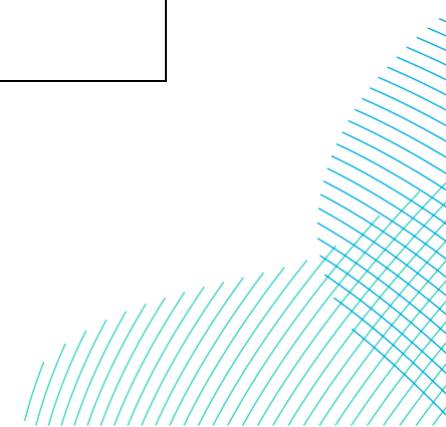
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SNFF 001 9	18/07/2023	National Federation of Fishermen's Organisations	Commercial Fisheries	14) We disagree with the assessment of displacement effects. Commercial fisheries in the region, both UK and EU fleets, are already subject to extensive spatial restrictions. The displacement effects of this development and others within the Dogger Bank region will have a continued effect on all commercial fisheries and this needs to be assessed correctly.	Displacement effects have been discussed further in commercial fisheries working group meetings. Displacement effects have been assessed in section 13.8 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> .  Impacts of displacement leading to increased gear conflict and pressure on adjacent fishing grounds are assessed to be, at worst, of a minor adverse effect which is not significant in EIA terms.	N
SNFF 002 0	18/07/2023	National Federation of Fishermen's Organisations	Commercial Fisheries	15) The Hornsea Four development should be scoped into the cumulative assessment, as fishers are already seeing both developments operating in the same spatial regions, specifically the export cable route.	Noted, potential cumulative effects with Hornsea Project Four, a Tier 3 project, have been considered in section 13.8 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> .	Y-M
SNFF 002 1	18/07/2023	National Federation of Fishermen's Organisations	Commercial Fisheries	16) It is welcome that the potential for benefit to fishing businesses of supply chain opportunities is assessed. There must be some scepticism here, however, as such benefits are not currently being delivered through the pre-construction surveys for this project. Non-local vessels, with foreign crew, are acting as guard and chase vessels and these have difficulty disseminating information at sea, inhibiting rapid and safe resolution of issues. As this is proposed as a potential mitigation measure, we would expect to see the practice of using non-local vessels replaced with ensuring only guard vessels and	The Projects acknowledge the benefits of using local vessels and crews to deliver safe and effective activities. It should be noted it is the Projects primary choice to use local vessels and crew, it is also highlighted all guard vessels deployed to date on the Projects had a crew of UK nationals (English or Scottish), with at least one local crew member at all times.  Supply chain opportunities for local fishing vessels are assessed in sections 13.6.1.5 and 13.6.2.5 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> . Minor beneficial impacts are assessed for demersal seine, dredge, otter trawl, pelagic trawl and offshore static gear vessels across all phases of the Projects.	N



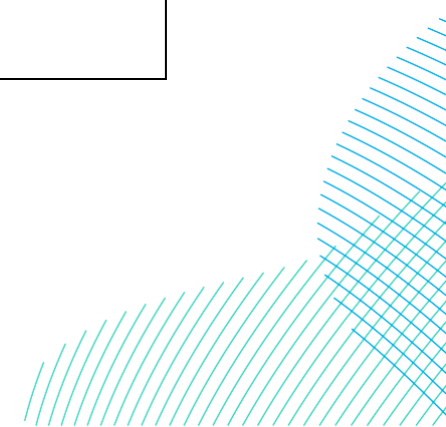
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				FLOs with local expertise are employed.		
SNFF 002 2	18/07/2023	National Federation of Fishermen's Organisations	Commercial Fisheries	17) The commercial fisheries in the region can expect to see a vastly changing landscape through the lifespan of the Dogger Bank South project. The spatial squeeze on fisheries due to offshore developments in the region is already extensive and the likelihood of further restrictions with regards to the current ban on all mobile gear within the SAC and potential bans on mobile gear within MCZs also envisaged. Factors associated with the renegotiation of the Trade and Cooperation Agreement and consequent changes in access arrangements for EU vessels will also affect commercial fishing opportunities in the region. Whilst these elements are acknowledged in the PEIR as possible factors, they are not accounted for in the impact assessments.	<p>Future trends are discussed within section 13.5.6 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> and in detail within <b>Volume 7, Appendix 13-1 Commercial Fisheries Technical Report (application ref: 7.13.13.1)</b>. Most notably the introduction of the Dogger Bank SAC byelaw is discussed within this section and several scenarios are considered within the impact assessment: firstly, the Dogger Bank SAC byelaw is in place which prohibits bottom towed gear within the entire SAC; secondly, a scenario where the Dogger Bank SAC byelaw is revoked and bottom fishing activity is permitted again within the boundary of the SAC; and thirdly for the Offshore Export Cable Corridor (where the only overlap with the Dogger Bank SAC byelaw is the easternmost option of the DBS East and DBS West Export Cable Routes).</p> <p>It is expected that the UK will receive higher fishing quotas as result of the new EU UK Trade and Cooperation Agreement. However, as a large proportion of the species landed within the Commercial Fisheries Study Area are non-quota shellfish species, they will not be affected by this agreement and no change is expected within the impact assessment.</p> <p>Further investigation into the quota uplift from leaving the Common Fisheries Policy is assessed in <b>Volume 7, Appendix 13-2 (application ref: 7.13.13.2)</b>. Spatial squeeze on fisheries due to offshore developments in the North Sea, including the possibility of further restrictions with regards to the potential ban on all mobile gear within MCZs, have been assessed as part of the cumulative effects assessment, within section 13.8 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b>.</p>	Y-M
SNFF 002 3	18/07/2023	National Federation of Fishermen's Organisations	Commercial Fisheries	18) It is recognised that the PEIR characterises a commercial fisheries baseline by analysing many different data sources to describe and analyse the commercial fisheries impact, including stakeholder expertise. The limitations of the data are well understood and described. The assumptions made, and subsequent impacts assessed from these data, do not align with	In response to consultation with the CFWG, and in recognition of the limitations of the available data, the low magnitude of impact definition has been updated in <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> , to cover a potential loss of revenue of between 5-10%, while the medium magnitude of impact definition now covers a potential loss of revenue of between 11-50%. As such, potential economic losses to commercial fisheries have been assessed accorded to these revised definitions.	Y-M

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				the level of economic impact assessed, however, and we do not agree with them.		
SNFF 002 4	18/07/2023	National Federation of Fishermen's Organisations	Commercial Fisheries	19) In fisheries management, a precautionary principle is enacted where there is a paucity of relevant data or significant uncertainties. This does not seem to be the case for impact assessments. Limitations of data are acknowledged but do not seem to influence the outcomes of impact assessments: a flaw in the methodological design and interpretation.	Section 13.4.6 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> outlines the limitations in detail and also states that where there may be limitations in data, findings have been supplemented by project-specific consultation feedback from commercial fisheries stakeholders. Data sources were presented to fisheries stakeholders during the CFWG meetings, and discussed during port visits. For example, with regard to the MMO VMS data, it was concluded that official data sources generally align with fisheries stakeholders understanding of fishing patterns, but it was noted and agreed that inshore fishing is likely to be under-represented by these data. For the inshore fleets and pelagic trawl fleets, site specific marine traffic and scouting surveys have been used to inform the existing environment and support official data sources, using an accepted approach similar to that of other offshore wind farm applications.  The magnitude of impact definitions have purposely used a range, i.e. between 5-10% of potential loss of revenue, as it is recognised that the estimates are based on data with various limitations and assumptions (which are outlined in the <b>Volume 7, Appendix 13-1 Commercial Fisheries Technical Report (application ref: 7.13.13.1)</b> ).	N
SNFF 002 5	18/07/2023	National Federation of Fishermen's Organisations	Commercial Fisheries	20) Whilst we appreciate the difficulties in assessing impacts with limited data sources, we feel that the effects of this needs to be fully accounted for in the methodology. This development will have a direct impact on commercial fisheries and their communities, and we feel the PEIR under-represent these.	Response to the above comment also applies here. In addition to the above, we have recently received additional VMS data from various organisations that are active within the commercial fisheries study area. Site specific marine traffic and scouting surveys have also been undertaken to further inform the existing environment for the inshore fleets and pelagic trawl fleets, for which VMS data is likely to be underrepresented. This has been incorporated into <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> .	N
SNG 001	14/07/23	National Gas Transmission	Other Marine Users	1. Please find attached a Holding Objection:  Unfortunately I am unable to view the plans provided, but I have cross referenced NGT's mapping system with the route map, and there	A meeting between the Projects and National Gas was held on 17th May 2023. NGT's concerns raised within their Section 42 response were discussed in detail within this meeting and it was agreed that subject to agreement on a form of Protective Provisions for inclusion within the Order, NGT's concerns could be resolved. Protective Provisions in an agreed form will provide necessary approvals processes of plans, drawings and information required by NGT to protect their	N

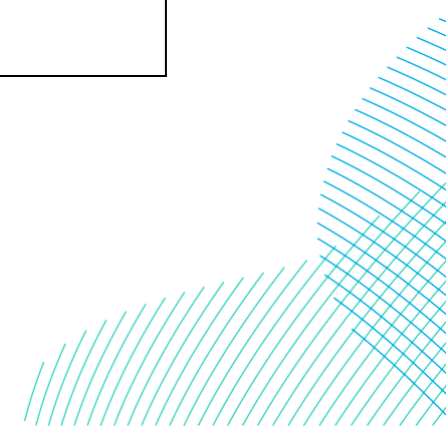
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				<p>appears to be multiple points of interaction with the project and NGT's assets.</p> <p>The approximate grid references for the interactions are as follows:            FM6 Burton Agnes to Beeford            X: 514585 Y:453024</p> <p>FM6: Beeford to South Skirlaugh            X: 514647 Y:450424            with a parallel run to            X:514816 Y:446069</p> <p>FM29 Ganstead to Asselby            Large area of interaction around            X: 502338 Y:436348</p> <p>National Gas Transmission's pipelines have an easement in operation, and formal written permission in the form of a "deed of consent" will be required to install the cable over the easements. The deed of consent must be completed before the installation can begin.</p> <p>To grant a deed of consent, the following will be required:</p> <ul style="list-style-type: none"> <li>• The specifications of the cable (voltage and intended burial depth)</li> <li>• A RAMS for the installation of the cable with specific reference to the NGT pipeline.</li> <li>• A route drawing with the crossing points clearly marked with a grid reference.</li> <li>• Trial holes must be carried out on each crossing point to positively</li> </ul>	<p>apparatus from any impact. The Applicants are in discussions with NGT on a form of Protective Provisions for inclusion within the Order.</p>	



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				<p>identify the depth of the pipeline at each location. The trial holes are to be facilitated by the crossing party, but will be monitored by a NGT responsible person.</p> <ul style="list-style-type: none"> <li>• A cross sectional drawing which shows the separation distance between the cable and the pipeline. The separation distance will depend on the voltage of the cable.</li> <li>• If the required separation distance isn't achievable above the pipeline, the cable must be routed below.</li> <li>• Details of any plant or machinery crossing the pipeline during installation must be provided. Protective matting may be required on the crossing points.</li> <li>• Pre and post energisation surveys are to be carried out to ensure that the cable doesn't cause interference with the pipelines' cathodic protection system.</li> <li>• A letter of intent and budget estimate are to be signed and returned to me. The crossing party is to accept and costs incurred by NGT as a result of the project.</li> </ul> <p>An engineer would be happy to attend a Teams call to discuss any of the above points, please feel free to contact him on and he will arrange a meeting.</p>		
SNG ETO 01	17/07/23	National Grid Electricity Transmission	Land Use	Where the Promoter intends to acquire land, extinguish rights, or interfere with or work within close proximity to any of NGET's apparatus and land, this will	Noted.	N

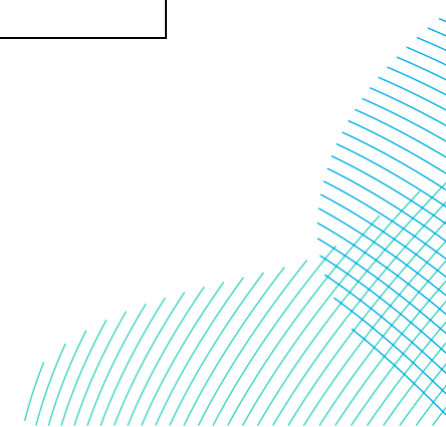


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				require appropriate protection and further discussion on the impact to its apparatus and rights.		
SNG ETO 02	17/07/23	National Grid Electricity Transmission	Land Use	<p>National Grid Electricity Transmission has high voltage electricity overhead transmission lines and substations within or in close proximity to the order boundary. The overhead lines and substations form an essential part of the electricity transmission network in England and Wales.</p> <p>Substation</p> <ul style="list-style-type: none"> <li>- Creyke Beck Substation</li> <li>- Associated overhead and underground apparatus including cables</li> </ul> <p>Overhead Lines</p> <p>4ZQ 400kV OHL</p> <ul style="list-style-type: none"> <li>- Creyke Beck - Humber Refinery - Keadby 1</li> <li>- Creyke Beck - Keadby - Killinghome 2</li> </ul> <p>4ZR 400kV OHL</p> <ul style="list-style-type: none"> <li>- Creyke Beck - Thornton 1</li> <li>- Creyke Beck - Thornton 2</li> </ul> <p>YYW 275kV OHL</p> <ul style="list-style-type: none"> <li>- Creyke Beck - Salt End North 1</li> <li>- Creyke Beck - Hedon 2</li> </ul>	The Applicants are in discussions with NGET on a form of Protective Provisions for inclusion within the Order.	N
SNG ETO 03	17/07/23	National Grid Electricity Transmission	Land Use	North Humber to High Marnham NGET are proposing to build a new high voltage electricity transmission line and associated works between a new substation north of Hull at Creyke Beck in the	Engagement ongoing with NGET to discuss project interactions.	N



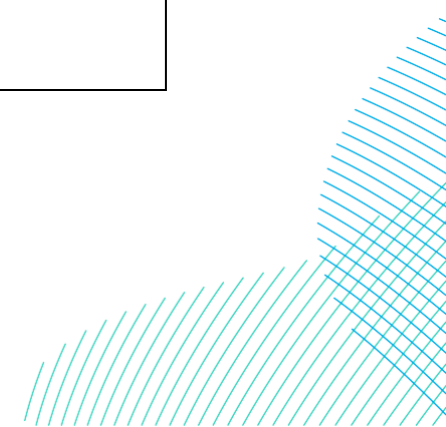


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				East Riding of Yorkshire and a new substation at High Marnham in Nottinghamshire. Details of the infrastructure project can be found on the NGET North Humber to High Marnham website. NGET asks for the promoter to continue with ongoing engagement and cooperation in respect to existing and future NGET assets and interests.		
SNG ETO 04	17/07/23	National Grid Electricity Transmission	Land Use	NGET are also proposing to extend the Creyke Beck substation and build a new substation on land to the northwest of the existing site to connect new customers to the network. Details of the proposed substation works can be found on the NGET Creyke Beck extension and new substation website.	Engagement ongoing with NGET to discuss project interactions.	N
SNG ETO 05	17/07/23	National Grid Electricity Transmission	Land Use	National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset	The Applicants are in discussions with NGET on a form of Protective Provisions for inclusion within the Order.	N
SNG ETO 06	17/07/23	National Grid Electricity Transmission	Land Use	Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 - 8 Technical Specification for	The Applicants are in discussions with NGET on a form of Protective Provisions for inclusion within the Order.	N

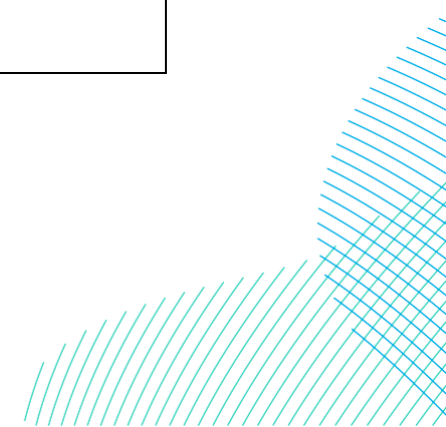


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				"overhead line clearances Issue 3 (2004).		
SNG ETO 07	17/07/23	National Grid Electricity Transmission	Land Use	If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.	The Applicants are in discussions with NGET on a form of Protective Provisions for inclusion within the Order.	N
SNG ETO 08	17/07/23	National Grid Electricity Transmission	Land Use	The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.	The Applicants are in discussions with NGET on a form of Protective Provisions for inclusion within the Order which will provide appropriate mechanisms for approval when working within proximity to NGET apparatus prior to construction. HSE safety guidance advised has been noted and construction works will be undertaken in line with this as noted within <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> .	N
SNG ETO 09	17/07/23	National Grid Electricity Transmission	Land Use	Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.	The Applicants are in discussions with NGET on a form of Protective Provisions for inclusion within the Order.	N
SNG ETO 10	17/07/23	National Grid Electricity Transmission	Land Use	If a landscaping scheme is proposed as part of the proposal, we request that only slow and low	The Applicants are in discussions with NGET on a form of Protective Provisions for inclusion within the Order. <b>Outline Landscape Management Plan</b> is included in	N

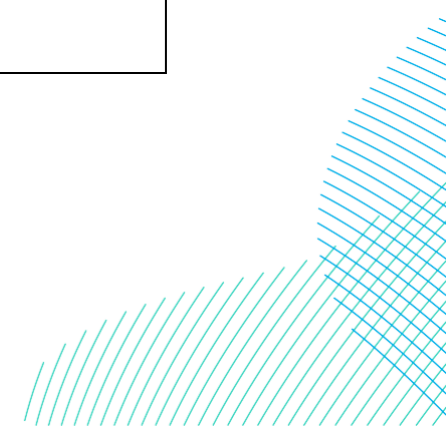
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				growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	<b>Volume 8 (application re 8.11)</b> , any planting under and OHL would be low growing and consider safety clearances.	
SNG ETO 11	17/07/23	National Grid Electricity Transmission	Land Use	Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.	The Applicants are in discussions with NGET on a form of Protective Provisions for inclusion within the Order.	N
SNG ETO 12	17/07/23	National Grid Electricity Transmission	Land Use	National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.	The Applicants are in discussions with NGET on a form of Protective Provisions for inclusion within the Order.	N
SNG ETO 13	17/07/23	National Grid Electricity Transmission	Land Use	Ground levels above our cables must not be altered in any way. Any alterations to the depth of our	The Applicants are in discussions with NGET on a form of Protective Provisions for inclusion within the Order.	N



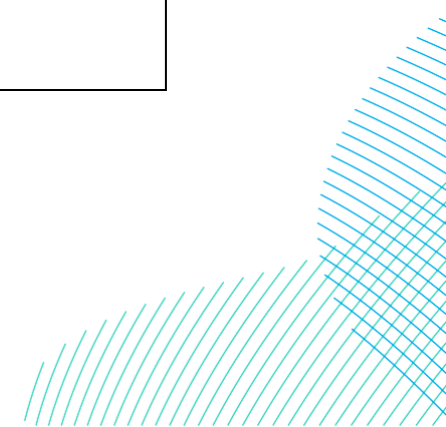
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				cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.		
SNH 001	17/07/2023	National Highways	Traffic and Transport	1) National Highways would expect that the standard procedure for [AIL]s will be followed by the Applicant, however, any potential carriageway width, height and weight restrictions for the movement of such vehicles will need to be discussed and agreed with National Highways. As such, we would advise that the Applicant directly discusses any matters pertaining to AIL movements with the National Highways Abnormal Indivisible Loads team (AbnormalIndivisibleLoadsTeam@nationalhighways.co.uk).	Following the Section 42 comments the Applicants have engaged further with National Highways upon this matter at an ETG (06/09/2023), during this meeting (detailed within <b>Volume 7, Chapter 24 Traffic and Access (application ref: 7.24)</b> , Table 24-1-1) the approach to the assessment of abnormal load movements was agreed.  Details of the approach to the assessment of abnormal loads is outlined within section 24.4.3.2.6 of <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> . Section 24.4.3.2.6 also confirms that National Highways have provided agreement in principle to the proposed route for abnormal loads.	Y-M
SNH 002	17/07/2023	National Highways	Traffic and Transport	2) The impact of the proposed development at the SRN over both the operational and construction phase must be understood in terms of absolute two-way flows over both morning / evening network peak hours. This is opposed to either total daily flows or proportional flows (percentage increase) in relation to baseline flows at any specific junction.	Following the Section 42 comments the Applicants have engaged further with National Highways at an ETG (06/09/2023), during this meeting (detailed within <b>Volume 7, Chapter 24 Traffic and Access (application ref: 7.24)</b> , (Table 24-1-1) the approach to the assessment of driver delay was agreed. Section 24.6.1.6 of <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> includes details of the agreed approach to the assessment of driver delay.  With regard to the Projects' operational phase, it has been agreed with National Highways at ETG on the 19/07/2021 (outlined Table 24-1-1) that operational impacts can be scoped out of the assessment. Table 24-2 of <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> provides details of the likely levels of operational traffic in support of the approach to scoping out operational traffic effects.	Y-M



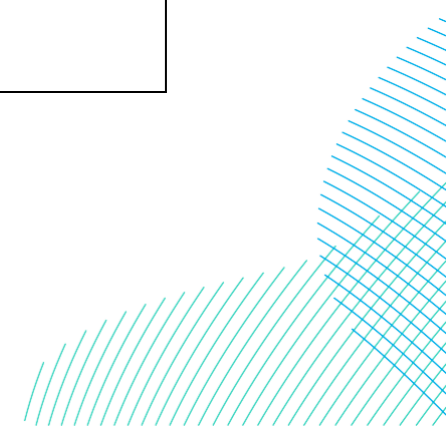
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SNH 003	17/07/2023	National Highways	Traffic and Transport	3) The appropriateness of any network baseline flows will only be commented on by National Highways at such a point whereby the proposed development is considered to incur a material impact at an SRN junction (>30 two-way trips over network peak hour), and subsequent junction modelling is required, if such a scenario arises.	Following the Section 42 comments the Applicants have engaged further with National Highways upon this matter at an ETG (06/09/2023), during this meeting (detailed later within this Table 24-1-1) the approach to data collection was agreed. Section 24.6.1.6 of <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> includes details of the agreed approach to the assessment of driver delay.	Y-M
SNH 004	17/07/2023	National Highways	Traffic and Transport	4) At this stage of the development scoping stage with overall highway impact yet to be fully agreed with National Highways, no further comment on the necessity of safety and collision data will be provided.	Following the Section 42 comments the Applicants have engaged further with National Highways upon this matter at an ETG (06/09/2023), during this meeting (detailed later within this Table 24-1-1) the approach to the assessment of road safety agreed.  Section 24.5.4 of <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> (and accompanying <b>Volume 7, Appendix 24-2 (application ref: 7.24.24.2)</b> ) presents an assessment of the baseline road safety conditions to identify links with higher than average collision rates (compared to National averages) and links where there are clusters of collisions. Section 24.6.1.4 of <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> presents an assessment of the effects of the Projects construction traffic upon road safety.	Y-M
SNH 005	17/07/2023	National Highways	Traffic and Transport	5) While the principle of first principles data is acceptable for the proposed scheme, further detail should be provided by the Applicant in relation to the specific first principles data underpinning the proposed development trip generation. For reference, National Highways would expect the first principles data to reflect a comparable development of comparable scale in a geographical location that largely reflects rural nature of the scheme area. Until this clarification is	Following the Section 42 comments the Applicants have engaged further with National Highways upon this matter at an ETG (06/09/2023), during this meeting (detailed later within this Table 24-1-1) the approach to the derivation of traffic demand was agreed.  <b>Volume 7, Appendix 24-2 (application ref: 7.24.24.2)</b> includes details of the approach to the derivation of construction traffic demand.	Y-M



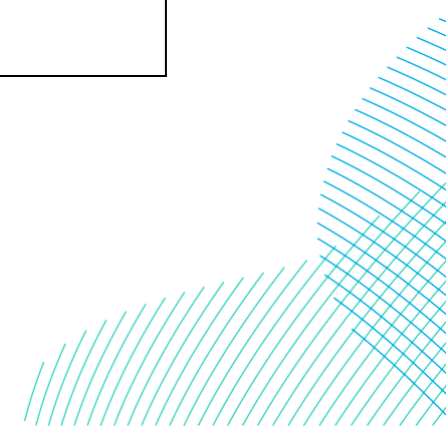
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				provided, the first principles data cannot be accepted.		
SNH 006	17/07/2023	National Highways	Traffic and Transport	6) National Highways will require confirmation of the expected 'peak' arrival / departure profile of construction vehicles, including construction staff, deliveries and associated movements during an identified 'peak' construction period, and how long this period may continue for, opposed to the generation of average movements or total daily / monthly movements. This is to ensure that any potential trip generation impact at the SRN can be accurately quantified as the development advances through the construction phase. This matter can be controlled through the production of a Construction Traffic Management Plan [CTMP].	An OCTMP is provided in support of the DCO application ( <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> ). The OCTMP includes a commitment to providing the information requested by National Highways.	Y-M
SNH 007	17/07/2023	National Highways	Traffic and Transport	7) The study area should extend to any SRN junction where a potential impact needs to be considered (to aid discussions National Highways suggest 30 two-way trips in a single hour being a starting point for consideration).	Following the Section 42 comments the Applicants have engaged further with National Highways upon this matter at an ETG (06/09/2023), during this meeting (detailed later within this Table 24-1-1) the extent of the TTSA was agreed.  Section 24.3.1 of <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> includes details of the approach to defining the extents of the TTSA.	Y-M
SNH 008	17/07/2023	National Highways	Traffic and Transport	8) National Highways will require highway assessment data applicable to the impact of the construction phase at the SRN to be quantified by way of AM / PM peak hour two-way trips at respective junctions, opposed to average daily flow values.	Following the Section 42 comments the Applicants have engaged further with National Highways at an ETG (06/09/2023), during this meeting (detailed later within this Table 24-1-1) the approach to the assessment of driver delay was agreed. Section 24.6.1.6 of <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> includes details of the agreed approach to the assessment of driver delay.	Y-M



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SNH 009	17/07/2023	National Highways	Traffic and Transport	9) The principle of utilising a gravity model to determine the proposed distribution of construction staff is accepted, however, National Highways would need to examine the model methodology in detail, i.e. via its original MS Excel format, before the subsequent distribution data can be accepted fully. The distribution of construction vehicle trips will need to be understood and agreed per SRN junction, opposed to simply the study area highway links proposed.	Following the Section 42 comments the Applicants have engaged further with National Highways at an ETG (06/09/2023), during this meeting (detailed later within this Table 24-1-1) the approach to the assessment of driver delay was agreed. Section 24.6.1.6 of <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> includes details of the agreed approach to the assessment of driver delay.	Y-M
SNE 245	17/07/2023	Natural England	Land Use	21.4.2.2: Natural England hold site specific data within the proposed red line DCO boundary. This should be used in conjunction with the applicants own ALC survey.  Please find enclosed the following ALC map and report, which lies within your area of interest.  Natural England Survey Ref: ALCL07990 Land at Tickton, Hall Farm	Post 1988 data for the area referred to has been included within the baseline environment section (Section 21.5 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> ).	N
SNE 001	17/07/2023	Natural England	Marine Physical Environment	Summary of Concerns: MPE & Geology and Land Quality  Based our experience of sustainable development impacts within the Dogger Bank sandbank and wider Northern North Sea, Natural England wishes to highlight the importance of marine physical processes in maintaining balanced coastal and marine ecosystems.	Project and site specific marine physical processes modelling has been undertaken, see <b>Volume 7, Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b> . The results of this modelling underpin the relevant assessments. Validation of results using empirical data has been undertaken where possible and relevant.	Y-M

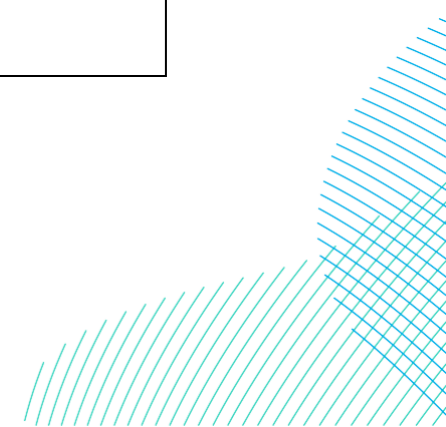


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				<p>Therefore, we advise that changes in marine physical processes are highly likely to have critical cross-cutting impacts across all thematic areas, with potential changes in marine physical processes impacting on benthic SAC/MCZ interest features and supporting habitats and prey availability for mobile Marine Protected Area interest features.</p> <p>Provide robust project and site specific modelling validated where possible from empirical evidence from adjacent windfarms and cables.</p>		
SNE 002	17/07/2023	Natural England	Marine Physical Environment	<p>Summary of Concerns: MPE &amp; Geology and Land Quality</p> <p>The marine physical environment baseline is incomplete. Natural England therefore cannot agree with the Conclusions of the PEIR at this time.</p> <p>Provide a robust baseline characterisation using site-specific data and including the latest modelling results</p>	<p>The marine physical environment baseline (section 8.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>) has been updated to include site specific survey data, the outputs of numerical modelling undertaken to support the ES (see <b>Volume 7, Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b>) and updated information and data shared through the consultation process.</p>	Y-M
SNE 003	17/07/2023	Natural England	Marine Physical Environment	<p>Summary of Concerns: MPE &amp; Geology and Land Quality</p> <p>Changes to the Flamborough Front.</p> <p>We advise that consideration should be given to how the</p>	<p>Changes to water circulation (Flamborough Front) due to the Projects alone have been assessed in section 8.7.4.3 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. Cumulative changes to the Flamborough Front due to the presence of the Projects alongside other offshore wind farms on Dogger Bank has been assessed in section 8.8.4 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	Y-M

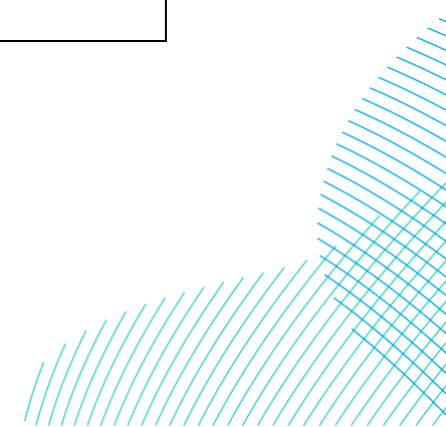




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				interaction between the water flow, infrastructure on the seabed, and stratification for the worst-case scenario (WCS) array layout(s) over the lifetime of the project alone, and as part of a cluster of offshore wind farms (OWF) can be accurately predicted. This should be coupled with an assessment of associated changes to primary production.	Potential effects on primary productivity are covered in section 8.7.4.3.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> .	
SNE 004	17/07/2023	Natural England	Marine Physical Environment	<p>Summary of Concerns: MPE &amp; Geology and Land Quality</p> <p>Cable installation across Smithic Bank.</p> <p>We advise avoiding cable installation (and cable protection) across Smithic Bank where possible to avoid / reduce the impact to the sandbank. If cable activity cannot be avoided, impacts should be reduced as much as possible. As has been conditioned on other projects, we advise that as a minimum, cable protection is not used within the 10m depth contour. Cumulative impacts due to cable installation (and cable repair, reburial, replacement and protection) for multiple developments should be assessed for the lifetime of the project.</p>	<p>The Offshore Export Cable Corridor (excluding the construction buffer) does not cross Smithic Bank as defined by JNCC or by the British Geological Survey (see section 8.5.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and <b>Volume 7, Figure 8-2 (application ref: 7.8.1)</b>).</p> <p>Due to the potential for Chalk bedrock to be present within cable burial depth in water depths &lt;10m below LAT (see section 8.5.2 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>), there is potential cable protection may be required locally within the 10m depth contour, however mitigation has been included to limit this. This has been assessed in section 8.7.4.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p> <p>Cumulative effects from cable installation have been assessed in section 8.8.3 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. Cumulative effects from cable repairs and reburial were not screened into the cumulative effects assessment as the effect occurs at discrete locations, for a limited time in duration.</p>	Y-M
SNE 005	17/07/2023	Natural England	Geology and Land Quality	Summary of Concerns: MPE & Geology and Land Quality	The marine physical environment baseline (section 8.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> ) has been updated to include site specific geophysical and geotechnical survey data. The approach to marine	Y-M

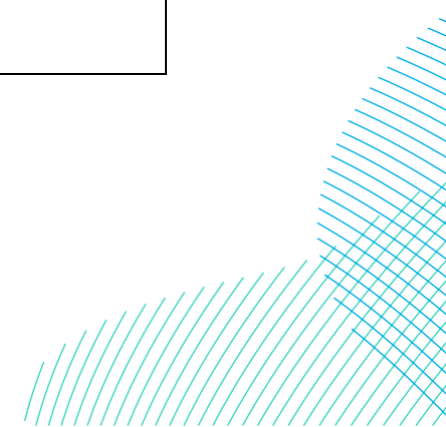


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>Data gaps within the geophysical / geotechnical data for the export cable corridor (ECC), HVAC area and Array.</p> <p>Details of what bespoke modelling and geotechnical and geophysical data will be undertaken to fill evidence gaps and inform impact assessment, should be shared with the Expert Topic Group as soon as possible</p>	<p>physical processes numerical modelling was shared through the EPP with the Seabed Expert Topic Group.</p>	
SNE 006	17/07/2023	Natural England	Cumulative Effects	<p>Summary of Concerns: MPE &amp; Geology and Land Quality</p> <p>The Cumulative Effects Assessment (CEA) does not include projects along the Holderness Coast and potentially within the Humber Estuary.</p> <p>The CEA should also include projects along the Holderness Coast and potentially within the Humber Estuary.</p>	<p>The cumulative effects assessment includes projects along the Holderness coast, including offshore wind farms and carbon capture and storage projects that make landfall along the coast.</p> <p>The Humber estuary as a morphological receptor is included as a receptor but is located 40km south of the landfall. The assessment of Projects alone effects did not identify far-field changes that extend 40km along the coast, therefore, projects within the Humber Estuary were not screened into the cumulative effects assessment.</p>	Y-M
SNE 007	17/07/2023	Natural England	Marine Physical Environment	<p>Summary of Concerns: MPE &amp; Geology and Land Quality</p> <p>Impacts on coastal processes and nearshore sediment pathways are likely to be key consenting risks for this project.</p> <p>It is important that these aspects are fully assessed and that there is sufficient time to fully explore options to ideally avoid, or if not</p>	<p>The effect of changes to nearshore sediment transport pathways have been assessed in sections 8.7.3.4, 8.7.3.9 and 8.7.4.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. The results of these assessments have been shared through the EPP via the seabed Expert Topic Group to allow time to consider consultee feedback which has been incorporated into the design and mitigation options for the Projects as appropriate.</p>	N

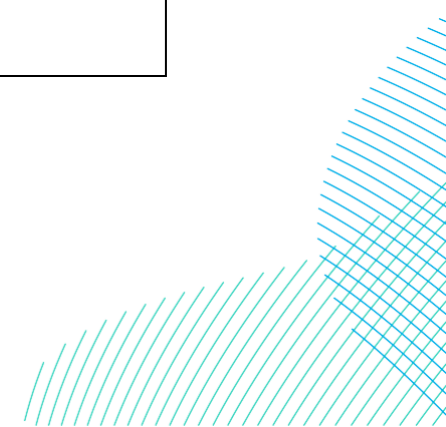


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				mitigate the impacts prior to application.		
SNE 008	17/07/2023	Natural England	Marine Physical Environment	<p>Summary of Concerns: MPE &amp; Geology and Land Quality</p> <p>Changes to coastal sediment pathways have the potential to significantly damage or destroy notified features of the Withow Gap, Skipsea SSSI.</p> <p>Natural England notes that the baseline data is incomplete and impacts are to be assessed once site specific data is included in the ES.</p> <p>Withow Gap, Skipsea SSSI should be considered as a receptor in the assessment of changes to Physical Marine Processes.</p> <p>Natural England advises that further engineering investigations which are currently being undertaken will be required pre-Application submission to assess the feasibility of any proposed mitigation measures for the Withow Gap Skipsea SSSI.'</p>	Withow Gap Skipsea SSSI has been included as a receptor for marine physical processes and is assessed in relation to changes in nearshore sediment transport pathways in sections 8.7.3.9 and 8.7.4.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> . With the mitigation measures proposed no significant effects on this receptor are predicted.	Y-M
SNE 009	17/07/2023	Natural England	Marine Physical Environment	The project parameters for marine process receptors are clearly defined.	Noted	N
SNE 010	17/07/2023	Natural England	Marine Physical Environment	<p>Project Description &amp; MPE General:</p> <p>The multi-build and operation scenarios make it difficult to fully assess the Worst-Case Scenario (WCS) as presented. It is unclear</p>	The multi-build construction scenarios have been defined in section 8.3.2 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and include the following: in-isolation, concurrent and sequential construction. Within the assessment of significance (section 8.7 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> ) for construction effects, the assessment of magnitude of impact and significance of effect has been separated into a "DBS East and DBS West	N

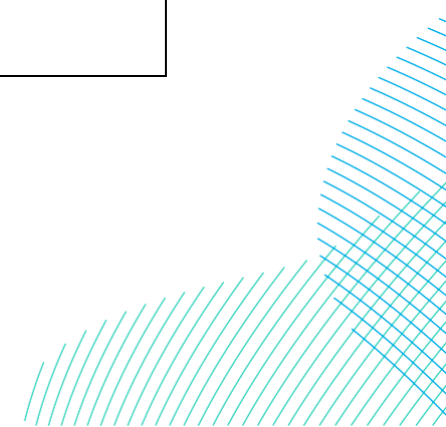
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>what the implications might be to the marine physical environment in a sequential vs concurrent scenario.</p> <p>Clarification should be provided in the ES on each build out scenario, including implications to receptors, pathways, and impacts.</p>	<p>In-Isolation” which covers the in-isolation construction option only, and a “DBS East and DBS West Together” scenario which includes both concurrent and sequential construction options. Where the effects from concurrent and sequential construction are different, they have been separated out with further clarification provided on each option independently.</p>	
SNE 011	17/07/2023	Natural England	Project Description	<p>Project Description &amp; MPE General:</p> <p>The EIA should include the WCS for scouring that may result from the proposed development.</p> <p>Provide WCS for scouring around foundations and cofferdams during construction, and around cable protection and foundations during operation.</p>	<p>Scour protection is included in the worst case scenario table (see Table 8-1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>). The footprint of the scour protection is based on predictions of the area of seabed likely to need protection and therefore impacted by scour.</p> <p>Cofferdams will no longer be installed during cable installation at the landfall.</p>	Y-D
SNE 012	17/07/2023	Natural England	Marine Physical Environment	<p>MPE General:</p> <p>We note that cliff recession rates and future cliff erosion have been considered and assessed. However, beach profile change/lowering has not.</p> <p>Beach profile change/lowering will need to be considered and assessed over the lifetime of the Project(s).</p>	<p>An assessment of beach platform lowering is outlined in section 8.5.16 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and shown on Plate 8-19.</p>	Y-M
SNE 013	17/07/2023	Natural England	Marine Physical Environment	<p>MPE General:</p> <p>Bedforms and significant seabed features have not been mapped. Clarity is needed on whether there</p>	<p>Section 8.5.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> has been updated to include site specific bathymetry data which has been interpreted to identify seabed features such as sand wave fields, which is summarised in section 8.5.8 and shown on <b>Volume 7, Figure 8-6 (application ref: 7.8.1)</b>. Cross profiles showing bedform morphology are shown in Plate 8-16 and 8-</p>	Y-M



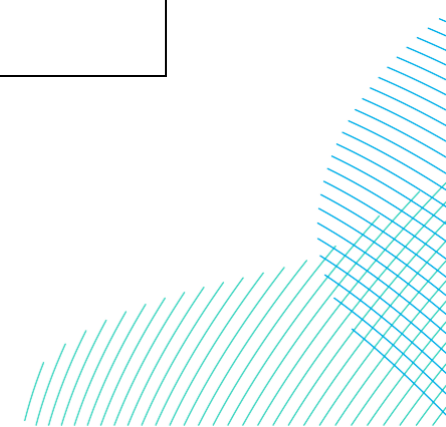
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>are any sandbanks (other than Dogger Bank SAC) or sand wave fields within the study area that could be impacted by the Project.</p> <p>We request a map is provided showing seabed morphological features. Sandbanks and sand wave fields should be identified and impacts due to the project should be assessed.</p>	<p>17, with effects assessed in sections 8.7.3.3 and 8.7.3.8 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	
SNE 014	17/07/2023	Natural England	Marine Physical Environment	<p>MPE Table 8-7: Several of the datasets used are more than 10 years old and there may be residual uncertainty regarding their precision or accuracy:</p> <p>NE Best Practice (Parker <i>et al.</i>, 2022a) guidance advises that as a general benchmark, care should be taken when considering datasets which are older than five years. Therefore, we advise that up to date and project specific data should be used.</p> <p>We note that the British Geological Survey (BGS) have recently released MBES (Multi Beam Echo Sounding) surveys of the Holderness coast out to 10 km which may be of use (<a href="https://nora.nerc.ac.uk/id/eprint/534206/">https://nora.nerc.ac.uk/id/eprint/534206/</a>).</p>	<p>The recommendations outlined in the Natural England's Approach to Offshore Wind guidance document have been followed where possible. Table 8-7 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> has been updated to include site specific data acquired within the last 5 years. There are however data and information sources that are older than 5 years that have been used to inform the baseline environmental characterisation and assessment of significance. These data sets are used in situations when more recent data is unavailable, with a discussion of their accuracy and precision where necessary.</p> <p>An assessment of the British Geological Survey's fine-scale maps of seabed geomorphology Offshore Yorkshire have been included in section 8.5.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	N
SNE 015	17/07/2023	Natural England	Marine Physical Environment	<p>MPE General: We advise that seabed mobility across the study area should be</p>	<p>Section 8.5.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> has been updated to include site specific bathymetry data which has been interpreted to identify seabed features such as sand wave fields. Section 8.5.8 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> provides a</p>	Y-M



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				<p>assessed.</p> <p>Provide a map showing seabed mobility across the project and wider area.</p>	<p>baseline characterisation of seabed mobility. <b>Volume 7, Figure 8-6 (application ref: 7.8.1)</b> shows the morphology and location of mobile seabed features.</p>	
SNE 016	17/07/2023	Natural England	Marine Physical Environment	<p>MPE 8.4.2.1, 8.5.3 &amp; 8.5.9: A site-specific geophysical survey and seabed grab sampling survey have been undertaken for the Projects. The results from particle size analysis (PSA) and sediment contaminants have been provided, however the geophysical survey data does not appear to have been provided and the Marine Processes baseline characterisation remains based on pre-existing data which may not be reliable. Therefore, the baseline presented at PEIR for marine physical environment is incomplete.</p> <p>We advise that the Marine Processes baseline is updated with the site-specific survey data.</p>	<p>The marine physical environment baseline (section 8.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>) has been updated to include site specific geophysical and geotechnical survey data, in addition to seabed grab sample and particle size analysis data.</p>	Y-M
SNE 017	17/07/2023	Natural England	Marine Physical Environment	<p>MPE 8.4.2.1: We note that Metocean data is currently being collected for the project, and data from March 2022 to date is included in the PEIR. The full dataset will be included in the final ES. The baseline is therefore currently incomplete.</p> <p>A robust baseline characterisation will be needed of the tidal</p>	<p>Section 8.5.6 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> has been updated to include updated metocean data acquired between March 2022 and May 2023. Sections 8.5.5 and 8.5.6 of Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8) have been updated to incorporate the results of hydrodynamic and wave climate modelling undertaken to support the ES. Water levels from the nearest tidal gauge at Bridlington are included in section 8.5.4 of Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8).</p>	Y-M



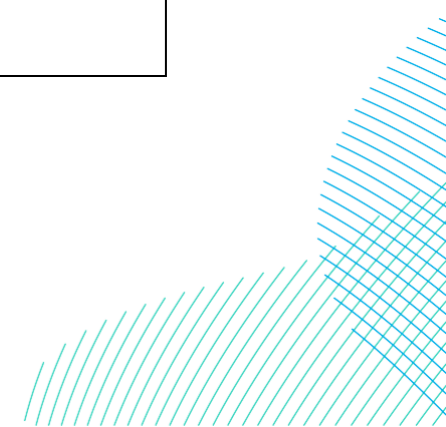
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				behaviour (water levels and tidal currents), wind and wave climate, and sediment transport regime, both within and adjacent to the development site. This should be incorporated into the ES.		
SNE 018	17/07/2023	Natural England	Marine Physical Environment	<p>MPE 8.5.2 &amp; 8.5.6:</p> <p>Natural England notes that geotechnical, geophysical and wave buoy survey work to complete this chapter will be included in the final application but we are concerned that there will be insufficient time to ensure all the impacts have been fully explored and assessed and mitigation measures adopted where required.</p> <p>We request that the complete baseline based on site specific data is provided with sufficient time to enable impacts to be assessed and any issues resolved.</p>	The marine physical environment baseline (section 8.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> ) has been updated to include site specific survey data which is used to inform the assessment of significance.	Y-M
SNE 019	17/07/2023	Natural England	Marine Physical Environment	<p>MPE 8.5.8 / Points 82 &amp; 83:</p> <p>The PEIR refers to: 'Two wave buoys being deployed, one in DBS East and one in DBS West. These wave buoys include downward facing Acoustic Doppler Current Profilers (ADCPs) that measure current speed and direction' with 'the full dataset being available in the ES'. Clarification is needed on whether the ADCP (Acoustic Doppler Current Profilers) backscatter will be used to infer</p>	Backscatter data was not collected by the wave buoy ADCPs, therefore the SSC was not updated by data collected by the ADCPs.	N



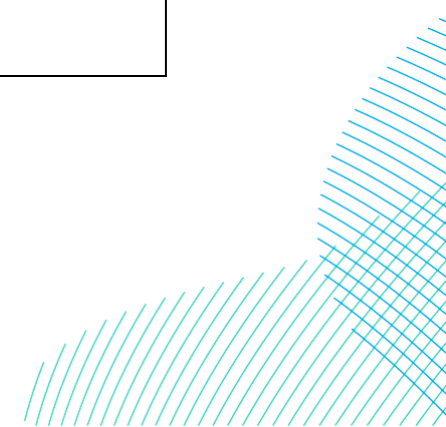
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				<p>Suspended Sediment Concentration (SSC) and if so, update the SSC dataset.</p> <p>Please provide clarification on whether the ADCP backscatter will be used to infer SSC and update the SSC dataset.</p>		
SNE 020	17/07/2023	Natural England	Marine Physical Environment	<p>MPE 8.5.7 / Point 81;</p> <p>It is stated that: 'there are no bedforms between Smithic Bank and the Holderness coast which suggests there is relatively little sediment exchange between Smithic Bank and the Holderness coast to the south (and vice versa). There is evidence of some exchange of material eroded from cliffs between Skipsea and Fraisthorpe which is transported along the beach, and offshore towards the southern and eastern parts of Smithic Bank (Pye <i>et al</i> 2015).</p> <p>Potential impacts to sediment exchange between the Holderness coast and Smithic Bank should be considered in the ES.</p>	<p>The baseline for coastal sediment transport is presented in section 8.5.15 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and includes a review of Pye and Blott (2015) which outlines sediment transport pathways south of Skipsea are to the south, away from Smithic Bank. Potential changes to sediment transport in the nearshore and coastal zone are assessed in sections 8.7.3.4, 8.7.3.9 and 8.7.4.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	N
SNE 021	17/07/2023	Natural England	Marine Physical Environment	<p>MPE 8.5.7 / Points 79 &amp; 80:</p> <p>The impact of Smithic Sands on sediment transport pathways is outlined in NE's scoping response.</p> <p>Natural England wishes to understand if / how the proposed</p>	<p>The offshore export cable corridor does not cross Smithic Bank as defined by JNCC or by the British Geological Survey (see section 8.5.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>). There is overlap between the construction buffer of the offshore export cable corridor and Smithic Bank as defined by JNCC. However, the Projects have committed to not deploying jack-up legs within Smithic Bank. Thus direct effects on this features will be avoided.</p>	Y-D



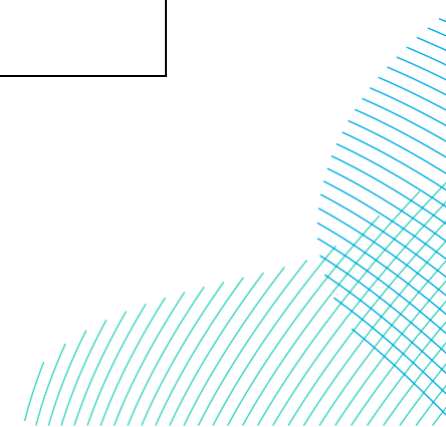
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				<p>cable route over the top of Smithic Sands might contribute to this impact.</p> <p>Natural England would also like to understand how this potential impact has been incorporated in the cliff erosion predictions in 8.5.15.</p> <p>We advise the Project to consider options to avoid impacts to Smithic Bank completely.</p>	<p>Potential changes to sediment transport, and associated effects on cliff erosion, in the nearshore and coastal zone are assessed in section 8.7.3.9 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	
SNE 022	17/07/2023	Natural England	Marine Physical Environment	<p>MPE 8.7.1:</p> <p>Impact receptors have been presented in Table 8-21; however, they have not been identified on a map of the study area.</p> <p>Provide a map showing all receptors and/or include on Figure 8-2.</p>	<p>Impact receptors are mapped within <b>Volume 7, Figure 8-13 (application ref: 7.8.1)</b>.</p>	Y-M
SNE 023	17/07/2023	Natural England	Marine Physical Environment	<p>MPE 8.7.3:</p> <p>We note that for the purposes of the PEIR, results of modelling and theoretical approaches from DB A, B, C and Sofia have been used as an analogue to assess the potential effects of the Projects on the identified receptors.</p> <p>Natural England has provided feedback on this approach previously (20 January 2023, highlighting notable differences between the physical environments of the proposed Project(s) and those of DB A, B, C and Sofia. However, we also note that</p>	<p>The approach to marine physical processes numerical modelling was shared through the EPP with the Seabed Expert Topic Group and is presented in <b>Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b>.</p>	Y-M



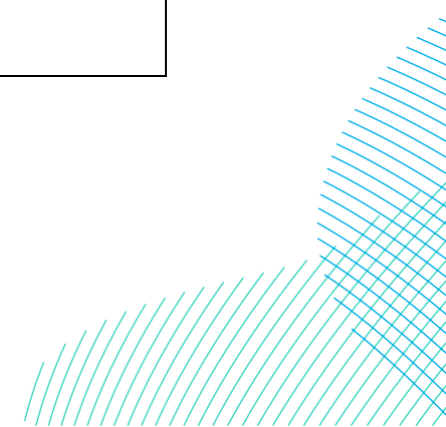
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				<p>bespoke numerical modelling of the Projects effects on the marine physical environment will be undertaken as part of the ES, which we welcome.</p> <p>We advise that output from the new bespoke numerical modelling is shared with the relevant stakeholders as soon as possible as part of the Evidence Plan Process.</p>		
SNE 024	17/07/2023	Natural England	Marine Physical Environment	<p>MPE 8.7.5.1.2 / Point 224:</p> <p>The Zone of Potential Influence for tidal regime effects is based on an understanding of the [spring] tidal ellipses.</p> <p>We advise that a map is provided showing the spring tidal ellipse variations across the study area.</p>	Tidal excursion ellipses are mapped <b>Volume 7, Figure 8-4 (application ref: 7.8.1)</b> .	Y-M
SNE 025	17/07/2023	Natural England	Marine Physical Environment	<p>MPE 8.7.5.3:</p> <p>Daewel <i>et al.</i> (2022) studied ecosystem response to wind wakes due to large offshore wind farm clusters and provides evidence that the associated wind wakes in the North Sea provoke large-scale changes in annual primary production with local changes of up to +/- 10% not only at the OWF clusters, but also over a wider region.</p> <p>We advise that wind wake effects should also be considered and</p>	Potential effects on primary productivity are covered in section 8.7.4.3.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> . Changes to the water mixing, and thus primary productivity associate with the Flamborough Front as a result of the Projects was found to be of negligible. As a result this impact was screened out of the cumulative assessments.	N



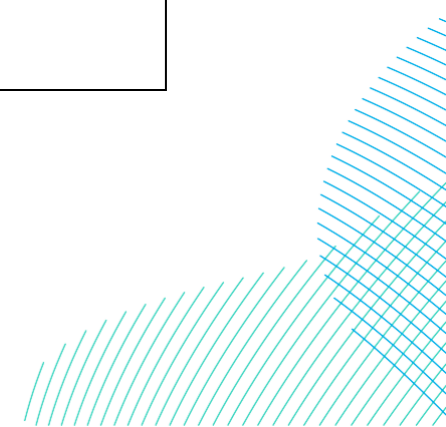
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				assessed for the project alone and in combination with the Dogger Bank OWFs and potentially Hornsea Four, Two & One.		
SNE 026	17/07/2023	Natural England	Cumulative Effects	<p>PD,MPE &amp; G&amp;LQ General:</p> <p>The WCS presented for different impacts are considered to have the same magnitude of impact for DBS E or DBS W developed in isolation (i.e., one array), as for both DBS E and DBS W developed concurrently or sequentially (i.e., two arrays). Logically, the impact of two arrays on the marine physical environment must be twice that of one array. It would be helpful if the rationale behind these magnitude of impact conclusions could be provided.</p> <p>Clarify or provide further explanation of the assessment of magnitude of impact for the two development scenarios.</p>	Further clarity has been provided in the assessment of significance (section 8.7 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> ) to distinguish between the effects from one Project being built in-isolation when compared to two Projects being built concurrently or sequentially. Further clarity is provided if the effects from any on particular Project built in isolation (e.g. DBS East or DBS West) are greater than if the other Project was built in isolation.	Y-M
SNE 027	17/07/2023	Natural England	Marine Physical Environment	<p>Chapter 8 / Section 5.4.4</p> <p>In addition to the eight Offshore Substation/Converter/Collector Platforms, there may be a requirement for up to three other platforms either along the export cable or within one of the arrays.</p> <p>Hydrodynamic and sediment transport impacts due to the presence of platform foundations in the offshore export cable</p>	Marine physical processes modelling included a scenario where one platform was installed within the Offshore Export Cable Corridor (see <b>Volume 7, Appendix 8-3 (application ref: 7.8.8.3)</b> ). The outputs of this modelling have been used to inform the assessment of significance in section 8.7 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> .	Y-M



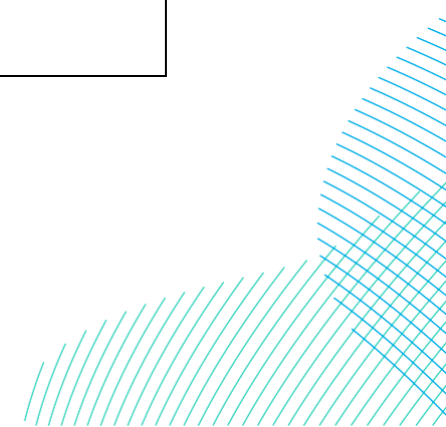
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				corridor (OECC) need to be identified and considered.		
SNE 028	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.4.10.1 / Point 212:</p> <p>It is stated that if built non-concurrently, it is anticipated that there would be up to a two-year lag between the start of construction for the first project and the start of construction for the second project. If one array is partly constructed at the time the second is being constructed, then the EIA for the marine physical environment should include this scenario.</p> <p>Consider and demonstrate potential impacts that might arise in a sequential build scenario whereby one array is part-built and construction on the other then begins.</p> <p>It would also be good to understand how monitoring of impacts of such a build out scenario would be achieved to enable marine licence discharge.</p>	<p>The worst case scenario for operation impacts is when both arrays are complete and this has been assessed in section 8.7.4 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> as any effects will increase sequentially as more structures are installed.</p> <p>During construction, a maximum of two concurrent installations will be undertaken at a given time. Therefore, as any changes are temporally and spatially restricted there is no difference in magnitude of impact if one project is partially built when construction of the other commences, when compared to the in-isolation and together build scenarios, as a maximum of two installations would occur simultaneously in all scenarios.</p>	N
SNE 029	17/07/2023	Natural England	Marine Physical Environment	<p>5.5.2 &amp; 8.7.4.10.1 / Point 212:</p> <p>It is anticipated that up to four floatation pits per export cable may be required to be installed in shallow water. This could modify hydrodynamic conditions and in turn, give rise to morphological change.</p>	<p>Following further review of the potential construction methodology for the Projects, floatation pits have been removed from the Projects design envelope.</p>	Y-D



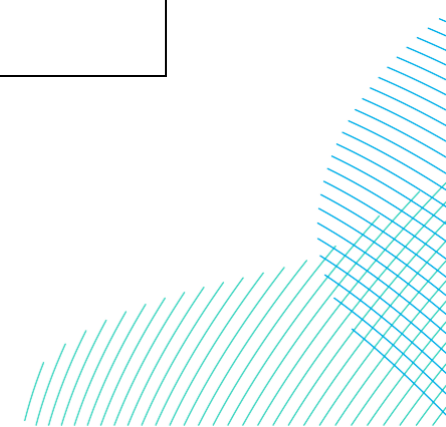
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				The WCS for floatation pit excavation should be presented and potential impacts to the hydrodynamic and sediment transport regimes should be assessed. Potential impacts to Holderness Inshore MCZ and sediment transport further down the coast will also need to be assessed.		
SNE 030	17/07/2023	Natural England	Marine Physical Environment	Chapter 8 / Point 107 & Table 8-19:  Representative Concentration Pathways (RCPs) are discussed in Point 107. However, in Table 8-19, these have been written as 'RPC'. This is because there are also 'Reactive Compensation Platforms' (RCPs). Please clarify in the text and Glossary.	The acronym has been corrected in Table 8-20 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and throughout the text.	N
SNE 031	17/07/2023	Natural England	Marine Physical Environment	Table 8-21:  Withow Gap, Skipsea SSSI and Humber Estuary SSSI and Ramsar have not been included in the list of receptors in Table 8-21.  Include Withow Gap SSSI and Humber Estuary SSSI & Ramsar in Table 8-21 and in the EIA.	The Withow Gap Skipsea SSSI is included as an impact receptor in Table 8-22 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> as it is designated for geological interest and is therefore a marine physical environment receptor. The Humber Estuary and its coastal geomorphological features are included as a receptor, but the Humber Estuary SSSI and Ramsar designated sites are not marine physical environment receptors and have therefore not been considered in this assessment. Potential impacts on the Humber Estuary SAC have been assessed in <b>Volume 6, Report to Inform Appropriate Assessment (application ref: 6.1)</b> .	Y-M/N
SNE 032	17/07/2023	Natural England	Marine Physical Environment	8.7.4:  There is the potential for overlapping impacts on the marine	The construction schedule is presented in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> . If both Projects are built together, cable installation will be undertaken in a single phase so there are no overlapping effects from cable installation activities.	N



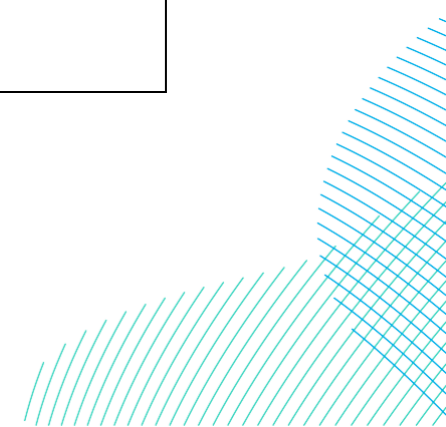
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>physical environment due to different construction activities being carried out.</p> <p>Provide details of WCS for overlapping activities that might take place during construction e.g., sediment plumes, deposition footprints.</p>	<p>If both Projects are built together, there will be a maximum of two concurrent foundations installation activities and the marine physical processes modelling (see <b>Volume 7, Appendix 8-3 (application ref: 7.8.8.3)</b>) shows there are no overlapping effects from the seabed clearance or drilling phases of foundations, assessed in section 8.7.3.1 and 8.7.3.2 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	
SNE 033	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.4.1-8.7.4.10:</p> <p>As the project-specific PSA data and results from the bespoke modelling are not yet available and/or incorporated, there is insufficient data to adequately inform the impact assessment.</p> <p>The results of the project-specific PSA and numerical modelling should be shared as soon as possible to establish the baseline conditions and potential impacts on the marine physical environment.</p>	<p>The marine physical environment baseline (section 8.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>) has been updated to include site specific geophysical, geotechnical survey, seabed grab sample and particle size analysis data.</p> <p>The approach to marine physical processes numerical modelling was shared through the EPP with the Seabed Expert Topic Group.</p> <p>The marine physical processes modelling technical report is presented in (see <b>Volume 7, Appendix 8-3 (application ref: 7.8.8.3)</b>).</p>	Y-M
SNE 034	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.4.1.6 &amp; 8.7.4.2.6:</p> <p>It is stated that it is considered unlikely that sediment plumes (elevated SSCs) will persist for a sufficiently prolonged period of time for them to interact with subsequent operations. Therefore, no cumulative effect is anticipated from multiple installations.</p> <p>It is also stated that construction of DBS E and DBS W together would not result in a more significant</p>	<p>The marine physical processes modelling (see <b>Volume 7, Appendix 8-3 (application ref: 7.8.8.3)</b>) shows that the sediment plumes created during foundation installation are small and short-lived with background levels returning to the baseline within hours of the disturbance. The modelling also shows there are no overlapping sediment plumes between structures and given a maximum of two concurrent installations will be undertaken, the effects from overlapping plumes will be negligible.</p>	N



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				<p>effect than DBS E or DBS W (for changes in SSC and transport due to foundation seabed preparation).</p> <p>Clarity is needed on whether overlapping plumes could occur between the DBS E and DBS W arrays.</p> <p>Please provide the rationale for the conclusion that changes in SSC and transport due to foundation seabed preparation and drill arisings for one array (i.e., DBS E or DBS W) would be the same as for two arrays (i.e., DBS E and W).</p>		
SNE 035	17/07/2023	Natural England	Marine Physical Environment	<p>Tables 8-23, 8-25 &amp; 8-27 Tables 8-33 &amp; 8-35:</p> <p>Dogger Bank SAC tolerance and recoverability have been assessed as 'High' and, sensitivity has been assessed as 'Negligible' for changes to SSC and seabed level. There are several species present within DB SAC that are sensitive to changes in SSC. These should be considered in the sensitivity assessment.</p> <p>We advise the Project to refer to the relevant conservation advice and to consider the sensitivity of the varied species present to this pressure in this assessment.</p>	<p>The Dogger Bank as a morphological feature has been included as a marine physical environment receptor. As Dogger Bank was created by glacial processes around 20,000 years ago it has negligible sensitivity to changes in SSC. The Dogger Bank SAC is not a marine physical environment impact receptor as it is designated for biological functioning and as such is assessed in relation to changes in SSC in <b>Volume 6, Report to Inform Appropriate Assessment Habitat Regulations Assessment (application ref: 6.1)</b>.</p>	N
SNE 036	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.4.2.1 / Point 136:</p> <p>It is stated that net movement of fine-grained sediment retained</p>	<p>This should be north-west to south-east, the text in section 8.7.4.2.1 has been updated to reflect this (<b>Volume 7, Chapter 8 Marine Physical Environment (application ref:7.8)</b>).</p>	N

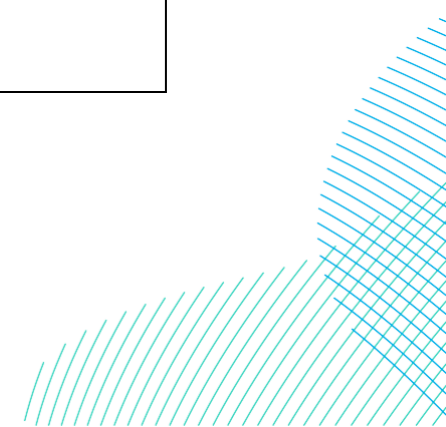


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				<p>within a plume would be to the northwest or southwest. Should this be northwest or southeast?</p> <p>Please clarify.</p>		
SNE 037	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.4.3 / Points 145 - 148:</p> <p>The worst-case cable laying technique is considered to be jetting. It is unclear if DBS East and DBS West were developed sequentially, whether the use of jetting would still be a feasible technique for the second wind farm's cable installation. If the cable routes lie next to each other, would the jetting technique cause damage or exposure to the first windfarm's buried cable? Would this result in the cables needing to be buried further apart with a wider impact zone. What impact would this have on the landfall location?</p> <p>Clarification needed on worst case scenario (WCS).</p>	<p>In the worst-case scenario, offshore export cable trenches have been spaced 50m apart, ensuring the viability of jetting for each individual trench. This has been clarified in Table 8-1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	N
SNE 038	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.4.3 / Point 147:</p> <p>Any sediment excavated during seabed levelling would be disposed of within close proximity to the point of excavation, ensuring there will be no net loss of sediment from any sandbank system. This is welcomed as a mitigation action.</p> <p>We advise that this mitigation is secured in the DCO/DML.</p>	<p>Noted. The worst case assumptions within <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> note that dredged sediments would be discharged as overflow close to the point of extraction and are, therefore, likely to be deposited in the vicinity of the point at which they were extracted. Additional detail on the Projects' approach to the disposal of dredged material is presented within <b>Volume 8, Disposal Site Characterisation Report (application ref: 8.17)</b>. Conditions have been secured in each DML which will prohibit the deposit of sediment removed from the Dogger Bank SAC anywhere other than within the Dogger Bank SAC. The Dogger Bank SAC is the only Annex I sandbank which will have sediment removed from it as part of development of the Projects.</p>	Y-D

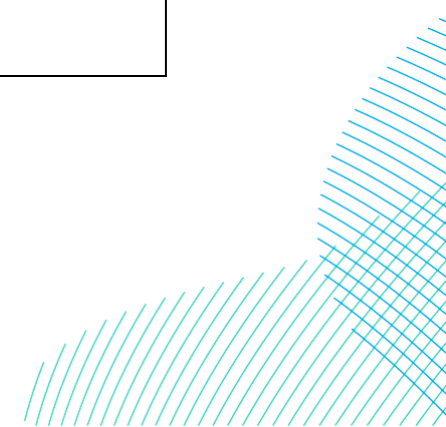




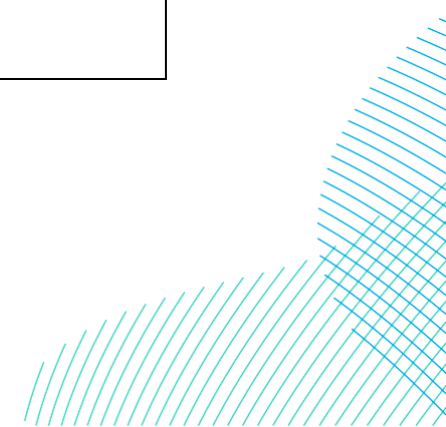
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SNE 039	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.4.3.1:</p> <p>We note that project specific data have not been used to quantify/assess sediment plume extent, concentration and persistence due to cable installation activities.</p> <p>We advise using project-specific data to assess and quantify sediment plume extent, concentration and persistence for cable installation activities.</p>	<p>The marine physical environment baseline (section 8.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>) has been updated with site-specific particle size analysis data. This data has been incorporated into modelling studies of plume dispersion due to cable installation activities (see <b>Volume 7, Appendix 8-3 (application ref: 7.8.8.3)</b>).</p>	Y-M
SNE 040	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.4.4 / Points 158 - 160:</p> <p>If DBS East and West were developed sequentially, would the same landfall location be able to be used, or would the second cable landfall have to be altered so as to not damage the first?</p> <p>Clarification is needed on the WCS assessed for landfall installation works.</p> <p>We advise that the landfall works including ducting are installed for both projects when the first one constructs to reduce impacts.</p>	<p>If both Projects are built together, there will be one phase of cable installation activity at the landfall over a maximum duration of 18 months. This has been considered in sections 8.7.3.4 and 8.7.3.9 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. If the Projects are developed sequentially, then the first Project to be developed will install the ducting at landfall for both Projects.</p>	Y-D
SNE 041	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.4.4.1 &amp; 8.7.4.9:</p> <p>Temporary installation of cofferdams in proposed in the intertidal zone. Clarity is needed on how many cofferdams will be in place at the same time, for how long, and what the WCS blockage</p>	<p>Following further review of the potential construction methodology for the Projects, cofferdams have been removed from the Projects design envelope.</p>	Y-D



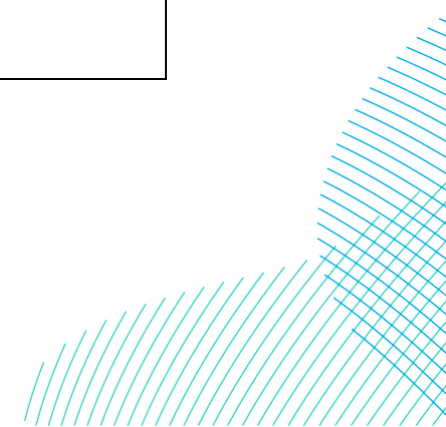
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>effect to hydrodynamic and sediment transport processes will be.</p> <p>Consideration needs to be given to whether the presence of ancillary infrastructure during construction (i.e., cofferdams) could give rise to changes in waves and/or current flows, affecting sediment transport and resulting in morphological change.</p>		
SNE 042	17/07/2023	Natural England	Marine Physical Environment	<p>Table 8-3:</p> <p>It is stated that if 'DBS East and DBS West are built in isolation there will be two separate phases of HDD installation'.</p> <p>In the Project Description, the 'isolation' scenario refers to only one project being built in total so would only require one phase of HDD installation.</p> <p>Clarity is needed on the isolation versus sequential scenarios and how these relate to the WCS for landfall works. We request that the terms are used consistently throughout the application documents to avoid confusion. Please see previous advice for installing ducts for both projects when the first project is built</p>	<p>If both Projects are built together, there will be one phase of cable installation activity at the landfall over a maximum duration of 18 months. This has been considered in sections 8.7.3.4 and 8.7.3.9 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. If the Projects are developed sequentially, then the first Project to be developed will install the ducting at landfall for both Projects.</p>	Y-D
SNE 043	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.4.6.3:</p> <p>It is stated that the WCS for changes in seabed level due to the</p>	<p>Further clarity has been provided in the assessment of significance (section 8.7 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>) to distinguish between the effects from one Project being built in-isolation when compared to two Projects being built concurrently or sequentially. Further clarity is</p>	Y-M



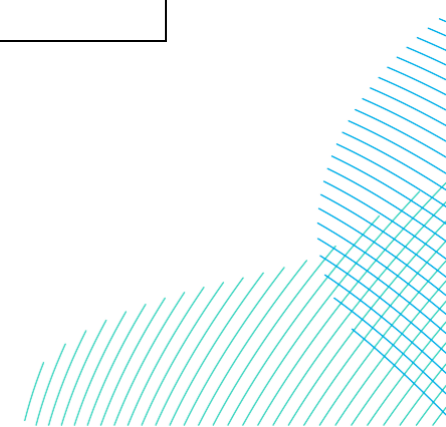
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>installation of 95 large wind turbines and eleven offshore platforms will have the same magnitude of impact as installation of 48 large wind turbines and six offshore platforms for DBS E or DBS W in isolation. We cannot agree with this, because the amount of seabed loss for the 'together' scenario will be double that of the 'in isolation' scenario. Moreover, the area of impact within DB SAC will be doubled in a 'together' build scenario. Furthermore, the potential for overlapping deposition footprints between the two arrays in the 'together' build scenario should also be considered and assessed.</p> <p>The WCS for 'in isolation' and 'together' scenarios should be assessed/quantified. We advise also considering and assessing potential overlapping deposition footprints between DBS E &amp; DBS W in a 'together' build scenario.</p>	<p>provided if the effects from any on particular Project built in isolation (e.g. DBS East or DBS West) are greater than if the other Project was built in isolation.</p> <p>The marine physical processes modelling (see <b>Volume 7, Appendix 8-3 (application ref: 7.8.8.3)</b>) shows that the sediment plumes created during foundation installation are small and short-lived with background levels returning to the baseline within hours of the disturbance. The modelling also shows there are no overlapping sediment plumes between structures and given a maximum of two concurrent installations will be undertaken, the effects from overlapping plumes will be negligible.</p>	
SNE 044	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.4.7.2: 8.7.4.8 / Point 197:</p> <p>Drill arising mounds may be present at up to 5 locations across the array areas. If cable/array installation disturbs till, the PEIR states that the clasts would remain on the seabed and break up later through sediment transport processes. Further information is needed on</p>	<p>If glacial till is disturbed during drilling for foundations or due to cable installation, there is potential for the till to form aggregated clasts of various sizes depending on the physical properties of the till. The larger clasts will require relatively higher currents to disaggregate or transport them whereas the smaller clasts will become part of the bedload. This has been included in the assessment in section 8.7.3.7 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	Y-M



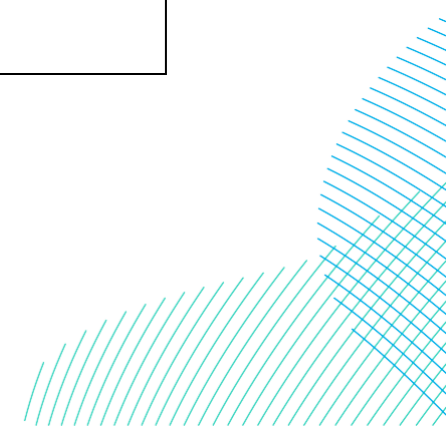
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				potential extent of the deposited clasts, how long they would remain on the seabed and whether they would impact sediment transport processes.		
SNE 045	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.4.8.4</p> <p>Cable installation (and cable protection) across and / or near Smithic Bank remains a concern, particularly when considered in-combination with other projects. Successive cable (and cable protection) installation could act cumulatively to increase morphological alteration of the sandbank through changes to sediment transport pathways. In turn, moderate elevation changes to the sandbank could affect the shoreline response to storm waves and shoreline morphology. Furthermore, given the uncertainty regarding the erosional or depositional nature of South Smithic, we are also concerned that burial of the export cable may not be achieved.</p> <p>As a first option, we advise avoiding cable installation (and cable protection) across Smithic Bank as this would remove / reduce the impact to the sandbank. If cable activity cannot be avoided, impacts to the form and function of Smithic Bank due to the project alone, and in-combination, with other projects,</p>	<p>The offshore export cable corridor (excluding the construction buffer) does not cross Smithic Bank as defined by JNCC or by the British Geological Survey (see section 8.5.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and <b>Volume 7, Figure 8-2 (application ref: 7.8.1)</b>).</p> <p>Potential changes to sediment transport, and associated effects on cliff erosion, in the nearshore and coastal zone are assessed in section 8.7.3.9 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	N



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				should be considered and assessed in the ES.		
SNE 046	17/07/2023	Natural England	Marine Physical Environment	<p>Table 8-37:</p> <p>The value of Smithic Bank has been assessed as 'Medium'. However, Smithic Bank plays a significant role in dissipating direct wave energy, refracting oblique waves, providing shelter to Bridlington, regulating sediment supply, and is an important nursery and feeding ground for fish. Therefore, we would advise that it is of 'High' value. We advise that Smithic Bank should be considered 'High' value in the EIA.</p>	<p>With regards to marine physical processes, following the definition of value in Table 8-10 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>, Smithic Bank is assigned medium as the receptor is not designated but of local/regional importance. To assign a high value in terms of marine physical processes, the feature would need to be designated.</p> <p>The value of Smithic Bank in relation to nursery and feeding grounds is covered in <b>Volume 7, Chapter 10 Fish and Shellfish (application ref: 7.10)</b>.</p>	N
SNE 047	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.4.9.5:</p> <p>It is stated that upon completion of cable installation at the HDD exit location, the trench will be backfilled, and the beach profile will recover quickly (less than a year).</p> <p>Pre- and post- construction monitoring of beach profile change should be carried out to confirm beach profile recovery and support predictions regarding impacts to the Holderness cliffs. We would also advise sediment being returned in the order it was removed to avoid creating areas of seabed with differing resistance</p>	<p>Noted. If the Projects trenchless technique exit pits are located within the intertidal area, pre- and post- construction monitoring of beach profile change would be carried out to confirm beach profile recovery and support predictions regarding impacts to the Holderness cliffs. This is detailed within <b>Volume 8, In Principle Monitoring Plan (application ref: 8.23)</b>.</p>	Y-D

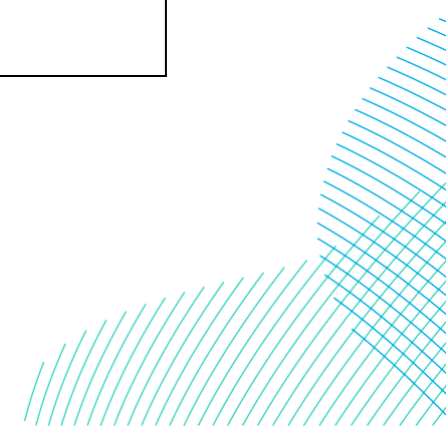


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				which could erode at different rates		
SNE 047	17/07/2023	Natural England	Project Description	<p>Chapter 5 / Point 209:</p> <p>We note that some work activities will be required to be performed on the beach.</p> <p>Further information is needed on access and infrastructure requirements (e.g., ramps) to assess the potential impacts of construction vehicle traffic and/or ancillary infrastructure.</p>	Detail is provided on works on the beach and the emergency beach access in <b>Volume 7, Chapter 5, Project Description (application ref: 7.5)</b> , there will be no direct access from the Landfall Zone onto the beach.	N
SNE 048	17/07/2023	Natural England	Marine Physical Environment	<p><b>Habitats Regulations Assessment – Stage 1 Screening</b></p> <p>Table 4-1:</p> <p>Natural England disagrees with abrasion/disturbance of the substrate on the surface of the seabed, changes in suspended solids, and penetration and/or disturbance of the substratum below the surface of the seabed, including abrasion being screened out for the operations and maintenance phase.</p> <p>We advise that these impacts are screened in for assessment.</p>	The effects of abrasion/disturbance of the substrate on the surface of the seabed, changes in suspended solids, and penetration and/or disturbance of the substratum below the surface of the seabed, including abrasion have been assessed across all phases of the Projects lifespan in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> .	N
SNE 049	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.5.1 / Points 221-224:</p> <p>Table 8.4 and section 8.3.3 states that: 'A minimum separation distance of 830m has been</p>	The marine physical environment baseline (section 8.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> ) has been updated to include site specific geophysical, geotechnical survey seabed grab sample and particle size analysis data.	Y-M



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				<p>defined between adjacent wind turbines, minimising the potential for interaction between adjacent wind turbines with respect to the marine physical environment'. The PEIR states potential impacts to the tidal regime due to structures will be based on an understanding of tidal ellipses which will be incorporated into the final ES. Natural England understands that further work to complete this chapter will be presented in the final application to confirm whether the distance between turbines is suitable mitigation.</p> <p>Incomplete baseline data, impacts to be assessed once site specific data included in ES. Details of what the site-specific modelling will include should be shared via the ETG. Provide evidence to demonstrate that wake-wake interaction is unlikely to occur at DBS.</p>	<p>The approach to marine physical processes numerical modelling was shared through the EPP with the Seabed Expert Topic Group.</p> <p>The marine physical processes modelling technical report is presented in <b>Volume 7, Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b>. This report demonstrates that wake effects are unlikely to occur given the separation distances of the turbines.</p>	
SNE 050	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.5.1.2 &amp; 8.7.5.1.3:</p> <p>In Table 8-42 it is suggested that the scale of near-field changes to the tidal regime would be 'Low'. As noted in Point 221, changes to baseline tidal conditions may extend beyond the array boundary for some kilometres, therefore, we suggest that the scale of the impact would be greater than low. Changes to the tidal regime could</p>	<p>The marine physical processes modelling shows that changes to tide regime beyond the Array Area boundaries (within a maximum of 8km) are <math>&lt;\pm 0.01\text{m/s}</math> <b>Volume 7, Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b>.</p> <p>The far-field scale of these changes has been updated to negligible in the assessment in section 8.7.4.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> based on the modelling results. The scale element of magnitude of impact as defined in section 8.4.3.1.3 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> considers a combination of size, extent and intensity. A consideration of extent alone may result in a definition of greater than low, however, the assessment collectively considers extent, size and intensity</p>	N

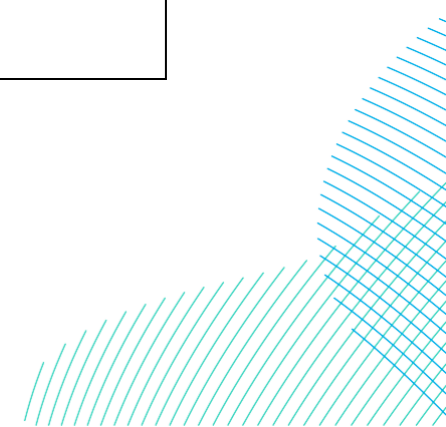
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>also affect the qualifying feature attributes of the Dogger Bank SAC.</p> <p>Further consideration will need to be given to potential impacts to the DB SAC qualifying feature attributes associated with changes to the tidal regime due to the presence of the array(s) over the lifetime of the Project(s). See Supplementary Advice on Conservation Objectives for Dogger Bank Special Area of Conservation: December 2022 (jncc.gov.uk)</p>	and given the size and intensity of the change is so small, the overall definition is negligible.	
SNE 051	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.5.1.6 / Point 228:</p> <p>This significance of effect discusses 'Construction of DBS East and DBS West together'. However, this section is related to an operation related effect.</p> <p>Please clarify/amend.</p>	"Construction" has been changed to "Development" to avoid confusion with a construction effect.	N
SNE 052	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.5.2 &amp; Table 8-44:</p> <p>In the assessment of Magnitude of Impact for 'Changes to the Wave Regime due to the Presence of Infrastructure', the scale of the impact is considered low, however there is the potential for the wave shadow effect to extend up to 10km from the site which would not be a small-scale impact.</p> <p>Further consideration will need to be given to potential impacts to</p>	<p>The marine physical processes modelling shows that the maximum changes to wave regime occur during a 1 in 1 year return period event and the changes in significant wave height within 7km of the Array Area boundaries are between 0.04 and 0.06m which are &lt;1.5% of baseline conditions (see <b>Volume 7, Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b>).</p> <p>The far-field scale of these changes has been updated to negligible in the assessment in section 8.7.4.2 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> based on the modelling results. A consideration of extent alone may result in a definition of greater than low, however, the assessment collectively considers extent, size and intensity and given the size and intensity of the change is so small, the overall definition is negligible.</p>	N



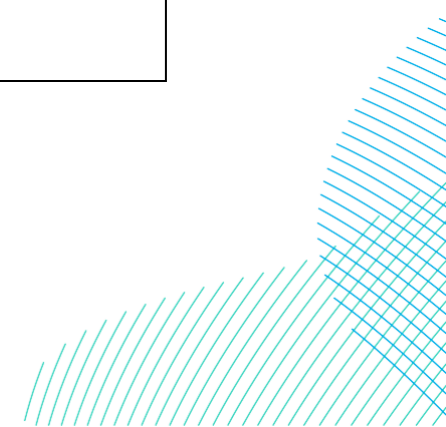


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				the DB SAC qualifying feature attributes associated with changes to the wave regime due to the presence of the array(s) over the lifetime of the Project(s).		
SNE 053	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.5.2 / Points 230 &amp; 231:</p> <p>The PEIR states that the change in significant wave height due the presence of foundation structures is predicted to be a worst-case scenario of 10% based on data from other windfarms.</p> <p>As wave buoys have been deployed on site, the data from these should be used to understand baseline conditions along with site specific numerical modelling to determine impacts on site, and that turbine spacing is suitable to minimize impact.</p> <p>Incomplete baseline data, impacts to be assessed once site specific data is included in the ES.</p> <p>We advise a review of the impact of the project on wave climate is also included as part of the cumulative impact assessment with other nearby windfarms on sensitive receptors.</p>	<p>The marine physical environment baseline (section 8.5.6 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>) has been updated to include wave data from the metocean buoy deployed between March 2022 and May 2023.</p> <p>Numerical modelling of changes to wave climate has been undertaken and is used to inform the assessment of significance (see <b>Volume 7, Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b>).</p> <p>The outputs of the wave modelling have been used to inform the cumulative impact assessment in section 8.8.4 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	Y-M
SNE 054	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.5.3.4:</p> <p>The Flamborough Front gives rise to nutrient-rich waters which create a biodiversity hotspot attracting seabirds and marine mammals to the area each year. It</p>	<p>With regards to marine physical processes, following the definition of value in Table 8-10, Flamborough Front is assigned medium as the receptor is not designated but of local/regional importance. To assign a high value in terms of marine physical processes, the feature would need to be designated.</p> <p>Potential effects on primary productivity are covered in section 8.7.4.3.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	N

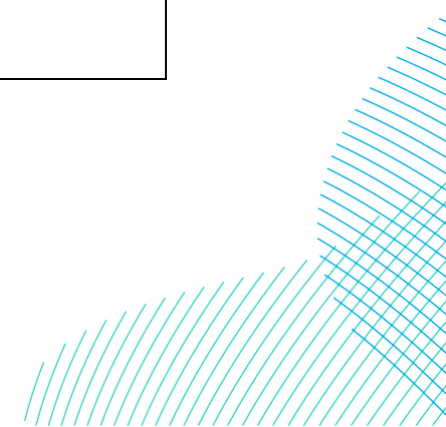
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>plays a key role in primary production, the marine ecosystem and biogeochemical cycles. Therefore, we advise that its value should be 'High' rather than 'Medium'.</p> <p>There is growing evidence that clusters of offshore wind farms alter stratification and, in turn, primary production. This poses a potential risk to the Attribute: 'Supporting Processes' associated with the DB SAC qualifying feature conservation objective. Therefore, we would also advise that 'Sensitivity' of the Flamborough Front due to the presence of the DBS arrays, is not 'Negligible'.</p> <p>Consideration should be given to how to accurately predict the interaction between the flow, infrastructure on the seabed, and stratification for the WCS array layout(s) over the lifetime of the project alone, and as part of a cluster of OWFs. Assessing potential changes to primary production should also be considered.</p>	<p>Changes to water circulation (Flamborough Front) due to the cumulative effect of windfarm infrastructure is assessed in section 8.8.4 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	
SNE 055	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.5.3 / Points 238 - 244</p> <p>The PEIR states that the main potential impact on the Flamborough Front is changes to near field mixing due to foundation wake effects and the potential for destabilising local water column stratification. All foundations will</p>	<p>Potential effects on primary productivity are covered in section 8.7.4.3.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p> <p>Changes to water circulation (Flamborough Front) due to the cumulative effect of windfarm infrastructure is assessed in section 8.8.4 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. No monitoring of this effect is proposed as the effects of the Projects on the Flamborough Front have been found to be negligible.</p>	N



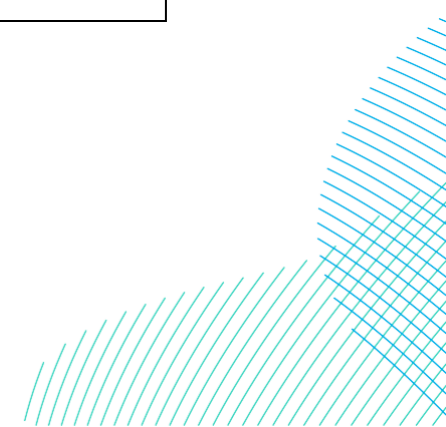
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>lead to some level of local turbulence and depending on the final design configuration of the foundations, the gravity-based foundation cross-section through the water column has the potential to lead to the highest level of turbulence compared to other foundation options.</p> <p>The chapter concludes that the scale of turbulence is considered to remain localised in the form of a wake in the lee of each foundation without a larger array scale effect. Cold water plumes could also form in the lee of the foundation structures of the array, altering the sea temperature. These cold-water plumes could, on an array-scale, also have a significant ecological impact on the primary production and the wider marine ecosystem. Further assessment of this is needed in the final assessment.</p> <p>Include a review of the impact of the project on the Flamborough Front as part of the cumulative impact assessment with other nearby windfarms on sensitive receptors.</p> <p>It will be important to establish a monitoring programme to record any changes to stratification and primary productivity, which would require surveys pre-construction, post-construction, and for the lifetime of the project. We advise this is discussed as part of the EP process. This should include</p>		



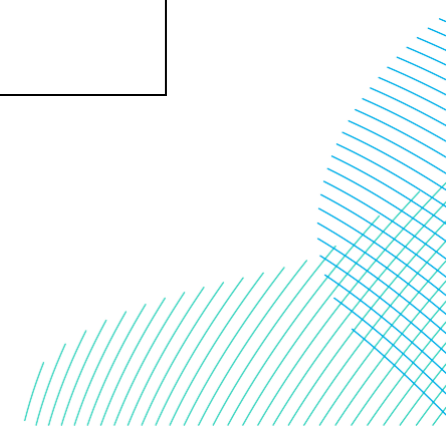
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>"trigger points" to allow interventions/remediation if required.</p>		
SNE 056	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.5.5: The introduction of infrastructure and hard substrata to an MPA is likely to hinder the conservation objectives of the site. Therefore, our preference is for cables to be buried. We would also be concerned with the placement of any cable protection across Smithic Bank as this could lead to a reduction in water depth within the water column, and potentially lead to local scour and the formation of a barrier to sediment transport. Significantly altering the profile of the sandbank could have a significant impact on longshore drift. Similarly, we would also be concerned with cable protection being placed in Holderness Inshore MCZ.</p> <p>We advise the Project to commit to cable burial in suitable habitats, before considering use of external cable protection. We advise that cable protection should be avoided within designated sites, Smithic Bank and in depths less than 10m where possible. Providing a cable burial risk assessment at the time of Application would help ensure that cable protection requirements</p>	<p>The Offshore Export Cable Corridor (excluding the construction buffer) does not cross Smithic Bank as defined by JNCC or by the British Geological Survey (see section 8.5.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and <b>Volume 7, Figure 8-2 (application ref: 7.8.1)</b>).</p> <p>Due to the potential for Chalk bedrock to be present within cable burial depth in water depths &lt;10m below LAT (see section 8.5.2), there is potential cable protection may be required locally within the 10m depth contour. This has been assessed in section 8.7.4.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. Mitigation has been put forward to limit the amount of cable protection that may be employed in this area.</p> <p>A preliminary cable burial risk assessment has been undertaken and is provided as support information in <b>Volume 8, Cable Statement (application ref: 8.20)</b>.</p>	Y-D



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				were understood and refined down as far as possible.		
SNE 057	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.5.5 / Point 258:</p> <p>The locations where cable protection measures are most likely to be required are areas of cable crossings and seabed characterised by exposed bedrock.</p> <p>Provide a map showing the location of areas most likely to require cable protection, including all crossings, and identify any sensitive receptors and designated areas.</p> <p>If any cable crossings are anticipated to be in the nearshore or near Smithic Bank, impacts to nearshore sediment transport pathways should be considered.</p>	Potential subsea cable / pipeline crossings along the Offshore Export Cable Corridor are presented in <b>Volume 7, Figure 8-14 (application ref: 7.8.1)</b> .	Y-M
SNE 058	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.5.6 / Points 275-278 &amp; Table 5-24 (Chapter 5):</p> <p>The worst-case maximum disturbance area for cable repair assumes 25% amounting to a total area of 1,354,662m<sup>2</sup>, if DBS E and DBS W are built together.</p> <p>Please provide rationale for the 25% disturbance area. Where MPAs are likely to be affected, the WCS of impact for each MPA for cable repair needs to be established</p>	<p>Cable repair estimates are based on the Applicants experience of operating transmission assets for other offshore wind farms.</p> <p>MPAs are not marine physical environment receptors and the effects of cable repair and reburial on these impact receptors are assessed in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b>.</p>	N

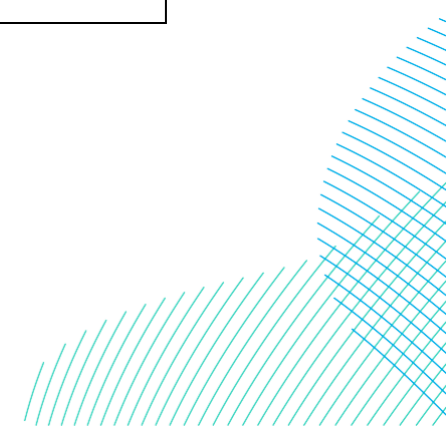


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SNE 059	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.5.6 / Table 8-53:</p> <p>The sensitivity of Smithic Bank to cable repair and maintenance operations has been assessed as 'Low'. We are concerned that cable installation, repairs, maintenance, replacement, protection by multiple developments on Smithic Bank, could affect its form and function. There is also uncertainty regarding the erosional/depositional nature of South Smithic and how its morphology will respond to the impact of multiple development installation and O&amp;M activities. We would also advise that its value is 'High'.</p> <p>The potential impact to Smithic Bank of cable reburial, cable replacement, and cable remediation activities through the lifetime of the Project(s) (including climate change impacts) need to be adequately assessed.</p>	<p>The Offshore Export Cable Corridor (excluding the construction buffer) does not cross Smithic Bank as defined by JNCC or by the British Geological Survey (see section 8.5.1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and <b>Volume 7, Figure 8-2 (application ref: 7.8.1)</b>).</p> <p>With regards to marine physical processes, following the definition of value in Table 8-10 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>, Smithic Bank is assigned medium as the receptor is not designated but of local/regional importance. To assign a high value in terms of marine physical processes, the feature would need to be designated.</p>	N
SNE 060	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.5.6:</p> <p>Cable repairs during operation are included, but not during construction. Cable remediation work may be required after installation (but before operation) to address faults and / or damages to the inter-array and export cables which occurred prior to installation or during installation.</p>	<p>Once the cable is installed, if repairs are required these are accounted for in the estimates for the Operation and Maintenance phase of the Projects.</p>	N



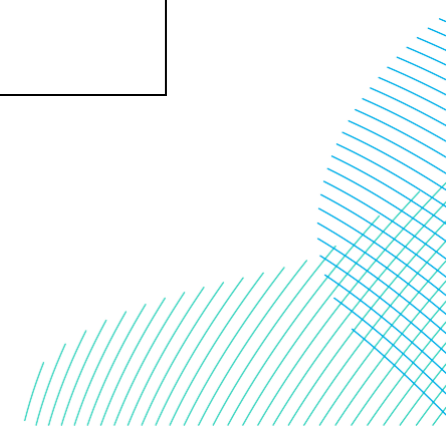
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				This is considered a separate activity to cable repairs and maintenance during operation and should be assessed as an additional phase of offshore wind development (see Natural England's Best Practice Guidance).		
SNE 061	17/07/2023	Natural England	Marine Physical Environment	<p>8.9</p> <p>Monitoring currently proposed for marine physical environment receptors:</p> <ul style="list-style-type: none"> <li>- Pre- and post-construction monitoring of sand waves to assess recovery rates and re-exposure of buried cables.</li> <li>- Recovery of the physical form of the seabed, including from export cable installation in the Holderness Inshore MCZ and across Smithic Sands.</li> <li>- Monitoring of scour protection measures and secondary scour to identify the extent, volume and integrity of any scour protection used.</li> </ul> <p>We welcome these proposed monitoring programmes.</p> <p>Further monitoring may be needed and we advise this is discussed as part of the EP process.</p>	Noted. The Applicants have prepared <b>Volume 8, In Principle Monitoring Plan (application ref: 8.23)</b> in support of their application for consent for the Projects.	N
SNE 062	17/07/2023	Natural England	Marine Physical Environment	<p>8.7.6 / Points 304 &amp; 306</p> <p>The PEIR states for decommissioning that scour, and cable protection would be left in-situ other than where there is a</p>	The scope of the decommissioning works would most likely involve removal of the accessible installed components. This is outlined in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> and the detail would be agreed with the relevant authorities at the time of decommissioning. Offshore, this is likely to include removal of all of the wind turbine components and part of the foundations (those above seabed level), removal of some or all of the array and export cables. Scour and cable	N

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				<p>specific condition for its removal. It is not clear from the PEIR how impacts to marine processes beyond the lifetime of the project have been assessed.</p> <p>Natural England advises that any scour prevention and cable protection within designated sites will need to be removed at the time of decommissioning.</p>	<p>protection would likely be left in situ unless removal is deemed to be of a greater benefit to the environment at the time of decommissioning.</p> <p>The effects of scour protection and cable protection on the surrounding environment following decommissioning would be comparable to that of the operational stage of the Projects. Accordingly, given that no significant impact was assessed for the identified marine physical environment receptors during the operational phase of the Projects, it is anticipated that the same would be valid for the decommissioning phase.</p>	
SNE 063	17/07/2023	Natural England	Marine Physical Environment	<p>8.8 &amp; 8.9 / Points 312 - 315:</p> <p>The PEIR states for cumulative impacts that several relevant projects have been listed. However, the chapter concludes: 'With respect to these activities, the cumulative assessment considers them to be part of the baseline conditions for the surrounding area'.</p> <p>More information should be provided around the potential interaction between DB South Projects and the other projects listed by reviewing any residual on-going impacts against receptors. Need to consider and assess the following: Given the connectivity along the Holderness coast and beyond, additional plans and projects should be scoped in. This should include (but not necessarily limited to) coastal infrastructure.</p>	<p>It is not the scope of this ES to assess the residual ongoing impacts on receptors from other projects. Impacts from other existing projects in the region are considered as part of the baseline environment. Coastal infrastructure projects are included in the cumulative effects assessment in section 8.8 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>, where relevant.</p>	N

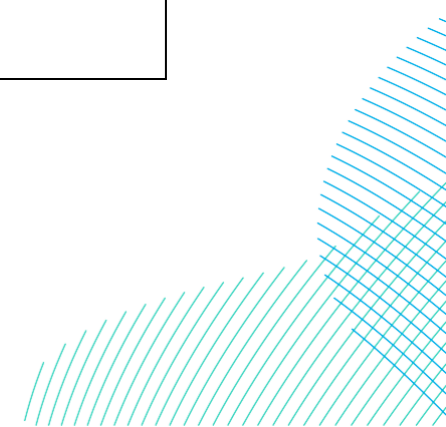




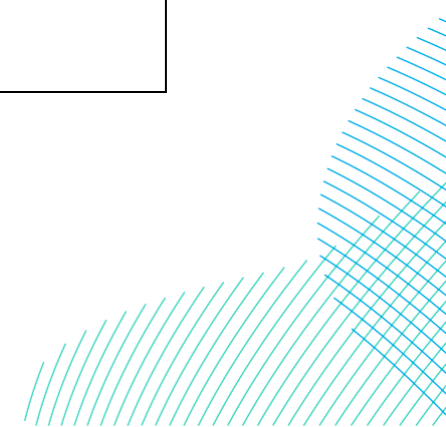
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SNE 064	17/07/2023	Natural England	Marine Physical Environment	<p>Chapter 6 / Point 61:</p> <p>We note that only those potential effects identified as major or moderate are regarded as 'significant' in EIA terms. This cut-off excludes minor or negligible effects from being regarded as 'significant'. We note that for Marine Physical Environment effects, several impact magnitudes and receptor sensitivities appear to have been underestimated. The matrix approach adopted in this EIA for determining effect significance relies, in part upon expert judgement, particularly for receptor value and sensitivity, which can be quite subjective. Moreover, having a cut-off between those effects determined to be 'significant' or not, in EIA terms, could lead to errors in assessing cumulative effects adequately.</p> <p>We advise a less subjective and more evidence-based approach to determining significance of effect.</p>	<p>The marine physical environment baseline (section 8.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>) has been updated to include site specific data and the outputs from marine physical processes numerical modelling (see <b>Volume 7, Figure 8-2 (application ref: 7.8.1)</b>). These data provide the evidence base for the assessment of significance, which is supported by expert judgment.</p>	Y-M
SNE 065	17/07/2023	Natural England	Marine Physical Environment	<p>Chapter 8 / Table 8-3:</p> <p>Impact C1b: Volume of drill arisings from a large WTG monopile foundation is given as 17,813m<sup>3</sup> per pile. It is assumed 5% of all WTGs will be drilled, which equates to 5 WTGs across both Projects. Thus, drill arisings from 5% of 95 large WTGs would be 5 x</p>	<p>Table 8-1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> has been updated to reflect a refined project design envelope and any reference to these values has also been updated in the relevant section of the text.</p>	Y-M



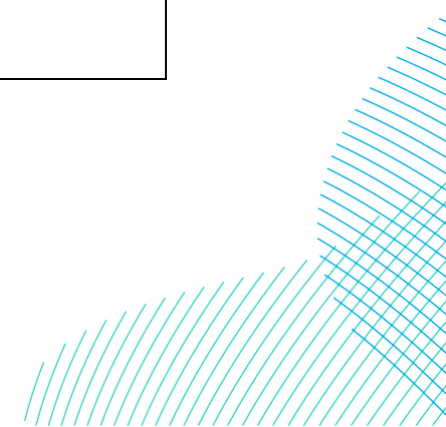
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>17,813 = 89,065m<sup>3</sup>. However, in Table 8-3, drill arisings from 95 large WTGs = 84,611m<sup>3</sup>.</p> <p>Please Clarify.</p>		
SNE 066	17/07/2023	Natural England	Marine Physical Environment	<p>Table 8-3:</p> <p>In Table 8-3, it states that the maximum sand wave material to be dredged for the OECC is 99,365,402m<sup>3</sup> and for the array and inter platform cables 99,365,402m<sup>3</sup>. However, in Table 5-7 (Chapter 5), WCS sand wave levelling scenario for DBS E and DBS W concurrently and/or sequentially in the array areas is 1,047,938m<sup>3</sup> and within the OECC, is 99,365,402m<sup>3</sup>. There is a significant difference in WCS between these two tables.</p> <p>Moreover, this is an incredibly significant volume based on the assumption that sand wave levelling will be carried out along the total (100%) offshore cable length, which we do not believe is a realistic worst-case scenario.</p> <p>All possible efforts should be made to avoid areas of sand waves or minimise the need for clearance by microrouting. We advise using project-specific geophysical survey data to refine down the WCS for sand wave clearance and a sand wave levelling management plan is provided for Dogger Bank SAC. If sand wave levelling cannot be</p>	<p>Table 8-1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> has been updated to reflect a refined project design envelope and any reference to these values has also been updated in the relevant section of the text.</p> <p>Pre- and post-construction monitoring of sand waves to seabed assess recovery rates is proposed in section 8.9 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p> <p>The effects from seabed levelling (sand wave clearance) have been modelled (see <b>Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b>) and used to inform the assessment of effects.</p>	Y-M



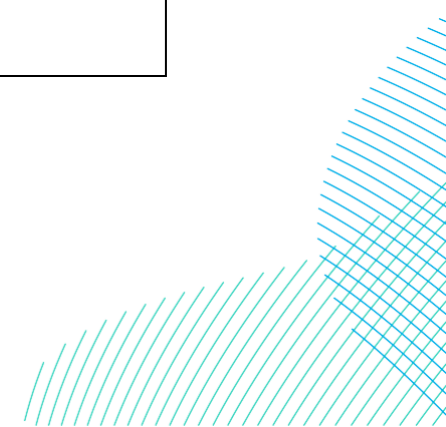
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				<p>avoided in a designated site where the sand waves are related to a designated feature, we advise that monitoring is undertaken to assess whether the cable remains buried, the sand waves recover, and how the natural processes reinstate themselves.</p> <p>The extent and location of sediment disturbance (area, volume) should be provided for affected MPAs / features and other receptors (e.g., DB SAC, Annex I sandbanks, Smithic Bank).</p>		
SNE 067	17/07/2023	Natural England	Marine Physical Environment	<p>Table 8-3</p> <p>Impact O1: The parameters described for this impact include 'seabed preparation for 48 x large suction bucket foundations with 4 x 25m diameter buckets per pile...'. Seabed preparation for gravity base foundation OCPs is also evaluated for this impact. However, seabed preparation is a construction-related activity not operation-related.</p> <p>Seabed preparation for foundations should be included in the Construction impact section where impacts are likely to short term. Evaluate the worst-case seabed obstruction footprint instead.</p>	<p>Table 8-1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> has been updated to reflect a refined project design envelope and any reference to these values has also been updated in the relevant section of the text. The equivalent table in the Environmental Statement has been reorganised and updated to reflect construction and operational impacts.</p>	Y-M
SNE 068	17/07/2023	Natural England	Marine Physical Environment	<p>Table 8-3, Section 5.4.7.7.1 &amp; Section 5.4.7.7.3:</p>	<p>Total cable protection requirements have been updated and included in Table 8-1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	N



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>Impact O4b: The maximum cable protection requirement for export cable length does not appear to be included in the 'Notes and Rationale'.</p> <p>In Section 5.4.7.7.1, Point 157 states that: an 'allowance of up to 170km of cable protection (total across both Projects) is included for array cables in close proximity to the wind turbines. How / where is this allowance included in the WCS in Table 8-3? Similarly, in Section 5.4.7.7.3, it states that a 'total allowance of [cable protection of] up to 177.7km is assumed for the export cables, 76.52km for the inter-platform cables (for both Projects) and 162.8km for the array cables.' How do these values relate to the WCS seabed footprint of cable protection estimates provided in Table 8-3?</p> <p>Please can this be clarified.</p>		
SNE 069	17/07/2023	Natural England	Marine Physical Environment	<p>Table 8-3:</p> <p>Impact O4b: Changes to bedload sediment transport and seabed morphology due to the presence of cable protection measures.</p> <p>We note that this WCS includes allowance for remedial cable protection for 20% of the route. It is unclear which route this relates to, for example, offshore export cable? The rationale for 20% remedial cable protection has also not been provided.</p>	<p>Remedial cable protection may be used for up to a maximum of 20% of the total length of the Offshore Export Cable Corridor. This figure represents an absolute worst case cable protection allowance in line with that consented for other offshore wind farm projects in the North Sea. Cable protection may be required in areas where the sediment depth is less than 0.5m above the underlying bedrock, or at subsea cables / pipelines. <b>Volume 7, Figure 8-14 (application ref: 7.8.1)</b> presents the locations of potential subsea cables / pipelines along the Offshore Export Cable Corridor.</p> <p>Due to the potential for Chalk bedrock to be present within cable burial depth in water depths &lt;10m below LAT (see section 8.5.2 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>), there is potential cable protection may be required locally within the 10m depth contour. This has been assessed in section 8.7.4.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. Mitigation has been put forward to limit the installation of this protection.</p>	N

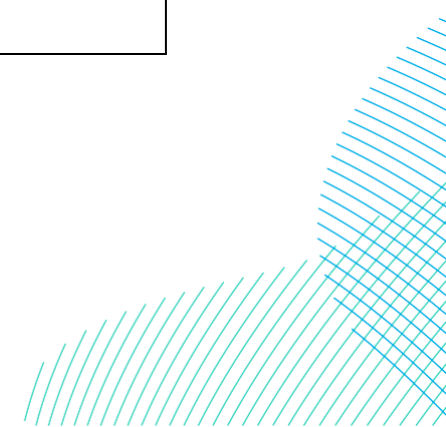


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				Please clarify and provide the rationale for 20% remedial cable protection and in which habitats this is likely to occur.		
SNE 070	17/07/2023	Natural England	Marine Physical Environment	8.4.3.1.3 / Table 8-11: It is unclear if spatial / geographical extent been taken into consideration within the definition of magnitude of impacts.  Please Clarify	The definition of magnitude takes into consideration scale (e.g. size, extent and intensity) as outlined in paragraph Section 8.4.3.1.3 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> .	N
SNE 071	17/07/2023	Natural England	Geology and Land Quality	19.4.2.2:  We note that only those potential effects identified as major or moderate are regarded as 'significant' in EIA terms. This cut-off excludes minor or negligible effects from being regarded as 'significant'. We note that for Geology and Land Quality effects, several impact magnitudes and receptor sensitivities appear to have been underestimated. The matrix approach adopted in this EIA for determining effect significance relies, in part upon expert judgement, particularly for receptor value and sensitivity, which can be quite subjective. Moreover, having a cut-off between those effects determined to be 'significant' or not, in EIA terms, could lead to errors in assessing cumulative effects adequately.	The significance of effect is evaluated with reference to definitive standards, accepted criteria, technical guidance or legislation where these exist.  An updated assessment has been undertaken and included within section 19.6 of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b> . The assessment reflects the refinement of the Onshore Development Area.	N

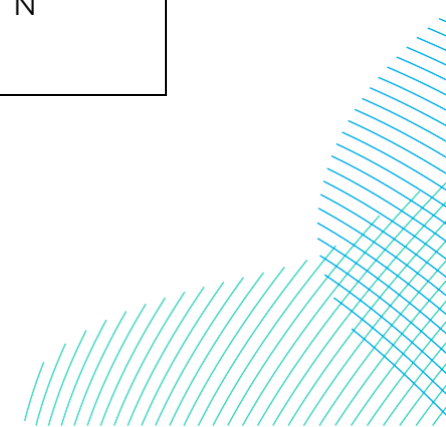


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				We advise a less subjective and more evidence-based approach to determining significance of effect.		
SNE 072	17/07/2023	Natural England	Geology and Land Quality	<p>19.7.2</p> <p>The PEIR states for cumulative impacts that several relevant projects have been listed. However, the chapter concludes: 'With respect to these activities, the cumulative assessment considers them to be part of the baseline conditions for the surrounding area'.</p> <p>More information should be provided around the potential interaction between DB South Projects and the other projects listed by reviewing any residual impacts against receptors.</p> <p>More information should be provided around the potential interaction between DB South Projects and the other projects listed by reviewing any residual on-going impacts against receptors.</p>	An updated cumulative assessment has been included within section 19.7 of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b> . The assessment reflects the potential interactions between the Projects and other developments.	N
SNE 073	17/07/2023	Natural England	Marine Physical Environment	<p>MCZ ASR General:</p> <p>The marine physical environment baseline data are still being collected and/or analysed, therefore, the baseline is currently incomplete.</p> <p>These data should be used to</p>	Project specific modelling results from <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> have been used in to inform the assessment conducted in this report.	N

ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				make an informed assessment of impacts to MCZs.		
SNE 073	17/07/2023	Natural England	Marine Physical Environment	<p>MPE &amp; HRA AS1S General:</p> <p>The marine physical environment baseline data are still being collected and/or analysed, therefore, the baseline is currently incomplete.</p> <p>These data should be used to make an informed assessment of impacts to designated sites.</p>	The marine physical processes baseline in section 8.5 has been updated with project specific data and the results from marine physical processes numerical modelling (see <b>Volume 7, Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b> ), and the assessment of significance updated where appropriate.	N
SNE 074	17/07/2023	Natural England	Marine Mammals	<p>4.3.4.1</p> <p>Table 4-7 and 4-8 indicated that Doggersbank SAC has been screened out, however Figure 4-6 shows it has been screened in.</p> <p>Recommendation: Please update Figure 4-6, Table 4-7 and Table 4-8 in the submitted ES so they show consistent information.</p>	For marine mammals the Doggersbank SAC has been screened in and assessed in the section 8.3.10 Other European Sites of <b>Volume 6, Report to Inform Appropriate Assessment Habitat Regulations Assessment (application ref: 6.1)</b> .	N
SNE 075	17/07/2023	Natural England	Marine Physical Environment	<p>MCZ ASR General:</p> <p>One of the potential landfalls is located within Holderness Inshore MCZ.</p> <p>Consideration will need to be given to whether cable installation will disturb sensitive areas of seabed in the intertidal and supratidal areas at landfall and the impact assessed appropriately.</p>	The offshore export cable route has been reduced at landfall and the corridor no longer overlaps with the Holderness Inshore MCZ.	Y-D

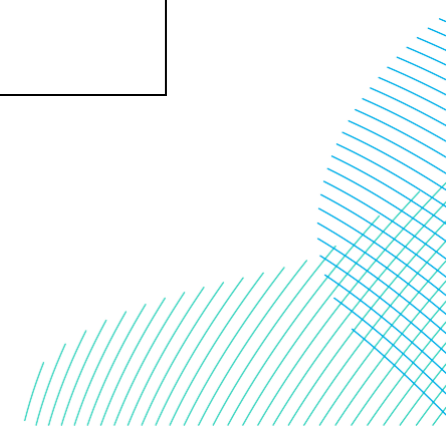


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SNE 076	17/07/2023	Natural England	Geology and Land Quality	<p>G&amp;LQ Not present in Chapters 8 or 19:</p> <p>Withow Gap, Skipsea SSSI: Coastal Erosion The coastal exposure of the Withow Gap, Skipsea SSSI comprises low cliffs of peat deposits, which are particularly vulnerable to coastal erosion, even in the context of the Holderness Coast. Changes to coastal sediment pathways therefore have the potential to significantly damage or destroy features for which the SSSI has been notified. The most concerning pathway stems from the potential for a coastal cofferdam to the north of the site, which would interrupt the flow of sediment along southwards along the coast. This could lower the beach profile immediately seaward of the SSSI cliffs and expose them to increased coastal erosion.</p> <p>Withow Gap, Skipsea SSSI should be considered as a receptor in the assessment of changes to Physical Marine Processes. Include this site in impact assessments and consider any requirements for changes to project design so operations likely to damage are avoided</p>	<p>Withow Gap Skipsea SSSI has been included as a receptor for marine physical processes and is assessed in relation to changes in nearshore sediment transport pathways in section 8.7.3.9 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and section 8.7.4.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. Cofferdams have been removed from the project design envelope.</p>	Y-D
SNE 077	17/07/2023	Natural England	Geology and Land Quality	<p>19.5.1 / Table 19-10, Parameter - Sensitive land uses:</p>	<p>The Onshore Development Area has now been refined and the Projects no longer interact with the SSSI as part of the landfall works.</p>	N

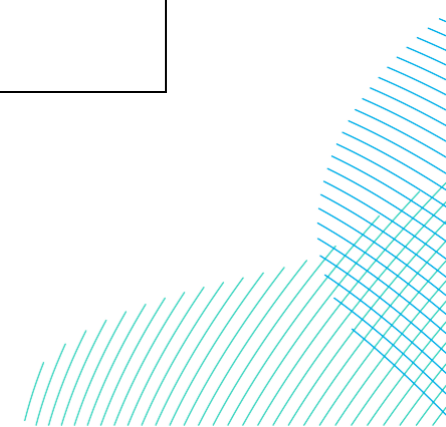




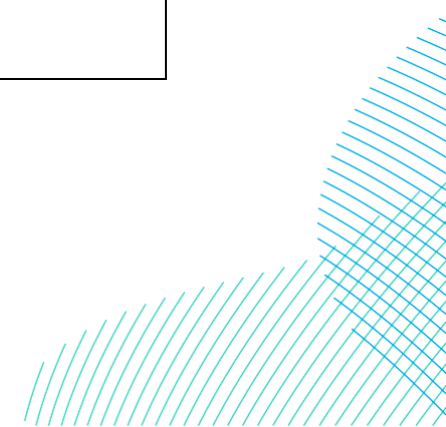
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>Withow Gap, Skipsea SSSI: Subsurface Features                      'Withow Gap, Skipsea - SSSI, SSSI Unit and SSSI impact risk zone designated due to its geological properties (exposed at the cliff face)'.                      Natural England notes that Withow Gap, Skipsea SSSI has both a coastal cliff and subsurface features:  <a href="https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1003207.pdf">https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1003207.pdf</a></p> <p>Clarity required: how will impacts from HDD on the buried features of Withow Gap, Skipsea SSSI be assessed?                      e.g., vibration, dewatering, contamination of palynological or isotope records.</p>		
SNE 078	17/07/2023	Natural England	Geology and Land Quality	<p>19.6.1.6.1 (172):                      'It is however noted that HDD would have to be below the Withow Gap Skipsea SSSI as it is in a cliff face'.                      Natural England notes that the cliff face feature of the SSSI is rapidly retreating inland due to coastal erosion and that this feature is not necessarily protected simply by avoiding the current cliff face.</p> <p>Clarity required: how will the HDD be directed to avoid impacting this feature over the lifetime of the project and beyond?</p>	The Onshore Development Area has now been refined and the Projects no longer interact with the SSSI as part of the landfall works.	N



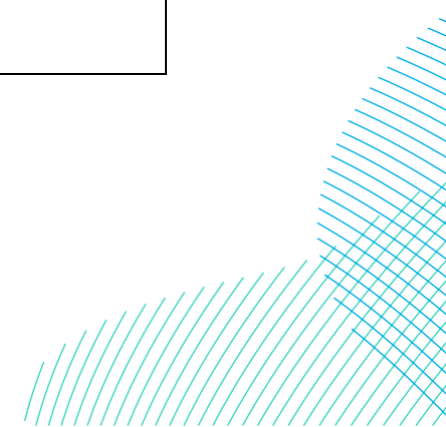
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SNE 079	17/07/2023	Natural England	Geology and Land Quality	<p>19.6.1.6.5 (176):</p> <p>'Further engineering investigations are currently being undertaken to assess the feasibility of applying these mitigation measures for the Withow Gap Skipsea SSSI.'</p> <p>Incomplete baseline data, impacts to be assessed once site specific data included in ES.</p>	The Onshore Development Area has now been refined and the Projects no longer interact with the SSSI as part of the landfall works.	N
SNE 080	17/07/2023	Natural England	Geology and Land Quality	<p>19.6.1.6.5 (177):</p> <p>'Assuming these measures can be applied to Withow Gap Skipsea SSSI they will reduce the magnitude of impact from high to negligible therefore the residual effect is minor adverse, which is deemed to be not significant.'</p> <p>Incomplete baseline data, impacts to be assessed once site specific data included in ES. But any operations likely to damage notified features will need to be mitigated for through conditions. For SSSI's EIA measures of significance are not appropriate.</p>	The Onshore Development Area has now been refined and the Projects no longer interact with the SSSI as part of the landfall works.	N
SNE 081	17/07/2023	Natural England	Benthic Habitats	<p>Summary of Key Issues - Benthic Habitats:</p> <p>Baseline data is incomplete. Site specific modelling for suspended sediments and geophysical surveys have not yet been provided. The Baseline Characterisation Report is also a draft, but it is unclear what, if</p>	Physical processes modelling results and a final version of the supporting benthic characterisation report is included in <b>Volume 7, Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b> and <b>Volume 7, Appendix 9-3 Benthic Ecology Monitoring Report (application ref: 7.9.9.3)</b> respectively, with any significant changes to the report highlighted.	N



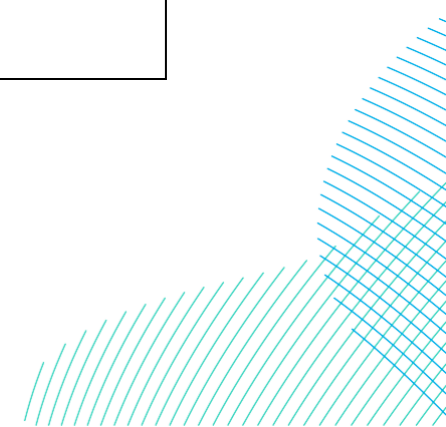
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>any, aspects are due to change.</p> <p>Natural England is unable to provide further advice until a complete draft ES chapter and supporting Annexes have been provided.</p>		
SNE 082	17/07/2023	Natural England	Benthic Habitats	<p>Summary of Key Issues - Benthic Habitats:</p> <p>We welcome a proportionate approach being taken to the assessments where appropriate, but note that there will be limitations to the use of the original Creyke Beck and Teesside EIA. The EIAs for Creyke Beck and Teesside were conducted over 10 years ago, and in line with our Best Practice Guidance, for data over 5 years old it must be evidenced that it is appropriate for use. Our understanding of affected designated sites, offshore wind (OWF) impacts, construction technologies and the volume of consented infrastructure in the area has evolved since the original assessment was conducted. For the above reasons, we support data from these EIAs being used to support Dogger Bank South's characterisation where appropriate, but it cannot be used in place of project specific data.</p> <p>Further clarification is required as to what the intended use of existing datasets would be – reference is</p>	<p>Further explanation on how existing datasets have been utilised in the assessment is included in section 9.4.2 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9.)</b>. Project-specific data, through the finalised benthic monitoring report (<b>Volume 7, Appendix 9-3 (application ref: 7.9.9.3)</b>) and marine physical processes modelling (see <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>), is used as the primary source of information when assessing impacts on the existing environment.</p>	Y-M



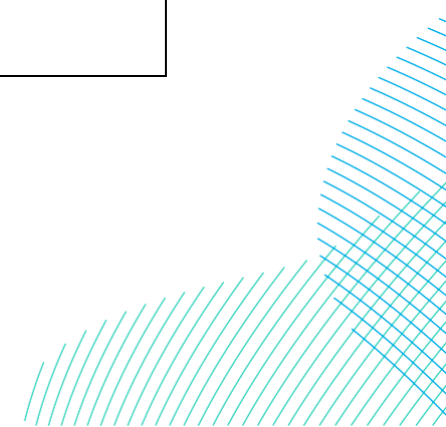
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				given in to other available sources of data but follow up on what context these have been used in is lacking.		
SNE 083	17/07/2023	Natural England	Benthic Habitats	<p>Summary of Key Issues - Benthic Habitats:</p> <p>A high level preliminary screening of cumulative effects has been provided, but a Cumulative Effects Assessment and in-combination assessment has not been provided.</p> <p>More clarity is needed as to how the EIA methodology (and subsequent outputs) is approached when evaluating the cumulative effects of different build out scenarios.</p>	A cumulative effects assessment is provided in section 9.8 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b> . In combination assessments are set out in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> submitted alongside this ES.	Y-M
SNE 083.1	17/07/2023	Natural England	Benthic Habitats	<p>Summary of Key Issues - Benthic Habitats:</p> <p>There are several inconsistencies across and/or within documents and therefore it is unclear what the worse-case scenario is and if it has been assessed.</p> <p>Natural England advises that inconsistencies are addressed prior to submission in order that worst-case scenarios can be determined.</p>	Noted, these inconsistencies have been addressed to ensure the worst-case scenarios can be determined.	Y-M
SNE 084	17/07/2023	Natural England	Offshore Ornithology	<p>Table 1-1</p> <p>Natural England note that no detail has been provided on the impact</p>	Details of the impact pathways assessed for each SPA feature are provided in section 9.1 of <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> .	Y-M



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>pathways to be considered for each SPA feature, but note that it is stated that this information will be provided in the RIAA.</p> <p>Recommendation: Please provide details of the impact pathways to be assessed for each SPA feature in the RIAA, as stated.</p>		
SNE 085	17/07/2023	Natural England	Benthic Habitats	<p>Summary of Key Issues - Benthic Habitats:</p> <p>Natural England notes that the approach to the EIA assessment is proposed to align with other OWF NSIPs. This matrix approach has been used throughout ESs to date to support the assessment of the magnitude and significance of impacts. Natural England notes numerous instances where significance has been presented as a range (i.e., slight, or moderate, or large) and it is nearly always the lower value that has been taken forward. In the absence of evidence to support the use of the lower value in a range, Natural England's view is that the higher value should always be assessed in order to ensure that impacts on features haven't been incorrectly screened out of further assessment. This is in line with the principles of the Rochdale envelope approach</p> <p>Robust justification will need to be provided for any parameters used</p>	<p>Noted, all significance statements made in each chapter topic have been reviewed to ensure their accuracy and proportionality. An explanation of the rationale used to determine the sensitivities of receptors and magnitudes of impact are also included in each chapter.</p>	Y-M

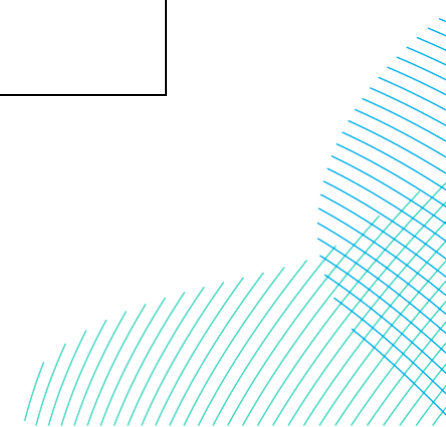


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				to determine the magnitude and significance of any impacts.		
SNE 086	17/07/2023	Natural England	Benthic Habitats	<p>Summary of Key Issues - Benthic Habitats:</p> <p>Natural England notes that the proposed number of platforms is considerably greater than for other recently consented OWFs e.g., Norfolk Boreas, but without clear justification for the additional platforms or how the mitigation hierarchy has been followed to minimise the impacts from the platforms placed within the Dogger Bank SAC</p> <p>Robust justification will need to be presented to support the Application</p>	<p>The Projects are integrated in National Grid ESO's proposed Holistic Network Design. The concept for the HND, issued in July 2022, showed two 1800MW HVDC connections between DBS and Creyke Beck with a 275kV interconnection between the HVDC converter stations, with interconnection to a third 1800MW HVDC connection to Lincolnshire (outside of DBS' scope). Due to the weight and space requirements to enable this interconnection and functionality, and the uncertainty of the final HND concept to be taken forward, DBS cannot currently confirm the number of required platforms. The proposed number of platforms is based on 2x HVAC collector platforms (500MW each) and a 1800MW HVDC converter station per DBS project. Therefore, 6 total electrical platforms within the Array Areas themselves. Further platforms may also be required to facilitate the connection to the Scotland 1800MW link (Electrical Switching Platform), and an accommodation platform to support O&amp;M.</p> <p>The DBS design envelope contained up to 11 platforms across two projects, each of up to 1.5GW of capacity each for PEIR. For ES submission this number will be reduced to a maximum of eight platforms across two projects.</p> <p>We note Hornsea Project Four allowed for up to 10 platforms and that each of the Dogger Bank Creyke Beck Projects (now Dogger Bank A and B) allowed for a maximum of seven platforms for each project (up to a total of 14 platforms). With reflection on these figures, and noting that the DBS projects represent two separate projects with a combined capacity greater than those mentioned for the purpose of comparison, it is suggested that the maximum number of platforms proposed is comparatively modest. A description of the purpose of each of the potential platforms included in the ES envelope has been included in the final project description (<b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>).</p>	Y-D
SNE 087	17/07/2023	Natural England	Benthic Habitats	<p>Summary of Key Issues - Benthic Habitats:</p> <p>We advise that further mitigation measures could be adopted to further minimise the benthic impacts on Dogger Bank SAC features</p>	<p>Suction bucket foundations for the turbines have been removed from the design envelope for the Projects post -PEIR. To accommodate the potential for larger topside platforms to be used for the offshore platforms, Gravity Based foundations have remained as an option only for any platform located along the Offshore Export Cable Corridor. Neither Gravity Based foundations nor suction bucket foundations will be used within the Dogger Bank SAC.</p>	Y-D



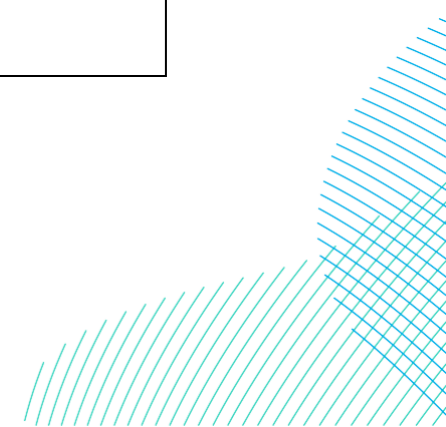
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				Consideration to reduce the Rochdale envelope to remove Gravity Base and suction bucket foundations from within Dogger Bank SAC.		
SNE 088	17/07/2023	Natural England	Benthic Habitats	<p>Summary of Key Issues - Benthic Habitats:</p> <p>Natural England advises that full consideration is given to potential benthic mitigation measures which have been adopted for other projects.</p> <p>Please see Annex B for full (not exclusive) list</p>	Mitigation measures utilised in recent project applications have been reviewed for their potential inclusion for the Projects – see section 9.3.3 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b> for embedded mitigation commitments.	N
SNE 089	17/07/2023	Natural England	Benthic Habitats	<p>Summary of Key Issues - Benthic Habitats:</p> <p>We note that for all impact and receptor pathways assessed during all project phases, none are considered to have a significance higher than minor adverse, despite the array areas being fully within Annex 1 habitat. Further, the magnitude of impacts of two wind farms being developed are assessed as being no higher than a single wind farm, with most impacts considered negligible.</p> <p>Clarify or provide further explanation of the assessment of magnitude of impact for the two development scenarios.</p>	<p>For the EIA, the designation of the sandbank as Annex 1 does not affect the sensitivity of the receptors, which are based on the MarESA criteria for their ecology. <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> assesses the SAC features specifically and is submitted alongside this ES.</p> <p>In the context of the Annex 1 sandbank habitat within the Dogger Bank SAC covering an extent of 12,331km<sup>2</sup>, and in the wider sandbank area present within the North Sea, it is considered that the difference in footprint between the Projects in isolation/together is negligible given the extent of existing habitat.</p> <p>It is also considered within the CEA (section 9.8.3.3) that the cumulative effects of habitat loss within the SAC are negligible due to the extent of the existing habitat.</p>	N

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SNE 090	17/07/2023	Natural England	Benthic Habitats	<p>Summary of Key Issues - Benthic Habitats:</p> <p>Natural England considers that both the Holderness Inshore MCZ assessment and Dogger Bank RIAA are fundamental documents required to support the Application, plus any discussion and issues resolution prior to Application submission on In principle Compensation Measures and Measures of Equivalent Environmental Benefit.</p> <p>Natural England advises that these documents are provided in order to progress project discussions prior to submission</p>	<p><b>Volume 8, Stage 1 Marine Conservation Zone Assessment (application ref: 8.17)</b> and <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> for the Projects has been submitted alongside this ES, with discussions held at ETGs with stakeholders.</p> <p><b>Volume 8, Stage 1 Marine Conservation Zone Assessment (application ref: 8.17)</b> assessment concluded that the effect of the Projects on the Holderness Inshore MCZ and Holderness Offshore MCZ would be non-significant, and Measures of Equivalent Environmental Benefit would not be required for these sites.</p>	N
SNE 091	17/07/2023	Natural England	Project Description	<p><b>Advice &amp; Recommendations - Benthic Habitats: docs used PD &amp; BH</b> Table 5-2 &amp; Table 5-3</p> <p>These tables indicate that there could be 48-100 turbines within each array across both projects. Natural England understands that the number used is based on the size of the turbine deployed, i.e. 48 large turbines or 100 small turbines.</p> <p>Clarity is needed on whether a mix of large and small turbines could also be installed within each array and what will determine the number of turbines installed, noting that the combination of size</p>	<p>There does exist the potential for a mix of large and small turbines to be installed within each array area. However, it should be noted that regarding the worst-case scenario for benthic and intertidal ecology, a full build-out of small turbines would cover the largest footprint, over that of any potential mix of large and small turbines.</p>	N

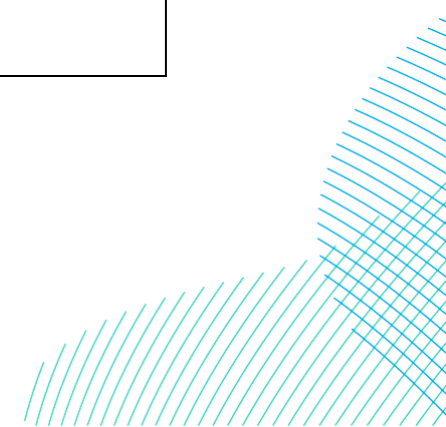




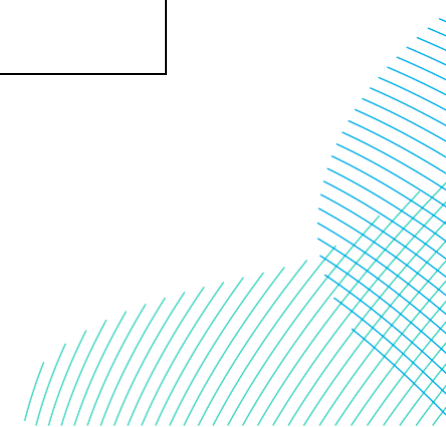
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				and number will impact both benthic and marine process receptors and will dictate the worst-case scenario		
SNE 092	17/07/2023	Natural England	Project Description	<p>Table 5-3:</p> <p>The sand wave levelling temporary construction footprints are given as:</p> <p>Array area: 2,587,500 m<sup>2</sup>                      ECC: 6,141,005 m<sup>2</sup> (with Dogger Bank South (DBS) West having double the amount of DBS East if HVAC is used)</p> <p>It is unclear what evidence has been used to derive these estimates.</p> <p>Further information is needed on how these estimates have been derived.</p>	Further details on how calculations have been estimated is included within the WCS table (Table 9-1 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b> ).	N
SNE 093	17/07/2023	Natural England	Project Description	<p>5.4.2.2</p> <p>The wind turbine layout will not be finalised until much closer to construction with the final layout being based on optimising energy output and ground conditions.</p> <p>We consider that the layout should also factor in reducing environmental impacts to both benthic and marine processes receptors.</p> <p>We advise that more detail on the type of foundation, orientation, and distribution pattern of the turbines relative to mean currents</p>	Site-specific data collected for the Projects will be used to further refine the layout for the Projects at the detailed design stage post consent. Detail from the project-specific marine physical processes modelling has been used to inform the CEA regarding sediment transport processes (see section 9.4.2.1 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b> ).	N



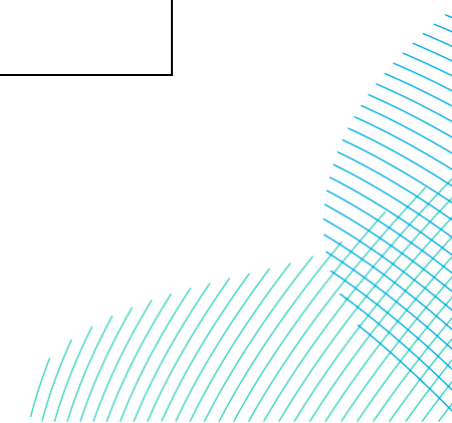
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				and tidal patterns is required as the cumulative impacts could have adverse effects on benthic communities as a result of changes in sediment transport processes.		
SNE 094	17/07/2023	Natural England	Project Description	<p>5.4.4.1</p> <p>As with wind turbines, locations of offshore platforms have not been provided.</p> <p>Noting that there could be up to four within each array, we advise that consideration should be given to environmental impacts to benthic and marine process receptors in their location. See Point B13.</p>	Site-specific data collected for the Projects will be used to inform the locations of the potential offshore platforms at the detailed design stage post consent.	N
SNE 095	17/07/2023	Natural England	Project Description	<p>5.4.4.2</p> <p>It is stated that the Electrical Switching Platform (ESP; if required) will provide a link to a co-ordinated east coast transmission system which is planned to run from Scotland to England, as per National Grid ESO's Holistic Network Design.</p> <p>Further information is needed on whether this would affect any other parameters within the project description, e.g. number of export cables, and when it will be known if this option is being taken forward. And any cumulative impacts HND options may pose, in-combination</p>	The parameters detailed in the worst-case description encompass any additional inputs from the HND. As such its implementation will not affect the other parameters.	N



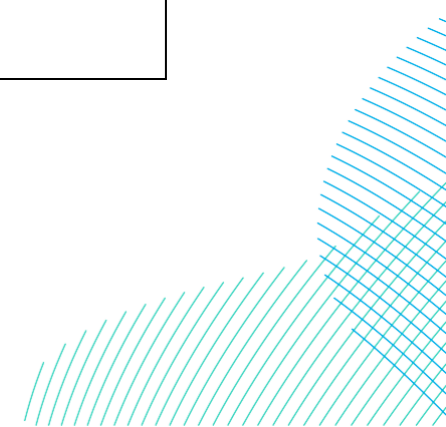
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				with the project, or is it a case of HND only?		
SNE 096	17/07/2023	Natural England	Project Description	<p>5.5.1 &amp; Table 5-25,</p> <p>Table 5-25 suggests that 9 HDD drills would be required for the build out scenarios of both two HVDC projects and a HVAC and HVDC project. Based on the text in 5.5.1, we consider that 8 would be needed if both projects used HVDC.</p> <p>Natural England advises that inconsistencies are addressed prior to submission in order that worst-case scenarios can be determined.</p>	Project parameters and any identified inconsistencies have been updated in line with the updated design envelope for the Projects. In addition, as below HVAC transmission has been removed from the design envelope since PEIR (see Table 9-1 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b> and <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> ).	N
SNE 096. a	17/07/2023	Natural England	Benthic Habitats	<p>Table 9-2</p> <p>The total area disturbed for offshore export cables for temporary physical disturbance during construction for DBS East and DBSW together is the same as for DBS West in isolation (15,496,459 m<sup>2</sup>). We believe this should be 24,684,688 m<sup>2</sup>.</p> <p>Natural England advises that inconsistencies are addressed prior to submission in order that worst-case scenarios can be determined.</p>	Total area of disturbance for all elements of DBS East and DBS West has been updated for the Environmental Statement and included in the worst case scenario table (see Table 9-2 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b> ).	Y-M
SNE 097	17/07/2023	Natural England	Benthic Habitats	<p>Table 9-2</p> <p>In the Project Description, four</p>	Noted, these inconsistencies have been addressed to ensure the worst-case scenarios can be determined.	Y-M



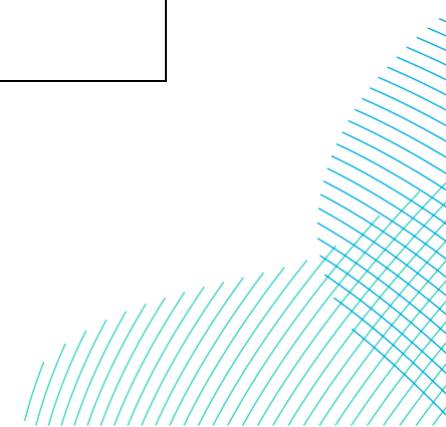
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				<p>HDD drills are required for DBS East in isolation. In Table 9-2, it is given as five.</p> <p>Natural England advises that inconsistencies are addressed prior to submission in order that worst-case scenarios can be determined.</p>		
SNE 097 a	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	<p>There is no assessment provided of functionally linked land associated with the Humber Estuary / Ramsar as recommended by Natural England on 20th January 2023. The Onshore Development Area is within 10km of the Humber Estuary SPA / Ramsar and falls within the Impact Risk Zone for this site. This means there is potential for the land to be used by wintering waders and geese as part of their foraging ranges.</p> <p>Natural England welcomes potential impacts to birds using functionally linked land associated with the Humber Estuary SPA / Ramsar has been screened into the HRA for further assessment. However, we would expect a desk-based assessment to be presented to determine if surveys are required.</p> <p>We recommend that the following information is provided to inform the Habitats Regulations Assessment (HRA):</p> <ul style="list-style-type: none"> <li>• A data search from the local</li> </ul>	<p>A functionally linked land assessment was undertaken and shared with Natural England. Further details are available in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b>. NE agreed at the Terrestrial Ecology and Ornithology ETG they were happy there were no significant effects on the functionally linked land.</p>	N



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>Ecological Data Centre;</p> <ul style="list-style-type: none"> <li>• Consultation with the Local Planning Authorities' Ecologist (both East Riding of Yorkshire Council and Hull City Council);</li> <li>• Consultation with local bird groups and other organisations that may hold relevant information;</li> <li>• A desk-based assessment - using aerial photography, mapping, habitat maps and relevant ecological literature - of the suitability for SPA birds of the habitats present on the proposed site and adjacent fields.</li> </ul> <p>If the above desk study identifies that the site or adjacent areas are used by bird features of the Humber Estuary SPA / Ramsar, we recommend that passage / wintering bird surveys may be required to assess the use of the site as functionally linked land to the estuary.</p> <p>Natural England offers the following advice on survey methodology:</p>		
SNE 098	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	We recommend that 'amended' vantage point (VP) surveys (principally following Scottish Natural Heritage (2017) methodologies (section 3.8) are undertaken of the site and surrounding habitats to provide an overview of bird usage, specifically	A functionally linked land assessment was undertaken and shared with Natural England. Further details are available in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> .	N

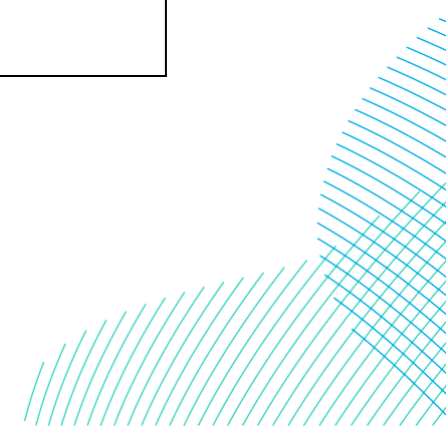


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>in relation to potential disturbance and displacement. It would be useful to record birds in flight especially if the application has potential to affect bird flight lines. We would expect to see commentary of birds landing and taking off within and out with the development site. Natural England would expect to see the level of survey effort comprise the following criterion:</p> <ul style="list-style-type: none"> <li>• Autumn Passage – weekly visits between August to November inclusive are advised due to high turnover of birds during migration;</li> <li>• Winter - two surveys per month between September to March inclusive;</li> <li>• Spring Passage – weekly visits between March to Mid-May inclusive are advised due to high turnover of birds during migration.</li> </ul> <p>The surveys should cover different tidal states and for sites which may potentially affect high tide roosts, observations should be conducted from two hours before high tide to two hours after high tide. Consideration should also be given to surveys in poor weather / visibility conditions as large movements of birds can be observed at this time.</p> <p>VP surveys may also need to take account of surveys at dusk and dawn, depending upon the bird species. For example, if geese have the potential to use the</p>		



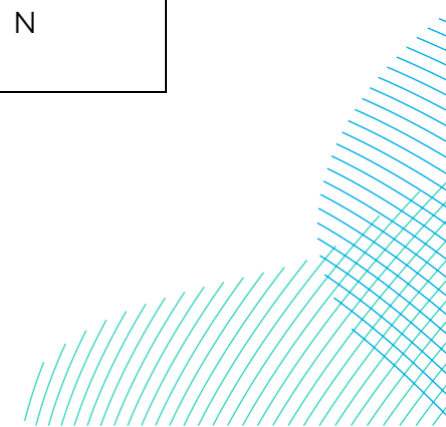
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				development site or surrounding area, we expect to see surveys 1 hour before and 1 hour after, dusk and dawn during the respective bird survey season (i.e., winter, spring and autumn passage). Depending upon the species of concern it may also be necessary to consider nocturnal surveys (specifically waders).		
SNE 099	17/07/2023	Natural England	Project Description	<p>5.1.1 &amp; 5.3</p> <p>It is stated that the transmission infrastructure will be developed as coordinated projects and that, where practicable, infrastructure will be co-located.</p> <p>Clarity is needed on the achievability of co-location if sequential and/or concurrent scenarios are taken forward by the same versus separate developers. It is unclear how the potential for co-location has been factored into the worst-case scenario. See Point B28.</p>	<p>In terms of offshore co-location, the Projects have the same landfalls and a single 1km wide export corridor for the export cable as far as possible up to the array areas. This reduces the development footprint under all scenarios.</p> <p>Works around landfall (HDD ducting) would all be undertaken in one campaign for both Projects for all scenarios meaning only one round of disturbance.</p>	N
SNE 100	17/07/2023	Natural England	Project Description	<p>5.1.1</p> <p>Natural England notes that the inclusion of one of the arrays having a HVAC electrical solution instead of HVDC considerably increases the amount of offshore infrastructure required, with two additional export cables and at least one additional platform needed.</p>	<p>HVAC transmission has been removed from the design envelope since PEIR. This is outlined in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>. Thus, it is not a feature of the design envelope for this consent application. This provides a clear demonstration of the Applicants' commitment to minimising the environmental impacts of the Projects wherever possible.</p>	Y-D

ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				Natural England advise that in line with the mitigation hierarchy the Applicant makes every effort to minimise environmental impacts, by committing to delivering both projects with HVDC transmission systems.		
SNE 101	17/07/2023	Natural England	Project Description	<p>5.4.4 &amp; Table 5-2</p> <p>It is unclear to Natural England why 6 offshore platforms have been included in the project envelope for each project, with a maximum of 11 across the two projects. We highlight that this is far greater than for other recently consented OWF projects.</p> <p>Further justification is needed for the inclusion of 11 platforms, 9 of which could be within the Dogger Bank SAC. Again, we advise that every effort will need to be made to minimise environmental impacts</p>	<p>The Projects Design Envelope contained up to 11 platforms across two projects, each of up to 1.5GW of capacity each for PEIR. For ES submission this number will be reduced to a maximum of eight platforms across two projects.</p> <p>We note Hornsea Project Four allowed for up to 10 platforms and that each of the Dogger Bank Creyke Beck Projects (now Dogger Bank A and B) allowed for a maximum of seven platforms for each project (up to a total of 14 platforms). With reflection on these figures, and noting that the DBS projects represent two separate projects with a combined capacity greater than those mentioned for the purpose of comparison, the Applicants suggest that the maximum number of platforms proposed is comparatively modest. A description of the purpose of each of the potential platforms included in the ES envelope has been included in the final project description (<b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>).</p>	Y-D
SNE 102	17/07/2023	Natural England	Project Description	<p>5.4.4.3.1 Table 5-2</p> <p>We welcome that gravity base foundations have not been included as an option for the wind turbines but note that they have been included as a platform foundation option.</p> <p>We highlight that no project in UK waters to date has required the use of gravity bases, and that their use</p>	<p>To accommodate the potential for larger topside platforms to be used for the offshore platforms, gravity based foundations have remained as an option for an offshore platform should one be located along the Offshore Export Cable Corridor. The Applicant has made a commitment that no gravity based foundations will be used within the Dogger Bank SAC. This is outlined in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>.</p>	Y-D

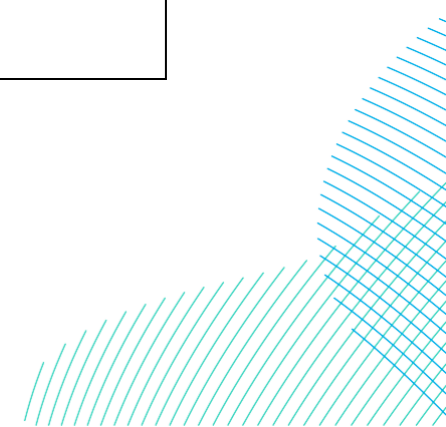




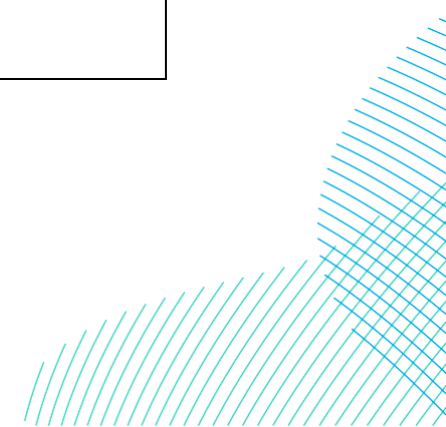
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>would result in a greater area of habitat loss within Dogger Bank SAC than with any other foundation option</p> <p>We advise that gravity base foundations are removed from the project envelope, or that further information is provided to justify their inclusion.</p>		
SNE 103	17/07/2023	Natural England	Project Description	<p>Table 5-4</p> <p>A WCS of 2,139,904 m2 has been estimated as the maximum lifetime footprint for array and inter-platform cable protection for sub-optimally buried cables.</p> <p>Clarification is needed on how these estimates have been derived. We advise that a Cable Burial Risk Assessment utilising site specific geotechnical data is provided at the time of application to determine the realistic level of cable protection that will be required within the Dogger Bank SAC.</p> <p>We highlight that assessments for other recent OWF projects within benthic SAC/MCZs have restricted scour prevention and cable protection allowances to construction, with operational requirements requiring a separate marine licence.</p>	<p>The estimate in the PEIR was based on a WCS of 20% of the array and inter-platform cabling requiring cable protection. It should be noted that this figure has been reduced to 10% for this ES to reduce these allowances.</p> <p><b>Volume 8, Cable Statement (application ref: 8.20)</b> includes Cable Burial Risk Assessments for the export cable and array area cables has been submitted for the Projects alongside this ES.</p>	N
SNE 104	17/07/2023	Natural England	Project Description	Table 5-4	<b>Volume 8, Cable Statement (application ref: 8.20)</b> includes Cable Burial Risk Assessments for the Projects Offshore Export Cable Corridor and Array Arrays	N



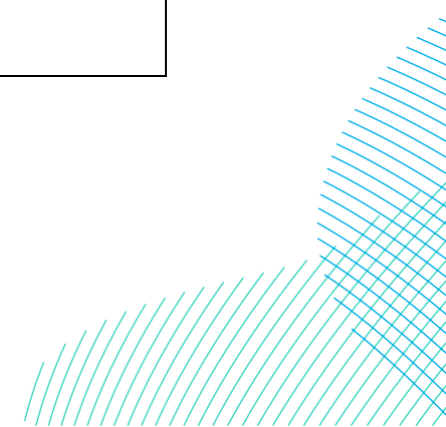
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>It is stated that the inter-array cables will be buried typically to a depth of 1m, but burial depth may range from 0.5 to 3m. Given the potential for some of these activities to occur within the Dogger Bank SAC we would like to emphasise that Dogger Bank is formed by underlying glacial sediments, if these are damaged this is a permanent impact and there is not scope for recovery. The surface sediments across Dogger Bank vary in depth (0.5m - 20m), therefore any proposed activities could have varying impacts to the glacial sediments beneath.</p> <p>We advise that cables should be micro sited where possible through areas of deeper surface sandy sediment to maximise the likelihood of achieving target burial depth without the need for cable protection, and to minimise impacts to glacial sediments within Dogger Bank SAC.</p>	<p>separately. This will aid in determining where shallow areas of glacial till may be located and if required, the use of micro-siting to avoid any such features will be discussed and agreed with the MMO in consultation with Natural England post-consent.</p>	
SNE 105	17/07/2023	Natural England	Project Description	<p>Table 5-5</p> <p>A WCS of 2,708,148 m<sup>2</sup> has been estimated as the maximum lifetime footprint for export cable protection for sub-optimally buried cables.</p> <p>As above. We note that for the impact assessments it will be necessary to know how much of this (if any) could fall within Dogger</p>	<p>Potential areas of required export cable protection are detailed in the WCS table (Table 9-1 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b>).</p> <p>The amount of cable protection within the SAC is detailed within <b>Volume 8, Stage 1 Marine Conservation Zone Assessment (application ref: 8.17)</b> and <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> submitted alongside the ES.</p>	N



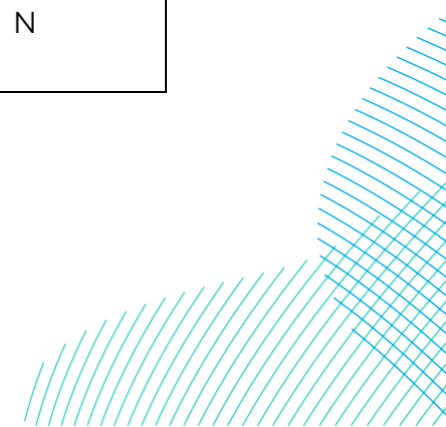
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				Bank SAC or Holderness Inshore MCZ. Please also see Point B24.		
SNE 106	17/07/2023	Natural England	Project Description	<p>B27 Table 5-7 &amp; Table 5-9</p> <p>Natural England acknowledges that for the options presented, suction bucket jacket foundations are the correct WCS to be assessed for turbines. However, we note that the impacts associated with this foundation type, particularly in terms of area and volume of scour protection needed, are orders of magnitude larger than for monopiles or pin-pile jacket foundations.</p> <p>Following the mitigation hierarchy, and considering that the project will need to compensate for the scale of its impacts on the Dogger Bank SAC (which currently exceed those predicted in the Plan Level HRA), we advise that suction bucket jacket foundations are removed from the project envelope for turbines.</p> <p>We also highlight that previous projects in the Dogger Bank Zone have been conditioned to remove all on or above seabed infrastructure including scour protection at decommissioning. We would advise that a similar condition is applied to this project, and consider that foundations requiring less scour protection</p>	<p>Suction bucket jackets for turbines have been removed from the design envelope post-PEIR.</p> <p>The scope of the decommissioning works would most likely involve removal of the accessible installed components. This is outlined in <b>Volume 7, Chapter 5 Project Description (application ref: 7.9)</b> and the detail would be agreed with the relevant authorities at the time of decommissioning. Offshore, this is likely to include removal of all of the wind turbine components and part of the foundations (those above seabed level), removal of some or all of the array and export cables. Scour and cable protection would likely be left in situ.</p>	Y-D



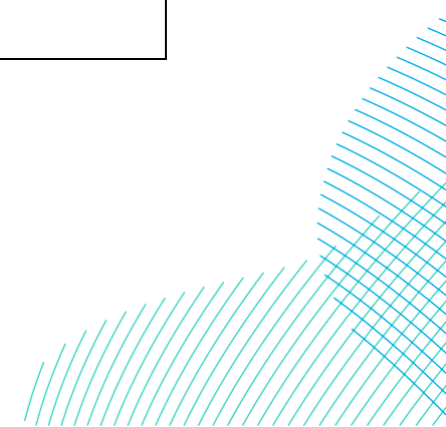
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				which can be more readily removed without further impacts to SAC features would therefore be beneficial.		
SNE 107	17/07/2023	Natural England	Project Description	<p>5.4.7.1 &amp; Table 9-2</p> <p>Natural England acknowledge that cables being laid and/or buried in separate trenches has been used as the WCS. However, we would encourage consideration of a commitment to bundle cables, particularly within designated sites, to reduce both the impacts of cable laying and volume of cable protection needed.</p> <p>We strongly advise the Applicant to commit to bundling the cables as this could reduce the Project's impacts by half, or two thirds if delivering HVDC only was also committed to.</p>	<p>As a worst-case, this ES assesses for no cable bundling to occur. The possibility of bundling cables remains within the design envelope and will be further considered as part of detailed design.</p> <p>In addition, HVAC transmission has been removed from the design envelope since PEIR, reducing the number of export cables required for burial from six to four.</p>	Y-D
SNE 108	17/07/2023	Natural England	Project Description	<p>5.4.7.4.5</p> <p>We note that Sand wave levelling has been included within the Rochdale envelope, which was not the case for the Dogger Bank Crekye Beck and Teesside Applications. Natural England would welcome further evidence to demonstrate a) the necessity for levelling within a stable environment and b) the benefits of sand wave levelling would outweigh the costs if it not undertaken.</p>	<p><b>Volume 8, Cable Statement (application ref: 8.20)</b> including an Outline Cable Burial and Specification, Installation and Monitoring Plan, Cable Burial Risk Assessment and Cable Protection Plan, and consideration of cabling in DB SAC Cable Protection Plan, has been submitted for the Projects alongside the ES. Details noting the worst case values for sand wave levelling are presented in <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. Assessment of any potential effects resulting from sand wave levelling has been carried out in the appropriate ES chapters.</p>	N



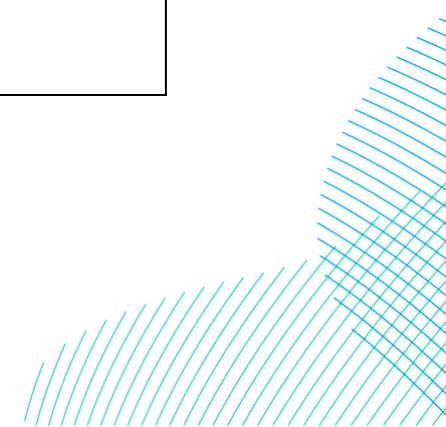
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				As with Norfolk Boreas and Vanguard, we would expect a sand wave levelling plan to be included with the Application to determine the quantity of levelling required within the SAC, and demonstrate that levelling and re-depositing of sediment can be undertaken whilst maintaining the structure and function of the sandbank/ site conservation objectives, including not significantly impacting areas of supporting habitat for foraging Annex I birds.		
SNE 109	17/07/2023	Natural England	Project Description	<p>5.4.7.7.2 and 5.4.1.3.</p> <p>Types of external cable protection should be thoroughly explored for which have the greatest likelihood of being successfully decommissioned.</p> <p>We draw your attention to the Norfolk Vanguard and Boreas pre-determination assessment of possible cable protection removal (EN010079-004217-ExA; Mit; 11.D10.2; App3 Additional Mitigation Appendix 3 Cable Protection Decommissioning.pdf (planninginspectorate.gov.uk)) and Natural England's paper on cable protection decommissioning (Scour and Cable Protection Decommissioning Study - NECR403 (naturalengland.org.uk))</p>	Noted, while the worst-case for potential external cable protection has been assessed within the ES, it has not yet been decided which type of external cable protection will be utilised for the Projects.	N
SNE 110	17/07/2023	Natural England	Project Description	Table 5-24	The potential cable reburial and cable protection replacement provided is the worst-case scenario for these elements, with a Project build-out of solely small turbines	N



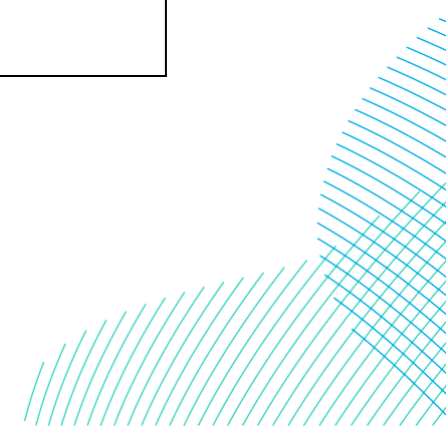
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				<p>The footprint of potential cable reburial and cable protection replacement during the operational phase has been provided with respect to a large or small turbine scenario, rather than the potential build out scenarios.</p> <p>Please provide the WCS for operational cable reburial, cable repair and replacement in line with the respective build out scenarios, noting the clarification requested in Point B11 on whether a mix of large and small turbines could be installed within each array, making the large versus small turbine scenario presented here inappropriate.</p>	<p>being the realistic worst-case when compared to a mix of large and small turbines. The estimated worst case scenario is presented in the Operation section of Table 9-1 Realistic Worst Case Design Parameters of this chapter (see <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b>).</p>	
SNE 111	17/07/2023	Natural England	Project Description	<p>5.5.2</p> <p>Landfall works, including HDD exit pits and cofferdams, could occur in either the intertidal or subtidal zone.</p> <p>It is important that the worst case scenario for landfall works is assessed with respect to benthic receptors in both the intertidal and subtidal, particularly where works are occurring within the Holderness Inshore MCZ. Consideration needs to be given to the presence and duration of ancillary infrastructure and access requirements for the landfall works.</p>	<p>Further details on landfall are included in the WCS table (Table 9-1 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b>) and the impacts within the intertidal area are discussed in sections 9.6.2.1.2 and 9.6.2.2.2.</p> <p>It should be noted that as a result of updates to the offshore export cable corridor and removal of a landfall option, the Projects no longer route through the Holderness Inshore MCZ.</p> <p>Please note that HDD is just one type of trenchless cable installation technique that may be utilised at landfall.</p>	N



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SNE 112	17/07/2023	Natural England	Benthic Habitats	<p><b>Baseline Characterisation- Document(s) Used: Chapter 9 - Benthic Habitats; Appendix 9-2 Draft Benthic Ecology Characterisation Report</b></p> <p>9.5</p> <p>We note that Appendix 9-2 which informs the existing environment characterisation is a draft report, however it is unclear which aspects of the report are 'draft' and may be subject to change. Site specific modelling for suspended sediments and geophysical surveys have also not yet been provided.</p> <p>Natural England is unable to provide further advice until a complete draft ES chapter and supporting Annexes have been provided.</p>	Physical processes modelling results and the final version of the supporting benthic characterisation report is included in <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and <b>Volume 7, Appendix 9-3 Benthic Ecology Monitoring Report (application ref: 7.9.9.3)</b> respectively, with any significant changes to the report highlighted.	N
SNE 113	17/07/2023	Natural England	Benthic Habitats	<p>9.5.1.1</p> <p>It is stated that the results of the seabed composition survey are in line with the results of other surveys undertaken within the Dogger Bank SAC and wider area. This is a generic statement with no explanation or background provided as to what such in line results would mean.</p> <p>Further clarification is required as to what the intended use of existing datasets would be - reference is</p>	Further detail of the intended use of the datasets is included in section 9.4.2 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b> .	Y-M

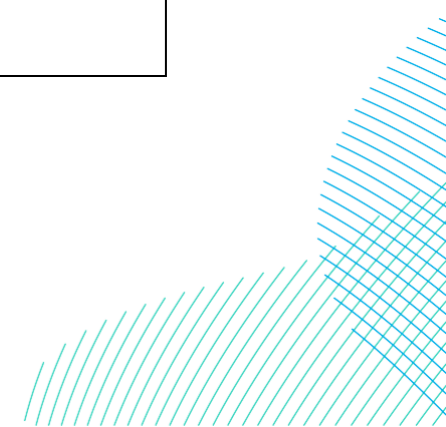


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				given in Table 9-6 to other available sources of data but follow up on what context these were used in is lacking.		
SNE 114	17/07/2023	Natural England	Marine Physical Environment	<p>General:</p> <p>We note that results of the geophysical surveys have not yet been provided. These will be needed to complete the baseline characterisation and assessment of impacts.</p> <p>We advise the results of the geophysical surveys are provided to the ETG as soon as possible, with an explanation as to how this data has been/will be used to inform grab sample and/or drop-down video ground truthing surveys to inform site characterisation.</p>	Results of the geophysical surveys and how they have informed the site characterisation have been shared via email (20/02/2024) and subsequent to the ETG meeting in January 2024.	N
SNE 115	17/07/2023	Natural England	Benthic Habitats	<p>General:</p> <p>Acknowledging that geophysical survey results have not yet been provided, it is unclear if sufficient data has been collected to characterise the baseline environment within Holderness Inshore MCZ and/or inform mitigation requirements of the landfall works. From the benthic characterisation report, it appears that only one grab sample has been taken within Holderness Inshore MCZ.</p>	<p>Results of the geophysical surveys and how they have informed the site characterisation has been shared via email (20/02/2024) and subsequent to the ETG meeting in January 2024.</p> <p>It should be noted that as a result of updates to the offshore export cable corridor and removal of a landfall option, the Projects no longer route through the Holderness Inshore MCZ. While indirect impacts from sediment dispersion have been assessed within <b>Volume 8, Stage 1 Marine Conservation Zone Assessment (application ref: 8.17)</b>, there is no longer the potential for direct impacts to occur to the site as a result of the Projects.</p>	N



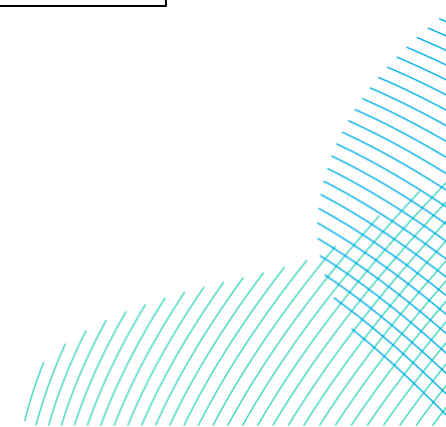


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				We advise the results of the geophysical surveys are provided to the ETG as soon as possible, with an explanation as to how this data has been/will be used to inform grab sample and/or drop-down video ground truthing surveys to inform site characterisation		
SNE 116	17/07/2023	Natural England	Benthic Habitats	<p>General:</p> <p>The British Geological Survey have recently released MBES survey data for the Yorkshire coastline out to 10km, which may be of use in the characterisation of the nearshore environment: <a href="https://nora.nerc.ac.uk/id/eprint/534206/">https://nora.nerc.ac.uk/id/eprint/534206/</a></p> <p>A survey of Holderness Inshore MCZ was also completed by Natural England and the Environment Agency in 2018 (Alexander, C., Meaton, N. and Pryor, K. 2019. Holderness Inshore MCZ 2018 Survey Report. Natural England Commissioned Reports, Number 303.). It is unclear if this has currently been used to inform the nearshore baseline.</p> <p>To Note</p>	<p>Noted. The BGS data has been used to inform the nearshore environment within <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and within the technical appendices for <b>Volume 7, Chapter 17 Offshore Archaeology and Cultural Heritage (application ref: 7.17)</b>.</p> <p>As the cable burial corridor no longer crosses the Holderness Inshore MCZ, the Holderness Inshore MCZ 2018 Survey Report has not been used to inform the nearshore baseline. In addition, there is no analysis of samples within the report which could have been used for comparison with the offshore export cable corridor.</p>	Y-M
SNE 117	17/07/2023	Natural England	Benthic Habitats	<p>General:</p> <p>Until further data and analysis is presented within the ES Chapter and supporting Appendices Natural England is unable to advise</p>	<p>Noted. Physical processes modelling results and final version of the supporting benthic characterisation report is included in <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and <b>Volume 7, Appendix 9-3, Benthic Ecology Monitoring Report (application ref: 7.9.9.3)</b> respectively, with any significant changes to the report highlighted.</p>	N

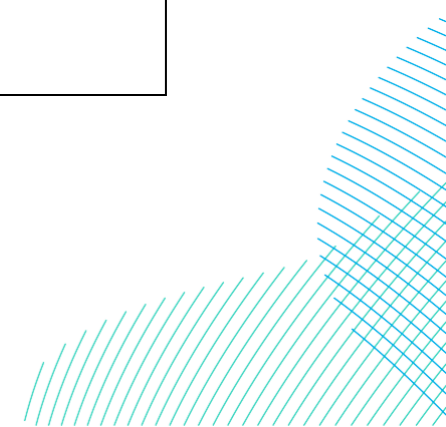


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				<p>further on the acceptability of the Analysis, Modelling and Reporting.</p> <p>Natural England is unable to provide further advice until a complete draft ES chapter and supporting Annexes have been provided.</p>		
SNE 118	17/07/2023	Natural England	Benthic Habitats	<p>General:</p> <p>Temporary installation of cofferdams have been proposed in the intertidal zone in the Marine Processes chapter, but have not been included in the Benthic chapter.</p> <p>We advise that the WCS for cofferdam usage is also assessed with respect to benthic impacts.</p>	The Projects have removed cofferdams from the Design Envelope. Potential use of exit pits within the intertidal have been included in the worst-case scenario at ES and assessed within sections 9.6.2.1.2 and 9.6.2.2.2 for temporary physical disturbance and suspended sediment concentrations, respectively.	Y-D
SNE 119	17/07/2023	Natural England	Project Description	<p>5.4.3.2.6:</p> <p>It has been estimated that up to 5% of turbines may require drilling, with drill arisings disposed of adjacent to the foundations.</p> <p>We advise that drill arisings should be included in the construction footprint area for impact assessment. We highlight that if glacial and/or clay deposits are brought up in the drill arisings, they may not dissipate and would require depositing within similar sediment type.</p>	Potential drill arisings have been considered as part of the worst-case footprint for assessment (see Table 9-1 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b> ).	Y-M

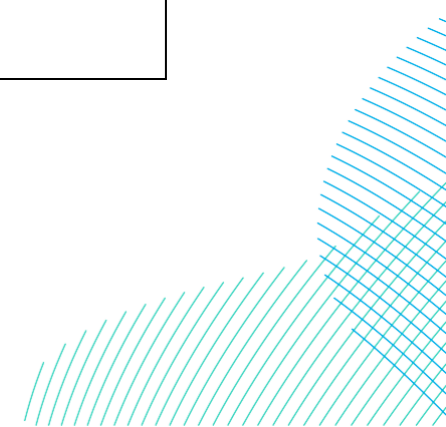
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SNE 120	17/07/2023	Natural England	EIA Methodology	<p>General:</p> <p>Matrix approach - Natural England notes that the approach to the EIA assessment is proposed to align with other OWF NSIPs. This matrix approach has been used throughout ESs to date to support the assessment of the magnitude and significance of impacts. Natural England notes numerous instances where significance has been presented as a range (i.e., slight, or moderate, or large) and it is nearly always the lower value that has been taken forward. In the absence of evidence to support the use of the lower value in a range, Natural England's view is that the higher value should always be assessed in order to ensure that impacts on features haven't been incorrectly screened out of further assessment. This is in line with the principles of the Rochdale envelope approach</p> <p>Robust justification will need to be provided for any parameters used to determine the magnitude and significance of any impacts. A clear distinction should be made between evidence-based and value-based judgements so that it is possible to assess the level of subjective evaluation that has been used (CIEEM, 2018).</p>	Noted, all significance statements made in each chapter topic have been reviewed to ensure their accuracy and proportionality.	Y-M



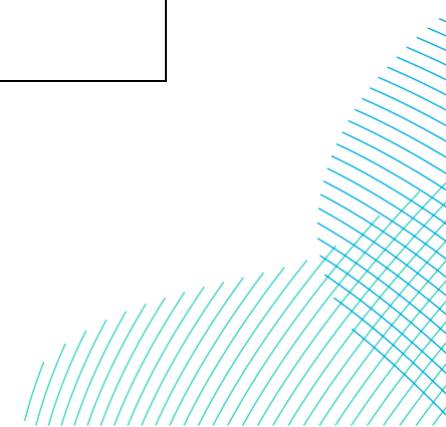
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SNE 121	17/07/2023	Natural England	Benthic Habitats	<p>Table 9.3:</p> <p>It is stated that the Applicant will seek to minimise the use of scour protection and external cable protection for any stretches of unburied cables and cable crossings which will be secured through a Scour Protection and Cable Protection Plan that will be submitted for approval post consent. This has been considered embedded mitigation for the projects.</p> <p>Natural England advises the provision of a plan is not embedded mitigation and the commitments within the plans will be key. Until outline plans have been provided, we are unable to advise if impacts have been adequately addressed and/or mitigated.</p> <p>In line with examination submissions for Norfolk Vanguard and Boreas, we advise that outline plans including any mitigation measures should be provided at the time of Application. Please see previous comments.</p>	<p>Further details on the approach of the Projects to scour protection and external cable protection are included within <b>Volume 8, Cable Statement (application ref: 8.20)</b> including an Outline Cable Burial and Specification, Installation and Monitoring Plan, Cable Burial Risk Assessment and Cable Protection Plan, and consideration of cabling in DB SAC Cable Protection Plan has been submitted for the Projects alongside this ES. This document is also included as embedded mitigation within <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b> (see Table 9-3).</p>	Y-M
SNE 122	17/07/2023	Natural England	Benthic Habitats	<p>9.3.1:</p> <p>The study area for benthic ecology uses a Zone of Influence (ZOI) for suspended sediments of 10km for the array area and 15km for the ECC. Whilst the 15km for the ECC is based on a tidal ellipse, and</p>	<p>Noted, this ZOI has been updated to 14km for both the Offshore Export Cable Corridor and the Array Areas based on the maximum tidal ellipse excursion and following the review of project-specific data and physical process modelling in <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	Y-M



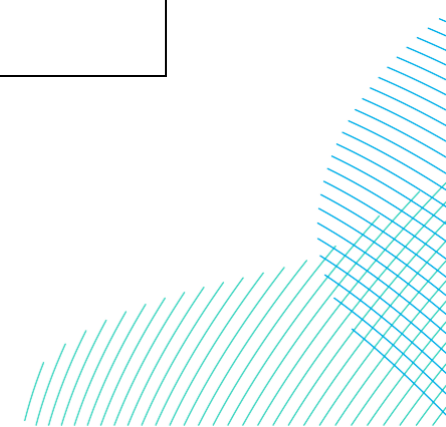
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				<p>therefore inline with Natural England's Best Practice Guidance (BPG; Parker <i>et al.</i>, 2022), the 10km ZOI for the array area is based on the EIA conducted for the Dogger Bank C and Sofia offshore wind farms (formerly Teesside A&amp;B). NE Best Practice Guidance advises that as a general benchmark, care should be taken when considering datasets which are older than 5 years. Further, as these windfarms are not yet operational the conclusions of their EIA have not yet been validated, and it has not been evidenced that the locations are comparable for the same data to be used.</p> <p>NE advise that a tidal ellipse is used to estimate the zone of greatest influence for sediment plumes for the array area and export cable corridor. We understand that the Applicant intends to provide new, site-specific modelling which may address this point. We request that the new modelling is provided for review during the Evidence Plan Process.</p>		
SNE 123	17/07/2023	Natural England	Benthic Habitats	<p>9.6:</p> <p>We note that for all impact and receptor pathways assessed during all project phases, none are considered to have a significance higher than minor adverse despite the array areas being fully within</p>	<p>An assessment of the potential effects on the qualifying features of the Dogger Bank SAC is provided in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> submitted alongside this ES.</p>	N



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				<p>Annex 1 habitat. The magnitude of impacts of two wind farms being developed are also assessed as being no higher than a single wind farm, with most impacts considered negligible. Further, all impacts have been assessed against individual EUNIS biotopes as receptors in terms of magnitude and sensitivity, with Annex 1 sandbank as a whole only considered with respect to percentage losses which are characterised in terms of North Sea extent.</p> <p>We consider that the current approach does not take into account the fact that Dogger Bank SAC is in unfavourable condition, and as only surface biotopes have been assessed, it does not factor in non-recoverable impacts to the underlying glacial sediments.</p> <p>Furthermore, we highlight that the SAC designation is representative protection of the wider feature, it should not be assumed that areas outside of the site do not meet the criteria for Annex 1 sandbank.</p> <p>Clarify or provide further explanation of the assessment of magnitude of impact for the two development scenarios. Whilst we acknowledge that some impacts may be minor/negligible for a project alone, further consideration needs to be given to cumulative effects, including both DBS East and West together.</p>		



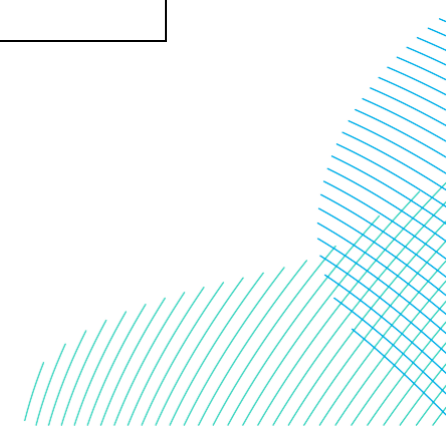
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				We also acknowledge that this is an EIA assessment, however as the entire arrays sit on Annex 1 feature within an SAC, full consideration needs to be given to the Habitats Regulations requirements. It is important that consideration is given to assessing impacts against the Conservation Objectives of the site/feature and maintaining the coherence of the network.		
SNE 124	17/07/2023	Natural England	Benthic Habitats	<p>9.6.1.2.2:</p> <p>It is unclear if the figures for temporary disturbance referenced here for DBS East and West in isolation are correct. Based on the values in Table 9-2 we consider the correct values for the array areas would be 8.8 km<sup>2</sup> for DBS East and 9.7km<sup>2</sup> for DBS West.</p> <p>Please clarify how the estimates in 9.6.1.2.2 have been derived and/or amend as needed.</p>	This was a typographic error. The figures for temporary disturbance in this instance should have been listed as 10.8km <sup>2</sup> and 11.1km <sup>2</sup> in section 9.6.2.1.1.2 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b> , which has now been updated.	Y-M
SNE 125	17/07/2023	Natural England	Benthic Habitats	<p>9.6.1.2:</p> <p>Dredged material from sand wave levelling will be disposed of at a site yet to be determined, but could be over the entire array area.</p> <p>As with Norfolk Boreas and Vanguard we would expect a sand wave levelling plan to be included with the Application to determine the quantity of levelling required within the SAC, and demonstrate</p>	<p><b>Volume 8, Cable Statement (application ref: 8.20)</b> including an Outline Cable Burial and Specification, Installation and Monitoring Plan, Cable Burial Risk Assessment and Cable Protection Plan, and consideration of cabling in DB SAC Cable Protection Plan has been submitted for the Projects alongside the ES and <b>Volume 8, Disposal Site Characterisation Report (application ref: 8.18)</b>. Assessment of any potential effects resulting from sand wave levelling has been carried out in the appropriate ES chapters.</p> <p>Impacts within the SAC are detailed within the <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> and <b>Volume 8, Stage 1 Marine Conservation Zone Assessment (application ref: 8.17)</b> submitted alongside this ES.</p>	N



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				that levelling and re-depositing of sediment can be undertaken whilst maintaining the structure and function of the sandbank/ site conservation objectives, including not significantly impacting areas of supporting habitat for foraging Annex I birds.		
SNE 126	17/07/2023	Natural England	Benthic Habitats	<p>9.6.1.2.2:</p> <p>Natural England highlights that the worst case crater depth from UXO clearance that has been evidenced in the marine environment is 4m (Ordtek 2021). Further, the underlying sediments within the Dogger Bank SAC are formed of glacial till and are therefore not dynamic. Any UXO clearance activities that breached the glacial sediments would be considered a permanent impact to the site.</p> <p>We advise that evidence from recent UXO clearance campaigns is utilised where appropriate to inform assessments, and refer the Applicant to our advice to MMO on recent UXO Marine License Applications within Dogger Bank SAC.</p>	<p>It is noted that the breaching of glacial sediments within the SAC would be considered permanent damage. The Ordtek (2021) report evidences a 4m crater depth for a UXO from another offshore wind farm in sandy gravel, however any underlying sediments are unknown. It is stated in the report that <i>"It is immediately evident looking at the sample detonations in similar conditions that there is apparently very little consistency in the sizes of craters that are produced, even for the same type of bomb"</i>.</p> <p>Recent UXO clearance activities for the nearby Dogger Bank B offshore windfarm resulted in maximum crater depths of 0.8m and a maximum crater diameter of 5.3m (see Project Close Out Report Dogger Bank UXO ID and Disposal 2022 report (case ref: MLA/2021/00552)).</p> <p>Given that the top of the chalk in the Offshore Development Area is at least 1m below the seabed overlain by glacial till, a maximum crater depth of 0.8m would not be a permanent impact because till would still be present at seabed. In addition, given that the maximum crater diameter is 5.3m, the size of the crater footprint on the seabed is insignificant compared to the area of naturally exposed seabed till in Offshore Development Area. Separate Marine Licenses will be acquired for UXO clearances post-consent.</p>	N
SNE 127	17/07/2023	Natural England	Benthic Habitats	<p>9.6.1.3:</p> <p>Significance of effect in the intertidal zone/nearshore. Whilst the location of HDD works will remain the same whether the projects are constructed</p>	<p>Impacts on the intertidal/nearshore benthic environment have been considered in the context of the potential for transition exit pit to be located in the intertidal area. Following updates to the intertidal works plan made post-PEIR, the potential impacts resulting from exit pit usage upon benthic species/habitats has been assessed within this chapter (section 9.6.2.1.2 and 9.6.2.2.2 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b>).</p>	Y-M

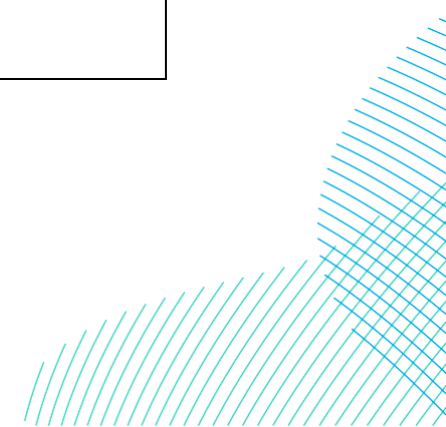


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>sequentially or concurrently, the duration of impact will differ (e.g. for cofferdam usage, beach access needs). Further, it is unclear if the intertidal/nearshore has been considered for all impact pathways.</p> <p>We advise that both build out scenarios are included in the assessment. Please provide clarification on how impacts in the nearshore have been assessed.</p>		
SNE 128	17/07/2023	Natural England	Benthic Habitats	<p>9.6.1.4:</p> <p>Natural England cannot comment on the assessment for suspended sediments as the baseline is currently incomplete.</p> <p>We advise that site specific modelling for suspended sediments is shared with the ETG as soon as possible.</p>	Project-specific modelling for the Projects has been completed and shared (via email 21/03/24 along with the final marine physical environment and benthic and intertidal ecology ETG minutes) with stakeholders prior to submission.	Y-M
SNE 129	17/07/2023	Natural England	Benthic Habitats	<p>9.7:</p> <p>We acknowledge that a Cumulative Effects Assessment (CEA) has not yet been provided. We provisionally agree with the projects screened in for assessment, noting that it is due to be revised and updated as needed prior to submission.</p> <p>Natural England advises that these documents are provided in order</p>	Noted, the list of projects assessed in the CEA was presented at the ETG in January 2024. There were no comments on the list.	Y-M



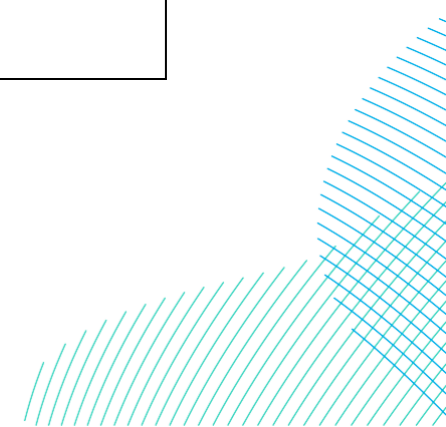
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				to progress project discussions prior to submission		
SNE 130	17/07/2023	Natural England	Benthic Habitats	<p>Table 9-19:</p> <p>We note that the target burial depth of cables (0.5m-1m) is shallower than required to not have to assess the operational impact of the electromagnetic field (EMF) for cables as given in the National Policy Statement (EN-3) (1.5m depth required). Further, we highlight that Teesside A &amp; B concluded a low magnitude of impact from EMF. This highlights the importance of the CEA due to the scale of activity in the Dogger Bank location.</p> <p>We advise that impacts from EMF are screened into the CEA.</p>	<p>Teeside A &amp; B assessed the impact from EMF as having a negligible impact on benthic communities when assessed in isolation or together.</p> <p>The Projects have also assessed them negligible either in isolation or together (section 9.6.3.4 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b>).</p> <p>The biotopes identified over the entire Offshore Development Area have a MarESA sensitivity of 'Not Relevant' in relation to the impact of EMF. 'Not Relevant' is recorded where the evidence suggests that there is no direct interaction between the pressure and biotope or characteristic species within.</p> <p>The presence of increased EMF will last over the entirety of the operational phase of the Projects, however indiscernible alteration to baseline EMF levels is predicted. This is due to the cables being planned to be buried in the seabed (where conditions allow) to a depth of 0.5-1m, a depth at which Love <i>et al.</i> (2017) found that EMF levels for submarine power cables declined to background levels 1m from the cable.</p>	Y-M
SNE 132	17/07/2023	Natural England	Benthic Habitats	<p>Table 4-1 &amp; Para 85</p> <p>Natural England disagree with the introduction or spread of INNS being screened out for the construction and decommissioning phases, as this is when vessel traffic and material introduction will be at its highest.</p> <p>We advise that INNS are screened in for all phases of the project.</p>	<p>As noted in the response from the MMO, they do not have any concerns regarding the scoping out of the potential impact INNS associated with the construction and decommissioning phases.</p> <p>During construction and decommissioning, embedded mitigation to reduce the spread of INNS is detailed in Table 9-3 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b>.</p> <p>The WCS for INNS is during the operational phase where the greatest amount of infrastructure will be available to be colonised. Therefore, the impact is assessed during operation in section 9.6.3.5 of <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9)</b>.</p>	N
SNE 133	17/07/2023	Natural England	Benthic Habitats	<p>4.1.3.2:</p> <p>A ZOI of 10km has been used for sediment plumes based on</p>	<p>Noted, this ZOI has been updated to 14km for both the Offshore Export Cable Corridor and the Array Areas based on the maximum tidal ellipse excursion and following the review of project-specific data and physical processes modelling (see <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>).</p>	Y-M

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				<p>evidence from the Teesside A&amp;B EIA.</p> <p>See Point X (9.3.1)</p>		
SNE 134	17/07/2023	Natural England	Benthic Habitats	<p><b>Marine Conservation Zone Assessment Screening Report</b></p> <p>4.2.3</p> <p>Natural England acknowledges the use of site proxies where site specific conservation advice is not available for Holderness Inshore MCZ. However, it may not be appropriate to use proxies for high and moderate energy circalittoral rock. Where possible, we advise that areas of high energy circalittoral rock and moderate energy circalittoral rock should be avoided or would require micro-siting around. The cliffs in this region are made of glacial till and areas of associated clay outcrops of varying height in the subtidal are common, and elevated examples are known as clay huts. We advise that exposed areas of clay are considered to be a component of the circalittoral rock feature and should be treated as such; it is a finite resource and will not recover from cable installation activities. We therefore recommend that clay is avoided where possible, and that rocky reef profile over the cable is reinstated at the time of construction where rock cannot be avoided. Whilst there will likely be a</p>	<p><b>Volume 8, Stage 1 Marine Conservation Zone Assessment (application ref: 8.17)</b> has been submitted alongside this ES. Noted on the limitations of using proxies for high energy circalittoral rock and moderate energy circalittoral rock in regards their use as proxies for the existing glacial till and clay outcrops, this has been factored into the assessment.</p>	Y-M

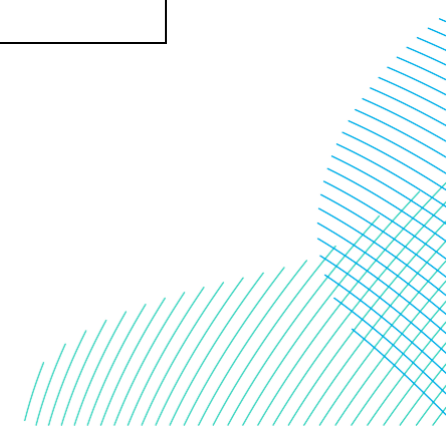


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				<p>short to medium term impact on the epibenthos and infauna from installation, recovery is more likely if using the same substrate.</p> <p>As per Sheringham and Dudgeon Extension Projects, a Stage 1 MCZ assessment will be required as part of the Applicant's submission</p>		
SNE 135	17/07/2023	Natural England	Benthic Habitats	<p>4.2.3:</p> <p>Natural England disagrees with the geological feature Spurn Point being screened out of further assessment. Longshore sediment transport through Holderness Inshore MCZ provides an essential source of sediment to Spurn and the Humber Estuary. It will need to be demonstrated that the projects both alone and in combination with other plans and projects will not impact sediment transport to Spurn and the Humber.</p> <p>We advise that Spurn Point is screened in for further assessment, and that Natural England's comments on Hornsea Project Four on the PINs website are considered by the Applicant (e.g. REP7-103, REP5-114).</p>	<p>As a result of updates to the Offshore Export Cable Corridor and removal of a landfall option, the burial corridor of Projects no longer route through the Holderness Inshore MCZ, therefore there is no direct impacts on the longshore sediment transport through Holderness Inshore MCZ. The impacts on coastal process are negligible to low as they are localised and temporary, and there is no long term change in sediment transport (<b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>).</p> <p>Due to this negligible to low impact and Spurn Point being 45km away from the Projects, it will not be screened in for further assessment with <b>Volume 8, Stage 1 Marine Conservation Zone Assessment (application ref: 8.17)</b>.</p>	N
SNE 136	17/07/2023	Natural England	Marine Mammals	<p>Only 1 year of baseline characterisation surveys have been presented at this PEIR stage. Therefore, Natural England cannot agree with the density estimates derived from the</p>	<p>Acknowledged. Two years of baseline characterisation surveys have been used to update density and abundance estimates in <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b>, further information is available in <b>Volume 7, Appendix 11-2 Marine Mammal Information Report (application ref: 7.11.11.2)</b>.</p>	N

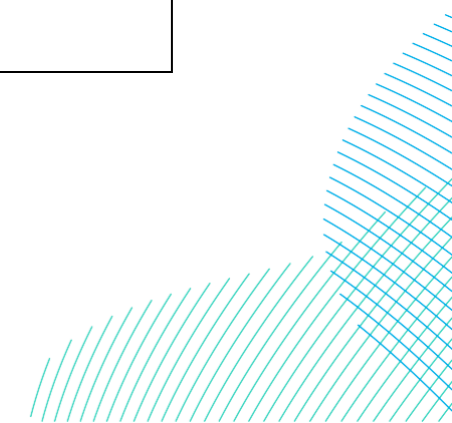
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				digital aerial surveys presented at this stage. This also applies to total survey area, confidence scores and environmental conditions. NE RECOMMENDATION - Present 2 years of baseline characterisation surveys in order to update density and abundance estimates in the submitted Environmental Statement (ES).		
SNE 137	17/07/2023	Natural England	Marine Mammals	<p>When assessing the potential impacts during construction, the information presented by the Applicant indicates that the full injury ranges are not suitable to be mitigated by Acoustic Deterrent Devices (ADDs). As a result, there will be a residual impact i.e., an area where permanent loss of hearing sensitivity (PTS) can occur, beyond the area that is mitigated.</p> <p>Natural England has not yet had sight of the draft Marine Mammal Mitigation Protocol (MMMP). Therefore, we cannot agree at this stage that the measures in the MMMP will be sufficient to significantly reduce any potential for PTS injury.</p> <p>Should a residual injury risk remain, Natural England will recommend that a European Protected Species(EPS) licence to injure is sought. However, such a licence can only be granted if the authority is satisfied that there is no satisfactory alternative (the</p>	<p>The mitigation measures in <b>Volume 8, Outline Marine Mammal Mitigation Protocol (application ref: 8.25)</b> and <b>Volume 8, In Principle Site Integrity Plan for the Southern North Sea Special Area of Conservation (application ref: 8.26)</b> have been and will be further discussed and agreed with Natural England during development of these documents and prior to submission of the final versions. The proposed mitigation will reduce the risk of PTS in marine mammals for the full injury zone, this will include, if required, the options for using noise abatement measures. It is proposed that a Marine Wildlife Licence application will be submitted, with adequate mitigation for injury.</p>	N



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				<p>second test). This includes alternatives to minimise the risk of injury, such as mitigation like noise abatement systems.</p> <p>NE RECOMMENDATION - Provide the information needed to demonstrate that the full injury zone will be mitigated in the submitted ES. This information should demonstrate that the Applicant has considered all mitigation options to minimise the risk of injury.</p> <p>We advise that the Applicant engages with Natural England on the draft MMMP and Site Integrity Plan during the Evidence Plan Process.</p>		
SNE 138	17/07/2023	Natural England	Marine Mammals	<p>For the concurrent piling scenarios modelling has been carried out for simultaneous piling at the Dogger Bank South (DBS) East: south location, DBS West: west location, and DBS East/West: central location, representing a worst case spread of locations.</p> <p>However, larger impact ranges have been modelled at the DBS East/West northern corner location compared to the DBS East/West central location.</p> <p>NE RECOMMENDATION - Natural England advise that the Applicant should consider whether the worst-case scenario has indeed been assessed and presented when considering concurrent piling operations, and if it has not,</p>	<p>With the change in Projects' Design Envelope, therefore an update in the underwater noise modelling (<b>Volume 7, Appendix 11-3 Underwater Noise Modelling Report (application ref: 7.11.11.3)</b>), the worst case locations have been used for the concurrent impact assessments.</p> <p>The greatest spread at the most easterly and westerly locations, in the deepest waters, leads to a greater total area than if one of these locations was much closer to a central point, even if the central location had a slightly greater area by itself.</p>	N



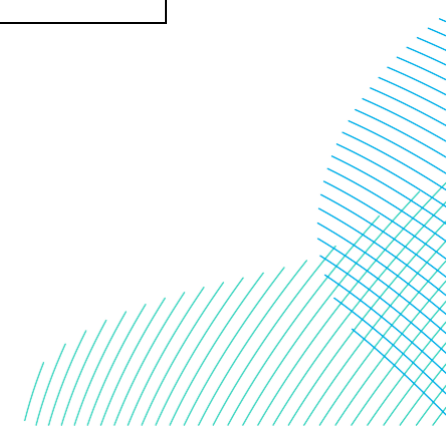
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				update the assessment accordingly.		
SNE 139	17/07/2023	Natural England	Marine Mammals	<p>Counts of unidentified species were not included in the density and abundance calculations for harbour porpoise, common dolphin, minke whale and grey seal but have been included for bottlenose dolphin, white beaked dolphin and harbour seal. There needs to be consistency on how unidentified species are attributed/apportioned and densities are calculated. Furthermore, there needs to be clarification and clear rationale on which unidentified species groups have been assigned, for example unidentified dolphins have been assigned to bottlenose dolphins, but unidentified dolphin / porpoise has not.</p> <p>NE RECOMMENDATION - When analysing the full survey data, the Applicant should clearly present the results and justification on how unidentified species have been apportioned. The approach to apportioning species should be undertaken in discussion with Natural England and in view of the best practice guidance (Parker <i>et al.</i> 2022a).</p>	All counts of unidentified species were included in raw counts in <b>Volume 7, Appendix 11-2 Marine Mammal Information Report (application ref: 7.11.11.2)</b> section 11.4 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> . However, the recordings from the survey that were not attributed to a species, for example unidentified dolphin and porpoise, were not apportioned in the survey data analysis. Therefore, they were not included in the final density estimates.	N
SNE 140	17/07/2023	Natural England	Marine Mammals	There is a lack of clarity on whether predicted vessel movement is per year or the total number across the five-year period. (Section 11.6.1.6)	The number of vessel round trips have been clarified in, section 11.6.1.6.1 and in section 11.6.1.6.2 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> for construction.	N



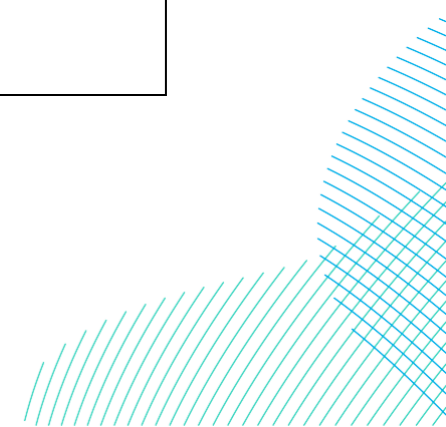
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				Natural England notes that in the project description, the locations for the construction (and operation/maintenance) ports have not been confirmed. NE RECOMMENDATION - Provide clarification on the worst-case scenario for vessel movements and therefore collision risk. Natural England advises that the potential port options (or locations if known) are presented at the Environmental Statement (ES) stage. Owing to the potential notable increase in vessel traffic, the impact on seal haul-out sites should be assessed once port options are known.	For operation and maintenance (O&M) this has been clarified in section 11.6.2.5.1 and section 11.6.2.5.2 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> .  A list of potential ports has been provided in the section 11.6.1.4.3.1 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> .  The assessment for potential disturbance to seal haul out sites is provided in section 11.6.1.9 and 11.6.2.8 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> .	
SNE 141	17/07/2023	Natural England	Marine Mammals	Regarding the HRA and the potential increase in vessel traffic during these projects, Natural England does not agree to screening out of disturbance to seal haul-out sites until likely construction ports are identified and potential disturbance can be assessed. NE RECOMMENDATION - Screen in disturbance to seal haul-out sites until construction ports are confirmed and potential disturbance can be assessed.	Acknowledged. This has been reviewed and updated in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> to include potential impact on seal haul-out sites, taking in to account potential port locations known at this stage. Results from the assessments in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> show no adverse effect on site integrity when assessing for the potential distance to seal haul-out sites.	Y-M
SNE 142	17/07/2023	Natural England	Marine Mammals	Whilst there is a commitment to submit a draft MMMP with the DCO application, we note that the same commitment is not made for the	<b>Volume 8, In Principle Site Integrity Plan for the Southern North Sea Special Area of Conservation (application ref: 8.26)</b> is submitted with the DCO application. The final version of the SIP will be developed with the final project design and submitted in the agreed time frame prior to construction.	N



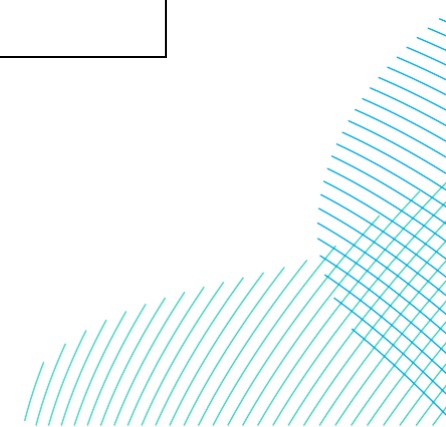
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				Site Integrity Plan (SIP). NE RECOMMENDATION - Natural England advise that a draft SIP should be submitted at the time of application		
SNE 143	17/07/2023	Natural England	Marine Mammals	<p>Project Parameters. Document(s) Used: Underwater Noise modelling Report (Appendix 11.2); Underwater Noise Assessment (Appendix 11.3); Chapter 11 - Marine Mammals</p> <p>Project Description</p> <p>Chapter 11, section 11.6.1.9.1</p> <p>Natural England notes that the locations for the construction (and operation/maintenance) ports have not been confirmed. Natural England advises that the potential port options (or locations if known) are presented at the Environmental Statement (ES) stage. Owing to the potential notable increase in vessel traffic, the impact on seal haul-out sites should be assessed once port options are known.</p> <p>Recommendation: At the ES stage, present potential port options (or exact locations if known) and review disturbance to seal haul-out sites.</p>	<p>A list of potential ports has been provided in section 11.6.1.4.3.1 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b>. The assessment for potential disturbance to seal haul out sites is provided in section 11.6.1.9 and 11.6.2.8 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b>.</p>	N



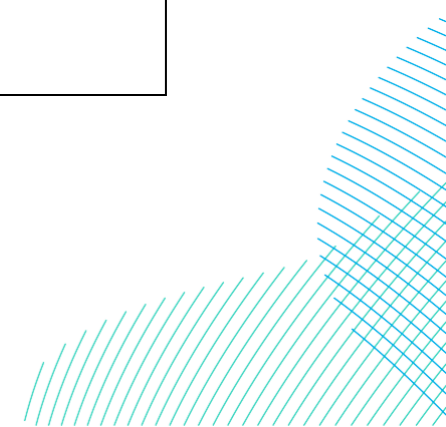
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SNE 144	17/07/2023	Natural England	Marine Mammals	<p>Natural England's Position on Worst Case Scenario or Scenarios</p> <p>Noise modelling Report (Appendix 11.2) 5.4</p> <p>For the concurrent piling scenarios modelling has been carried out for simultaneous piling at the Dogger Bank South (DBS) East: south location, DBS West: west location, and DBS East/West: central location, representing a worst case spread of locations. Natural England understand these locations have been used to show 'geographic spread' but larger impact ranges have been modelled at the DBS East/West north corner location compared to the DBS East/West: Central location. The Applicant should consider whether the worst-case scenario has indeed been assessed and if not, update the assessment accordingly.</p> <p>Recommendation: Natural England advise that the worst case scenario should be presented and assessed when considering concurrent piling operations</p>	<p>Acknowledged. The worst case for the combined area has been modelled in <b>Volume 7, Appendix 11-3 Underwater Noise Modelling Report (application ref: 7.11.11.3)</b>. The greatest spread at the most easterly and westerly locations, in the deepest waters, leads to a greater total area than if one of these locations was much closer to a central point, even if the central location had a slightly greater area by itself.</p>	N
SNE 145	17/07/2023	Natural England	Marine Mammals	<p>Baseline Characterisation Document(s) Used: Marine Mammal Information (Appendix 11.1); Underwater Noise modelling Report (Appendix 11.2); Underwater Noise Assessment (Appendix 11.3); Chapter 11</p>	<p>Two years of baseline characterisation surveys have been used to update density and abundance estimates in <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> and <b>Volume 7, Appendix 11-2 Marine Mammal Information Report (application ref: 7.11.11.2)</b>.</p>	N



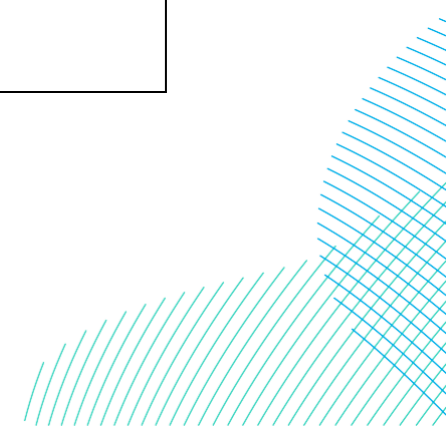
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>Marine Mammals</p> <p>Appendix 11.1</p> <p>Only 1 year of baseline characterisation surveys has been presented at this PEIR stage. Therefore, we cannot agree with the density estimates derived from the digital aerial surveys presented at this stage.</p> <p>Recommendation: Present 2 years of baseline characterisation surveys in the submitted ES and update density and abundance estimates accordingly</p>		
SNE 146	17/07/2023	Natural England	Marine Mammals	<p>Appendix 11.1, section 11.5.1</p> <p>Please update baseline site survey information to include total survey area.</p> <p>Recommendation: Present the total survey area in the submitted ES Appendix.</p>	This has been included in <b>Volume 7, Appendix 11-2 Marine Mammal Information Report (application ref: 7.11.11.2)</b> , section 11.5.1 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> .	N
SNE 147	17/07/2023	Natural England	Marine Mammals	<p>Appendix 11.1, section 11.5.1</p> <p>It would be advantageous to know the confidence score (number of definite, probable etc) for species identification and examples of each.</p> <p>Recommendation: Present the confidence scores for the surveys in the submitted ES Appendix.</p>	All marine mammals attributed to a species are done so with high confidence and if there was any level of uncertainty the sighting would be classified in the relevant unidentified grouping. Therefore, confidence scores have not been included within the ES Appendices.	N



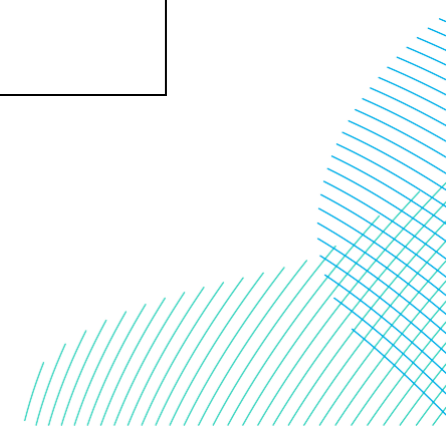
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SNE 148	17/07/2023	Natural England	Marine Mammals	<p>Appendix 11.1, section 11.5.1</p> <p>It would be advantageous to know the environmental conditions (sea state, turbidity etc) for the surveys as these can impact the likelihood of seeing marine mammals.</p> <p>Recommendation: Present the environmental conditions for each survey in the submitted ES Appendix.</p>	<p>The environmental conditions during digital aerial surveys have been presented in <b>Volume 7, Appendix 11-2 Marine Mammal Information Report (application ref: 7.11.11.2)</b> section 11.4.</p>	N
SNE 149	17/07/2023	Natural England	Marine Mammals	<p>Appendix 11.1 Paragraphs 50, 73, 98, 118, 137, 153, 218, table 11-8</p> <p>Counts of unidentified species were not included in the density and abundance calculations for harbour porpoise, common dolphin, minke whale and grey seal but have been included for bottlenose dolphin, white beaked dolphin and harbour seal. There needs to be consistency on how unidentified species are attributed/apportioned and densities are calculated. Furthermore, there needs to be clarification and clear rationale on which unidentified species groups have been apportioned, for example unidentified dolphins have been apportioned to bottlenose dolphins, but unidentified dolphin / porpoise has not.</p> <p>Recommendation: When analysing the full survey data, the</p>	<p>The recordings from the digital aerial survey attributed to unidentified species was not apportioned in the survey data analysis. For example, the number of individuals recorded as 'Dolphin / porpoise species' equates to less than 10% of the number of harbour porpoise recorded, across either site. Due to the low number of unidentified dolphin and porpoise recorded, there would not be a significant difference to the individual densities if they were apportioned in the calculations, therefore the unidentified species were presented in the results but not used for any of the species density estimates.</p> <p>Justification on the approach has been presented in <b>Volume 7, Appendix 11-2 Marine Mammal Information Report (application ref: 7.11.11.2)</b>; section 11.5.</p>	N



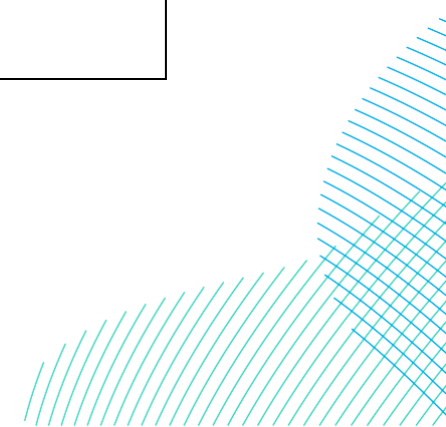
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				Applicant should clearly present the results and justification on how unidentified species have been apportioned. The approach to apportioning species should be undertaken in discussion with Natural England and in view of Phase I of the Natural England best practice advice		
SNE 150	17/07/2023	Natural England	Marine Mammals	<p>Appendix 11.1, paragraphs 52 and 53</p> <p>As noted by the Applicant, a correction factor, to account for animals beyond depth of visibility, should be applied. Natural England anticipate that this will be applied once the full survey data is analysed and will review it at that stage. Note that information on the correction factors should be clearly presented and justified.</p> <p>Recommendation: Present correction factor with justification alongside full survey data, referring to Phase I of the best practice advice guidance as required.</p>	Correction factors have been applied to account for diving species which is presented in section 11.5 of <b>Volume 7, Appendix 11-2 (application ref: 7.11.11.2)</b> .	Y-M
SNE 151	17/07/2023	Natural England	Marine Mammals	<p>Appendix 11.1</p> <p>Please add marine mammal survey data to the Marine Data Exchange (MDE) and to the Joint Cetacean Data Programme (JCDP).</p> <p>Recommendation: To note</p>	Acknowledged. The Applicants are submitting the aerial survey data to the MDE and would consider making survey data public accessible on the JCDP.	Y-M



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SNE 152	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11, paragraph 181</p> <p>The text says "...and medium for minke whale and harbour porpoise due to four sequential monopiles and jacket pin piles (Table 11-23)." However, this is inconsistent with Table 11-23 which refers to two sequential monopiles and four jacket pin piles.</p> <p>Recommendation: Revise text in the submitted ES.</p>	<p>All of the assessments and tables have been updated in response to the changes in the Projects' Design Envelope and updated results from the underwater noise modelling in <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b>, section 11.6.</p>	N
SNE 153	17/07/2023	Natural England	Marine Mammals	<p><b>General:</b></p> <p>Natural England query some of the density estimates proposed to be used by the Applicant in the impact assessment. Specifically:</p> <ul style="list-style-type: none"> <li>- The Applicant has not used the worst-case density estimate for grey seals (Appendix 11.3, table 11-5);</li> <li>- The Applicant has used Waggitt <i>et al.</i> (2019) to determine absolute density of several cetacean species. However, Waggitt <i>et al.</i> (2019) do not advise that their maps are used in this way: "Because of these caveats, outputs should not be used as a representation of absolute densities and fine scale distributions at the present time. Instead, it is recommended that outputs be used as a general illustration of relative densities and broad-scale</li> </ul>	<p>The density estimates have all been updated with the second-year results from the baseline survey, the cetacean density estimate have been reviewed in line with the updated with SCAN-IV survey and the worst case presented for assessments.</p> <p>Additionally, density estimates for each cetacean has been derived from using the Waggitt <i>et al.</i> (2019) density maps over the area of the SCANS survey block to allow for a more direct and less fine scale comparison. This is presented in <b>Volume 7, Appendix 11-2 Marine Mammal Information Report (application ref: 7.11.11.2)</b>; section 11.5.</p> <p>The worst case density estimates (see section 11.5) have been used for the impact assessments of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b>.</p>	N



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>distribution over several decades".</p> <p>Natural England request further justification on why the densities for the impact assessment have been chosen. This should be presented for the final densities selected for the ES impact assessment, which in turn should be selected after the full 2 years of site-specific data have been analysed.</p> <p>Recommendation: Provide clear justification for why densities have been selected for impact assessment and/or use worst case estimate in the submitted ES.</p>		
SNE 154	17/07/2023	Natural England	Marine Mammals	<p>Data Gaps:</p> <p>Appendix 11.1, section 11.5.4, table 11-6</p> <p>The Inter-Agency Marine Mammal Working Group (IAMMWG) 2022 review has been used for information on Management Units. Please use the recently updated 2023 review.</p> <p>Recommendation: Use the 2023 update of Management Units: IAMMWG. 2023. Review of Management Unit boundaries for cetaceans in UK waters (2023). JNCC Report 734, JNCC, Peterborough, ISSN 0963-8091.</p> <p><a href="https://hub.jncc.gov.uk/assets/b4">https://hub.jncc.gov.uk/assets/b4</a></p>	<p>Acknowledged. This was not available at the time of writing the PEIR but the updated information has been used in <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> and are presented in <b>Volume 7, Appendix 11-2 Marine Mammal Information Report (application ref: 7.11.11.2)</b>.</p>	Y-M

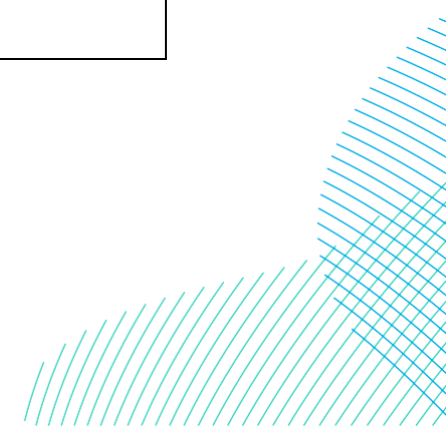


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				8b8332-349f-4358-b080-b4506384f4f7		
SNE 155	17/07/2023	Natural England	Marine Mammals	<p>Noise Modelling Report (Appendix 11.2) General Comment:</p> <p>Natural England defer to Cefas as the underwater noise specialists on the plausibility of the piling Permanent Threshold Shift (PTS)/ Temporary Threshold Shift (TTS) impact ranges and the Unexploded Ordnance (UXO) clearance PTS/TTS impact ranges presented in this report.</p> <p>Recommendation: To note.</p>	Acknowledged. The underwater noise modelling has been presented in <b>Volume 7, Appendix 11-3 Underwater Noise Modelling Report (application ref: 7.11.11.3)</b> .	N
SNE 156	17/07/2023	Natural England	Marine Mammals	<p>Noise Modelling Report (Appendix 11.2) Section 6.3.1.1</p> <p>Provide justification as to why a maximum 698kg weight has been used for the UXO modelling.</p> <p>Recommendation: The submitted ES should provide a justification for why a maximum of 698kg has been estimated.</p>	Acknowledged. The modelling undertaken for potential UXO clearance ( <b>Volume 7, Appendix 11-3 Underwater Noise Modelling Report (application ref: 7.11.11.3)</b> ) takes in to account the worst case potential NEQ weight identified as possibly present in the preliminary review of ordinance at the Projects ( <b>Volume 8, Unexploded Ordnance (UXO) Risk Management – Potential UXO Predictive Numbers (application ref: 8.29)</b> ). As noted in <b>Volume 7, Appendix 11-3 Underwater Noise Modelling Report (application ref: 7.11.11.3)</b> , should a 750 kg device be detected and require clearance, this will lead to a negligible increase in noise (<0.5 dB) and impact range.	N
SNE 157	17/07/2023	Natural England	Marine Mammals	<p>Noise Modelling Report (Appendix 11.2)Section 6.3.1.3</p> <p>Natural England considers that there is insufficient evidence to demonstrate noise reduction from 'low yield' clearance of UXOs at this time.</p>	Noted	N

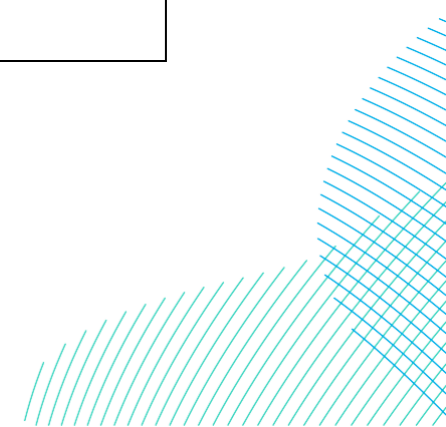


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				Recommendation: To note.		
SNE 158	17/07/2023	Natural England	Marine Mammals	<p>Noise Modelling Report (Appendix 11.2) Table 6-9</p> <p>It is unclear why the Sound Exposure Level, single strike (SELs) source level (276.6dB) for the Low yield charge is higher than the high order SELs source level of a 698kg + donor charge (237.1dB).</p> <p>Recommendation: Clarify in the submitted ES.</p>	Acknowledged. Natural England are correct, the "low yield" source levels were transferred to the report incorrectly. The correct source levels are 273.4dB SPLpeak and 218.2dB SELs as presented in <b>Volume 7, Appendix 11-6 Unexploded Ordnance Clearance Information and Assessment (application ref: 7.11.11.6)</b> .	N
SNE 159	17/07/2023	Natural England	Marine Mammals	<p>Chapter 1 Section 11.6.1.1.11</p> <p>The maximum Peak Sound Pressure Level (SPLpeak) PTS range for Very High-Frequency (VHF) cetaceans is greater than 500m for both monopiles and pin piles in certain locations. Therefore, the monitoring zone within the MMMP will need to reflect this.</p> <p>Recommendation: To note for when the Marine Mammal Mitigation Protocol (MMMP) is produced. The monitoring zone in the MMMP should encompass the maximum PTS range for a single strike of hammer.</p>	Acknowledged. The monitoring zone in <b>Volume 8, Outline Marine Mammal Mitigation Protocol (application ref: 8.25)</b> and final MMMP will encompass the maximum PTS range for a single strike of hammer at maximum energy and would be agreed through consultation.	Y-M
SNE 160	17/07/2023	Natural England	Marine Mammals	<p>Appendix 11.3 Table 11-3</p> <p>The pin pile SELs source level used</p>	The worst case scenarios have been presented in section 11.6 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> .	N

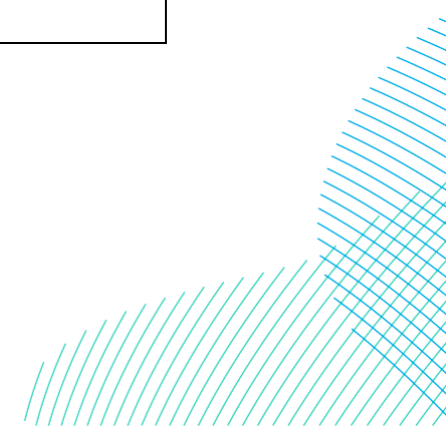
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				<p>in the impact assessment is 222.2 dB re 1 <math>\mu</math>Pa<sub>2s</sub> @1m however in the noise modelling report a higher source level of 222.5 dB re 1 <math>\mu</math>Pa<sub>2s</sub> @1m is reported for pin piles at DBS East: South and DBS West: West.</p> <p>Recommendation: The worst-case scenario source levels should be used in the noise impact assessment.</p>		
SNE 161	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11; Appendix 11.3 General Comment</p> <p>For the underwater noise assessment, the Natural England best practice advice recommends that <i>'Figures should be used to visually present this information wherever they can add value. For example, maps should be provided with overlaying noise level contours and important receptors, such as designated site boundaries, known areas of importance for focal marine mammal species, hotspots of abundance or known migration routes.'</i></p> <p>Recommendation: Add in figures where visual representation of the noise contours would improve the clarity of the assessment. Refer to Phase III of the Natural England Best Practice Advice.</p>	<p>Noise contours are presented in section 11.6 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> for dose response curve assessments and <b>Volume 7, Figure 11-1 to 11-9 (application ref: 7.11.1)</b>.</p>	Y-M



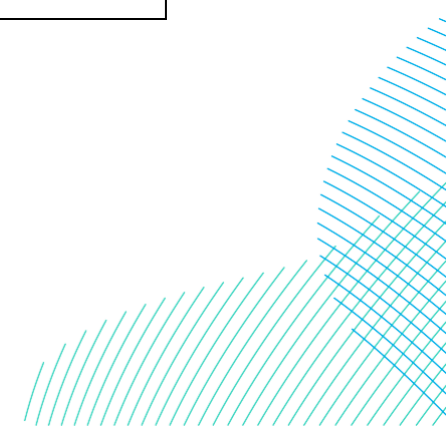
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SNE 162	17/07/2023	Natural England	Marine Mammals	<p>Environmental Impact Assessment - Document Used: Underwater Noise modelling Report (Appendix 11-2); Underwater Noise Assessment (Appendix 11-3); Chapter 11 Marine Mammals, Marine Mammal Information (Appendix 11-1).</p> <p>Chapter 11 Table 11-1, Table 11-18; Appendix 11.1, section 11.6.2</p> <p>Natural England advised during the Expert Topic Group (ETG) meeting on 21st February 2023, that for any impacts that are associated with the offshore array area itself, it is acceptable to use the Greater North Sea Management Unit (MU) for bottlenose dolphin density estimates in the PEIR. However, any project related activities on the coast have the potential to overlap with an area of increased bottlenose dolphin presence, of individuals that are associated with the Coastal East Scotland (CES) MU and Moray Firth SAC population.</p> <p>Natural England acknowledge that the Applicant intends to consider the CES MU for the impact assessment during the ES for potential impacts in the coastal region such as works in the Export Cable Corridor.</p> <p>Recommendation: Natural</p>	<p>Any activities occurring near the coast in the Offshore Export Cable Corridor that could potentially impact the coastal bottlenose dolphin population would include the CES population in the assessments and has been presented in <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> section 11.6.</p>	N



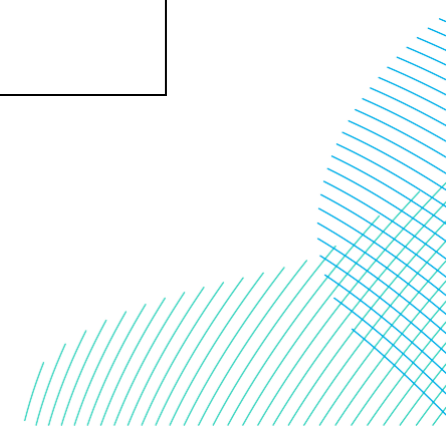
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>England advise that the Coastal East Scotland MU is included (alongside the estimates for the Greater North Sea MU) at the ES level to assess the potential impacts on this inshore population of bottlenose dolphin. Please reference updated review of Management Units for more information on this bottlenose dolphin population:</p> <p>IAMMWG. 2023. Review of Management Unit boundaries for cetaceans in UK waters (2023). JNCC Report 734, JNCC, Peterborough, ISSN 0963-8091. <a href="https://hub.jncc.gov.uk/assets/b48b8332-349f-4358-b080-b4506384f4f7">https://hub.jncc.gov.uk/assets/b48b8332-349f-4358-b080-b4506384f4f7</a></p>		
SNE 163	17/07/2023	Natural England	Marine Mammals	<p>Methodology Chapter 11 Table 11-1</p> <p>An assessment of the impacts of UXO clearance has not been included at the PEIR stage. Natural England note that a separate licence will be submitted for UXO activities and that an initial assessment of the potential impacts from UXO clearance (including the potential cumulative effects) will be provided during the ES, for information purposes only. Natural England will comment on this assessment when it is provided.</p>	An indicative assessment for UXO clearance and potential effects have been presented in <b>Volume 7, Appendix 11-6 Unexploded Ordnance Clearance Information and Assessment (application ref: 7.11.11.6)</b> .	Y-M



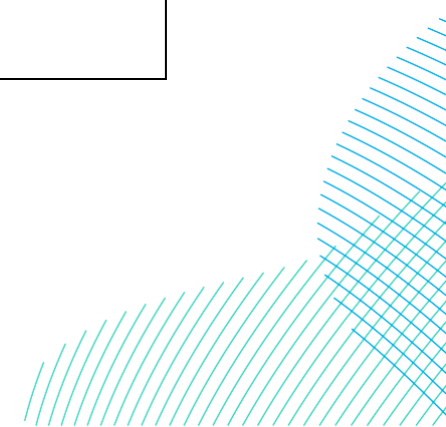
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				Recommendation: To note.		
SNE 164	17/07/2023	Natural England	Marine Mammals	<p>Appendix 11.3, Table 11-23</p> <p>The impact range for rock placement is incorrectly listed as 0.23 km; it should be 0.99 km, based on Table 6-4 in the Underwater Noise Modelling.</p> <p>Recommendation: Correct the value and re-calculate the assessment of effect</p>	Potential impact ranges for rock placement and other construction activities have been updated and presented in section 11.6.1.3 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> .	N
SNE 165	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11 Table 11-4; Table 11-90</p> <p>Natural England support the Applicant's commitment to submit Draft MMMPs for piling activities and UXO clearance at the Development Consent Order (DCO) stage.</p> <p>Recommendation: Agreement</p>	Acknowledged. Refer to <b>Volume 8, Outline Marine Mammal Mitigation Protocol (application ref: 8.25)</b> for further information.	N
SNE 166	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11 Table 11- 4</p> <p>Whilst there is a commitment to submit a draft MMMP with the DCO application, we note that the same commitment is not made for the Site Integrity Plan (SIP).</p> <p>Recommendation: We advise that a draft SIP should be submitted at the time of application</p>	As outlined in section 11.7 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> the <b>Volume 8, In Principle Site Integrity Plan for the Southern North Sea Special Area of Conservation (application ref: 8.26)</b> is submitted with the DCO application. Consultation with Natural England was undertaken during development of the In Principal SIP. The final version of the SIP will be developed and submitted prior to construction.	N



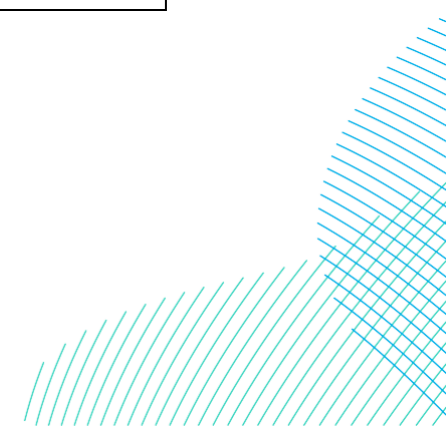
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SNE 167	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11 Section 11.6.1.2</p> <p>Natural England supports the use of Effective Deterrent Ranges (EDRs) and Dose Response Curves to assess disturbance for harbour porpoise and the two seal species. Natural England note the lack of literature/disturbance studies for the other species, and that TTS thresholds have been used to infer a fleeing response/behavioural disturbance in the absence of species specific disturbance information.</p> <p>However, TTS can occur at higher thresholds and therefore this may underestimate the behavioural response. The Applicant should keep the evidence base on disturbance under review and utilise more appropriate methods should they become available.</p> <p>Recommendation: Keep the evidence base on disturbance under review and utilise more appropriate methods (than TTS) should they become available.</p>	Acknowledged. All available and current information has been presented in section 11.6 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> .	N
SNE 168	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11 Section 11.6.1.2.2.4</p> <p>Natural England note that the use of Acoustic Deterrent Devices (ADDs) and their duration will be discussed with regulators and their advisors post consent, during finalisation of the MMMP. Therefore, we agree that the</p>	Acknowledged. The use of ADDs and their duration will be discussed with regulators and their advisors post consent, during finalisation of <b>Volume 8, Outline Marine Mammal Mitigation Protocol (application ref: 8.25)</b> . Therefore, the assessment of ADD disturbance would be illustrative (section 11.6.1.2.2.5 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> ).	N



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>assessment of ADD disturbance is illustrative and will not comment on the outcomes of the assessment at this time.</p> <p>Recommendation: To note.</p>		
SNE 169	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11 Section 11.6.1.2.2.4</p> <p>In the PEIR the Applicant outlines that the full PTS impact ranges (11km for harbour porpoise, 20km for minke whale) are greater than the range that can be mitigated by ADDs with certainty. The Applicant notes that the ADD duration needed to theoretically displace animals beyond the full PTS range, 123 minutes, has the potential to cause disturbance and may be deemed as excessive. Hence, they have used an ADD activation duration of 80 minutes.</p> <p>The information presented by the Applicant therefore indicates that the full injury ranges are not suitable to be mitigated by ADDs. <b>As a result, there will likely be a residual impact i.e. an area where PTS can occur, beyond the area that is mitigated.</b></p> <p>We highlight that the Applicant will be recommended to apply for a European Protected Species Licence for disturbance and/or injury post-consent for the piling works, so that an offence does not</p>	<p>With the reduction in monopile diameter size and hammer energy, PTS impact ranges can now be mitigation with 80 minutes ADD activation time.</p> <p>Information will be provided to demonstrate that injury and disturbance impacts will be sufficiently mitigated in <b>Volume 8, Outline Marine Mammal Mitigation Protocol (application ref: 8.25)</b> and <b>Volume 8, In Principle Site Integrity Plan for the Southern North Sea Special Area of Conservation (application ref: 8.26)</b> prior and at the time of application.</p> <p>In addition, Natural England will be consulted during the development of the final MMMP and SIP to ensure adequate mitigation measures are agreed prior to construction.</p>	N

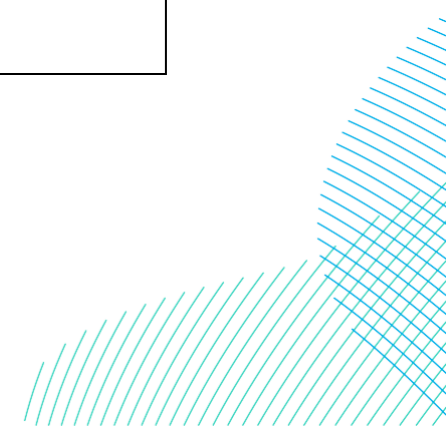


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				<p>occur. As part of the EPS application, the Applicant will be required to demonstrate that all mitigation options have been considered. Indeed, a licence can only be granted if the authority is satisfied that there is no satisfactory alternative (the second test). This includes alternatives to minimise the risk of injury, such as mitigation like noise abatement systems (NAS). If Natural England does not have confidence that an EPS licence could be issued, then we query the implications for the DCO Application.</p> <p>We highlight that disturbance mitigation will also need to be considered in the final application with respect to the Southern North Sea Special Area of Conservation. Natural England advise that, following the mitigation hierarchy, impacts should be minimised as far as possible, and we therefore recommend that the use of NAS is committed to in the draft MMMP/SIP, with the option to demonstrate that it is not needed post consent.</p> <p>Recommendation: Provide information to demonstrate that injury and disturbance impacts will be sufficiently mitigated in the draft</p>		

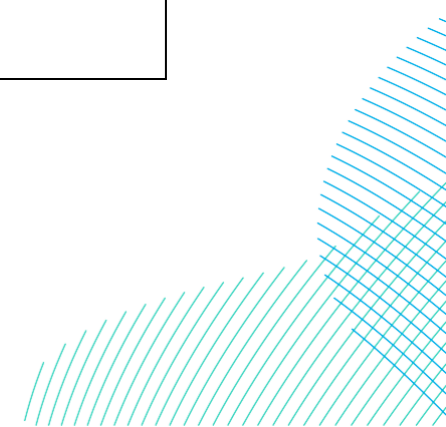




ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				MMMP and SIP at the time of application.		
SNE 170	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11 Section 11.6.1.4.2</p> <p>Here it states that all TTS impact ranges are &lt;100m for large and medium vessels but in the noise modelling report (Appendix 11-2) the TTS ranges are &gt;100m for large vessels (VHF) and large and medium vessels (LF) respectively.</p> <p>Recommendation: Correct this and update assessment in the submitted ES.</p>	<p>TTS impact ranges have been updated in section 11.6.1.4.2 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> with results from the recent underwater noise modelling.</p> <p>The TTS ranges that would be &gt;100m were based on a model assuming a stationary marine mammal with all sources assumed to operate constantly for 24 hours, both of which are highly unlikely scenarios and therefore not carried forward as the realistic worst case.</p>	Y-M
SNE 171	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11</p> <p>Natural England advise that a vessel management plan is included within the Project Environmental Management Plan (PEMP) and best practice measures are followed in order to mitigate the impacts of increased vessel presence on marine mammals at all stages of the project (including operation/maintenance stage).</p> <p>Recommendation: Ensure vessel management plan is included in PEMP to cover all stages of the project.</p>	<p>Acknowledged. The vessel management plan is included in <b>Volume 8, Outline Project Environmental Management Plan (application ref: 8.21)</b> submitted alongside the DCO, to cover all stages of the Projects.</p>	Y-M
SNE 172	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11 Section 11.6.1.4.6</p> <p>Natural England supports the use of a 4km distance being used to</p>	<p>Noted. A 4km buffer has been incorporated to assess for potential disturbance from the presence of vessels in the Projects' Array Areas in <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b>. In addition, a 4km disturbance range has been</p>	Y-M

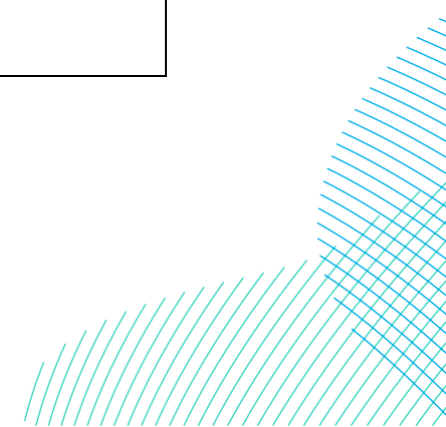


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>assess disturbance during construction activities other than piling/UXO clearance. Based on the Benhemma Le Gall <i>et al.</i> (2021) study, Natural England advise that a 4km distance is used to assess disturbance for construction vessels and operational/maintenance vessels also.</p> <p>Recommendation: Use 4km for assessing disturbance for construction activities, and vessel disturbance (for both construction and operational/maintenance stages).</p>	<p>assessed for a transiting vessel in sections 11.6.1.4.3 and 11.6.2.3.2 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b>.</p>	
SNE 173	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11 Section 11.6.1.6</p> <p>In Table 11-2 (Page 22) it states that there will be 5,745 round trips to port (for DBS East or DBS West in isolation) and 11,489 round trips (for both projects concurrently). Clarity is needed on whether this is per year or the total number across the five-year period. In section 11.6.1.6.2 it states that this is over the five years of construction however in section 11.6.1.9.2 it states that 'for the construction of DBS East and DBS West together, up to 11,489 round trips to port from the array areas <b>each year for five years</b>'.</p>	<p>Noted. The number of round trips to port is described in section 11.6.1.6 and 11.6.2.5 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> where the worst case scenario has been presented for vessel movements and collision risk.</p>	N

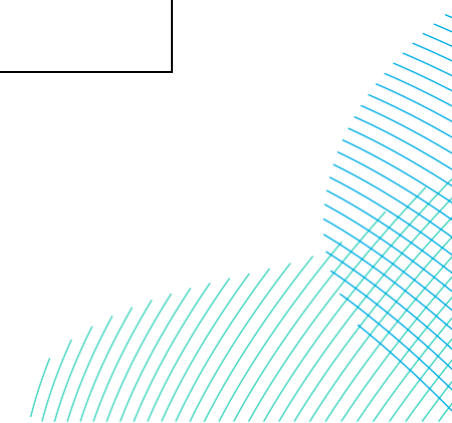


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				Recommendation: The submitted ES should provide clarification on the worst-case scenario for vessel movements and so collision risk.		
SNE 174	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11 Table 11-95</p> <p>Natural England has not yet had sight of the draft MMMP. Therefore, we cannot agree at this stage that the measures in the MMMP will be sufficient to significantly reduce any potential for PTS injury. Please also see our earlier comment regarding the need to consider all mitigation measures that can minimise the risk of injury.</p> <p>Recommendation: Engage with Natural England on the draft MMMP through the Evidence Plan process.</p>	The Applicants have engaged with Natural England on <b>Volume 8, Outline Marine Mammal Mitigation Protocol (application ref: 8.25)</b> and development of the final MMMP through the Evidence Plan process. The mitigation measures in the MMMP will be sufficient to mitigate any potential for PTS injury, all mitigation measures that can minimise the risk of injury will be considered.	N
SNE 175	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11 Section 11.12</p> <p>Natural England request to be consulted on any geophysical survey applications for the project.</p> <p>Recommendation: Consult Natural England on any geophysical surveys for the project.</p>	Acknowledged. There is currently no formal licencing process that would include Natural England's consultation. However, The Applicants would ensure the statutory guidance for mitigation is adhered to during all potential geophysical survey.	N
SNE 176	17/07/2023	Natural England	Marine Mammals	<p>Chapter 11 Section 11.4.4</p> <p>Please clarify what the cut-off period will be for the cumulative screening process.</p>	The cut off period for the cumulative screening process would be six months prior to DCO submission as discussed during the EPP process. The cumulative screening for marine mammals is presented in <b>Volume 7, Appendix 11-5 CEA Screening (application ref: 7.11.11.5)</b> .	N

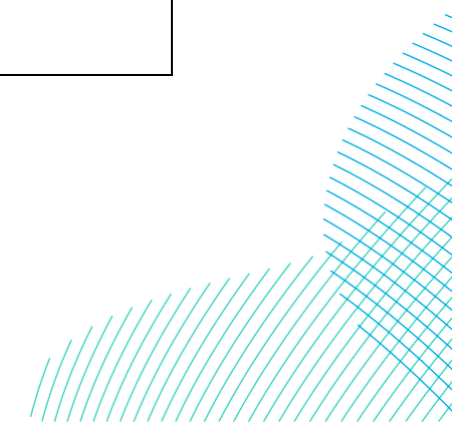
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				Recommendation: Clarify		
SNE 177	17/07/2023	Natural England	Marine Mammals	<p><b>Cumulative Impact Assessment (CIA)</b></p> <p>Chapter 11 Section 11.7.1</p> <p>In Table-89 'No Potential for cumulative effect' has been assigned to all impacts at the operational and maintenance stage, despite the text in rationale column stating that impacts could result in a cumulative effect on marine mammal receptors. The approach to screening impacts in the cumulative effects assessment should be reviewed and full (and consistent) justification be provided for the screening decision.</p> <p>Recommendation: Ensure screening decisions are consistent and well-justified in the submitted ES.</p>	Acknowledged. The relevant information for screening of cumulative effects included in the assessment is presented in <b>Volume 7, Appendix 11-5 CEA Screening (application ref: 7.11.11.5)</b> .	N
SNE 178	17/07/2023	Natural England	Marine Mammals	<p>HRA - Document Used: HRA Screening</p> <p>4.3.2.1</p> <p>Owing to the potential increase in vessel traffic during these Projects, Natural England does not agree to screening out of disturbance to seal haul-out sites until likely construction ports are identified and potential disturbance can be</p>	In <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> disturbance to seal haul outs have been scoped in and is presented in sections 7.3.6 for grey seal in the Humber Estuary SAC; sections 7.3.7 for harbour seal in the Wash and Norfolk Coast SAC, and sections 7.3.8 for the Berwickshire North Northumberland Coast SAC.	Y-M



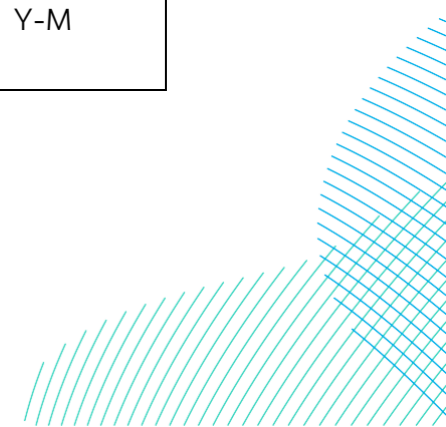
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>assessed.</p> <p>Recommendation: Screen in disturbance to seal haul-out sites until construction ports are identified and potential disturbance can be assessed.</p>		
SNE 179	17/07/2023	Natural England	Marine Mammals	<p>4.3.3.3 Figure 4-5</p> <p>Figure 4-5 displays the Management Units (MUs) for bottlenose dolphins from the 2015 review. There have been updates and changes to the bottlenose dolphin MUs since then. Please update to the latest review (2023).</p> <p>Recommendation: Update figure to the latest review: IAMMWG. 2023. Review of Management Unit boundaries for cetaceans in UK waters (2023). JNCC Report 734, JNCC, Peterborough, ISSN 0963-8091. <a href="https://hub.jncc.gov.uk/assets/b48b8332-349f-4358-b080-b4506384f4f7">https://hub.jncc.gov.uk/assets/b48b8332-349f-4358-b080-b4506384f4f7</a></p>	Acknowledged. This has been reviewed and updated in <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b> and <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> .	N
SNE 264	17/07/2023	Natural England	Cumulative Effects	<p>There are no assessment of in-combination impacts with other relevant plans or projects for the Humber Estuary SAC. We advise the following impacts pathways are considered:</p> <ul style="list-style-type: none"> <li>• loss of functionally linked land;</li> <li>• disturbance to SPA/Ramsar bird species using functionally linked land;</li> </ul>	A functionally linked land assessment was undertaken and shared with Natural England. Further details are available in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> .	N



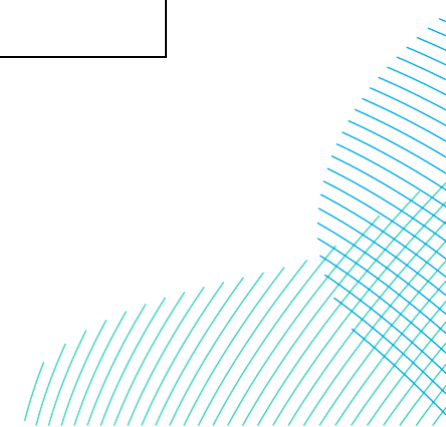
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<ul style="list-style-type: none"> <li>• lamprey migration routes;</li> <li>• water quality; and</li> <li>• air quality.</li> </ul> <p>As a minimum we advise considering site allocations in relevant Local Plans as well as relevant planning applications from East Riding of Yorkshire Council and Hull City Council. This should include:</p> <ul style="list-style-type: none"> <li>• existing completed projects;</li> <li>• approved but uncompleted projects;</li> <li>• ongoing activities; and</li> <li>• plans or projects for which an application has been made and which are under consideration by the consenting authorities; and plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects. <p>Potential in-combination impacts to the Humber Estuary SAC should be assessed with other relevant plans or projects.</p> </li></ul>		
SNE 181	17/07/2023	Natural England	Offshore Ornithology	Survey data: Only 12 months of baseline survey data have been included in this PEIR. It will not be possible for Natural England to comment on the sufficiency and	The full 24 months has been presented in the <b>Volume 7, Chapter 12 Offshore ornithology (application ref: 7.12)</b> (section 12.4.2).	N



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>robustness of the baseline data or on the conclusions of the assessment until we have seen the full assessment using all 24 months of baseline data.</p> <p>Recommendation: It is advised that the full 24 months of baseline survey data are presented and analysed within the ES.</p>		
SNE 182	17/07/2023	Natural England	Offshore Ornithology	<p>Abundance and density estimates: We note that only design-based methods have been used to estimate abundance and density.</p> <p>Recommendation: We recommend the use of model-based density and abundance estimates (such as MRSea), and that design based outputs are presented alongside model-based outputs.</p>	<p>This request is noted, however it is only possible to undertake robust spatial modelling for species present in sufficient numbers that their distributions can be reliably analysed in all months. Since this condition is only met for some species in some months, this would result in a piecemeal set of model results, which it would be not be possible to use in the assessment.</p> <p>Furthermore, the primary purpose of spatial modelling is being able to compare distributions, such as before and after wind farm construction, to understand the nature of observed changes. Therefore, spatial models provide limited benefits for baseline characterisation prior to wind farm construction. Given this, the technical challenges of undertaking spatial modelling and the greater data requirements it has not been considered that the effort is justified for the current situation.</p>	N
SNE 183	17/07/2023	Natural England	Offshore Ornithology	<p>Combined abundance estimates: It is noted that no detail has been provided on the methods used to combine abundance estimates of the array +2km buffer of the two arrays, to account for the overlapping buffers.</p> <p>Recommendation: We advise that further detail is provided in the submitted ES in order to establish that the combination method is robust.</p>	<p>Following revisions to the Projects the boundaries of DBS East and DBS West are now a minimum of 8km apart and therefore there is no overlap between the Projects even when their respective 4km buffers are included and hence it has not been necessary to account for the overlap referred to in this comment in the final assessment presented in the ES.</p>	N
SNE 184	17/07/2023	Natural England	Offshore Ornithology	<p>Population scales: Natural England advises that, for EIA, the key</p>	<p>The population sizes recommended by Natural England have been used in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b>.</p>	Y-M

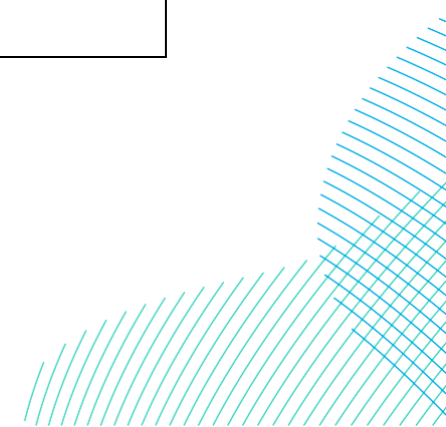


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>assessment should be an annual assessment of impact at the largest population size, and note that in the case of kittiwake, guillemot and puffin, the largest Biologically Defined Minimum Population Scale (BDMPS) is in the breeding season.</p> <p>Recommendation: The reference populations recommended here are advised to be used to assess EIA impacts in the submitted ES.</p>		
SNE 185	17/07/2023	Natural England	Offshore Ornithology	<p>Calculation of baseline mortality: We note that the demographic rates used to calculate 'average mortality' differ from those presented in Horswill &amp; Robinson (2015) for several species.</p> <p>Recommendation: NE advises that the Applicant use the demographic rates as provided in Horswill &amp; Robinson (2015).</p>	These demographic rates have been reviewed and amended as appropriate. This has resulted in only very minor differences in the estimated all-age class average mortality rates.	Y-M
SNE 186	17/07/2023	Natural England	Offshore Ornithology	<p>Construction and decommissioning displacement: We do not agree with the approach taken for assessing the impacts of construction or decommissioning displacement.</p> <p>Recommendation: It is recommended that displacement impacts during construction and decommissioning be presented as 50% of the operational displacement impacts.</p>	The assessment has been amended to include this approach (section 12.6.1 of <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> ).	Y-M

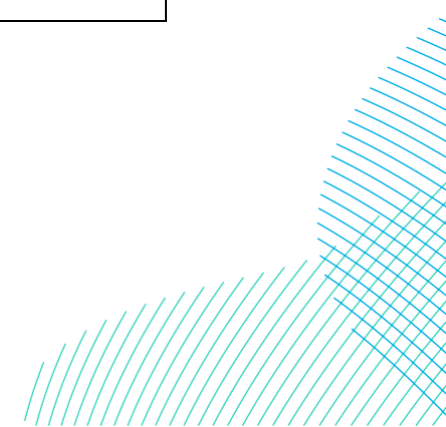




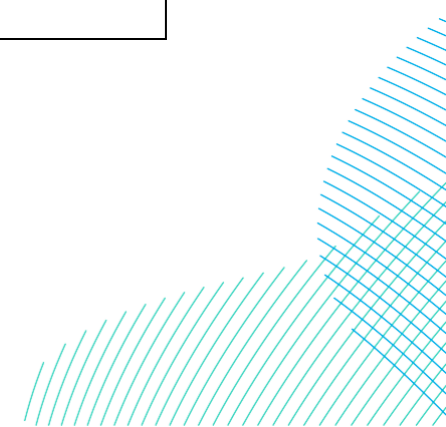
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SNE 187	17/07/2023	Natural England	Offshore Ornithology	<p>Collision risk: We note that several migratory species have been screened out due to low numbers.</p> <p>Recommendation: It is our advice that migratory species should not be excluded from Collision Risk Model (CRM) assessments based on low numbers during site-based surveys. The most appropriate method of assessing collision risk to migratory species should be agreed through the Expert Topic Group discussions.</p>	<p>These species have been included in the technical appendices, and also in the relevant sections of <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> (e.g. section 12.6.2).</p>	Y-M
SNE 188	17/07/2023	Natural England	Offshore Ornithology	<p>Collision risk: It is noted that the results of CRM using Natural England's recommended avoidance rate are not assessed for gannet.</p> <p>Recommendation: We advise that the results of CRM using NE's recommended avoidance rate are fully presented and assessed for gannet.</p>	<p>This is not considered to be correct. NE's guidance is to use a mean rate of (micro) avoidance of 99.2% in the CRM and to reduce densities by 70% (or a range from 65-85%) to correspond to macro avoidance. The approach taken in the CRM was to combine these sources of avoidance to obtain a single value for use in the modelling:  <math>= 1 - ((1 - 0.992) \times (1 - 0.7)) = 0.9976</math>                      The collision estimates obtained are identical using either the combined rate above or adjusting the densities, however the combined approach is simpler to implement and does not require multiple adjustments to be made.</p>	N
SNE 189	17/07/2023	Natural England	Offshore Ornithology	<p>Assessment of impacts: We note that no further consideration has been given to impacts assessed as exceeding the 1% threshold of baseline mortality.</p> <p>Recommendation: It is advised that any impacts exceeding the 1% threshold of baseline mortality should be taken through to further assessment, e.g. population modelling, to determine the</p>	<p>The Applicants' have applied the 1% threshold approach to assessment in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b>.</p>	Y-M



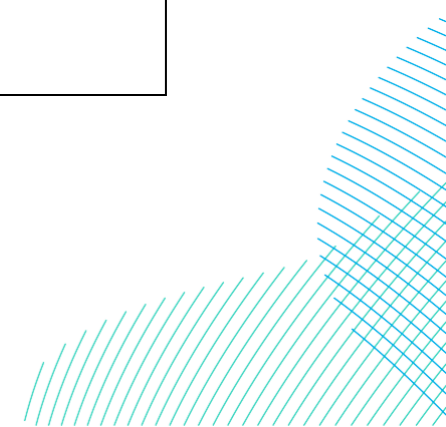
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				significance of the mortality for the population in question.		
SNE 190	17/07/2023	Natural England	Offshore Ornithology	<p>HRA screening: We do not agree with the Applicant's approach of only screening in SPAs within mean max foraging range +1s.d. for potential effects on non-breeding seabirds.</p> <p>Recommendation: We advise that the screening process be revised, considering the information presented in Furness (2015) on potential connectivity of seabird features of SPAs outside the breeding season.</p>	<p><b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> has applied this proposed screening approach (mean maximum foraging range plus 1 standard deviation) for non-breeding season impacts on SPAs.</p>	Y-M
SNE 191	17/07/2023	Natural England	Project Description	<p>Project Parameters. Document(s) Used: PEIR Chapter 05 - Project Description; Chapter 12 - Offshore Ornithology</p> <p><b>Project Description</b> Table 5.2</p> <p>The minimum lower blade tip height has been provided in meters to MSL. We are unclear what MSL refers to.</p> <p>Recommendation: Please provide the minimum clearance height in relation to highest astronomical tide (HAT). We advise that this should be raised above 22m as much as possible to reduce seabird collision risk.</p>	<p>MSL = Mean Sea Level, which is the datum used for seabird flight heights, and the reason why the CRM includes an 'offset' value as turbine clearance heights are often quoted from other datums, such as highest astronomical tide (HAT), mean high water springs, lowest astronomical tide, etc. The use of MSL simplifies this since no other calculation is required.</p>	N



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SNE 192	17/07/2023	Natural England	Project Description	<p>Section 12.3.2.3</p> <p>We note that details have not been provided on the construction of the cable corridor, which will be required to assess impacts.</p> <p>Recommendation: NE would like to see details relating to the construction of the cable corridor i.e., timings, vessel numbers and movements, as well as an assessment of impacts. This is in order to advise on the impacts of the construction of the cable corridor on the SPA.</p>	<p>Assessment of potential impacts along the export cable construction corridor have been included in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> (section 12.6.1).</p>	Y-M
SNE 193	17/07/2023	Natural England	Project Description	<p>Section 12.3.2.4, Section 12.3.3</p> <p>Natural England note that no details have been provided of vessel or helicopter movements, routes or schedules, which will be required to assess impacts. Natural England further note that no mitigation measures have been described that relate to disturbance/displacement caused by vessel or helicopter movements.</p> <p>Recommendation: Natural England advise that details of vessel and helicopter movements be provided in the Environmental Statement (ES), along with assessment of potential impacts and details of any relevant mitigation measures.</p>	<p>The potential for displacement due to construction vessels has been assessed in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> (section 12.6.1). This has focussed on the potential for effects within the array areas and along the export cable corridor as these are where any likely effects would be anticipated to take place. Any effects due to the passage of vessels and helicopters would be short-term and localised and therefore does not require assessment.</p>	N

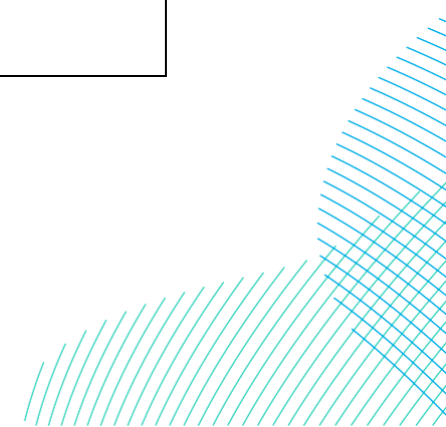


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SNE 194	17/07/2023	Natural England	Offshore Ornithology	<p><b>Natural England's Position on Worst Case Scenario or Scenarios</b></p> <p>Section 12.3.2.3</p> <p>Natural England note that there are three potential build-out scenarios, and that the worst-case scenario is accounted for in any population modelling of impacts.</p> <p>Recommendation: Natural England advise that each potential build-out scenario is assessed in terms of the worst-case scenario of any population modelling of impacts.</p>	<p>The worst case scenario for all impacts has been assessed through <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b>. All development scenarios are considered – namely building either project in isolation, or both projects concurrently or sequentially.</p>	Y-M
SNE 195	17/07/2023	Natural England	Offshore Ornithology	<p><b>Survey Data Acquisition</b></p> <p>Chapter 12, Section 12.4.2.1 Table 12-1 Technical Appendix 12-1</p> <p>Natural England note that only 12 months of baseline characterisation data have been included in this PEIR. It will not be possible for Natural England to comment on the sufficiency and robustness of the baseline data until the full 24 months have been provided.</p> <p>Natural England cannot rule out the possible need to analyse any data already collected (but not analysed) from additional cameras if, following the completion of 2</p>	<p>The full 24 months has been presented in the <b>Volume 7, Chapter 12 Offshore ornithology (application ref: 7.12)</b> (section 12.4.2).</p>	N

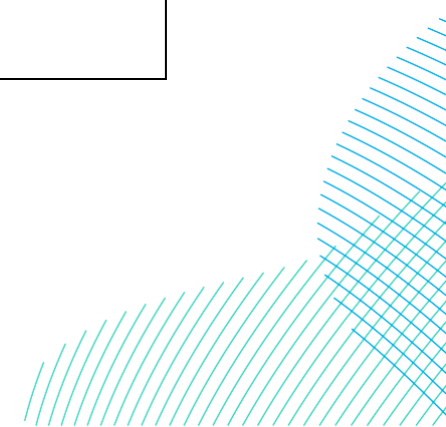


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				<p>years of baseline survey data collection, the survey coverage does not appear to be sufficient for assessment purposes (e.g. where measures of confidence in the data suggest analysing images collected but not analysed might improve confidence for certain species).</p> <p>Natural England welcomes the Applicant's intention to present all 24 months of survey data in the Environmental Statement (ES) and to discuss its analysis during post-PEIR consultation.</p> <p>Recommendation: Please include the full 24-months of baseline data in the final assessment, as stated, and engage with Natural England on the analysis of this data through the Evidence Plan Process.</p>		
SNE 196	17/07/2023	Natural England	Offshore Ornithology	<p>General</p> <p>Natural England note that the 24-month period of baseline surveys includes months prior to, and others during, the highly pathogenic avian influenza (HPAI) outbreak in seabirds in summer 2022.</p> <p>Because of this, Natural England may need to discuss data collected from summer 2022 onwards with the Applicant, as stated in our advice note from September</p>	<p>This point is acknowledged, however further discussions with Natural England and their guidance on this matter* has indicated that there is no clear requirement for further actions to be taken in the assessment. In addition, the colony monitoring undertaken by the RSPB of the Flamborough and Filey Coast SPA (Butcher <i>et al.</i> 2023 and Clarkson <i>et al.</i> 2022) have not found any significant changes in the monitored species counts over this period.</p> <p>* (e.g. Highly Pathogenic Avian Influenza (HPAI) outbreak in seabirds and Natural England advice on impact assessment (specifically relating to offshore wind) September 2022;  <a href="https://defra.sharepoint.com/sites/WorkDelivery2512/SitePages/Home.aspx">https://defra.sharepoint.com/sites/WorkDelivery2512/SitePages/Home.aspx</a>)                      Butcher, J., Aitken, D., O'Hara, D. (2023) Flamborough and Filey Coast SPA Seabird Monitoring Programme 2023 Report                      Clarkson, K., Aitken, D., Cope, R., &amp; O'Hara, D. (2022) Flamborough &amp; Filey Coast SPA: 2022 seabird colony count and population trends. Unpublished RSPB report.</p>	N

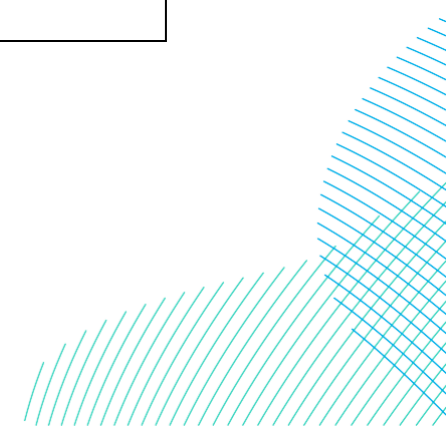
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				2022. Recommendation: To note.		
SNE 197	17/07/2023	Natural England	Offshore Ornithology	Chapter 12, Section 12.4.2.1 <i>"The survey methodology was discussed and agreed with Natural England through the ETG process"</i>  Natural England do not agree with the statement that Natural England has agreed all aspects of the survey methodology with the Applicant. Natural England has previously requested more detail on the survey methodology than has been presented hitherto. After reviewing this PEIR, Natural England still note a lack of detail provided on the baseline surveys(see comment below).  Recommendation: To note.	The Applicants have provided further details on methodology as requested by Natural England in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> and technical appendices.	Y-M
SNE 198	17/07/2023	Natural England	Offshore Ornithology	Technical Appendix 12-1, Section 2.1  Natural England's Best Practice Guidance (BPG) states that the following information on baseline surveys for offshore ornithology be presented: - "A table [...] to clearly present the site-specific survey information, including survey dates, number of transects, total transect length, total area surveyed (measured in km <sup>2</sup> ), percentage coverage of survey area, sea state (range and	The requested survey information has been provided in the Appendices to the ES chapter (see <b>Volume 7, Appendix 12-2 (application ref: 7.12.12.2)</b> ).	Y-M



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				<p>predominant, and/or number of images/minutes at each sea state), turbidity, and number of images / cameras (where applicable)”                      - “A figure [...] to display survey transects across the project area, including a readable scale “Natural England note that the details currently provided do not include survey dates, number of transects, total transect length, total area surveyed per survey, sea state, turbidity, number of images, number of cameras, or a figure showing the location of the transects.</p> <p>Recommendation: Please present the requested information about the baseline surveys in the submitted ES.</p>		
SNE 199	17/07/2023	Natural England	Offshore Ornithology	<p>Technical Appendix 12-1, Section 2.3</p> <p>We note that only design-based methods have been used to estimate abundance and density.</p> <p>We advise consideration is given to the use of model-based (e.g. MRSea) estimates, and that design-based outputs are presented alongside model-based outputs where used, along with distribution maps of the raw survey data. If used, evidence of the suitability of any novel modelling method would need to be provided.</p>	<p>This request is noted, however robust spatial modelling for all months requires that species are present in large numbers throughout the year, which is not the case with sites this far from the coast. Furthermore, the key strength of spatial modelling is being able to compare distributions, such as before and after wind farm construction. Given this, the technical challenges of undertaking spatial modelling and the greater data requirements it has not been considered that the effort is justified for the current situation.</p>	N

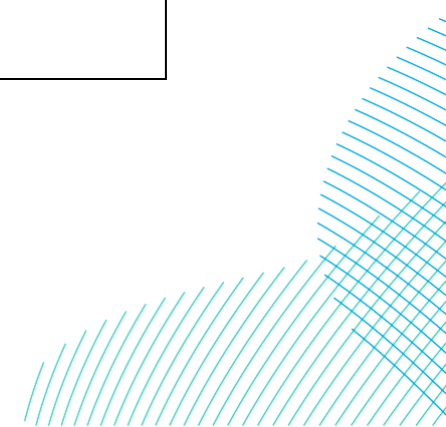


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				Recommendation: Natural England advise the use of model based (e.g. MRSea) estimates, and that these be presented alongside design-based outputs and distribution maps of the raw survey data.		
SNE 200	17/07/2023	Natural England	Offshore Ornithology	<p>Technical Appendix 12-1, Section 2.3</p> <p>We understand from the ETG meeting held on 7th February 2023 that the autocorrelation approach to be applied was novel for OWF applications.</p> <p>Recommendation: Natural England would welcome further discussion on the autocorrelation approach during the EP process.</p>	The Applicants have discussed this approach further with NE in the ETG held on 6th February 2024 and provided further information in <b>Volume 7, Appendix 12-2 (application ref: 7.12.12.2)</b> with respect to the methods used.	Y-M
SNE 201	17/07/2023	Natural England	Offshore Ornithology	<p>Technical Appendix 12 -2, Technical Appendix 12-3</p> <p>Natural England's best practice advice states: "<i>Tables of abundance and density estimates should be presented separately for birds in flight, birds on the water, and all birds.</i>"</p> <p>We note that separate abundance and density estimates for birds in flight and birds on the water have not been presented.</p> <p>Recommendation: Please present separate abundance and density</p>	<b>Volume 7, Appendix 12-3 to 12-9 (application ref: 7.12.12.3 to 7.12.12.9)</b> provides the full set of tables as requested.	Y-M

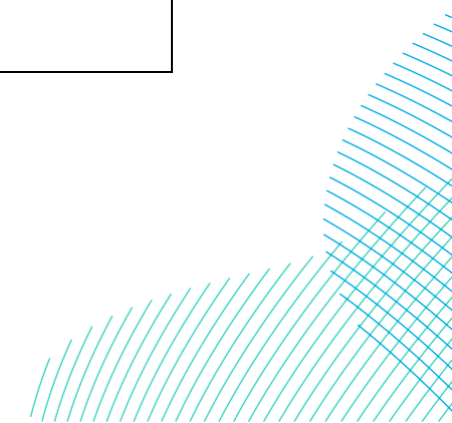




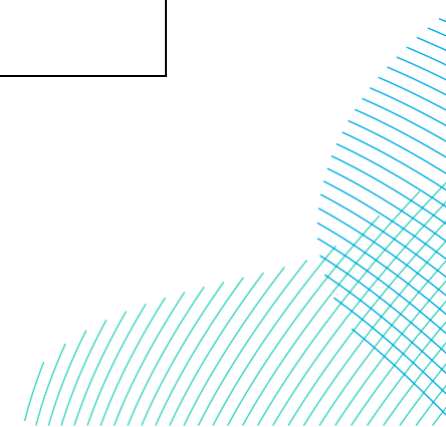
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				estimates for birds in flight, birds on the water, and all birds.		
SNE 202	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.6.2.1 Technical Appendix 12-2</p> <p>It is stated that: <i>"because the two array areas (East and West) share a border the buffer areas from the two array areas overlap. Therefore, the sum of the number at risk from each array area (when the buffers are included) is greater than the total from analysis of the array areas combined (i.e. as a result of double counting of birds recorded in the overlap zone; this double counting will be addressed in the ES)."</i></p> <p>The Tables showing abundance estimates for both projects plus buffer combined in Technical Appendix 12-2 state: <i>"Note that the Project Total is Less Than the Sum of East and West Due to Overlap of the Individual 2km Buffers"</i></p> <p>Natural England note that no detail has been provided on the extent of the overlap of the project buffers, the estimation of abundance within the overlapping zones, or the methods used to add the abundance estimates of Dogger Bank South – East &amp; buffer with those of Dogger Bank South – West &amp; buffer.</p>	<p>Following Project design changes the boundaries of DBS East and DBS West are now a minimum of 8km apart, therefore there is no overlap between the two Projects or their 4km buffers and there is no requirement for the analysis to account for the previous overlap.</p>	N



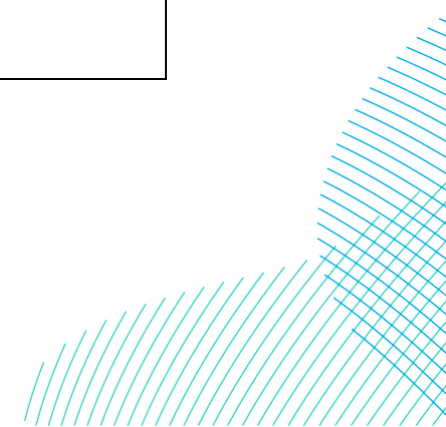
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				Recommendation: In the submitted ES, please provide detail on the extent of the overlap of the project buffers, the estimation of abundance within the overlapping zones, and in particular the methods used to add the abundance estimates of Dogger Bank South – East & buffer with those of Dogger Bank South – West & buffer.		
SNE 203	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Table 12-14, Technical Appendix 12-2, Technical Appendix 12-4</p> <p>Seasonal peak abundances: Natural England notes that there are some discrepancies between the monthly abundance estimates presented in Appendices 12-2 and 12-4 and the seasonal peak abundances presented in Chapter 12, Table 12-14.</p> <p>Recommendation: Ensure seasonal peak abundances are consistent in the submitted ES.</p>	All population estimates have been checked for consistency in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> .	N
SNE 204	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Table 12-14, Technical Appendix 12-2</p> <p>It is advised that 'commic' terns are either:</p> <ul style="list-style-type: none"> <li>- apportioned to species based on identifiable ratios/migration timings; or,</li> <li>- worst case scenarios are assessed where all 'commic' tern</li> </ul>	The tern assessments have been updated in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> .	Y-M



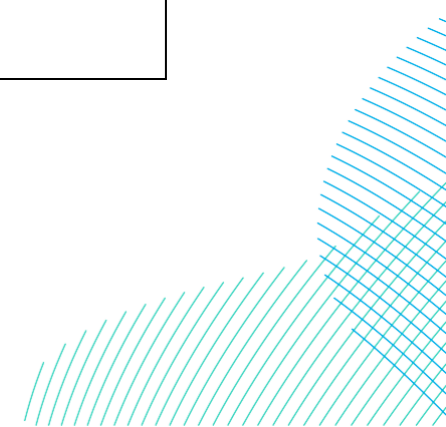
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>are assumed to be Arctic tern and all 'commic' tern are assumed to be common tern.</p> <p>Recommendation: Please revise the apportioning of 'commic' terns.</p>		
SNE 205	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.5.2 Table 2-11</p> <p>Seasons: Natural England welcomes the use of the 'full' breeding season for species.</p> <p>However, for species where the Projects are beyond foraging range +1sd of any colonies, Natural England note that it is appropriate to define the breeding season as the 'migration-free' breeding period, to ensure that late or early migratory movements are assessed against the appropriate reference populations. For DBS, Natural England note that this would apply to both Arctic and common tern.</p> <p>Recommendation: Please revise the seasons used for Arctic and common tern.</p>	The assignment of full or migration-free breeding seasons have been reviewed and adjusted as appropriate, noting NE's suggestion regarding terns.	Y-M
SNE 206	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.5.2, Table 12-11</p> <p>Population scales: Natural England advises that, for EIA, the key assessment should be an annual assessment of impact at the largest population size, and note</p>	The Applicants are grateful for these recommended reference populations for use in the annual EIA assessments. The approach for terns has also been reviewed and updated as appropriate. It should be noted however, that very few terns of any species were recorded at DBS so very little assessment was necessary for these species.	Y-M



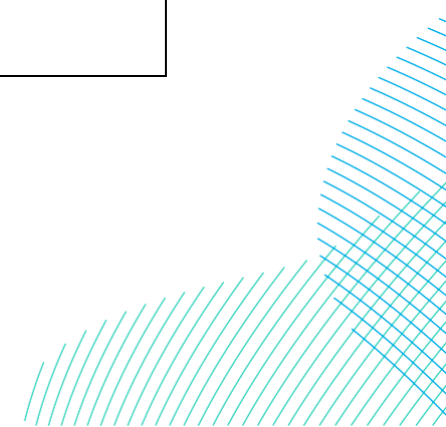
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>that in the case of kittiwake, guillemot and puffin, the largest BDMPS is in the breeding season.</p> <p>We advise that the following largest BDMPS be used for these species:</p> <ul style="list-style-type: none"> <li>- Kittiwake (breeding): 839,456</li> <li>- Guillemot (breeding): 2,045,078</li> <li>- Puffin (breeding): 868,689</li> </ul> <p>We note that this has implications for the calculation of baseline mortality against which impacts are assessed throughout for these species.</p> <p>Natural England further recommend that common tern and Arctic tern be treated separately, in terms of BDMPS and baseline mortality.</p> <p>Recommendation: Please revise the reference population sizes for kittiwake, guillemot and puffin. Please assess population size and baseline mortality separately for Arctic and common tern.</p>		
SNE 207	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.5.2, Table 12-13</p> <p>Species average mortality: The Applicant states that demographic rates have been taken from Horswill and Robinson (2015).</p> <p>However, we note that the demographic rates presented in</p>	<p>These demographic rates suggested have been reviewed and amended as appropriate. It is not anticipated that this will make a large difference to the all-age class average mortality rates.</p>	Y-M



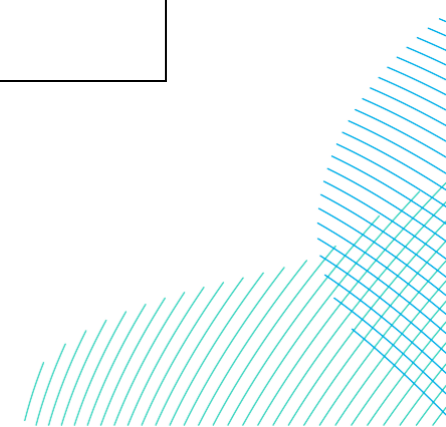
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>Table 12-13 differ from those presented in Horswill &amp; Robinson (2015) for several species (e.g. puffin), with implications for the calculation of the 'average mortality' figures and thus on the calculation of baseline mortality rates against which impacts are assessed.</p> <p>Natural England advise that the demographic rates are used as provided in Horswill &amp; Robinson (2015), and that any deviations from these rates be fully explained.</p> <p>Recommendation: Please use the rates provided in Horswill &amp; Robinson (2015) when calculating 'average mortality'.</p>		
SNE 208	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Technical Appendices</p> <p>Natural England note that no consideration has been given to the baseline environment relating to the cable corridor or vessel routes. The scoping report stated "The Offshore Study Area closer to shore, crosses the Greater Wash SPA, for which consideration of potential impacts will need to be given".</p> <p>Recommendation: Provide clarification on the worst-case scenario for vessel movements and cable corridor. Natural England advises that the potential port options (or locations if known)</p>	<p>Consideration of vessel movements has provided in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> and assessed in full in section 12.6.1.</p>	Y-M



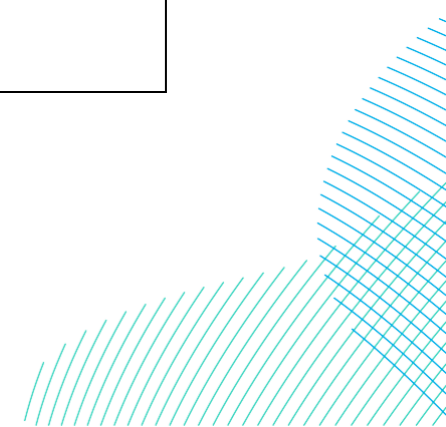
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				are presented at the Environmental Statement (ES) stage. Please note that recent DAS survey data for the Greater Wash SPA will become available for use in assessments in due course.		
SNE 209	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12</p> <p>Natural England note that no additional datasets have been considered to provide context when characterising the baseline environment, beyond the 12 months of project survey data. The Scoping Report stated that data from Dogger Bank Creyke Beck and Dogger Bank Teesside would be included when characterising the baseline environment. Natural England previously advised also using data collected at the Round 3 Hornsea projects.</p> <p>Recommendation: Please draw upon additional data from Dogger Bank Creyke Beck, Dogger Bank Teesside and the Round 3 Hornsea projects where appropriate to contextualise the baseline environment characterisation.</p>	Reference to other datasets have been made in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> as appropriate (e.g. section 12.4.2).	Y-M
SNE 210	17/07/2023	Natural England	Offshore Ornithology	<p><b>Identified Impacts</b></p> <p>Chapter 12, Section 12.6.1.1</p> <p>Construction displacement: Natural England do not agree with the approach taken for assessing the impacts of construction</p>	The assessment has been amended to include this approach (section 12.6.1 of <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> ).	Y-M



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>displacement.</p> <p>Natural England do not agree with the statement that "Any impacts resulting from disturbance and displacement from construction activities would be short-term, temporary and reversible in nature, lasting only for the duration of construction activity, with birds expected to return to the area once construction activities have ceased"</p> <p>Natural England consider that displacement is likely to occur within and around the constructed array area, due to the presence of turbines, and where construction activities are ongoing. This will represent an increasing spatial impact as construction progresses. The approach taken by the Applicant does not reflect this, despite stating that "At such time as wind turbines (and other infrastructure) are installed onto foundations the impact of displacement would increase incrementally to the same levels as operational impacts", which Natural England agrees with.</p> <p>Natural England advise that the sensitivity to displacement during construction and decommissioning should be the same as during the operational phase.</p> <p>Natural England recommend that</p>		

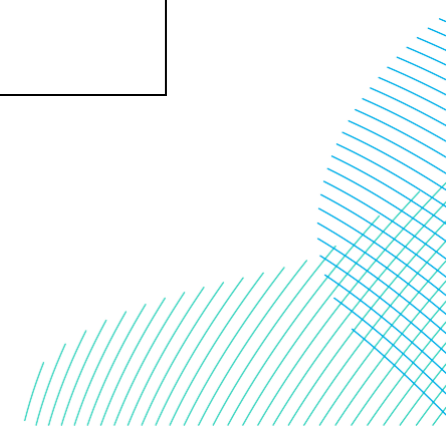


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				<p>displacement impacts during construction be presented as 50% of the operational displacement impacts, as has been carried out for other recent OWF submissions.</p> <p>Recommendation: Please present construction displacement impacts as 50% of the operational displacement impacts.</p>		
SNE 211	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.6.1.1</p> <p>Natural England note that no consideration has been given to potential impacts of displacement from construction of the cable corridor.</p> <p>Recommendation: Please include consideration of potential impacts of displacement caused by the construction of the cable corridor. For vessel movements/construction activities within, or within 2km of Greater Wash SPA, the use of the Natural England's Best Practice Protocol for Minimising Disturbance to Red-Throated Diver will be a minimum requirement, and further mitigation may be necessary depending on the scale and intensity of the proposed activity.</p>	<p>Consideration of vessel movements has been provided in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> and assessed in full (section 12.6.1).</p>	Y-M
SNE 212	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.6.2.1</p> <p>Operational displacement: Natural England note that the displacement matrices presented</p>	<p>These have been provided as requested, although to minimise the over-complication and content in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> the full tables have been included in the <b>Volume 7, Appendix 12-12 (application ref: 7.12.12.12)</b>, with just the key impact values discussed in the text in relation to the upper and lower abundance estimates.</p>	Y-M

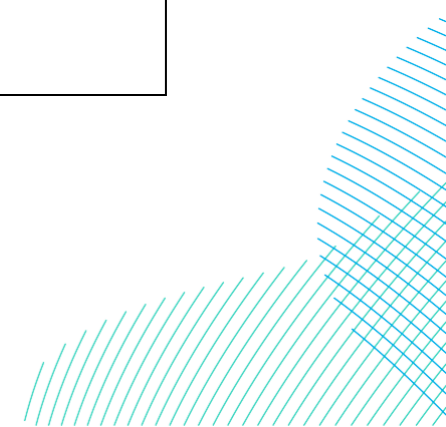




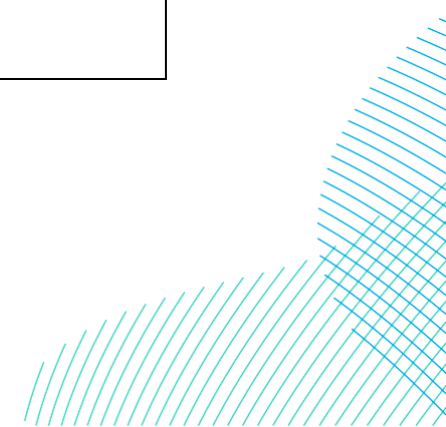
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				<p>in this section are derived from central abundance estimates alone, and request that matrices are also presented of the upper and lower confidence intervals, so that the full range of impact scenarios can be understood.</p> <p>Recommendation: Please present matrices of the upper and lower confidence intervals.</p>		
SNE 213	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.6.2.1</p> <p>Operational displacement: Whilst Natural England cannot comment on the validity of the conclusions presented, we note that the Applicant's assessment has concluded that impacts exceed the 1% threshold of baseline mortality for guillemot and razorbill, but has assessed the significance of these impacts as 'minor to moderate' for guillemot and 'minor' for razorbill. Natural England's best practice advice advises that any impacts exceeding the 1% threshold of baseline mortality be given further consideration, e.g. through population modelling, to determine the significance of the mortality for the population in question.</p> <p>Recommendation: Please give further consideration, e.g. through population modelling, to any impacts exceeding the 1% threshold of baseline mortality when the full baseline is assessed.</p>	<p><b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> has provided additional assessment for impacts which exceed the 1% mortality threshold as requested.</p>	Y-M



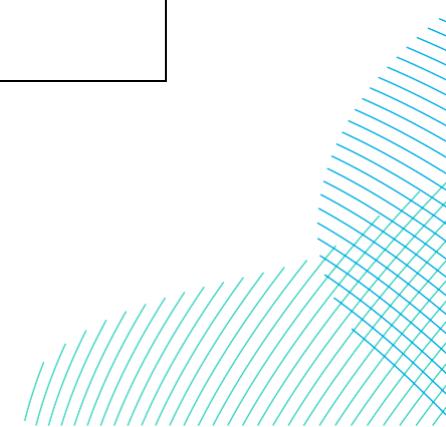
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SNE 214	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.6.2.1, Table 12-20, Paragraph 401</p> <p>Operational displacement (screening): Natural England note that the screening in of species has been done based on the first 12 months of baseline data only and advise that it may be necessary to reconsider which species are screened in for displacement impact assessment following the analysis of the full 24 months of baseline survey data, as the Applicant has stated is the intention with regards to screening for collision risk.</p> <p>Recommendation: Please review the species screened in for assessment once the full 24 months of baseline data has been analysed.</p>	Screening has been revisited during the <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> assessment as suggested.	Y-M
SNE 215	17/07/2023	Natural England	Offshore Ornithology	<p>Section 12.6.2.1, Table 12-20</p> <p>Operational displacement: Natural England note that impacts from operational cable maintenance have been screened out as “unlikely to result in detectable effects at either the local or the regional population level”.</p> <p>Natural England also notes that while the Applicant states the intention to consider displacement impacts due to maintenance operations associated with the offshore infrastructure, no</p>	Consideration for these potential impacts has been provided in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> (section 12.6.2).	Y-M



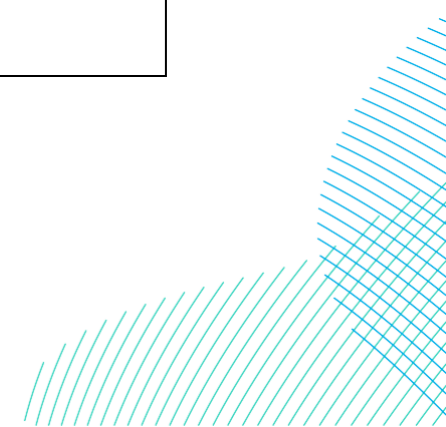
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>consideration appears to have been given to the potential displacement impacts of vessel routes and traffic associated with those maintenance operations. Natural England note that consideration of these impacts may affect the species screened in for displacement assessment (e.g. red-throated diver and common scoter).</p> <p>Recommendation: Please consider impacts of disturbance/displacement from operation and maintenance vessels.</p>		
SNE 216	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.6.2.3, Table 12-70</p> <p>Collision risk (screening): Natural England note that common tern and Arctic tern have been screened out of collision risk assessment due to 'very low' estimated densities of birds in flight within the array areas. We note that it is unclear whether, or how, the recorded densities of 'commic tern' have been assessed in this screening process.</p> <p>Natural England further note that common and Arctic tern have been assessed as at 'low' risk of collisions, while small gulls have been assessed as at 'medium risk' and large gulls as at 'high risk'. These risk categories do not fit with</p>	The collision risk assessment for terns has been reviewed as advised and these species are now screened into the assessment.	Y-M



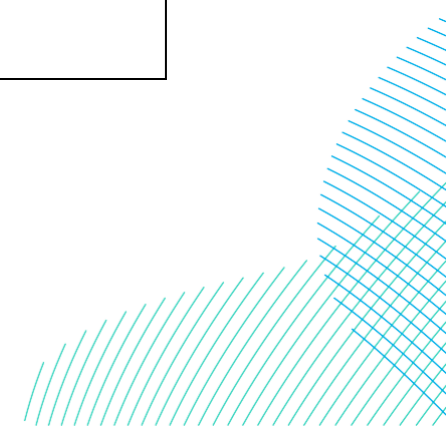
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				<p>Natural England's latest advice on CRM parameters (see interim note July 2022). According to the revised avoidance rates advocated by Natural England in the interim note, small gulls and large gulls have a similar level of risk, and terns are at higher risk than gulls, having a lower avoidance rate.</p> <p>Natural England also note that the timings of detections of common, Arctic and 'commic' tern within the array suggest that these birds are migrants, and that Natural England's best practice advice states that migratory birds "should not be excluded from CRM assessments based on low numbers recorded during site-based surveys alone. Migrants may travel through an area continuously for certain times of year, but this may not be adequately captured by baseline characterisation surveys which represent a snapshot of conditions at the particular time of the survey. CRM assessments should therefore account for the flux of birds on passage through the site "</p> <p>Natural England therefore advise that common and Arctic tern are screened in for collision risk assessment and assessed appropriately.</p> <p>Recommendation: Please revise the collision 'risk' levels in</p>		



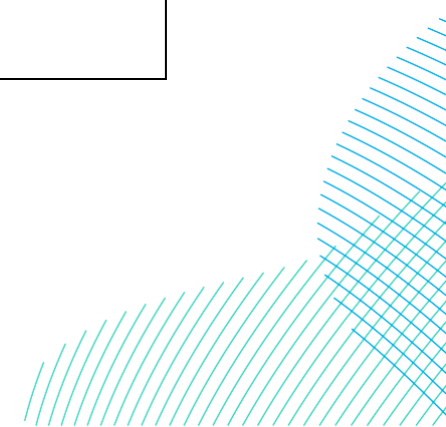
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				<p>accordance with Natural England's advice.</p> <p>Please screen in Arctic and common tern for collision risk assessment.</p>		
SNE 217	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.6.2.3, Table 12-7</p> <p>Collision risk: Natural England note that little gull, common gull, Arctic skua, and great skua were initially screened in for collision risk assessment, but were subsequently screened out based on low numbers.</p> <p>Natural England also refer the Applicant to the previous comment about migratory species, which apply to these species.</p> <p>Natural England advise that assessment is carried out in line with our BPG and results presented for all species screened in for collision risk assessment, including migratory species.</p> <p>Recommendation: Please screen in little gull, common gull, Arctic skua and great skua for migratory collision risk assessment and assess in line with the BPG.</p>	These species have been included in the technical appendices, and also in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12).</b>	Y-M
SNE 218	17/07/2023	Natural England	Offshore Ornithology	Chapter 12, Section 12.6.2.3, Table 12-71, Table 12-72, Table 12-73, Table 12-74	The gannet CRM has used the avoidance rates advised by Natural England.	Y-M



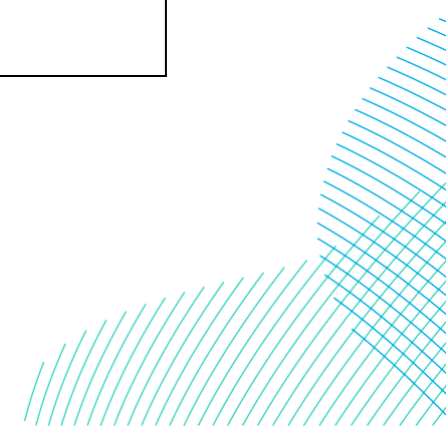
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				<p>Natural England note that the Applicant has included the avoidance rate recommended by Natural England for gannet (0.992) and has presented summary outputs from CRM using this avoidance rate in Tables 12-72 and 12-73 and in Appendix 12-6. However, the results of CRM using this avoidance rate are not presented in Table 12-74, and that these are the results used to assess significance of impacts against baseline mortality.</p> <p>Natural England request that full CRM outputs are presented for gannet for the recommended avoidance rate of 0.992, and that these outputs are used to assess significance of impacts against baseline mortality.</p> <p>Recommendation: Please present and assess the results of CRM using Natural England's recommended avoidance rate for gannet.</p>		
SNE 219	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.6.2.4</p> <p>Combined collision and displacement: Natural England note that the annual collision figure used for gannet in this combined assessment is the mean between the results of using the two higher avoidance rates, neither of which is Natural England's recommended avoidance rate. The annual</p>	<p>The gannet collision risk assessment has been undertaken in line with Natural England advice. Please refer to the methodological information presented in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b>.</p>	Y-M



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				<p>mortality as calculated by the Applicant using Natural England's recommended avoidance rate and shown in Table 12-73 is 36.29. The statement in paragraph 424 that combined collision and displacement impacts result in "a maximum of 29.7 individuals" is therefore incorrect.</p> <p>Although Natural England cannot comment on the conclusions presented here due to the incomplete baseline, we advise the Applicant to present CRM outputs using Natural England's recommended avoidance rate when assessing for combined collision and displacement risks for gannet.</p> <p>Recommendation: Please use the results of CRM using Natural England's recommended avoidance rate for gannet when assessing combined collision and displacement for gannet.</p>		
SNE 220	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.6.3.1</p> <p>Decommissioning displacement: Natural England do not agree with the Applicant that impacts of decommissioning displacement can be predicted to be negligible. We refer the Applicant to our comments above on construction displacement. Natural England advise that decommissioning displacement impacts be treated</p>	The assessment has been amended to include this approach as appropriate (section 12.6.3 of <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> ).	Y-M

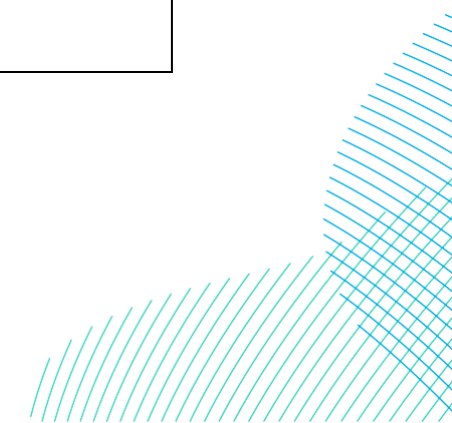


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				<p>the same as construction displacement impacts and that they be presented as 50% of the operational displacement impacts.</p> <p>Recommendation: Please present decommissioning displacement impacts as 50% of the operational displacement impacts.</p>		
SNE 221	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.7</p> <p>Cumulative effects: Natural England note the lack of detail provided on cumulative assessment methodology, and expect to see a fuller description of methods within the submitted ES.</p> <p>Recommendation: Please provide more detail on cumulative assessment methodology in the submitted ES.</p>	A full CEA has been provided in <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> .	Y-M
SNE 222	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.7, Table 12-79</p> <p>Cumulative effects (screening): Natural England do not agree with the screening out of decommissioning displacement effects. As stated in comments above, these should be treated the same as construction displacement impacts, and therefore should be screened into the cumulative assessment.</p> <p>Recommendation: Please screen in decommissioning displacement</p>	The assessment has been amended to include this approach as appropriate (section 12.6.7 of <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> ).	Y-M

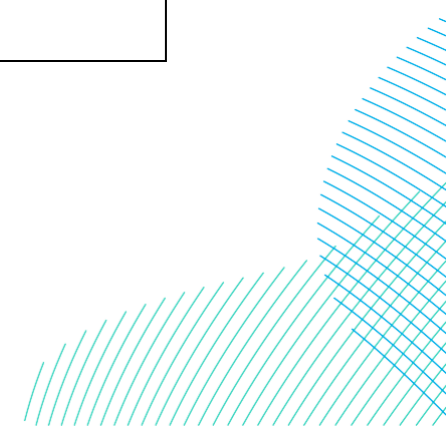




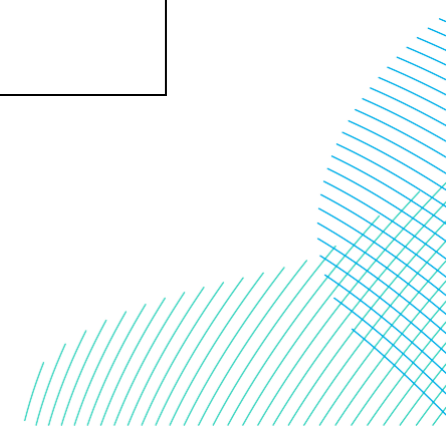
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				impacts into the cumulative effects assessment.		
SNE 223	17/07/2023	Natural England	Offshore Ornithology	<p>Chapter 12, Section 12.7</p> <p>Cumulative effects: Natural England note that, when the Applicant produce their ES, the most recent agreed cumulative assessment is likely to be that produced for the Sheringham Shoal &amp; Dudgeon Extension (SEP &amp; DEP) projects by the end of the Examination, and advise that the Applicant refer to the list of projects considered and the agreed cumulative totals from this project in their own cumulative assessment.</p> <p>Natural England note that we have been unable to rule out significant adverse impacts at the EIA scale for gannet, kittiwake, great black-backed gull, guillemot, razorbill, and red-throated diver, irrespective of whether SEP &amp; DEP impacts are included in the cumulative totals (see Natural England relevant representations for SEP &amp; DEP), and we note that SEP &amp; DEP (and therefore DBS) will be further adding to these cumulative totals.</p> <p>Recommendation: To note.</p>	The Applicants note NE's comments on the approach to CEA and have reviewed the ES's available at the time of writing.	N
SNE 224	17/07/2023	Natural England	Offshore Ornithology	<b>HRA - Document Used: Document Name; Habitat Regulations Assessment - Stage 1 Screening</b>	Non-breeding season impacts have been considered for more distant SPA colonies as per Natural England's advice, see <b>Volume 6, Report to Inform Appropriate</b>	Y-M



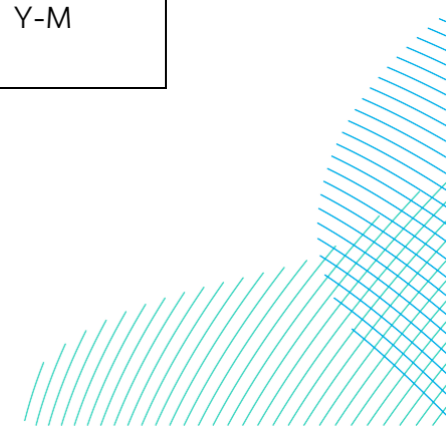
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>Section 4.4.4.2. Table 4-10, Table 4-11</p> <p>Non-breeding and migratory seabirds: Natural England do not agree with the Applicant's approach of only screening in SPAs within mean max foraging range +1s.d. for potential effects on nonbreeding seabirds. SPAs screened in should not be limited to those determined solely by the breeding season/foraging ranges of their ornithological features, but also account for the potential for the projects to interact with birds from much more distant SPAs during the migration and non-breeding seasons.</p> <p>Furness (2015) provides information for many of the relevant seabird species on the suite of SPAs with potential connectivity to the relevant area outside of the breeding season. This information should be considered when screening in SPAs for impacts on seabird species outside of the breeding season.</p> <p>Recommendation: Natural England advise that the screening process be revised, taking into account the information presented in Furness (2015) on potential connectivity of seabird features of SPAs outside the breeding season.</p>	<p><b>Assessment Habitats Regulations Assessment (application ref: 6.1)</b> for further details</p>	



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SNE 225	17/07/2023	Natural England	Offshore Ornithology	<p>Section 4.4.4.4, Table 4-10, Table 4-11</p> <p>Transboundary considerations: Natural England does not agree with screening out non-UK SPAs that are within foraging range (mean max + 1sd) for breeding features or that might have connectivity with features during the non-breeding season (see comment above re information in Furness 2015). Non-UK SPAs should be treated the same as for UK SPAs and screened in for assessment where appropriate.</p> <p>Recommendation: Natural England advise that the screening process be revised to include all SPAs that are within foraging range (mean max + 1sd) for breeding features.</p>	<p>This approach has been reviewed and the assessment updated as considered appropriate (section 12.9 of <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b>).</p>	Y-M
SNE 226	17/07/2023	Natural England	Offshore Ornithology	<p>Table 4-10, Table 4-11</p> <p>FFC SPA: "There is potential for disturbance to breeding cormorant, shag and herring gull from operation &amp; maintenance vessels."</p> <p>Natural England notes that disturbance from operation &amp; maintenance vessels may also affect guillemot, razorbill, and puffin, and advises that these species be screened in for assessment of impacts from operation and maintenance</p>	<p>This approach has been reviewed and the assessment updated as considered appropriate (section 12.6.2 of <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b>).</p>	Y-M



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				vehicles.  Recommendation: Please include consideration of disturbance impacts from operation & maintenance vessels to FFC guillemot, razorbill, and puffin.		
SNE 227	17/07/2023	Natural England	Offshore Ornithology	Section 3.3.1  Natural England welcomes the Applicant's adoption of the 7-tiered approach advocated in Natural England's best practice advice.  Recommendation: We advise the Applicant to review Natural England's recent submissions to the Hornsea Four and SEP&DEP Examinations, particularly with respect to integrity judgements for FFC SPA.	The Applicants have reviewed these assessments and made appropriate use of the information therein.	Y-M
SNE 228	17/07/2023	Natural England	Land Use	Incomplete surveys due to landowner permissions. Access to be obtained to ensure a full assessment of the impacts can be made	All survey access was granted in 2023 and the full suite of surveys have been completed. The findings of these surveys are presented in the ES and survey reports are appended to the ES ( <b>Volume 7, Appendix 18-2 to 18-9 (application ref: 7.18.18.2 to 7.18.18.9).</b> )	N
SNE 229	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	Possible inappropriate methodology for the bat transects.  Clarify if transect routes were walked in one direction across all surveys or if the routes were reversed.	All bat transects surveys were "reversed on some survey visits" following best practice guidance. ( <b>Volume 7, Appendix 18-6 Bats (Monthly Activity Transects) Report (application ref: 7.18.18.6).</b> )	N
SNE 230	17/07/2023	Natural England	Land Use	An Agricultural Land Classification (ALC) survey has not been	The Applicants have completed an ALC survey at the Onshore Substation Zone in February 2024 and committed to undertaking Agricultural Land Classification	Y-M

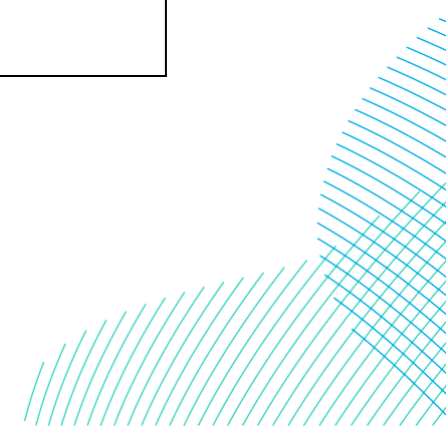


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				<p>undertaken within the area proposed for the route of trench line for the underground cabling.</p> <p>This should be undertaken as part of a comprehensive set of baseline soil and ALC information given that soil disturbance will take place in these areas. The soil survey will inform suitable soil handling and restoration criteria.</p>	<p>surveys for the Onshore Cable Corridor and the Landfall Zone in Summer 2024 . A contractor (or appointed Agricultural Land Officer) will undertake soil condition and intrusive soil survey trial pits to identify and describe the physical and nutrient characteristics of the existing soil profiles. Information gathered as part of this exercise will inform the reinstatement methodology following completion of the construction works. The ALC surveys undertaken at the Onshore Substation Zone have been incorporated into <b>Volume 8, Appendix A -Outline Soil Management Plan (OSMP) of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>. The final SMP will incorporate the findings of the survey results from the Onshore Export Cable Corridor and the Landfall Zone.</p> <p>The assessment of the potential impacts to BMV land (Section 21.6.1.2 and 21.6.2.2 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>) has assumed, in the absence of Post 1988 data or site specific survey data, that all land classified as Grade 3 within the Provisional ALC data is Grade 3a. This is considered a suitably conservative approach as not all land, once surveyed, may be considered BMV. However, where ALC survey data is available for the Onshore Substation Zone this has been identified as 3b which is not classed as BMV land.</p>	
SNE 231	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	<p>No assessment has been provided of potential loss of functionally linked land associated with the Humber Estuary SPA / Ramsar / SSSI.</p> <p>Further information needs to be provided inform the need for wintering / passage bird surveys.</p>	<p>The HRA screening concluded that there would be no pathway for effects on Functionally Linked Land (FLL) for the Humber Estuary and that the “<i>FLL does not provide suitable foraging/breeding habitats or is considered critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which the Humber Estuary SPA / Ramsar site has been designated</i>” (<b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b>). Natural England is satisfied that the survey effort is sufficient to rule out impacts to FLL in this case.</p>	N
SNE 232	17/07/2023	Natural England	Air Quality	<p>Air quality impacts more than the 1% critical load for the Humber Estuary SAC / SPA have been identified but not assessed further.</p> <p>Potential impacts to ecological receptors from construction road vehicle exhaust emissions should be assessed in the EIA and HRA. Further detailed advice on this will</p>	<p>Air quality impacts more than the 1% critical load for the Humber Estuary SAC are assessed in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> and section 18.6.1.1 of <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b>.</p>	N

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				be provided by Natural England at a later date.		
SNE 233	17/07/2023	Natural England	Flood Risk and Hydrology	<p>The Onshore Development Area crosses watercourses that are hydrologically connected to the Humber Estuary SAC/SPA/Ramsar.</p> <p>The EIA and HRA should include an assessment of potential construction phase impacts to the water quality of the Humber Estuary SAC / SPA / Ramsar / SSSI.</p>	<p>Watercourses that are hydrologically connected to the Humber Estuary SAC/SPA/Ramsar are assessed in <b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> and section 18.6.1.1 of <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b>.</p> <p>Where the Projects cross watercourses connected to sites of particular sensitivity (e.g. Sites of Special Scientific Interest (SSSI) or groundwater Inner Source Protection Zones (SPZs)) a hydrogeological risk assessment will be undertaken to inform a site-specific crossing method statement which will also be agreed with the relevant authorities prior to construction. This is secured in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>.</p>	N
SNE 234	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	<p>The habitat survey does not identify ancient woodland, wood, pasture parkland, or ancient and veteran trees.</p> <p>The ancient tree inventory should be used as a starting point to identify important populations of ancient and veteran trees.</p>	<p>The habitat surveys have been completed and no ancient woodland, pasture parkland, or ancient and veteran trees were identified within the Onshore Development Area. A tree survey and impact assessment of the Onshore Development Area will be completed in 2024 prior to construction start, which will identify tree protection zones as detailed in <b>Volume 8, Outline Ecological Management Plan (application ref: 8.10)</b>.</p>	N
SNE 235	17/07/2023	Natural England	Project Description	<p>Natural England is provisionally content that the onshore project parameters have been appropriately defined. We reserve the right to comment further if further information is provided.</p>	Noted.	N
SNE 236	17/07/2023	Natural England	Land Use	<p>21.4.2.2 (33 &amp; 34): The Applicant's Agricultural Land Classification (ALC) survey, following the Guide to assessing development proposals on agricultural land - GOV.UK (www.gov.uk), will identify land that is subdivided into 3a and 3b Best and Most Versatile Land (BMV)</p>	<p>The Applicants have completed an ALC survey at the Onshore Substation Zone in February 2024 and committed to undertaking Agricultural Land Classification surveys for the Onshore Cable Corridor and the Landfall Zone in Summer 2024 . A contractor (or appointed Agricultural Land Officer) will undertake soil condition and intrusive soil survey trial pits to identify and describe the physical and nutrient characteristics of the existing soil profiles. Information gathered as part of this exercise will inform the reinstatement methodology following completion of the construction works. The ALC surveys undertaken at the Onshore Substation Zone</p>	N

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				land.  Natural England does not concur with the PEIR's 'worst-case' scenario approach when assessment of a proposals impact on agricultural land is required. The Applicant should consider the worst-case scenario based on the BMV subdivision into level 3a (in particular).	have been incorporated into <b>Volume 8, Appendix A - Soil Management Plan (OSMP) of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> . The final SMP will incorporate the findings of the survey results from the Onshore Export Cable Corridor and the Landfall Zone.  The assessment of the potential impacts to BMV land (Section 21.6.1.2 and 21.6.2.2 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> ) has assumed, in the absence of Post 1988 data or site specific survey data, that all land classified as Grade 3 within the Provisional ALC data is Grade 3a. This is considered a suitably conservative approach as not all land, once surveyed, may be considered BMV. However, where ALC survey data is available for the Onshore Substation Zone this has been identified as 3b which is not classed as BMV land.	
SNE 237	17/07/2023	Natural England	Land Use	18.5.1 (79): Natural England notes that landowner restrictions have resulted in habitat and species surveys being incomplete.  Obtain access and complete all habitat and species surveys to ensure a full assessment of the impacts can be made.	All survey access was granted in 2023 and the full suite of surveys has been completed. The findings of these surveys are presented in the ES and survey reports appended to the ES ( <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology, Appendix 18-2 to 18-9 (application ref: 7.18.18.2 to 7.18.18.9)</b> ).	N
SNE 238	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	18.5.4.2 (109): The paragraph states that five records of badger were identified within 2km of the Onshore Study Area and goes on to say that none of these records relate to areas within 2km of the Onshore Development Area. This is contradictory.  Review locations of badger records and amend as appropriate to provide clarity on badger setts within 2km.	It is not contradictory. The Onshore Development Area is the red line boundary of the works. The Onshore Study Area is the Onshore Development Area, plus a 2km buffer. Badger sett records were located outside of the development area but inside the study area boundary.	N
SNE 239	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	18.6.1.7.4 (287): The impacts only consider the impact to loss of foraging and commuting habitat and does not connect the potential	Noted. This is assessed in the ES <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> sections 18.6.1.6 and 18.6.1.7. <b>Volume 7 Appendix 18-5 Bats (Ground Level Tree Assessment) Report (application ref:</b>	N

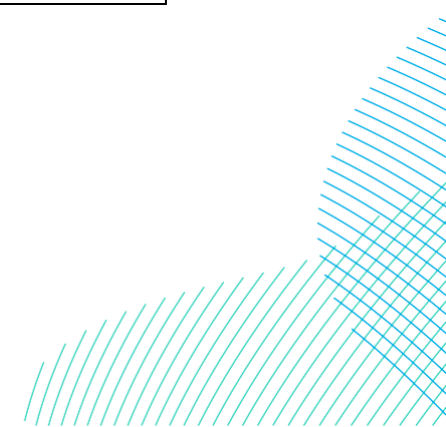
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				<p>for roost destruction with the loss of foraging / commuting habitat (i.e., bat from a maternity roost no longer having access to foraging due to the loss of habitat resulting in the decline and abandonment of the maternity roost).</p> <p>The report should consider the potential for interconnected impacts for both roost loss and foraging / commuting habitat loss.</p>	<p><b>7.18.18.5) and Volume 7, Appendix 18-6 Bats (Monthly Activity Transects) Report (application ref: 7.18.18.6)</b> provides details of the survey results.</p>	
SNE 240	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	<p>2.2 (Bat Transects and Static Monitoring Report): It is not stated that the transect routes were walked equally in different directions (i.e., reversed) on the survey dates. Walking in the same direction increases the risk that any early emerging species are potentially missed at the end of one transect and later emerging species missed at the beginning.</p> <p>Consideration should be given to repeating the transect surveys if the route was uniform throughout the surveys.</p> <p>If the routes were reversed, please explain within the report.</p>	<p>All bat transects surveys were “reversed on some survey visits” following best practice guidance and methodology detailed in <b>Appendix 18-6 Bats (Monthly Activity Transects) Report (application ref: 7.18.18.6)</b>.</p>	N
SNE 241	17/07/2023	Natural England	Land Use	<p>19.6.1.7 (179): An ALC survey has not been undertaken within the area proposed for the route of trench line for the underground cabling.</p> <p>This should be undertaken as part</p>	<p>The Applicants have completed Agricultural Land Classification (ALC) surveys at the Substation Zone, ALC surveys will be completed for the Onshore Export Cable Corridor and the Landfall Zone in Summer 2024, prior to the commencement of works. A contractor (or appointed Agricultural Land Officer) will undertake soil condition and intrusive soil survey trial pits to identify and describe the physical and nutrient characteristics of the existing soil profiles. Information gathered at the Substation Zone has informed <b>Volume 8, Appendix A - Outline Soil Management</b></p>	Y-M





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				of a comprehensive set of baseline soil and ALC information given that soil disturbance will take place in these areas. The soil survey will inform suitable soil handling and restoration criteria.	<p><b>Plan (OSMP) of Volume 8, Outline Code of Construction Practice (application ref: 8.9).</b> The additional ALC surveys will inform the reinstatement methodology in the Soil Management Plan (SMP) following completion of the construction works. Additional details can be found in Table 21.3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21).</b></p> <p><b>Volume 8, Appendix A - Outline Soil Management Plan (OSMP) (application ref: 8.9)</b> also sets out the procedures for the appropriate handling of soils during the works, which includes reference to the Defra (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites guidance.</p> <p>Only impacts to agricultural land from a contaminated land perspective are discussed within the ground conditions and land quality chapter. Additional impacts to agricultural land, including the potential impacts to Agricultural Land Classification (ALC) land and soils, as a result of the construction and operation of the Projects are discussed in <b>Volume 7, Chapter 21 Land Use (application ref: 7.21).</b></p>	
SNE 242	17/07/2023	Natural England	Land Use	<p>19.6.1.7.1 (183 &amp; 184): The temporary displacement of soil due to the underground cable installation and temporary haul roads / construction compounds can result in permanent land quality change and soil damage if undertaken inappropriately.</p> <p>Natural England advise this should be considered in the Soil Management Plan (SMP). This is required for consultees and decision makers to understand the extent (ha) and long-term impacts on agricultural land quality (ALC grade).</p>	<p>The Applicants have completed Agricultural Land Classification (ALC) surveys at the Substation Zone, ALC surveys will be completed for the Onshore Export Cable Corridor and the Landfall Zone in Summer 2024, prior to the commencement of works. A contractor (or appointed Agricultural Land Officer) will undertake soil condition and intrusive soil survey trial pits to identify and describe the physical and nutrient characteristics of the existing soil profiles. Information gathered at the Substation Zone has informed <b>Volume 8, Appendix A - Outline Soil Management Plan (OSMP) of Volume 8, Outline Code of Construction Practice (application ref: 8.9).</b> The additional ALC surveys will inform the reinstatement methodology in the Soil Management Plan (SMP) following completion of the construction works. Additional details can be found in Table 21.3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21).</b></p> <p><b>Volume 8, Appendix A - Outline Soil Management Plan (OSMP) (application ref: 8.9)</b> also sets out the procedures for the appropriate handling of soils during the works, which includes reference to the Defra (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites guidance.</p> <p>Only impacts to agricultural land from a contaminated land perspective are discussed within the ground conditions and land quality chapter. Additional impacts to agricultural land, including the potential impacts to Agricultural Land Classification (ALC) land and soils, as a result of the construction and operation of the Projects are discussed in <b>Volume 7, Chapter 21 Land Use (application ref: 7.21).</b></p>	Y-M
SNE 243	17/07/2023	Natural England	Land Use	Sections 19.6.1.1.5, 19.6.1.2.5 and 19.6.1.3.4 do not include	The Applicants have completed Agricultural Land Classification (ALC) surveys at the Substation Zone, ALC surveys will be completed for the Onshore Export Cable	Y-M

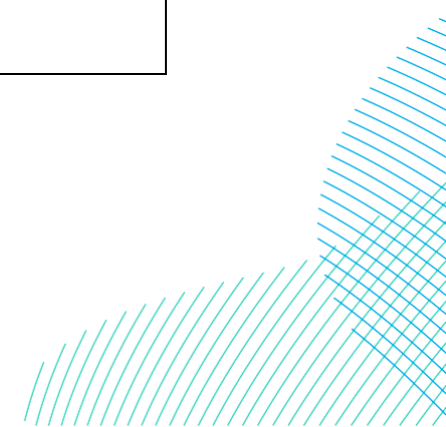
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				<p>measures to mitigate impacts on agricultural soils during construction activities.</p> <p>As previously outlined, above mitigation measure should follow guidance set out in the Construction Code of Practice for the Sustainable Use of Soils on construction Sites - Defra Construction Code of Practice</p>	<p>Corridor and the Landfall Zone in Summer 2024, prior to the commencement of works. A contractor (or appointed Agricultural Land Officer) will undertake soil condition and intrusive soil survey trial pits to identify and describe the physical and nutrient characteristics of the existing soil profiles. Information gathered at the Substation Zone has informed <b>Volume 8, Appendix A - Outline Soil Management Plan (OSMP) of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>. The additional ALC surveys will inform the reinstatement methodology in the Soil Management Plan (SMP) following completion of the construction works. Additional details can be found in Table 21.3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>. <b>Volume 8, Appendix A - Outline Soil Management Plan (OSMP) (application ref: 8.9)</b> also sets out the procedures for the appropriate handling of soils during the works, which includes reference to the Defra (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites guidance.</p> <p>Only impacts to agricultural land from a contaminated land perspective are discussed within the ground conditions and land quality chapter. Additional impacts to agricultural land, including the potential impacts to Agricultural Land Classification (ALC) land and soils, as a result of the construction and operation of the Projects are discussed in <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>.</p>	
SNE 244	17/07/2023	Natural England	Land Use	<p>19.6.3 (246): It is noted that the proposed operational lifespan is approximately 30 years. There needs to be a firm commitment to decommission the site after 30 years (or sooner if no longer operational), remove all infrastructure and equipment and return the land to its original condition and ALC grade.</p> <p>There should be a commitment to prepare and submit to the planning authority a detailed decommissioning plan to restore the site prior to the end of its operational use.</p>	<p>The decommissioning methodology would be finalised immediately prior to decommissioning and would depend on the requirements of the onshore decommissioning plan approved by the local planning authority secured through Requirement 27 (Onshore decommissioning) in <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b>.</p>	N



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SNE 246	17/07/2023	Natural England	Land Use	Table 21-7 requires updating to show difference between 3a and 3b Best and Most Versatile (BMV) agricultural land.	Definitions for Grade 3a and 3b BVM land has now been included within Table 21-6 (previously Table 21-7 within the PEIR) of ES <b>Volume 7, Chapter 23 Land Use (application ref: 7.23)</b> . The Onshore Substation Zone has been classified as grade 3b.	N
SNE 247	17/07/2023	Natural England	Land Use	21.6.1.3.5 (137) Natural England supports the measures to mitigate for residual effects on agricultural soils, however measures should be based on the findings of the Applicant's ALC survey as discussed previously.	The ALC surveys undertaken at the Onshore Substation Zone have been incorporated into <b>Volume 8, Appendix A - Outline Soil Management Plan (OSMP)</b> of <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> . The final SMP, to be developed prior to construction will incorporate the findings of the survey results from the Onshore Export Cable Corridor and the Landfall Zone.	Y-M
SNE 250	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	18.5.2.1 (88-89): Chapter 18 states that likely significant effects to onshore International Statutory Designated Sites have been screened out of further assessment. This does not align with the conclusions of the HRA Screening. Amend section to align with conclusions of HRA Screening, with consideration to Natural England's comments below.	<b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> considers effects of the project landward of MHWS. The Humber Estuary SAC has been screened in for potential impacts associated with changes to air quality. Further details of the assessment is given in section 18.5.2.1. All of the likely significant effects screened in for further assessment in the HRA are provided in <b>Volume 6, Report to Inform Appropriate Assessment, Habitat Regulations Assessment (application ref: 6.1)</b> .	N
SNE 251	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	18.6.1.9.4 (308): Natural England notes that there is a commitment to pre-construction surveys, where construction works are undertaken within functionally linked land between November and January, to determine whether mitigation measures will be required including habitat manipulation to discourage bird usage. We advise that the proposed mitigation is not suitable for wintering/passage birds associated with the Humber Estuary SPA/Ramsar. Further discussion will be needed	The HRA screening concluded that there would be no pathway for effects on FLL for the Humber Estuary SPA and that the "FLL does not provide suitable foraging/breeding habitats or is considered critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which the Humber Estuary SPA / Ramsar site has been designated". The full HRA can be viewed in <b>Volume 6, Report to Inform Appropriate Assessment, Habitat Regulations Assessment (application ref: 6.1)</b> . Following the ETG meeting on 14th Dec 2023 and subsequent written communication on 11th Jan 2024, Natural England is satisfied that the survey effort is sufficient to rule out impacts to FLL in this case.	N

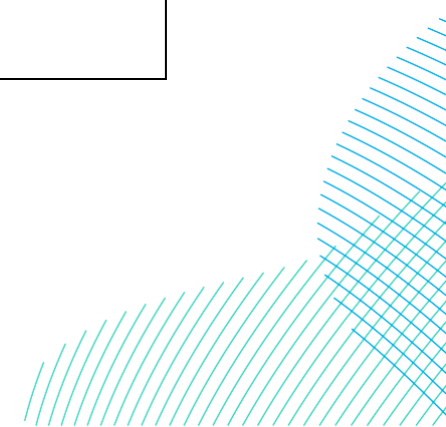
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				on the evidence required to determine impacts on birds on functionally linked land during the EP process, based on the outputs of F21.		
SNE 252	17/07/2023	Natural England	Terrestrial Ecology	Detailed advice from Natural England is to follow in relation to air quality impacts on Humber Estuary SSSI / SPA / SAC / Ramsar.	Noted	N
SNE 253	17/07/2023	Natural England	Air Quality	26.6.1.3.1 .2, 26.6.1.3.2.2 & 26.11: The air quality assessment (Chapter 26) identifies project contributions significantly more than 1% of the Critical Loads or Levels (both alone and in-combination) for Humber Estuary SAC qualifying habitats and Humber Estuary SPA supporting habitats from construction road vehicle exhaust emissions. The report states that the significance of impacts are discussed in Chapter 18, however, here is no further assessment provided in Chapter 18. Potential impacts to ecological receptors from construction road vehicle exhaust emissions should be assessed in the EIA and HRA.	Air quality effects to ecological receptors are assessed and detailed in <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> . This includes the assessment of effects on the Humber Estuary SAC in relation to Nitrogen deposition, which are not considered significant but have been screened into the HRA as detailed in <b>Volume 6, Report to Inform Appropriate Assessment, Habitat Regulations Assessment (application ref: 6.1)</b> .	N
SNE 254	17/07/2023	Natural England	Flood Risk and Hydrology	The Onshore Development Area crosses watercourses that are hydrologically connected to the Humber Estuary SAC / SPA / Ramsar. As such, we advise that there is a possibility that impacts may occur from construction activities and this should be	There will be no hydrological impact on the Humber Estuary SAC / SPA / Ramsar because of the planned embedded mitigation as outlined in the ES <b>Volume 7, Chapter 19 Geology and Land Quality (application ref 7.19)</b> and <b>Volume 7, Chapter 20, Flood risk and Hydrology (application ref: 7.20)</b> . Effects to water quality are assessed in the <b>Volume 6, Report to Inform Appropriate Assessment, Habitat Regulations Assessment (application ref: 6.1)</b> and the ES ( <b>Volume 7, Chapter 20 Flood Risk and Hydrology (application ref: 7.20)</b> ).	N

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				<p>assessed in the HRA.</p> <p>The EIA and HRA should include an assessment of potential construction phase impacts to the water quality of the Humber Estuary SAC / SPA / Ramsar</p>		
SNE 255	17/07/2023	Natural England	Air Quality	Detailed advice from Natural England is to follow in relation to air quality impacts on Humber Estuary SSSI / SPA / SAC / Ramsar.	Noted.	N
SNE 256	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	<p>4.5.3.2 (239): The HRA states that disturbance to birds from onshore works is limited to within 1km of the impacts source and no sites are screened in for further consideration on this basis. Whilst Natural England agrees that this is a reasonable assumption, it does not take into consideration potential impacts to bird species using functionally linked land associated with the Humber Estuary SPA / Ramsar.</p> <p>Based on the information provided, we advise there is not enough evidence to screen out potential construction phase impacts to SPA / Ramsar birds using functionally linked land. We advise that impacts to functionally linked land are screened in for further assessment.</p>	The HRA screening concluded that there would be no pathway for effects on FLL for the Humber Estuary and that the "FLL does not provide suitable foraging/breeding habitats or is considered critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which the Humber Estuary SPA / Ramsar site has been designated" <b>Volume 6, Report to Inform Appropriate Assessment, Habitat Regulations Assessment (application ref: 6.1)</b> . Natural England is satisfied that the survey effort is sufficient to rule out impacts to FLL in this case.	N
SNE 257	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	4.5.3.2 (243): The report states that it is not fully understood if the land within / in the vicinity of the onshore cable route and	Humber Estuary SPA was screened in but following the completion of breeding and overwintering bird surveys, the SPA was later scoped out as no impacts are anticipated, as stated in the ES ( <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> ) and <b>Volume 6, Report to Inform Appropriate</b>	N

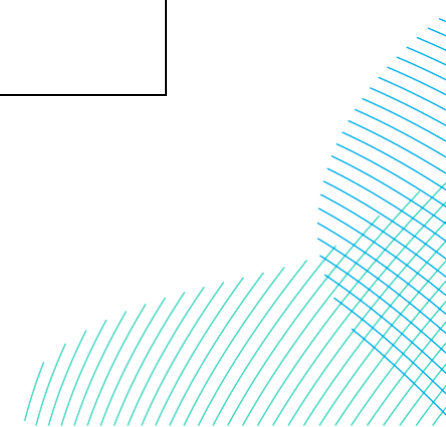


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				<p>substation zone(s) is functionally linked with the Humber Estuary SPA.</p> <p>As advised, evidence should be provided to provide certainty to the HRA conclusions.</p>	<b>Assessment, Habitat Regulations Assessment (application ref: 6.1).</b> Natural England have agreed to the Humber Estuary SPA being scoped out.	
SNE 258	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	<p>HRA Table 5-1: Natural England welcomes that potential impacts to SPA/Ramsar birds have been screened into the HRA for further assessment. However, we advise there are two separate potential impact pathways:</p> <ul style="list-style-type: none"> <li>• Loss of functionally linked land;</li> <li>• Construction phase disturbance to SPA / Ramsar birds using functionally linked land.</li> </ul> <p>Include two separate impact pathways for functionally linked land.</p>	<p>The HRA screening concluded that there would be no pathway for effects on FLL for the Humber Estuary and that the “<i>FLL does not provide suitable foraging/breeding habitats or is considered critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which the Humber Estuary SPA / Ramsar site has been designated</i>” <b>Volume 6, Report to Inform Appropriate Assessment, Habitat Regulations Assessment (application ref: 6.1).</b> Natural England is satisfied that the survey effort is sufficient to rule out impacts to FLL in this case.</p>	N
SNE 259	17/07/2023	Natural England	Flood Risk and Hydrology	<p>4.5.3.2 (238): The HRA states there will be no alterations to the hydrology regime of the Humber Estuary SAC. However, there is no assessment of potential water quality impacts to the Humber Estuary SAC / SPA / Ramsar.</p>	<p>Humber Estuary SPA was screened in but was later scoped out as no impacts to the hydrology and watercourses are anticipated following survey results and consultation with NE, as stated in the ES (<b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b>) and <b>Volume 6, Report to Inform Appropriate Assessment, Habitat Regulations Assessment (application ref: 6.1).</b></p>	N
SNE 260	17/07/2023	Natural England	Cumulative Effects	<p>There are no assessment of in-combination impacts with other relevant plans or projects for the Humber Estuary SPA. We advise the following impacts pathways are considered:</p> <ul style="list-style-type: none"> <li>• loss of functionally linked land;</li> <li>• disturbance to SPA / Ramsar bird species using functionally linked</li> </ul>	<p>Noted. This has been reviewed and updated in <b>Volume 6, Report to Inform Appropriate Assessment, Habitat Regulations Assessment (application ref: 6.1).</b> The Humber Estuary SAC has been screened in for potential impacts associated with changes to air quality, however effects are not considered significant and there are no in-combination impacts. Further details of the assessment are given in section 18.5.2.1 of the ES <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> and details of the methodology applied to assess changes to air quality are given in ES <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26).</b></p>	N

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				<p>land;</p> <ul style="list-style-type: none"> <li>• lamprey migration routes;</li> <li>• water quality; and</li> <li>• air quality.</li> </ul> <p>As a minimum we advise considering site allocations in relevant Local Plans as well as relevant planning applications from East Riding of Yorkshire Council and Hull City Council. This should include:</p> <ul style="list-style-type: none"> <li>• existing completed projects;</li> <li>• approved but uncompleted projects;</li> <li>• ongoing activities;</li> <li>• plans or projects for which an application has been made and which are under consideration by the consenting authorities; and</li> <li>• plans and projects which are foreseeable, i.e., projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects. <p>Potential in-combination impacts to the Humber Estuary SAC should be assessed with other relevant plans or projects.</p> </li></ul>		
SNE 261	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	4.2.3.3 (130): The Onshore Development Area crosses the River Hull and falls within the Impact Risk Zone for lamprey	Following consultation with Natural England during the ETG Meeting on 20th April 2023, it was established that the River Hull is not considered a migration route for lamprey and the species have been scoped out.	Y-M

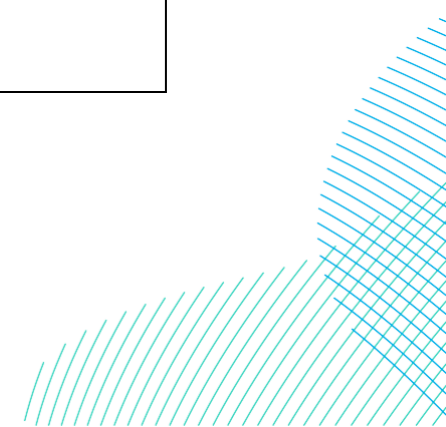


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				<p>migration routes associated with the Humber Estuary SAC.</p> <p>Include Humber Estuary SAC in the list of sites containing species whose range overlaps with the Projects effects.</p>		
SNE 262	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	<p>4.2.3.3 (133-134) Table 4-4 &amp; Table 5 - 1: Natural England welcomes the assessment of disturbance impacts to lamprey from noise sources such as piling and UXO (Unexploded Ordnance) clearance in coastal waters. However, no assessment has been made for potential impacts to lamprey migration routes from construction works within the Onshore Development Area. The River Hull is a Humber Estuary SAC lamprey migration route and as such it should be determined whether the Project is likely to have a significant effect on lamprey associated with the Humber Estuary SAC.</p> <p>We advise that potential impact pathways may include:</p> <ul style="list-style-type: none"> <li>• disturbance from noise and vibration;</li> <li>• damage to habitat; and</li> <li>• water quality.</li> </ul> <p>Potential construction and / or operational phase impacts to Humber Estuary SAC lamprey migration routes should be assessed in the HRA.</p>	<p>Lamprey have been scoped out as the River Hull is not a hotspot for the species (EA) and will be avoided by using a trenchless crossing technique such as HDD (<b>Volume 7. Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b>).</p>	Y-M

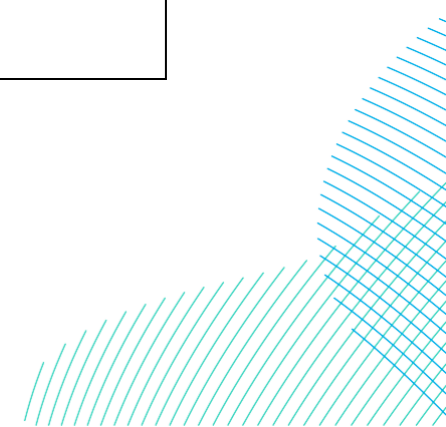




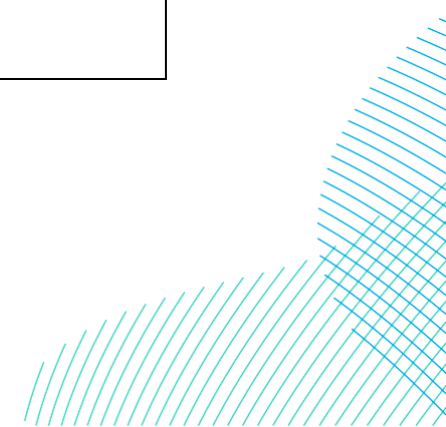
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SNE 263	17/07/2023	Natural England	N/A	4.5.3.2 (238) See F25 and F26.	Noted	N
SNE 265	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	<p>18.5.2.2: Natural England notes that the Humber Estuary SSSI is not listed in Chapter 18. Our advice regarding the potential impacts upon the Humber Estuary SSSI coincides with our advice regarding the potential impacts upon the Humber Estuary SPA / SAC / Ramsar as detailed above</p> <p>The EIA should include an assessment of potential impacts to the Humber Estuary SSSI.</p>	The Humber Estuary SSSI has been scoped out within the ES chapter as it is over 2km from the Onshore Development Area, except in relation to Air Quality effects, where temporary effects of Nitrogen Deposition on a small areas of the Humber Estuary SAC/SSSI are not considered significant ( <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> ).	Y-M
SNE 266	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	<p>18.6.1.1.4: The impact assessment identifies ancient woodland but only mentions veteran trees with respect to Burton Bushes SSSI. Burton Bushes, as well as being on the ancient woodland inventory, is on the Wood Pasture Parkland inventory where the site boundary extends beyond the SSSI. Wood Pasture Parkland of ancient origin, is a form of ancient woodland, is an irreplaceable habitat, and has the same protections under planning policy. The impact assessment should include impacts to ancient woodland, wood pasture as well as veteran trees.</p> <p>It is worth noting that the ancient woodland inventory update project currently underway and due to complete in 2025, will consistently</p>	Since this comment was provided, the Onshore Development Area has been reduced and the Burton Bushes SSSI is now no longer adjacent to the Onshore Development Area as stated in the ES chapter ( <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> ). No impacts to the Burton Bushes SSSI are anticipated.	N



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				incorporate ancient wood pasture Parkland for the first time.		
SNE 267	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	<p>Appendix 18-1 – Habitat Survey Report: The habitat survey does not identify ancient woodland, wood, pasture parkland, or ancient and veteran trees.</p> <p>Ancient and veteran trees can host rare, invertebrates, and lichens, which could be particularly sensitive to impacts. Such species would need to be surveyed in significant populations of ancient and veteran trees, such as that at Burton bushes.</p> <p>The NSP guidance referred to is now out of step with the current version of the NPPF (National Planning Policy Framework) which says that permission should be refused for proposals causing loss or deterioration irreplaceable habitats, like ancient woodland and ancient and veteran trees, unless there are exceptional reasons, and a suitable compensation Strategy exists. Full details are available in the Natural England Forestry Commission, standing advice on ancient woodland, and ancient and veteran trees – Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk).</p> <p>The ancient tree inventory should</p>	<p>All of the habitat surveys have been completed and the findings of these surveys has been presented in the ES (<b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b>), and survey reports appended (<b>Volume 7, Appendix 18-2 to 18-9 (application ref: 7.18.18.2 to 7.18.18.9)</b>).</p> <p>Since the Onshore Development Area has been refined, all impacts to designated sites have been avoided. The impacts to priority habitats have also been avoided as far as possible. Reports have been made available to stakeholders and no further comments have been received.</p> <p>There is an area of ancient woodland and one veteran tree (identified via the ancient tree inventory) within the Onshore Development Area, both of these receptors will not be affected directly or indirectly by the Projects. Wood-pasture &amp; parkland habitat was identified within the Onshore Development Area. Further arboricultural survey of the Onshore Development Area is being undertaken and a detailed method statement for works around woodland and trees will be completed following best practice (including root protection zones and recommended buffers) prior to the construction phase, as detailed in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>.</p>	N

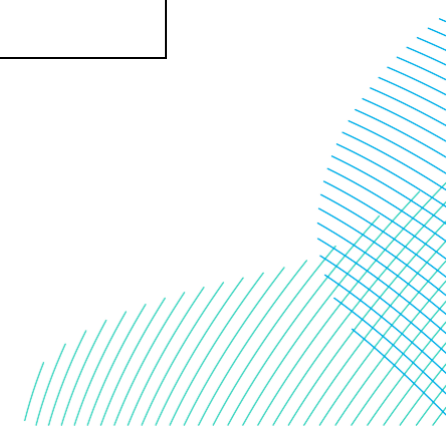


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>be used as a starting point to identify important populations of ancient and veteran trees. It should be noted that this is a volunteer database so is incomplete. For example, there are veteran trees north of Poplar Farm near Birkhill Wood which are within the compound boundary.</p> <p>The standing advice also points out that condition of the woodland, or trees should not be taken into account when deciding whether to permit development. Habitat in poor condition can be improved with suitable management. For example, PAWS, plantation on ancient woodland site is given the same protection as ASNW ancient, semi natural woodland. The ancient woodland receptor Birkhill wood is ASNW and PAWS. However, only conifer is given as a receptor in the air quality assessment, broadleaves should also be included.</p> <p>The standing advice also states that buffer zones around ancient woodland should be 15m.</p>		
SNE 268	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	18.6.1.3.2 (210): The air quality assessment (Chapter 26) identifies project contributions more than 1% of the Critical Loads and/or Levels (both alone and in-combination) for the 'unnamed woodland' which is on the Ancient Woodland Inventory. Chapter 18	Following detailed air quality assessment within the ES <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b> , the unnamed ancient woodland (a small woodland block to the north of Bentley Moor Wood) and all other priority habitats, are not considered to be affected by fugitive emissions or potential impacts arising from changes to air quality. However, a small area of broadleaved woodland within Humber Bridge Country Park LNR, has been assessed as having exceedances of a Critical Load or a Critical Level through a contribution of air emissions, NOx and NH3, from traffic associated with the Projects (>1% but <3.5%). Further detail of the	N



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				<p>states that the 'unnamed woodland' may be indirectly affected by activities which generate fugitive emissions. However, it does not provide any further assessment of impacts.</p> <p>Further detailed advice on air quality impacts on ancient woodland is to follow from Natural England.</p> <p>An assessment of potential air quality impacts to the 'unnamed woodland' should be provided.</p>	<p>assessment is given in the ES (<b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b>) and details of the methodology applied to assess changes to air quality are given in ES <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b>.</p>	
SNE 269	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	<p>The results of several project specific surveys remain outstanding due to landowner permissions. The lack of site-specific data to inform baseline characterisation presents significant uncertainties and therefore conclusions on the PEIR cannot be drawn with any confidence at this point. For some surveys (e.g., bats) clarifications are needed to ensure an appropriate methodology has been used.</p> <p>No assessment has been provided of potential loss of functionally linked land associated with the Humber Estuary SPA/Ramsar. We welcome that potential impacts to birds using functionally linked land have been screened into the HRA for further assessment, however we would expect a desk-based assessment to be presented to</p>	<p>The scope, methodology and results of the habitat and species-specific surveys have been presented and discussed three ETG meetings (20th April and 14th Dec 2023 and 19th March 2024). Full survey details are presented in the ES (<b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b>) and survey reports appended (<b>Volume 7, Appendix 18-2 to 18-9 (application ref: 7.18.18.2 to 7.18.18.9)</b>).</p> <p>Since the Onshore Development Area has been refined, direct impacts to designated sites have been avoided. Humber Estuary SPA was screened in but following the completion of breeding and overwintering bird surveys, the SPA was later scoped out as no impacts are anticipated, as stated in the ES chapter and HRA report. The HRA screening concluded that there would be no pathway for effects on FLL for the Humber Estuary SPA and that the "FLL does not provide suitable foraging/ breeding habitats or is considered critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which the Humber Estuary SPA / Ramsar site has been designated" (Report to Inform Appropriate Assessment, Habitat Regulations Assessment (<b>Volume 6, application ref: 6.1</b>)). Natural England is satisfied that the survey effort is sufficient to rule out impacts to FLL in this case.</p> <p>There will be no hydrological impact on the Humber Estuary SAC / SPA / Ramsar because of the planned embedded mitigation as outlined in the ES <b>Volume 7, Chapter 19 Geology and Land Quality (application ref: 7.19)</b> and <b>Volume 7, Chapter 20, Flood risk and Hydrology (application ref: 7.20)</b>.</p> <p>The Applicants have completed an ALC survey at the Onshore Substation Zone in February 2024 and committed to undertaking Agricultural Land Classification</p>	N

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				<p>determine if surveys are required. The EIA and HRA should also include an assessment of potential construction phase impacts to the water quality of the Humber Estuary SAC/SPA/Ramsar/SSSI, as the Onshore Development Area crosses watercourses that are hydrologically connected to the Humber Estuary sites.</p> <p>An Agricultural Land Classification (ALC) survey has not been undertaken within the area proposed for the route of trench line for the underground cabling. We advise that one should be undertaken as part of a comprehensive set of baseline soil and ALC information, given that soil disturbance will take place in these areas and will inform suitable soil handling and restoration criteria.</p> <p>Natural England will provide detailed comments on Air Quality in a follow up addendum to this response in due course. However, we are provisionally concerned that air quality impacts more than the 1% Critical Loads and/or Levels for the Humber Estuary SAC / SPA have been identified but do not appear to have been assessed further. Potential impacts to ecological receptors from construction road vehicle exhaust emissions should be assessed in the EIA and HRA.</p>	<p>surveys for the Onshore Cable Corridor and the Landfall Zone in Summer 2024. A contractor (or appointed Agricultural Land Officer) will undertake soil condition and intrusive soil survey trial pits to identify and describe the physical and nutrient characteristics of the existing soil profiles. Information gathered as part of this exercise will inform the reinstatement methodology following completion of the construction works. The ALC surveys undertaken at the Onshore Substation Zone have been incorporated into <b>Volume 8, Appendix A - Outline Soil Management Plan (OSMP) of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>. The final SMP will incorporate the findings of the survey results from the Onshore Export Cable Corridor and the Landfall Zone. The Humber Estuary SAC has been screened in for potential impacts associated with changes to air quality. Further details of the assessment are given in section 18.5.2.1 of the ES <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> and details of the methodology applied to assess changes to air quality are given in ES <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b>.</p>	



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SNE 270	17/07/2023	Natural England	Terrestrial Ecology and Ornithology	<p>18.6.1.1.4 The impact assessment identifies ancient woodland but only mentions veteran trees with respect to Burton Bushes SSSI. Burton Bushes, as well as being on the ancient woodland inventory, is on the Wood Pasture Parkland inventory where the site boundary extends beyond the SSSI. Wood Pasture Parkland of ancient origin, is a form of ancient woodland, is an irreplaceable habitat, and has the same protections under planning policy. The impact assessment should include impacts to ancient woodland, wood pasture as well as veteran trees. It is worth noting that the ancient woodland inventory update project currently underway and due to complete in 2025, will consistently incorporate ancient wood pasture Parkland for the first time.</p>	<p>Since this comment was provided, the Onshore Development Area has been amended to avoid Burton Bushes SSSI and the site is now no longer adjacent to the Onshore Development Area, as stated in the ES chapter. No impacts to the Burton Bushes SSSI are anticipated (<b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)) and Volume 7, Figure 18-3 (application ref: 7.18.1).</b></p> <p>The habitat surveys have been completed and no ancient woodland, pasture parkland, or ancient and veteran trees were identified within the Onshore Development Area except for a small ancient (unnamed) woodland block adjacent to the Substation Zone that will be avoided. Further arboricultural survey of the Onshore Development Area and detailed method statement will be completed prior to construction phase.</p>	
SNE AQO 01	05/09/2023	Natural England	Air Quality	<p><b>Project Details</b> We note that the Planning Inspectorate has agreed to scope out the 'Offshore Air Quality' impacts as the effects are unlikely to be significant (26.1 (2)). However, we advise there is currently not enough information to rule of potential impacts from vessel emissions at port or on routes close to any relevant terrestrial ecological receptors.</p>	<p>We have excluded the assessment of onshore air quality effects resulting from offshore vessels associated with offshore construction, operation, and decommissioning.</p> <p>The Local Air Quality Management Technical Guidance (LAQM TG22) provides screening criteria for the requirement for detailed assessment of vessel emissions. These are as follows:</p> <ul style="list-style-type: none"> <li>• More than 5,000 large ship movements per year, with relevant exposure within 250m of the berths and main areas of manoeuvring</li> <li>• More than 15,000 large ship movements per year, with relevant exposure within 1km of the berths and main areas of manoeuvring</li> </ul> <p>In a worst case scenario, the maximum number of vessel return trips generated during the construction of the Projects (7,512) would be spread over the minimum five-year offshore construction period. Therefore, the mean average maximum</p>	N

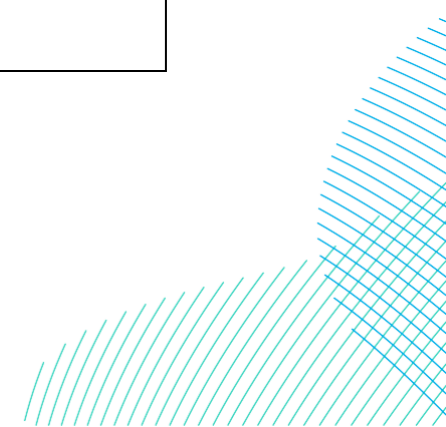
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>Provide further information on vessels routes, port location and activities during construction and operational phases.</p>	<p>number of vessel return trips required per year for construction (1,502) and operation (473) are well below the screening criteria included in LAQM TG22 (Defra, 2022).</p> <p>Notwithstanding this, not all vessel movements generated during the construction and operation of the Projects would complete the same route (i.e., transit in/out along the Humber Estuary) nor would all vessels be in close proximity to sensitive habitats. Therefore, the number of vessels with the potential to impact on any one terrestrial ecological site would be significantly lower than the total number of vessels detailed above. For example, the landfall cable installation vessel will have a maximum of three return trips.</p> <p>The air quality impact from vessel emissions on designated ecological sites is therefore considered to be not significant. This includes the impact from vessel emissions on the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar and SSSI.</p> <p>The Inspectorate agreed with this approach, as stated in the Scoping Opinion (the Planning Inspectorate, 2022) that this matter may be scoped out of the ES on the basis that the main source of emissions would be exhaust emissions from vessels, and due to the nature and location of the offshore components of the Proposed Development associated vessel movements would only generate a small increase in emissions in all phases, which is unlikely to result in significant effects to land based human and ecological receptors.</p>	
SNE AQQ 02	05/09/2023	Natural England	Air Quality	<p>Horizontal Directional Drilling (HDD) compounds are currently only identified east and southeast of Skipsea. It is important to understand where all HDD compounds are proposed as this is where NRMM with emissions to air will be located.</p> <p>Provide further information on NRMM locations and clarification on whether there is potential for emissions associated with NRMM associated with HDD to occur outside of HDD compounds.</p>	<p>Defra technical guidance (Defra, 2022) states that emissions from NRMM used on construction sites are unlikely to have a significant impact on local air quality where relevant control and management measures are employed. However, intensive construction activities, for example Horizontal Directional Drilling (HDD) works, may temporarily increase pollutant concentrations in the vicinity of receptors. Trenchless crossing techniques (such as HDD) may be used in selected locations for crossing existing infrastructure/natural features and this may require 24-hour working. This 24-hour working is likely to last less than one month at most locations. The Environmental Statement <b>Volume 7 Chapter 5 Project Description (application ref: 7.5)</b> will provide further detail on the programme and construction timelines.</p> <p>Embedded mitigation measures specific to NRMM have been included in the design of DBS Offshore Wind Farm. Therefore, although the assessment considers emissions from all NRMM plant, the focus of the assessment is on trenchless crossing techniques (e.g. HDD) as this is considered to have the largest emissions generation potential.</p> <p>The exact location that NRMM will be operational within the Onshore Development Area is unknown. However, generators to power trenchless crossings will be confined</p>	N

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					<p>to temporary construction compounds (TCC), and not the entire Onshore Development Area. The qualitative assessment of NRMM emissions provided in <b>Volume 7 Chapter 26 Air Quality (application ref: 7.26)</b> section 26.6 considers worst-case locations to ensure a robust assessment, i.e., assuming all NRMM and trenchless crossing generators are located at the closest edge of the proposed TCC.</p> <p>Further refinement of the Projects' Onshore Development Area and additional NRMM and trenchless crossing information have been considered in <b>Volume 7 Chapter 26 Air Quality (application ref: 7.26)</b> section 26.6. This includes the anticipated duration of trenchless crossings and the number and type of NRMM anticipated to be required during construction. Therefore, it is considered the assessment is sufficient and robust.</p>	
SNE AQO 03	05/09/2023	Natural England	Air Quality	<p><b>Baseline Characterisation</b></p> <p>The concentrations reported for S33 and S34 do not match those reported in the East Riding of Yorkshire's 2020 annual status report.</p> <p>Provide clarification as to whether this affects the model verification and consequently the modelled results.</p>	<p>Noted. The error in reporting does not impact on the model verification in PEIR.</p> <p>The monitoring data carried out by East Riding District Council has been updated since the PEIR, including description of the monitoring results. This is reported in <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b> section 26.5.</p> <p>In addition, the base year for the purpose of model verification in the ES has been updated to 2022; whereas in the PEIR a base year 2019 was used. Therefore, model verification has been updated since PEIR, as detailed in <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b> section 26.4.3.3.</p>	N
SNE AQO 04	05/09/2023	Natural England	Air Quality	<p><b>Methodology</b></p> <p>The traffic and transport assessment has scoped out operational traffic impacts based on an expected eight annual vehicle trips associated with onshore substation maintenance and "low vehicle demand" associated with the onshore cable inspections and maintenance. However, it does not appear to consider potential additional vehicle trips associated with operational vessel movements,</p>	<p>Operational vehicle movements associated with the onshore operation of the Projects would be limited to routine maintenance, estimated at an average of one visit per week.</p> <p>The preferred base port (or ports) for the offshore construction, operation and decommissioning of the Projects are not known and any decision would not be expected until post-consent. Such facilities would be existing or would be provided or brought into operation by means of one or more planning applications or as port operations with permitted development rights. It has therefore been agreed with National Highways, Hull City Council and East Riding of Yorkshire Council to scope out of the assessment the onshore impacts of traffic and transport associated with offshore construction, operation and decommissioning activities.</p> <p>As such, the number of vehicle movements generated during operation has not been considered, and comparison to screening criteria is therefore not possible. However,</p>	N



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				<p>e.g., vessel workers/operator's movements to and from ports.</p> <p>Provide confirmation of the number of operational vehicle movements associated with staff travel to and from ports for vessel movements and if this number scopes in or out of requiring additional air quality assessment.</p>	<p>it is considered operational vehicle movements would be well below the screening criteria.</p> <p>To ensure proper assessment and mitigation of potential effects related to the operational phases of the Projects (including cumulative effects), <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> includes a Requirement to develop a Port Traffic Management Plan (PTMP) once the final base port location is determined.</p> <p>This approach has been accepted by the Planning Inspectorate for other recently consented offshore wind farm projects, e.g., Norfolk Vanguard and Boreas, East Anglia Two, East Anglia One North and Hornsea Three.</p>	
SNE AQO 05	05/09/2023	Natural England	Air Quality	<p>There is no consideration of operational traffic impacts contribution in-combination with other plans or projects. Cumulative impacts with other developments could potentially result in significant impacts on nature conservation sites due to emissions to air.</p> <p>The EIA and HRA should assess operational phase traffic impacts in-combination with other plans or projects.</p>	<p>Operational vehicle movements associated with the onshore operation of the Projects would be limited to routine maintenance, estimated at an average of one visit per week.</p> <p>The preferred base port (or ports) for the offshore construction, operation and decommissioning of the Projects are not known and any decision would not be expected until post-consent. Such facilities would be existing or would be provided or brought into operation by means of one or more planning applications or as port operations with permitted development rights. It has therefore been agreed with National Highways, Hull City Council and East Riding of Yorkshire Council to scope out of the assessment the onshore impacts of traffic and transport associated with offshore construction, operation and decommissioning activities.</p> <p>As such, the number of vehicle movements generated during operation has not been considered, and comparison to screening criteria is therefore not possible.</p> <p>To ensure proper assessment and mitigation of potential effects related to the operational phases of the Projects (including cumulative effects), <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> includes a Requirement to develop a Port Traffic Management Plan (PTMP) once the final base port location is determined.</p> <p>This approach has been accepted by the Planning Inspectorate for other recently consented offshore wind farm projects, e.g., Norfolk Vanguard and Boreas, East Anglia Two, East Anglia One North and Hornsea Three.</p>	N
SNE AQO 06	05/09/2023	Natural England	Air Quality	<p>The consultation response table within the air quality assessment chapter indicates that the assessment has not accounted for potential emissions associated</p>	<p>Details of the number and capacity of back-up generators are not yet known; however, any local air quality impact is very unlikely to be significant. Given their purpose, such plant operate very infrequently, although need to be regularly tested, but typically this is for a short time, on a periodic basis, such as weekly or monthly. Generators which have a thermal input rating greater than 1MWth will require an</p>	N

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				<p>with back-up generators. The response notes that the number and capacity of generators is not yet known, however emissions are unlikely to be significant due to the expected minimal operational times and that if generators are greater than 1MWth. This plant will be regulated under the Medium Combustion Plant Directive regulations and will be permitted by the Environment Agency. Nevertheless, there is the potential that a significant generator capacity may be required during the operational phase.</p> <p>Provide further information on the location, number, capacity, and operational hours of proposed back-up generators and assess for potential air quality impacts to designated sites and ancient woodland in proximity to the onshore development area.</p>	<p>operational Environmental Permit. Emergency standby generators which are tested &lt;50 hours/year are exempt from the 'Specified Generator' requirements, but they are still classed as 'Medium Combustion Plants'. The new units would be considered in aggregate capacity, according to the rated thermal input not electrical output. Depending on various factors including the location, a Standard Rules Permit may be available. The Applicants will apply for and have in place the requisite Permit(s), which if required would consider any potential impacts upon ecological sites, for its back-up power provision at the appropriate time.</p>	
SNE AQO 07	05/09/2023	Natural England	Air Quality	<p><b>Section 42 Preliminary Environmental Information Report.</b></p> <p>A total of 11,489 vessel return trips are anticipated during the construction phase, although the potential for significant air quality impacts to sensitive receptors have been scoped out due to distance. It is not considered to be enough information to screen out</p>	<p>We have excluded the assessment of onshore air quality effects resulting from offshore vessels associated with offshore construction, operation, and decommissioning.</p> <p>The Local Air Quality Management Technical Guidance (LAQM TG22) provides screening criteria for the requirement for detailed assessment of vessel emissions. These are as follows:</p> <ul style="list-style-type: none"> <li>• More than 5,000 large ship movements per year, with relevant exposure within 250m of the berths and main areas of manoeuvring</li> <li>• More than 15,000 large ship movements per year, with relevant exposure within 1km of the berths and main areas of manoeuvring</li> </ul> <p>In a worst case scenario, the maximum number of vessel return trips generated</p>	N

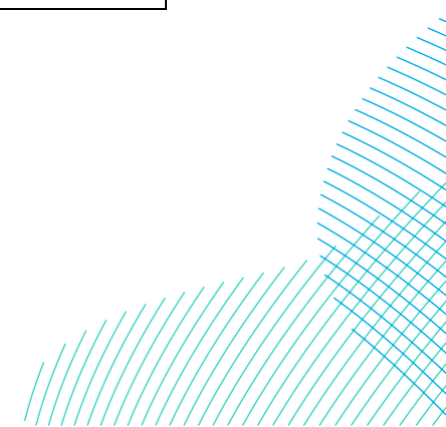


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				<p>potential for significant air quality impacts to the Humber Estuary SAC/SPA/Ramsar/SSSI due to near shore construction phase vessel movements.</p> <p>Provide additional information on the construction phase vessels' routes, port location and activities. The EIA and HRA should assess potential air quality impacts to the Humber Estuary SAC/SPA/Ramsar/SSSI from vessel emissions.</p>	<p>during the construction of the Projects (7,512) would be spread over the minimum five-year offshore construction period.</p> <p>Therefore, the mean average maximum number of vessel return trips required per year for construction (1,502) and operation (473) are well below the screening criteria included in LAQM TG22 (Defra, 2022).</p> <p>Notwithstanding this, not all vessel movements generated during the construction and operation of the Projects would complete the same route (i.e., transit in/out along the Humber Estuary) nor would all vessels be in close proximity to sensitive habitats. Therefore, the number of vessels with the potential to impact on any one terrestrial ecological site would be significantly lower than the total number of vessels detailed above. For example, the landfall cable installation vessel will have a maximum of three return trips.</p> <p>The air quality impact from vessel emissions on designated ecological sites is therefore considered to be not significant. This includes the impact from vessel emissions on the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar and SSSI.</p> <p>The Inspectorate agreed with this approach, as stated in the Scoping Opinion (the Planning Inspectorate, 2022) that this matter may be scoped out of the ES on the basis that the main source of emissions would be exhaust emissions from vessels, and due to the nature and location of the offshore components of the Proposed Development associated vessel movements would only generate a small increase in emissions in all phases, which is unlikely to result in significant effects to land based human and ecological receptors.</p>	
SNE AQO 08	05/09/2023	Natural England	Air Quality	<p>A maximum of 474 vessel movements may be required per year during operational phase, although the potential for significant air quality impacts to sensitive receptors has been scoped out due to distance. It is not considered to be enough information to screen out potential for significant air quality impacts to the Humber Estuary SAC/SPA/Ramsar/SSSI due to near shore operational phase vessel movements.</p>	<p>We have excluded the assessment of onshore air quality effects resulting from offshore vessels associated with offshore construction, operation, and decommissioning.</p> <p>The Local Air Quality Management Technical Guidance (LAQM TG22) provides screening criteria for the requirement for detailed assessment of vessel emissions. These are as follows:</p> <ul style="list-style-type: none"> <li>• More than 5,000 large ship movements per year, with relevant exposure within 250m of the berths and main areas of manoeuvring</li> <li>• More than 15,000 large ship movements per year, with relevant exposure within 1km of the berths and main areas of manoeuvring</li> </ul> <p>In a worst case scenario, the maximum number of vessel return trips generated during the construction of the Projects (7,512) would be spread over the minimum five-year offshore construction period. Therefore, the mean average maximum number of vessel return trips required per year for construction (1,502) and operation (473) are well below the screening criteria included in LAQM TG22 (Defra,</p>	N

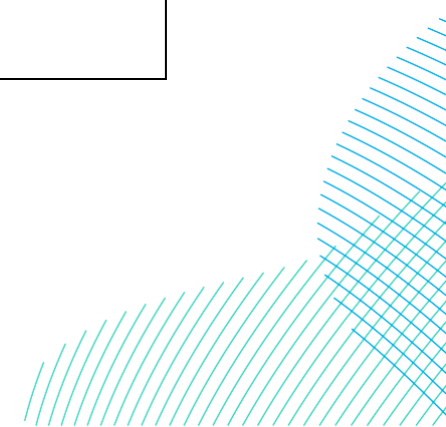
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>Provide additional information on the operational phase vessels' routes, port location and activities. The EIA and HRA should assess potential air quality impacts to the Humber Estuary SAC/SPA/Ramsar/SSSI from vessel emissions.</p>	<p>2022). Notwithstanding this, not all vessel movements generated during the construction and operation of the Projects would complete the same route (i.e., transit in/out along the Humber Estuary) nor would all vessels be in close proximity to sensitive habitats. Therefore, the number of vessels with the potential to impact on any one terrestrial ecological site would be significantly lower than the total number of vessels detailed above. For example, the landfall cable installation vessel will have a maximum of three return trips.</p> <p>The air quality impact from vessel emissions on designated ecological sites is therefore considered to be not significant. This includes the impact from vessel emissions on the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar and SSSI.</p> <p>The Inspectorate agreed with this approach, as stated in the Scoping Opinion (the Planning Inspectorate, 2022) that this matter may be scoped out of the ES on the basis that the main source of emissions would be exhaust emissions from vessels, and due to the nature and location of the offshore components of the Proposed Development associated vessel movements would only generate a small increase in emissions in all phases, which is unlikely to result in significant effects to land based human and ecological receptors.</p>	
SNE AOO 09	05/09/2023	Natural England	Air Quality	<p>There is not enough information regarding location of NRMM or duration of activities. to enable the risk of habitat impacts to be screened out.</p> <p>Additionally, no minimum NRMM standard is currently defined. A minimum NRMM standard is useful as this will establish the emission limit value associated with the plant to inform the assessment of impacts and mitigate the effects of emissions.</p> <p>Provide further information on the location, number, capacity, and operational hours of proposed back-up generators and assess for potential air quality impacts to</p>	<p>Defra technical guidance (Defra, 2022) states that emissions from NRMM used on construction sites are unlikely to have a significant impact on local air quality where relevant control and management measures are employed. However, intensive construction activities, for example Horizontal Directional Drilling (HDD) works, may temporarily increase pollutant concentrations in the vicinity of receptors. Trenchless crossing techniques (such as HDD) may be used in selected locations for crossing existing infrastructure/natural features and this may require 24-hour working. This 24-hour working is likely to last less than one month at most locations. The Environmental Statement <b>Volume 7 Chapter 5 Project Description (application ref: 7.5)</b> will provide further detail on the programme and construction timelines.</p> <p>Embedded mitigation measures specific to NRMM have been included in the design of DBS Offshore Wind Farm. Therefore, although the assessment considers emissions from all NRMM plant, the focus of the assessment is on trenchless crossing techniques (e.g. HDD) as this is considered to have the largest emissions generation potential.</p> <p>The exact location that NRMM will be operational within the Onshore Development Area is unknown. However, generators to power trenchless crossings will be confined to temporary construction compounds (TCC), and not the entire Onshore Development Area. The qualitative assessment of NRMM emissions provided in</p>	N

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				designated sites and ancient woodland in proximity to the onshore development area.	<p><b>Volume 7 Chapter 26 Air Quality (application ref: 7.26)</b> section 26.6 considers worst-case locations to ensure a robust assessment, i.e., assuming all NRMM and trenchless crossing generators are located at the closest edge of the proposed TCC.</p> <p>Further refinement of the Projects' Onshore Development Area and additional NRMM and trenchless crossing information have been considered in <b>Volume 7 Chapter 26 Air Quality (application ref: 7.26)</b> section 26.6. This includes the anticipated duration of trenchless crossings and the number and type of NRMM anticipated to be required during construction. Therefore, it is considered the assessment is sufficient and robust.</p>	
SNE AQQ 10	05/09/2023	Natural England	Air Quality	<p>The JNCC report 'Guidance on Decision-Making Thresholds for Air Pollution,' (Chapman &amp; Kite, 2021) on the level of traffic changes needed to cause a 1% change in critical levels may not be relevant for this project since the traffic change is based on 'an average vehicle fleet mix in 2019 for NOx and 2015 for NH3'. The construction fleet mix may not represent an 'average fleet' due to the high levels of construction vehicles.</p> <p>Provide further information on the predicted construction fleet mix. It may be possible that custom emissions calculations and dispersion modelling is required.</p>	<p>The suitability of the Joint Nature Conservation Committee (JNCC) Reports methodology (2021a; 2021b) for assessing the impact of the Projects on ecological receptors has been considered in a technical memo (Reference: PC2340-RHD-ON-ZZ-TN-Z-0043) issued to Natural England on 4 April 2024. This memo summarised and concluded that (1) more stringent AADT screening criteria (including the consideration of pollutant Critical Level and Load specific screening criteria) are applied than compared to the Natural England screening criteria and therefore a greater number of affected roads and ecological sites within 200m of these roads are screened in for further assessment, (2) the data provided in the JNCC Reports methodology and used in the assessment are based on a combination of monitored measurements and verified detailed modelling which "can be considered more certain than many modelling-based results" and is "expected to provide robust and representative, albeit indicative, information which will often be better than a detailed model if that model has not been verified against measurements" (Chapman &amp; Kite, 2021b), (3) no change from the 2019 (NOx) and 2015 (NH3 and N-Dep) monitored concentrations is applied to consider any changes in ambient pollutant levels with the successful introduction of tighter emission standards for petrol cars and diesel vehicles over the last decade, and (4) the assessment is undertaken in-combination with other Projects and Plans (including traffic growth), therefore, despite Project-generated traffic containing a high proportion of construction traffic, this is reduced overall when combined with the total in-combination traffic flows.</p> <p>Furthermore, as discussed in <b>Volume 7 Chapter 26 Air Quality (application ref: 7.26)</b> section 26.4.3.3.7.4, the majority of in-combination AADT considered in the assessment comprises traffic other than Project-generated traffic. Given the conservative and robust nature of the JNCC Reports' approach, it is considered this outweighs any concerns regarding the average fleet mix used to calculate the in-combination impact of traffic emissions on designated ecological sites.</p>	N

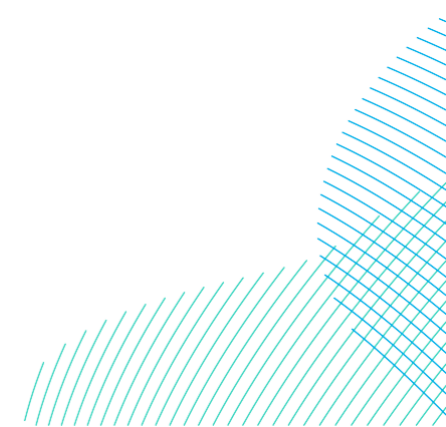
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SNE AQO 11	05/09/2023	Natural England	Air Quality	<p><b>SSSI Screening</b></p> <p>We note Table 26-20 shows potential air quality impacts to Burton Bushes SSSI and ancient woodland from road traffic emissions has been scoped out of further assessment.</p> <p>Burton Bushes SSSI and ancient woodland should be included in the detailed assessment pending resolution of the above comment (E13) and assessed in-combination with other plans or projects.</p>	<p>The requirement for further assessment of road traffic emissions on Burton Bushes SSSI and ancient woodland was completed by screening the in-combination traffic flows against the JNCC distance-based screening thresholds (further detail is provided in <b>Volume 7 Chapter 26 Air Quality (application ref: 7.26)</b> Section 26.4.3.3. At PEIR stage, the traffic generated by the Projects in addition to other plans and projects (including general traffic growth) along the road link adjacent to Burton Bushes SSSI and ancient woodland did not exceed the screening criteria at the distance the ecological site is located from the road, as road traffic pollutant concentrations decrease rapidly with distance back from the road's edge, and therefore did not require detailed assessment.</p> <p>For the ES, the revised in-combination traffic flows have been considered in the assessment. In-combination traffic flows on the road link adjacent to the Burton Bushes SSSI and ancient woodland do not exceed the JNCC distance-based screening thresholds equating to a 1% increase in CLe or CL, as detailed in <b>Volume 7 Chapter 26 Air Quality (application ref: 7.26)</b> Section 26.4.3.3.7. Therefore, impacts on this site are considered to be insignificant, in accordance with JNCC (Chapman &amp; Kite, 2021a; 2021b) guidance.</p>	N
SNE AQO 12	05/09/2023	Natural England	Marine Physical Environment	<p>Impact C1c: The assumptions used for estimating the maximum seabed footprint area for sand wave levelling and volume of sand wave material dredged/relocated, are not clear. What is the sand wave levelling corridor width and depth?</p> <p>Please clarify. It would also be useful to state the WCS total volume sand wave material to be dredged/relocated</p>	<p>Table 8-1 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> has been updated to reflect a refined project design envelope and any reference to these values has also been updated in the relevant section of the text. This updated material provides the greater detail requested.</p>	Y - M



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				for offshore export, array, and inter platform cable corridors.		
SNE AQO 13	05/09/2023	Natural England	Marine Physical Environment	<p>"The evidence used to determine impacts on marine processes in the PEIR currently consists of an extensive literature review and conclusions drawn from the impact assessments from existing nearby wind farms and the initial results, where available, from site specific surveys. The results of a number of project specific surveys remain outstanding. These include but are not limited to a project specific bathymetric survey, geotechnical studies, tidal ellipse data and a sediment mobility study. Project-specific modelling of changes to the marine physical environment have also not been included but will be part of the Environmental Statement (ES). The lack of site-specific data to inform baseline characterisation presents significant uncertainties and therefore conclusions cannot be drawn with any confidence at this point. Consequently, Natural England cannot agree with the conclusions of the PEIR at this stage.</p> <p>Impacts on coastal processes and nearshore sediment pathways in relation to the Humber Estuary SAC/SPA/Ramsar/SSSI, Holderness Inshore MCZ and Withow Gap, Skipsea SSSI are likely to be key consenting risks for this project. It is therefore important</p>	<p>The marine physical processes baseline in section 8.5 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> has been updated with project specific data and the results from marine physical processes numerical modelling (see <b>Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b>), and the assessment of significance updated where appropriate.</p> <p>Smithic Bank is avoided by the Offshore Cable Corridor. The offshore construction buffer does overlap with this site, however, jacking-up will be avoided at this site.</p>	Y-M

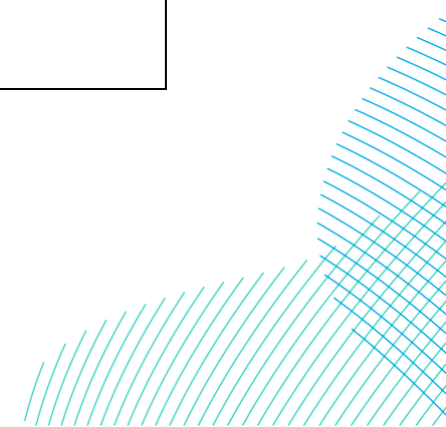


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				that these aspects are fully assessed and that there is sufficient time to fully explore options to ideally avoid, or if not mitigate the impacts prior to application. The Project should consider options to avoid impacts to Smithic Bank completely, and to reduce/remove the potential for impacts on coastal processes. "		
SNR 001	17/07/2023	Network Rail	Land Use	1) Key concerns will be how the scheme impacts on the railway operations in terms of the management of construction works around the operational railway and details such as boundary treatments, any lighting and drainage schemes that may impact on the operational railway.	<p>The Applicants have been engaged with NR's Asset Protection Eastern team since May 2023 to discuss the trenchless crossing of a Network Rail railway line north of Beverley. Agreement in principal was provided via Business and Technical clearance which was granted in July 2023.</p> <p>The Applicants are liaising with NR's property team in respect of an easement for property rights and continue to liaise with NR's ASPRO team as design progresses. A draft BAPA is expected to be provided by NR in the coming weeks.</p> <p>The Applicants are also in discussions with Network Rail on an agreed form of Protective Provisions for inclusion within the Order to provide further protection for NR's statutory undertaking in relation to this interface</p> <p>There are no active Network Rail level crossings in the Projects' Traffic and Transport study area.</p>	N
SNR 002	17/07/2023	Network Rail	Traffic and Transport	2) In addition, the routing of construction traffic (including HGVs/abnormal loads) and subsequent operational site traffic will require further consideration and discussion with Network Rail if it such routes take in railway assets such as bridges (with low clearance/weight restrictions) and railway level crossings.	<p>There are no level crossings located within the traffic and transport study area. Further information including plans and technical drawings have been shared with Network Rail through meetings held with the ASPRO team with no key concerns raised.</p> <p>The Applicants have been engaged with NR's Asset Protection Eastern team since May 2023 to discuss the trenchless crossing of a Network Rail railway line north of Beverley. Agreement in principal was provided via Business and Technical clearance which was granted in July 2023.</p> <p>The Applicants are in discussions with Network Rail on a form of Protective Provisions for inclusion within the Order to provide adequate protection for NR's statutory undertaking and concerns raised.</p>	N

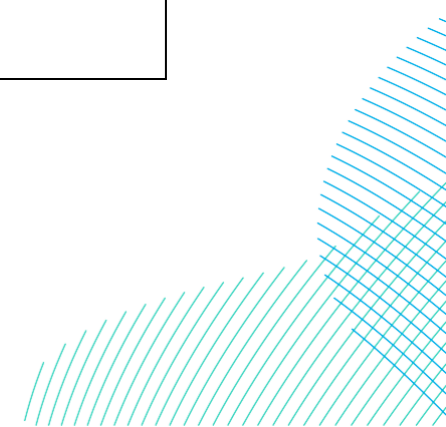




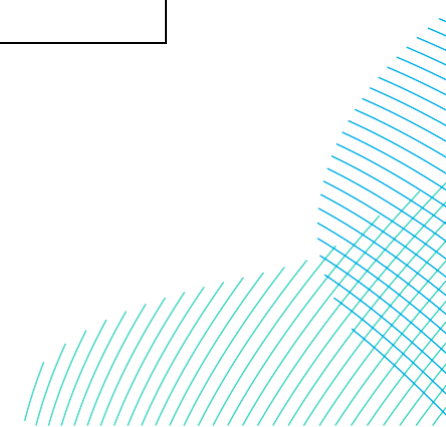
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
SNR 003	17/07/2023	Network Rail	Land Use	3) With these points in mind, at this stage the information supplied is not sufficiently detailed to fully assess potential impacts of the scheme on the railway and further information will be required to properly respond on the likely impacts of the proposed scheme.	<p>Further information including plans and technical drawings have been shared with Network Rail through meetings held with the ASPRO team.</p> <p>The Applicants has been engaged with NR's Asset Protection Eastern team since May 2023 to discuss the trenchless crossing of a Network Rail railway line north of Beverley. Agreement in principal was provided via Business and Technical clearance which was granted in July 2023.</p> <p>The Applicants are in discussions with Network Rail on an agreed form of Protective Provisions for inclusion within the Order, to provide adequate protection for NR's statutory undertaking and concerns raised.</p>	N
SNR 004	17/07/2023	Network Rail	Land Use	4) In order to ensure that the scheme does not impact on operational railway safety, the developer must liaise closely with Network Rail Asset Protection to ensure that the haulage routes into the site are appropriate, and the design and construction of the new facility and associated infrastructure will not have an adverse impact on railway operations (including glint and glare issues as outlined above). It is therefore assumed that a condition of the Order would be that detailed specifications of the proposed scheme, its construction and traffic management plans are to be provided and agreed in writing before development can commence.	<p>The Applicants have been engaged with NR's Asset Protection Eastern team since May 2023 to discuss the trenchless crossing of a Network Rail railway line north of Beverley. Agreement in principal was provided via Business and Technical clearance which was granted in July 2023.</p> <p>The Applicants issued a draft Outline Construction Traffic Management Plan to Network Rail ASPRO for review and comment on 29/05/24.</p> <p>The Applicants are in discussions with Network Rail on an agreed form of Protective Provisions for inclusion within the Order to provide adequate protection for NR's statutory undertaking and concerns raised.</p>	N
SNR 005	17/07/2023	Network Rail	Land Use	5) Please note that if the intention is to install cabling/equipment in support of the project through railway land, the developer will need an easement from Network Rail and we would recommend that they engage with us early in the	<p>The Applicants are engaged with NR's property team to discuss terms for an easement across NR property. Draft Heads of Terms are in circulation between parties and negotiations will continue.</p>	N



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				<p>planning of their scheme in order to discuss and agree this element of the proposals. Our Easements and Wayleaves Team can be contacted at easements&amp;wayleaves@networkrail.co.uk.</p>		
SNR 006	17/07/2023	Network Rail	Land Use	<p>6) Network Rail will be seeking protection from the exercise of compulsory purchase powers over operational land either for permanent or temporary purposes. In addition, Network Rail will wish to agree protection for the railway during the course of the construction works and otherwise to protect our undertaking and land interests. Network Rail reserves the right to produce additional and further grounds of concern when further details of the application and its effect on Network Rail's land are available. In addition, any rights for power or other lines under, over or alongside the railway line will require appropriate asset protection measures deemed necessary by Network Rail to protect the operational railway and stations. We have standard protective provisions which will need to be included in the DCO as a minimum therefore contact should be made to Emily Christelow, email:[redacted] to obtain a copy of the relevant wording In addition a number of legal and commercial agreements will need to be entered</p>	<p>The Applicants are in discussions with Network Rail on a form of Protective Provisions for inclusion within the Order to provide adequate protection for NR's statutory undertaking and concerns raised.</p> <p>The Applicants will continue negotiations with NR's property team for permanent property rights to install and maintain cables across NR property. These negotiations are ongoing at present with draft Heads of Terms in circulation.</p> <p>The Applicants have been engaged with NR's Asset Protection Eastern team since May 2023 to discuss the trenchless crossing of a Network Rail railway line north of Beverley. Agreement in principal was provided via Business and Technical clearance which was granted in July 2023.</p>	N



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				<p>into, for example, asset protection agreements, method statements, connection agreements, property agreements and all other relevant legal and commercial agreements. This list is not exhaustive and will need to be reviewed once more details of the scheme are discussed between the parties. Consideration should be given to ensure that the construction and subsequent maintenance can be carried out without adversely affecting the safety of, or encroaching upon Network Rail's adjacent land. In addition, security of the railway boundary will require to be maintained at all times. In any event you must contact Network Rail's Asset Protection Engineers as soon as possible in relation to this scheme on the following e-mail address AssetProtectionEastern@networkrail.co.uk.</p>		
SNR 007	17/07/2023	Network Rail	Land Use	<p>7) Network Rail is prepared to discuss the inclusion of Network Rail land or rights over land subject to there being no impact on the operational railway, all regulatory and other required consents being in place and appropriate commercial and other terms having been agreed between the parties and approved by Network Rail's board. Network Rail also reserves the right to make additional comments</p>	<p>The Applicants are in discussions with Network Rail on a form of Protective Provisions for inclusion within the Order to provide adequate protection for NR's statutory undertaking and concerns raised.</p> <p>The Applicants will continue voluntary negotiations with NR's property team for permanent property rights to install and maintain cables across NR property. These negotiations are ongoing at present with draft Heads of Terms in circulation.</p> <p>The Applicants has been engaged with NR's Asset Protection Eastern team since May 2023 to discuss the trenchless crossing of a Network Rail railway line north of Beverley. Agreement in principal was provided via Business and Technical clearance which was granted in July 2023.</p>	N



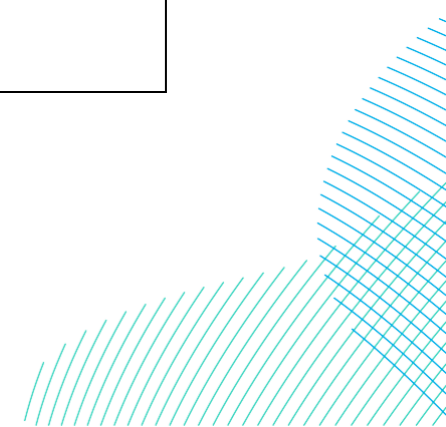
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				once we have evaluated the proposals in more detail.		
SNR 008	17/07/2023	Network Rail	Consultation	8) Network Rail would be grateful if the comments and points detailed within this consultation response are considered by Dogger Bank South - RWE Renewables UK Swindon Limited. Network Rail would welcome further discussion and negotiation with Dogger Bank South - RWE Renewables UK Swindon Limited in relation to the proposed development as required going forward. If you have any questions or require more information in relation to the above please let me know.	<p>The Applicants are in discussions with Network Rail on a form of Protective Provisions for inclusion within the Order to provide adequate protection for NR's statutory undertaking and concerns raised</p> <p>The Applicants will continue negotiations with NR's property team for permanent property rights to install and maintain cables across NR property. These negotiations are ongoing at present with draft Heads of Terms in circulation.</p> <p>The Applicants have been engaged with NR's Asset Protection Eastern team since May 2023 to discuss the trenchless crossing of a Network Rail railway line north of Beverley. Agreement in principal was provided via Business and Technical clearance which was granted in July 2023.</p>	N
SNP GOO 1	14/07/23	Northern Power Grid	Land Use	1. Northern Powergrid as a statutory utility company must at all times protect their assets to ensure their obligations to maintain electrical supplies are not compromised. As a result and following Company standard procedure I write to formally object to the draft Order.	The Applicants has been engaged with NPG's property and asset protection team since April 2023. Initial advice and guidance has been provided by NPG to help inform design. The Applicants are engaged with NPG to agree a form of Protective Provisions for inclusion within the Order.	N
SNP GOO 2	14/07/23	Northern Power Grid	Land Use	2. Northern Powergrid Property and Engineering Teams do have a meeting scheduled for Thursday 20th July with RWE to discuss the project and its interaction points with Northern Powergrid apparatus. Following this meeting Northern Powergrid will be able to provide more details as to any comments or objections to the	<p>The Applicants has been engaged with NPG's property and asset protection team since April 2023 with a Teams meeting held on 20<sup>th</sup> July 2023. Initial advice and guidance has been provided by NPG to help inform design.</p> <p>The Applicants are engaged with NPG to agree a form of Protective Provisions for inclusion within the Order.</p>	N

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				proposed project and look to begin the process of agreeing protective provisions.		
SFO 01	17/07/2023	Oliver Stones - ON BEHALF OF STEPHEN FOREMAN (MR MOOS)	Consultation	More details needed on the size of the proposed compound and infrastructure proposed to assess impact on future uses of the land and nearby fixed equipment (houses and buildings)	<p>All construction activities will be managed in accordance with <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> submitted with the application. All efforts will be made to mitigate the impact of construction activities on nearby properties. No significant residual effects have been identified in <b>Volume 7, Chapter 25 Noise (application ref: 7.25)</b> or <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b> during construction.</p> <p>The Landfall Zone is described in <b>Volume 7, Chapter 5 Project Description (Application ref: 7.5)</b>. A temporary Transition Joint Bay (TJB) Compound of 190m x 75m would be required to accommodate the drilling rigs, ducting (if installed from onshore) and welfare facilities. Each drill would start from the landfall compound, travel beneath the beach, and would exit either in the intertidal or subtidal zone at a suitable water depth. The drill would be of sufficient depth below the coastal shore platform to have no effect on coastal erosion. A temporary access route would be constructed to allow for transport to/from the temporary onshore compound.</p>	N
SFO 02	17/07/2023	Oliver Stones - ON BEHALF OF STEPHEN FOREMAN (MR MOOS)	Project Description	Details of the type and scale of any above and below ground structures/compound needed. Proposals for acquiring the required rights in this land not yet confirmed. Details and area of the temporary compound still to clarify. Confirmation needed as to whether land fall infrastructure for each project will be constructed at the same time or individually as greater impact if constructed individually. Construction traffic could be a major issue and a risk to visitors/customers of Mr Moos - recommend project consider a permanent footpath from Skipsea village. • Impact on the operational business and how this could be addressed/mitigated.	<p>Following environmental, engineering, land and consultation feedback further refinement of the Projects landfall location concluded in the selection of the landfall adjacent to Skipsea (landfall 8) as outlined in <b>Chapter 4 Site Selection and Alternatives (Application ref:7.4)</b>. The assessments within the Environmental Statement have been updated since the PEIR stage. Landfall 9 is no longer being considered so any direct impacts have been removed from the Projects</p> <p>The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>. We believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>, on balance achieves the optimum design however we would seek to avoid further constraints at detailed design. This includes details of the Landfall Zone within which two Temporary Construction Compounds are required for up to 6 years for the construction of Transition Joint Bays (TJB) and installation of the cable ducts using a trenchless technique e.g. HDD. The projects will either be constructed at the same time (concurrently) or sequentially without a two year lag between Projects. An indicative construction programme is included in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>. In the worst case scenario construction works are to be</p>	N

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					<p>completed for both Projects simultaneously in the first four years, with additional works at the landfall, substation zone and cable joint bays in the following two years. Maximum duration of effects of six years. Following completion of the works, the land will be reinstated and the only above ground infrastructure would be a manhole cover associated with each TJB.</p> <p>Construction traffic is assessed in <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b>, no significant effects have been identified at the landfall with the consideration of measures set out in the <b>Outline Construction Traffic Management Plan (application ref: 8.13)</b>.</p>	
SFO 04	17/07/2023	Oliver Stones - ON BEHALF OF STEPHEN FOREMAN (MR MOOS)	Project Description	Works corridor needs to follow field boundaries otherwise risks greater impact of landowners fields as the sterilisation area is greater. Cables must be at least 1.2 m deep and indemnity needed on existing and future land drainage to avoid lasting financial impact on the landowners impacted by the scheme. Cumulative impact on this landowner is significant with the fields immediately to the west impacted by Dogger Bank A and B Scheme and other land included with the holding impacted by the Hornsea 4 Scheme.	<p>All construction activities will be managed in accordance with <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> submitted with the application. All efforts will be made to mitigate the impact of construction activities on nearby properties. No significant residual effects have been identified in <b>Volume 7, Chapter 25 Noise (application ref: 7.25)</b> or <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b> during construction. Cable ducts are generally laid in trenches at a maximum cable depth 2m, indicatively at a cable depth at 1.6m with a minimum cover of 1.2m to the top of the protective tile.</p> <p>The cumulative impact of temporary land use during construction are assessed in section 21.8 of <b>Volume 7, Chapter 21 - Land Use (application ref: 7.21)</b>. By consulting with landowners and occupiers, maintaining access to severed land, appropriate timings of works and reinstatement of land to pre-construction conditions as soon as reasonably practicable, it is likely that the amount of land temporarily unsuitable for agriculture would be reduced.</p> <p>Private agreements (or compensation in line with the compulsory purchase completion code) would be sought with relevant landowners / occupiers and the land would be reinstated to its pre-construction condition.</p>	N
SFO 05	17/07/2023	Oliver Stones - ON BEHALF OF STEPHEN FOREMAN (MR MOOS)	Cumulative Effects	Cumulative impact on this landowner is significant with the fields immediately to the west impacted by Dogger Bank A and B Scheme and other land included with the holding impacted by the Hornsea 4 Scheme.	<p>Following environmental, engineering, land and consultation feedback further refinement of the Projects landfall location concluded in the selection of the landfall adjacent to Skipsea (landfall 8) as outlined in <b>Chapter 4 Site Selection and Alternatives (Application ref:7.4)</b>. The assessments within the Environmental Statement have been updated since the PEIR stage. Landfall 9 is no longer being considered so any direct impacts have been removed from the Projects.</p> <p>The Projects are in direct collaboration with all other developers in the vicinity to agree mitigation measures such as sharing access provisions where possible with a view to agreeing Statements of Common Ground at the earliest opportunity to</p>	N

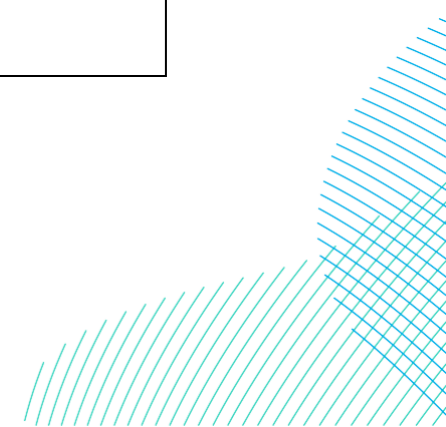
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					mitigate the impact on landowners. The cumulative impact of temporary land use during construction are assessed in section 21.8 of <b>Volume 7, Chapter 21 - Land Use (application ref: 7.21)</b> .	
SFO 06	17/07/2023	Oliver Stones - ON BEHALF OF STEPHEN FOREMAN (MR MOOS)	Land Use	Due to the limited information provided to date, it is difficult to assess the impact on the operational business operated by the landowner and how this could be addressed/mitigated. The proposal is already impacting medium to long-term investment decisions and this needs to be addressed asap.	<p>Following environmental, engineering, land and consultation feedback further refinement of the Projects landfall location concluded in the selection of the landfall adjacent to Skipsea (landfall 8) as outlined in <b>Chapter 4 Site Selection and Alternatives (Application ref:7.4)</b>. The assessments within the Environmental Statement have been updated since the PEIR stage. Landfall 9 is no longer being considered so any direct impacts have been removed from the Projects</p> <p>The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>. We believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>, on balance achieves the optimum design.</p> <p>Under a worst case scenario, the Onshore Export Cable Corridor would be fenced for the entire duration of the onshore works, up to 6 years. However, the Project has made a commitment to reinstate areas between Jointing Bays within two years of the start of construction and return the land to its previous use. Some areas of Haul Road and Temporary Construction Compound will be required to remain in place for the full duration of the works but, would be fully reinstated following the completion of construction.</p> <p>There are not considered to be any significant environmental effects on receptors during construction at the landfall with the implementation of the mitigation measures set out in the <b>Outline Code of Construction Practice (application ref: 8.9)</b> and the <b>Outline Construction Traffic Management Plan (application ref: 8.13)</b>. No significant residual effects have been identified with Air Quality, Noise, Traffic and Transport or Tourism and Recreation at the landfall.</p> <p>By consulting with landowners and occupiers, maintaining access to severed land, appropriate timings of works and reinstatement of land to pre-construction conditions as soon as reasonably practicable, it is likely that the amount of land temporarily unsuitable for agriculture would be reduced.</p> <p>Private agreements (or compensation in line with the compulsory purchase compensation) would be sought with relevant landowners / occupiers.</p>	N

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SOO 06	17/07/2023	Orsted	Site Selection and Assessment of Alternatives	<p>The closest point on the respective cable corridors between the two projects is immediately west of Beverley at Burton Bushes. The proposed cable route for Dogger Bank South Offshore Wind Project appears to be immediately adjacent to the cable for Hornsea Four.</p> <p>The Preferred Cable Route has a greater offset from the Hornsea Four cable corridor and does not appear to overlap, although there will be a requirement for coordination to ensure interfaces are managed appropriately.</p>	Coordination with Hornsea Four to ensure interfaces are managed appropriately will continue as the Projects progress.	N
SOO 07	17/07/2023	Orsted	Site Selection and Assessment of Alternatives	<p>Offshore export cable corridor</p> <p>The proposed Dogger Bank South Offshore Wind Project offshore export cable corridor is 1km wide (with a 500m temporary working area buffer either side) but funnels out to up to 4km on approach to the landfall. We note that there are up to six cable crossings in close proximity of the landfall required with Hornsea Four Orsted would want to be consulted on the detailed routeing of the export cable/s at the pre-construction stage.</p>	Consultation with Hornsea Project Four will continue as the Projects progress. It should be noted that following updates to the Projects design envelope, the offshore export cable corridor now funnels out to 3km.	N
SOO 01	17/07/2023	Orsted	Other Marine Users	Having reviewed the information in the Preliminary Environmental Information Report (PEIR), there is some potential spatial overlap between our respective wind farm project areas. We write to register	Noted.	N

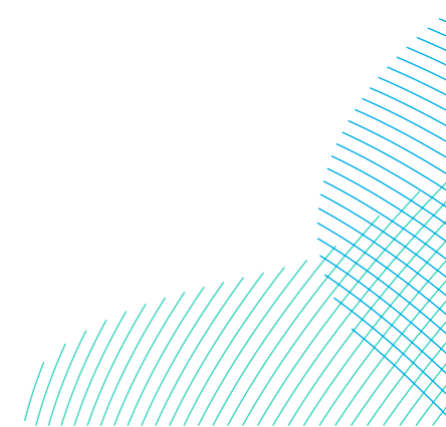




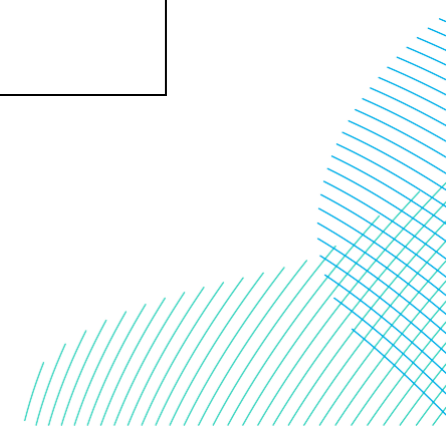
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				with you our interest in your proposal and in particular areas of potential interaction between your proposed development and the proposed Hornsea Four Offshore Wind Farm ("Hornsea Four"). Our response at this stage is based on documents currently made available regarding your project and our response will develop as more information is made available including during application and examination stage and as we further consider the potential interaction between the projects.		
S00 04	17/07/2023	Orsted	Other Marine Users	The Dogger Bank South Offshore Wind Project array area is expected to be 40 km from Hornsea Four offshore array and has significant interaction with the Hornsea Four Order limits onshore and offshore export cable corridor.	Noted, potential interactions with Hornsea Project Four are detailed in <b>Volume 7, Chapter 16 Infrastructure and Other Users (application ref: 7.16)</b> .	N
S00 02	17/07/2023	Orsted	Other Marine Users	Hornsea Four is in development with a proposed capacity of 2.6 MW and 180 wind turbine generators. On 12 July 2023 Orsted received notification that the application for development consent for the Hornsea Four was approved by the Secretary of State for Energy Security and Net Zero. Orsted holds a lease from the Crown Estate.  Hornsea Four is expected to operate to the full extent of its	Hornsea Project Four has been included within the cumulative assessment for the Projects, where relevant in each ES topic chapter.	N



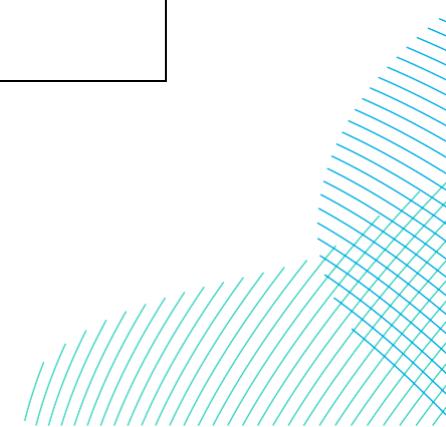
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				<p>consents and licences, be maintained, and may in due course be upgraded and repowered, and will at some stage be decommissioned. Thus, any interactions and impact should be considered to be long-term and the various project stages of operation/maintenance, repowering and decommissioning should be considered by the Dogger Bank South Wind Project. In addition, it is important that during the long-term interaction of the projects, the Hornsea Four consents (including consent conditions) and any stakeholder agreements entered for the benefit of Hornsea Four are not adversely affected.</p>		
SOO 03	17/07/2023	Orsted	Other Marine Users	<p>Offshore Export Cable Corridor:</p> <p>The proposed Dogger Bank South Offshore Wind Project offshore export cable corridor is 1km wide (with a 500m temporary working area buffer either side) but funnels out to up to 4km on approach to the landfall. We note that there are up to six cable crossings in close proximity of the landfall required with Hornsea Four Orsted would want to be consulted on the detailed routeing of the export cable/s at the pre-construction stage.</p>	<p>Consultation with Hornsea Project Four will continue as the Projects progress. It should be noted that following updates to the Projects' design envelope, the offshore export cable corridor now funnels out to 3km.</p>	N



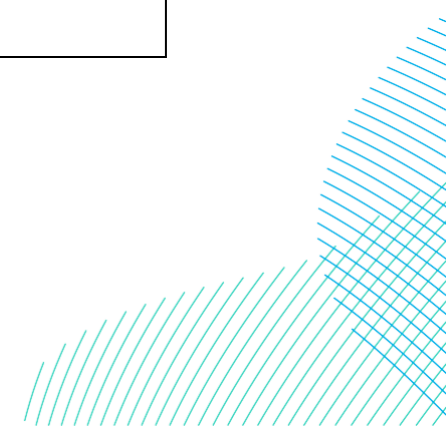
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SOO 03	17/07/2023	Orsted	Other Marine Users	<p>2) Hornsea Four Hornsea Four is in development with a proposed capacity of 2.6 MW and 180 wind turbine generators. On 12 July 2023 Orsted received notification that the application for development consent for the Hornsea Four was approved by the Secretary of State for Energy Security and Net Zero. Orsted holds a lease from the Crown Estate.</p> <p>Hornsea Four is expected to operate to the full extent of its consents and licences, be maintained, and may in due course be upgraded and repowered, and will at some stage be decommissioned. Thus, any interactions and impact should be considered to be long-term and the various project stages of operation/maintenance, re-powering and decommissioning should be considered by the Dogger Bank South Wind Project. In addition, it is important that during the long-term interaction of the projects, the Hornsea Four consents (including consent conditions) and any stakeholder agreements entered for the benefit of Hornsea Four are not adversely affected.</p>	<p>Hornsea Four has been included within the cumulative assessment for the Projects, where relevant in each topic chapter.</p> <p>The Applicants are in discussion with Orsted on a form of agreement to cover identified interactions between the Projects, to include ongoing cooperation and collaboration provisions.</p>	N
SOO 05	17/07/2023	Orsted	Project Description	<p>4) Physical interaction of projects a) Onshore substation and access route</p>	<p>The Applicants are in discussions with Orsted Hornsea Project Four Limited on this matter.</p>	N



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				<p>The Dogger Bank South Offshore Wind Project's proposed onshore development zones overlap, or are located immediately adjacent to, Hornsea Four consented infrastructure development zones.</p> <p>The Dogger Bank South web-hosted GIS system illustrates the position of a proposed Indicative Road Access Zone immediately south of the A1079. The Proposed Development Plan makes no reference to this feature in terms of design or functionality, although it appears to impinge upon Hornsea Four's permanent access junction. In addition, the Hornsea Four access route cuts through the proposed Onshore Development Area, and therefore any access required (e.g. grid connection cable) by Dogger Bank South Offshore Wind Project to the south-east of Jillywood Farm would need to cross the Hornsea Four asset. It is also unclear why the proposed Onshore Development Area extends to the boundary of the Hornsea Four substation site.</p> <p>Hornsea Four would like to register interest in Dogger Bank South Offshore Wind Project proposed grid connection design to understand interfaces with Hornsea Four's permanent substation access. At this stage of the development scoping stage</p>		

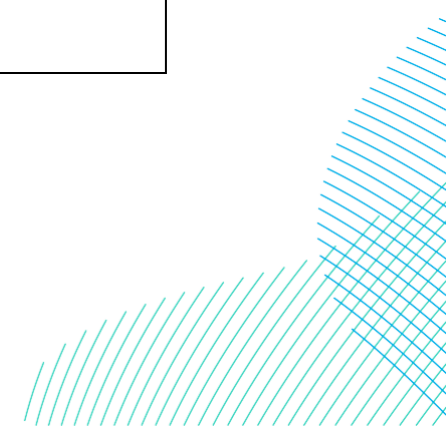


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				with overall highway impact yet to be fully agreed with National Highways, no further comment on the necessity of safety and collision data will be provided.		
SOO 08	17/07/2023	Orsted	Marine Mammals	DBS Marine Mammal Impact Assessment It should be noted that the background noise levels taken from the Hornsea Zone during 2020 would have been when construction activities were occurring in general. Therefore this is not a non-construction baseline.	Noted. The background noise levels mentioned were sufficiently far from any construction activities that there was a negligible influence on the ambient noise at the monitoring location. These do not have any bearing on the assessment or its conclusions.	N
SOO 09	17/07/2023	Orsted	Cumulative Effects	8) Cumulative and in-combination effects of projects In response to the Dogger Bank South Offshore Wind Farm Scoping Report, Orsted indicated the potential for the proposed developments to interact and for both developments to have cumulative environmental effects on other receptors. Orsted re-states that it is important to ensure that all environmental impacts of your project are properly and fully assessed including any potential cumulative or in combination effects with Hornsea Four.  In particular Orsted will want to be consulted on the Marine Mammal Mitigation Protocol (MMMP) for piling and Unexploded Ordnance (UXO) and the respective Site Integrity Plans (SIPs).	Orsted have been provided with a copy of the respective <b>Volume 8, In Principle SIP (application ref: 8.26)</b> and the <b>Volume 8, Outline MMMP (application ref: 8.25)</b> for piling and UXO in advance of formal submission.  Hornsea Project Four is considered as a cumulative development in both the onshore and offshore environmental assessments and assessed where relevant. As detailed in <b>Volume 7, Chapter 6 Appendix EIA Methodology (application ref: 7.6)</b> .	N



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SOO 11	17/07/2023	Orsted	Shipping and Navigation	Important to ensure that all environmental impacts of the Projects are properly and fully assessed including any potential cumulative or in combination effects with Hornsea Four.	Hornsea Four has been screened into the CEA (see section 14.8 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> ).	N
SOO 10	18/07/2023	Orsted	Cumulative Effects	We would welcome the opportunity to discuss further the following cumulative and in-combination impacts: <ul style="list-style-type: none"> <li>• to shipping and navigation, ornithology, and marine mammals, as well as seabed morphology due to the nature of the increased development in a congested area of sea.</li> <li>• Further displacement of fisheries and established co-existence relationships.</li> </ul>	The final Cumulative Effects Assessments are available in their respective topic chapters within this ES submission. The Projects continue to engage with Orsted on Hornsea Project Four.	N
SRE 002	17/07/2023	Riplingham Estate	Site Selection and Assessment of Alternatives	From the consultation interactive map it will be noted that the Indicative Preferred 100m Corridor and the Indicative Zone of Off Route Access both run approximately north-south right through approximately the centre of this land and very close to the farmhouse and buildings at Vinegar Hill Farm	The electrical infrastructure technology included in the Projects design is High Voltage Direct Current (HVDC), this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. There would be a temporary construction impact across a 75m corridor - the Projects would be sterilising 24m corridor during operation that would return to productive agricultural use and any reasonable loss of development will be a compensable matter.	N
SRE 006	17/07/2023	Riplingham Estate	Site Selection and Assessment of Alternatives	wish to work positively with RWE to try to resolve the cable route in an acceptable manner to Riplingham Estates Ltd and the movement of the cable route to the north west corner of Riplingham Estates Ltd	The electrical infrastructure technology included in the Projects design is High Voltage Direct Current (HVDC), this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. There would be a temporary construction impact across a 75m corridor. The Projects would have a 24m permanent easement during operation that would return to productive agricultural use and any reasonable loss of development will be a compensable matter. Removal of Substation Zone 1 from the Project Design Envelope as outlined in <b>Chapter 4 Site Selection and Alternatives (Application ref:</b>	Y-D

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				ownership would be a much better situation.	<b>7.4)</b> has allowed the movement of the cable route to the north west corner of Riplingham Estates Ltd ownership Landowners and Agents have been kept informed of progress to date and the project held an agents briefing session to aide discussion and plan ahead.	
SRE 001	17/07/2023	Riplingham Estate	Land Use	The point we are clearly making here is that we regard the subject area as having considerable potential for future release as residential development land.	Unfortunately, we can only consider developments that have significantly progressed planning consent. We have considered all those projects which have a planning application submitted that are registered in ERYC Planning Portal. These are set out in <b>Volume 7, Chapter 6 EIA Methodology (application ref: 7.6)</b> .  The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> . We believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> , on balance achieves the optimum design.	N
SRE 003	17/07/2023	Riplingham Estate	Project Description	It is not known whether HVAC or HVDC cabling is planned or a combination. <ul style="list-style-type: none"> <li>• From the above we do not know the nature of the trenching proposed or how many cables/trenches will be involved.</li> <li>• Accordingly we do not know the likely cable easement widths sought nor in fact the proposed depth of cabling, save for the drawings on pages 110-113 of Chapter 05 of the PEIR which suggest somewhere between 1200 and 1603mm where generally possible, but these are indicative only. We spent considerable time looking through the PEIR documents to try to find the proposed easement widths, only to establish in the end that they are not even mentioned.</li> </ul>	Ongoing development of the project design envelope in line with statutory consultation feedback, site investigation and negotiation of a grid connection offer has cumulated in both projects being developed to use High Voltage Direct Current (HVDC) technology. Stakeholder feedback also allowed the decision to co-locate both HVDC Converter Stations on Zone 4, South West of Beverley, near to the village of Bentley. The Onshore Export Cable Corridor has been reduced to 75m as part of making this technology choice which in turn will reduce the land take and impact on impact landowners. The Projects are seeking 2x 12m easements within a 75m construction corridor. The Onshore Export Cables would be either laid directly in trenches or pulled through pre-installed ducts. Cable ducts are generally laid in trenches at a maximum cable depth 2m, indicatively at a cable depth at 1.6m with a minimum cover of 1.2m to the top of the protective tile. Alternatively, they would be installed in HDD bores and then the cables are pulled through. Further detail is provided in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> ,	N

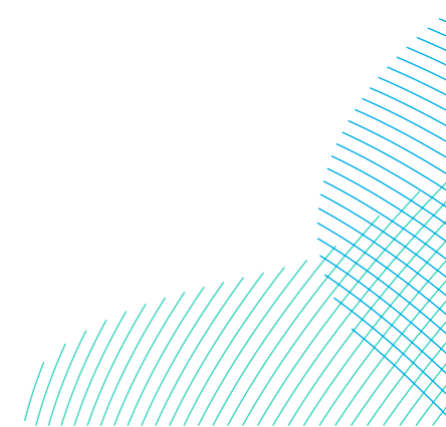


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SRE 004	17/07/2023	Riplingham Estate	Land Use	Interim adverse impacts on the potential production from the farmland including the ability to either maintain existing drainage or indeed renew it or install new drainage where necessary.	<p>Under a worst case scenario, the Onshore Export Cable Corridor would be fenced for the entire duration of the onshore works, up to 6 years. However the Project has made a commitment to reinstate land between Jointing Bays within two years of the start of construction as detailed in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>. By consulting with landowners and occupiers, maintaining access to severed land, appropriate timings of works and reinstatement of land to pre-construction conditions as soon as reasonably practicable, it is likely that the amount of land temporarily unsuitable for agriculture would be reduced. Private agreements (or compensation in line with the compulsory purchase compensation code) would be sought with relevant landowners / occupiers and the land would be reinstated to its pre-construction condition.</p> <p>An Agricultural Liaison Officer (ALO) from Dalcour Maclaren has been deployed by the projects throughout 2023 to oversee the intrusive and non-intrusive survey campaign across the summer, which has been welcomed by affected landowners and will continue to engage throughout development and construction of the projects.</p> <p>Land Drainage Consultancy Ltd have also been appointed to develop conceptual pre- and post-construction drainage plans that will be shared with the main works contractor once appointed to implement where reasonably practicable. These will be developed with land-owners and agents outside the limitations of the DCO and will be agreed by private treaty, committed to as part of the Option Agreements. An <b>Outline Construction Drainage Strategy (application ref: 8.11)</b> includes detail of how pre-construction drainage would be installed to manage water coming from existing underground land drainage pipes which would be affected by the installation of the new export cables. Following installation of the Onshore Export Cables, the post-construction drainage program would commence to ensure that soils affected by the onshore export cable corridor are left in a condition that enables a return within the affected fields to full agricultural production. Where necessary, post-construction drains may be installed. <b>Volume 8, Appendix A - Outline Soil Management Plan (OSMP)</b> is also included in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>.</p>	N
SRE 005	17/07/2023	Riplingham Estate	Land Use	The very damaging implications that would result from the cable scheme passing through this property in terms of future ability to develop the land which, for the reasons we have given above, we believe has an above average	The electrical infrastructure technology included in the Projects design is High Voltage Direct Current (HVDC), this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. There would be a temporary construction impact across a 75m corridor. The Projects would be sterilising 24m corridor during operation that would return to	N



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				chance of securing a residential allocation in the no scheme world.	<p>productive agricultural use and any reasonable loss of development will be a compensable matter.</p> <p>Removal of Substation Zone 1 from the Project Design Envelope as outlined in <b>Volume 7, Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b> has allowed the movement of the cable route to the north west corner of Riplingham Estates Ltd ownership Landowners and Agents have been kept informed of progress to date and the project held an agents briefing session to aide discussion and plan ahead.</p> <p>Unfortunately, we can only consider developments that have significantly progressed planning consent. We have considered all those projects which have a planning application submitted that are registered in ERYC Planning Portal. These are set out in <b>Volume 7, Chapter 6 EIA Methodology (application ref: 7.6)</b>.</p>	
SRP COO 1	17/07/23	Rowley Parish Council	Land Use	<p>Zone 4 Substation</p> <p>The proposed substation in Zone 4 (Bentley) is situated in a rural Hamlet and within Rowley Parish. The Parish Council unanimously support the residents and strongly object to a substation being built in this location. This will have a significant and detrimental impact on the residents of Bentley, there will also be harm to the visual amenity in an area of high landscape value. The sheer amount of land required for this project will have a sizeable impact on local farmers.</p>	<p>An extensive site selection process has been undertaken to identify the site as detail in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>. <b>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)</b>, identifies significant adverse effects from a representative viewpoint along Copleflat Lane in section 23.6.2.3.2. However, it should be noted that significant visual effects are limited to within 1km of the Onshore Converter Station(s).</p> <p><b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b> has been developed for the Projects, reflecting the form and scale of the proposals, and the assessed landscape and visual effects. However, it is recognised that mitigation planting will not be fully effective until plants begin to grow and mature. The assessment and <b>Volume 7, Figure 23-8 (application ref: 7.23.1)</b> therefore include effects at year 1 following completion, when the effectiveness of planting will be least (major adverse). This represents a worst-case assessment. The LVIA also reports on effects at year 10, assuming that planting is maturing and beginning to be more effective in mitigating the effects. At this time the effects are considered to be reduced to moderate adverse, however still significant in EIA terms. <b>Volume 8, Design and Access Statement (application ref: 8.8)</b> sets out the design principles for the Onshore Converter Station(s) and includes a requirement for a 'Design Champion' and 'Design Panel' with representatives to be agreed with the Planning Authority, who will work with the engineers at the detailed design stage to consider the external appearance of the buildings and ensure the detailed Landscape Management Plan maximises the screening opportunities set out in <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b>.</p>	N

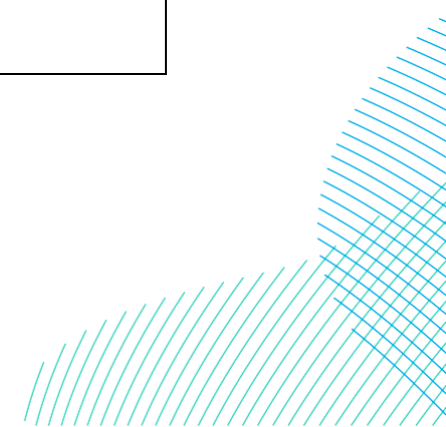
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					<p>Effects on agricultural land are assessed in <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>, this identifies a major adverse significance of effect at the Substation Zone in relation to the loss of agricultural land, however the site has been surveyed and is not classed as Best and Most Versatile (BMV) Land. As detailed in <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b> areas of land within the Substation Zone will be returned to agriculture, where planting is not required for the landscape and visual screening or sustainable drainage systems. A private land agreement will also be sought with the landowner.</p>	
SRP COO 3	17/07/23	Rowley Parish Council	Land and Visual Impact	<p>Screening You are consulting with arboriculturists? - you need to consult with the residents and the Parish Council, as they are the ones directly impacted. Their views matter!! Screening of a 27m high building with a high-pressure gas line in the vicinity is significant and requires attention to detail/due diligence. We Strongly object against a taller building. The building would need to be as low as possible in the land to reduce the visual impact.</p>	<p>DBS Local Liaison Meetings were held in February 2024 where <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b> proposals, including the proposed list of species to be planted were presented to the Parish Councils including Rowley Parish Council. Some feedback was received on the type of trees and the planting list was updated. The Substation Zone has been designed to take account of the high-pressure gas pipelines and tree planting has been moved to the South of the site closer to the receptors at Bentley. The area directly about the pipeline will be returned to agriculture but a native species, shallow rooted hedge is proposed along the western boundary of the site.</p> <p>The photomontages and viewpoints in <b>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)</b> were also presented at the DBS Local Liaison Meetings were held in February 2024 and comments were received on the indicative external appearance. <b>Volume 8, Design and Access Statement (application ref: 8.8)</b> sets out the design principles for the Onshore Converter Station(s) and includes a requirement for a 'Design Champion' and 'Design Panel' with representatives to be agreed with the Planning Authority, who will work with the engineers at the detailed design stage to consider the external appearance of the buildings and ensure the detailed Landscape Management Plan maximises the screening opportunities set out in <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b>.</p> <p>The Project Design Envelope includes a maximum building height of 24m and is a realistic worst-case scenario based on the design of the HVDC electrical infrastructure. Further detail is provided in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> on the design of the HVDC Converter Station(s). The assessment in <b>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)</b>, is based on this maximum height and includes lightning masts of up to 27m.</p>	Y-D



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SRP COO 4	17/07/23	Rowley Parish Council	Traffic and Transport	<p>Traffic Roads and traffic around Bentley, coming in from the north side of the site will increase traffic east &amp; west. The proposed Zone 4 will have a detrimental impact on local farmers, and tourism, a camping and glamping business will be harmed to a point where the viability of the business will be in doubt.</p>	<p>Potential noise impacts are assessed in <b>Volume 7, Chapter 25 Noise (application ref: 7.25)</b> of the ES. The assessment covers both the construction phase and operational phases. Noise and vibration effects can arise from construction traffic using the local highway network and from construction plant used to build the Onshore Export Cable Corridor. Operational noise effects can arise from the Onshore Converter Stations and associated plant. The assessment finds that potential effects during construction, including those from construction traffic are not considered to be significant with the implementation of the mitigation measures set out in <b>Volume 7 Chapter 25 Noise (application ref: 7.25)</b>. This includes the implementation of a Code of Construction Practice (in accordance with <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> submitted with the application.</p> <p>Noise effects during the operational phase (arising from the Onshore Converter Stations) have been assessed within the ES Chapter are not considered to be significant. Operational noise will be managed by DCO Requirement 21 (Control of noise during the operational phase).</p> <p><b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> has not identified any significant residual effects relating to construction traffic, in accordance with the Outline CTMP, all construction traffic will be managed by a Construction Traffic Management Plan, provided with the DCO application is included in <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b>.</p> <p>Moderate adverse temporary construction impacts are identified in section 23.6.1.2.3.1 of <b>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)</b>. However, on completion of all construction works, construction effects on the Butt Farm viewpoint would be superseded by the operational effects, which are assessed in section 23.6.2.3.1 as a significant residual adverse effect (moderate adverse). A significant adverse effect has also been identified in <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b> on Butt Farm campsite. By year 10, the mitigation planting to the north of the Onshore Converter Stations is expected to be effective in partly screening and filtering views of the Onshore Converter Stations, with vegetation expected to be around 8-10 m in height (modelled in the photomontage). The vegetation would largely screen the lower elements of the Onshore Converter Stations, however, the upper parts of the Onshore Converter Stations such as the roofs of the buildings would still be visible on the skyline. The amount of screening provided by the planting would continue to increase as the trees mature with age. As described above, <b>Volume 8, Design and Access Statement (application ref: 8.8)</b> sets out the design principles for the Onshore Converter Station(s) and includes a requirement for a</p>	N

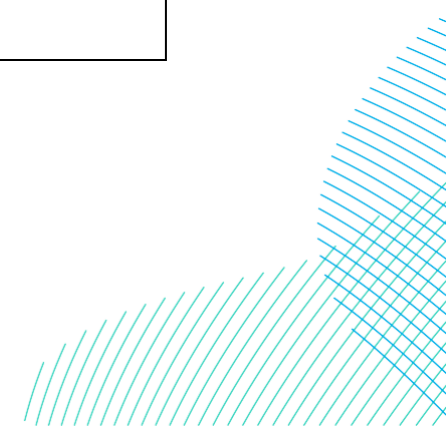
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					'Design Champion' and 'Design Pannel' with representatives to be agreed with the Planning Authority, who will work with the engineers at the detailed design stage to consider the external appearance of the buildings and ensure the detailed Landscape Management Plan maximises the screening opportunities set out in <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11).</b>	
SRP C00 5	17/07/23	Rowley Parish Council	Socio-Economics	There is no mention of any compensation for residents or any scheme to support cost of living when the project is already identified as 4 years minimum with capacity for 4-7 years of construction and a 30-year expected lifespan.	The detail of any community benefit package offered, will be developed following engagement with the local community and remain separate from the planning process.  Although the Applicants acknowledge the concerns of residents, it is not considered house prices would be significantly affected. Where any resident feels the value of their property has significantly decreased in value this would be considered on case by case basis.	N
SRP C00 2	17/07/23	Rowley Parish Council	Site Selection and Assessment of Alternatives	Cable Corridor 2 Landfall sites suggested from the coast, one being Skipsea, bringing the cables in, and route 3 being a preferred option which will come in from the north side of Bentley to the suggested site compound. Why hasn't Hull City Council been used as a preferred option - Hull City Council have a list of Brownfield Sites, one being significantly and less damaging to residents to the Creyke Beck (National Grid Sub Station).	An extensive site selection process has been undertaken to identify the site as detail in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4).</b> The Onshore Export Cable Corridor has been designed to connect to the Proposed Birkhill Wood National Grid Substation and therefore a route though Hull would not have been appropriate due to the large number of receptors, engineering constraints and its distance from the grid connection point.	N
SSG N00 1	13/07/23	Scottish Gas Networks	Land Use	1. SGN do not work in this area.  This area is covered by NORTHERN GAS NETWORKS LIMITED.	Noted.	N
SS0 04	17/07/2023	Sinkler/Manor Farm	Site Selection and Assessment	Out of the three above methods the only option which our Client considers viable is to directional drill from the east side of Meaux	The Applicants have met the landowners several times to discuss the potential implications of the Projects and how they can mitigate the impacts on the farm. Commitments have been made to utilise trenchless crossings on Meaux Lane and the A1035.	N

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			of Alternatives	Lane to the west side of the poultry building and range access road.		
SS001	17/07/2023	Sinkler/Manor Farm	Land Use	The route of the Proposed Development passes between the farmstead of Manor Farm and our Client's free range poultry buildings and ranges. The route of the Proposed Development crosses the access road which links the two. The main concern with the proposal is the potential bio security risk which it raises given the high Avian Influenza ("AI") pressure over the last 12 months. A secondary concern is the proximity of the proposed construction corridor to [redacted] house at Manor Farm, which would be approximately 15m at its closest point.	The Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> . We believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> , on balance achieves the optimum design.  The proposed route has been optimised in negotiations with the landowners to mitigate the potential for spreading Avian Influenza by providing an alternative access point off the A1035 to prevent the need for a haul passing through the farm.	Y-D
SS002	17/07/2023	Sinkler/Manor Farm	Land Use	There is grave concern that the initial plans to lay the proposed cables by way of an open cut trench with a haul road through the farm could create a major bio-security risk and potentially lead to an outbreak of AI on the holding.	The electrical infrastructure technology included in the Projects design is High Voltage Direct Current (HVDC), this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. There would be a temporary construction impact across a 75m corridor - the Projects would be sterilising 24m corridor during operation that would return to productive agricultural use and any reasonable loss of development will be a compensable matter.  The proposed route has been optimised in negotiations with the landowners to mitigate the potential for spreading Avian Influenza by providing an alternative access point off the A1035 to prevent the need for a haul passing through the farm. The Applicants have also committed to several trenchless technique e.g. HDD crossings in these locations, further mitigating the extent of open cut trenching and bios security risk.	Y-D
SS003	17/07/2023	Sinkler/Manor Farm	Project Description	Since initial discussions have taken place three construction methods have been proposed by the project team:	The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> .	Y-D



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				<p>1. Open cut along the original proposed route</p> <p>2. Directional drilling from the east side of Meaux Lane to west side of the poultry building and range access road, with no surface access between the two</p> <p>3. Open cut on a route curving slightly south to move away from Manor Farm house but requiring one of the poultry buildings to be demolished to facilitate the cable works</p>	<p>We believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>, on balance achieves the optimum design.</p> <p>Whilst all options remain available for construction in the worst case scenarios, the technology choice of High Voltage Direct Current (HVDC) has significantly reduced the construction working width to 90m allowing all scenarios to pass between the farm house and first bird house.</p> <p>The proposed route has been optimised in negotiations with the landowners to mitigate the potential for spreading Avian Influenza by providing an alternative access point off the A1035 to prevent the need for a haul passing through the farm. The Projects have also committed to several trenchless crossings in these locations, further mitigating the extent of open cut trenching and bios security risk.</p>	
SS0 05	17/07/2023	Sinkler/Manor Farm	Flood Risk and Hydrology	There is also concern that the borehole water supply the serves Manor Farm could become contaminated as a consequence of the project.	A Hydrogeological Risk Assessment will be undertaken, where required as detailed in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> . This will consider any potential contamination pathways associated with trenchless crossings, an suitable mitigation to protect aquifers along the Onshore Export Cable Corridor. Borehole water sampling has been undertaken by the Applicants to establish a baseline water quality so that any changes can be established and dealt with appropriately	N
SSPF 001	27/06/23	Sweden Pelagic Federation	Fish and Shellfish Ecology	<p>1. Impacts on fish stocks</p> <p>Windmill farms may result in e.g. continuous low frequency underwater noise during the windmill park lifetime, increased turbidity during construction, changed current patterns, and electromagnetic fields around cables. Crab and lobster larvae have been demonstrated to risk impaired swimming capabilities from electromagnetic fields, and there are indications that pelagic species may avoid wind parks. The present knowledge about these factors and their effect on the underwater fauna is severely lacking. SPF members are</p>	<p>Please refer to <b>Volume 7, Chapter 10 Fish and Shellfish (application ref: 7.10)</b> for further details on this topic.</p> <p>Impacts of EMF and underwater noise have been assessed to be, at worst, or a minor adverse effect in the fish and shellfish chapter (application ref:7.10). These impacts have also been considered within the commercial fisheries chapter and as such impacts to commercially important fish and shellfish resources are assessed to be of a minor adverse effect, which is not significant in EIA terms.</p>	N

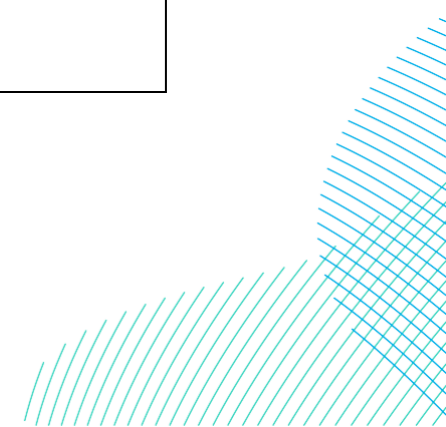
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				concerned that these and other impacts from windmill farms may negatively impact some fish species. Risk for effects on fish behaviour, migration patterns and fish reproduction etc. cannot be ruled out.		
SSPF 002	27/06/23	Sweden Pelagic Federation	Fish and Shellfish Ecology	In the southern Baltic, there has been an extensive expansion of windmill farms. At the same time, the migration patterns and behaviour of the southern/western Baltic spring-spawning herring seem to have changed, and the recruitment of this stock is presently at historically low levels. ICES has since several years given a zero advice for fishing on the stock and severe fishing restrictions are in place. Even though there are no proof that the reproduction has been impaired directly through the windmill farms, this is the connection that many of our members do, and they are concerned that windmill farms in other areas may likewise negatively impact pelagic fish recruitment.	No additional monitoring requirements are proposed for fish and shellfish receptors when the embedded mitigation measures are considered. Please refer to section 10.8 of <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> .	N
SSPF 003	27/06/23	Sweden Pelagic Federation	Fish and Shellfish Ecology	SPF is of the opinion that using the precautionary principle, studies on factors such as these on a wide range of fish and crustacean species need to be carried out before any decision can be made on allowing offshore windmill parks. If wind parks are approved	Existing UK legislation does not prohibit commercial fishing within operational offshore wind farms, and for some sites that have fixed foundation options, commercial fishing has continued during this phase. Please refer to Paragraph 245 of the commercial fisheries ES chapter where examples of where fishing has continued successfully are described in detail. It should also be noted that the commercial fisheries impact assessment has been completed in line with most recent and up to date guidance and legislation.	N



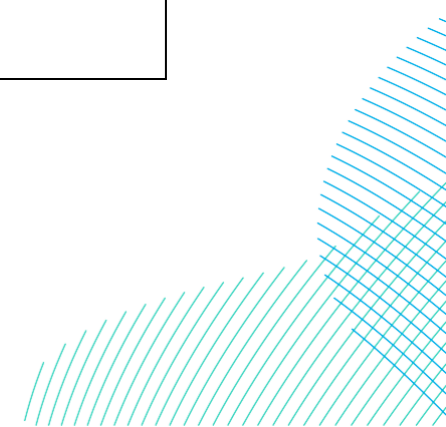
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				and built, we are of the strong opinion that long-term studies on the fish community must be conducted in and around the park to further the knowledge on effects from wind parks on different fish and crustacean species.	No specific monitoring requirements are deemed necessary for fish and shellfish, due to the long-term use of the Dogger Bank as a commercial fishing ground and associated long-term data sources relating to fish and shellfish as a result of this.  Please refer to <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> for further details on this topic.	
SSPF 004	27/06/23	Sweden Pelagic Federation	Commercial Fisheries	2. Impacts on fisheries Large areas on the Dogger Bank are now restricted for fishing practices. This negatively affects our members and other fishermen, who have fished in these areas for generations. Pelagic fishing with midwater trawls or purse seines is a practice that needs large areas, and the towed gear can be well over a kilometre long. Currently, we are not aware of any wind park where fishing with active gear is allowed or practically feasible. Therefore, windmill farms have replaced the historical fishery in many areas. Cumulative effects on fisheries in a larger regional context should be considered, and fishermen compensated by the windmill companies both for the loss of fishing waters and fishing opportunities.	Existing UK legislation does not prohibit commercial fishing within operational offshore wind farms, and for some sites that have fixed foundation options, commercial fishing has continued during this phase. Please refer to Paragraph 245 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> where examples of where fishing has continued successfully are described in detail.  Existing and future fisheries exclusions due to regulation are discussed within the existing environment and future trends in sections 13.5 and 13.5.6 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> , respectively. Furthermore, potential cumulative effects as a result of other plans and projects and fisheries exclusions, such as the Dogger Bank SAC, are considered and assessed within section 13.8 of <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> .	N
SEA 001	17/07/2023	The Environment Agency	Flood Risk and Hydrology	Flood Risk - Flood Risk Lifetime of development – It has been stated previously that you believe the lifetime of this development will be 25 years, which is an extremely short time for such a large and complex investment. We request that	Reference has been made to the Planning Practice Guidance and the guidance on development lifetime provided in Paragraph 006 which states: “The lifetime of a non-residential development depends on the characteristics of that development but a period of at least 75 years is likely to form a starting point for assessment.”  The Applicants note the characteristics of this type of project differ from other non-residential development and is governed by the lifetime of key elements of the Projects. As such it has been confirmed within <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> that the Projects will have an operational lifetime	Y-M



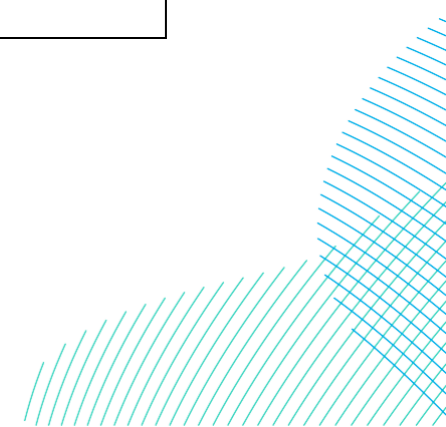
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				although you are working to a 25-year lifetime you assess for a longer lifetime for any above ground infrastructure, such as the onshore substation(s). Please note that the revised Planning Practice Guidance states that non-residential development should include an assessment of at least 75 years. We highlight the need for full justification for the lifetime, and that this may have a bearing on the evidence required and/or need for further modelling. We recommend that a longer lifetime is considered, to ensure that the development would remain safe under a longer lifetime and/or additional climate change impacts.	of up to 30 years. To ensure consistency in approach the Flood Risk Assessment (FRA) has adopted the same development lifetime in its assessment.	
SEA 002	17/07/2023	The Environment Agency	Flood Risk and Hydrology	Flood Risk - Where relevant, your assessment of future flood risk should incorporate a credible maximum scenario.	The FRA includes an assessment period of 30-32 years in line with the lifetime of the development. The guidance on the application of the credible maximum scenarios for NSIPs relates to sea level rise and wave height (coastal flooding) and peak river flow (fluvial flooding) allowances and should be considered as a sensitivity test.  Given the only above ground infrastructure, during the operational phase, is the onshore converter station, which is located in Flood Zone 1 (i.e. at low risk from either coastal or fluvial flooding) it is not considered appropriate to consider the credible maximum scenario further.	N
SEA 003	17/07/2023	The Environment Agency	Flood Risk and Hydrology	Flood Risk - We note that the landfall area (chapter 5, 5.5.1, 200) extends inland to allow the TJBs to be located beyond areas at risk of coastal erosion. We also note that trenchless techniques are to be used at landfall. You should identify a construction methodology for the landfall works that minimises the impact of your development on the environment.	The Landfall Zone has been designed to account for the coastal erosion rates, provided by the Coastal Risk Management Authority in October 2023, Transition Joint Bays (TJBs) will be constructed a suitable distance from the coastline to avoid coastal erosion for the lifetime of the Projects. At the detailed design stage, the location of the compound for the trenchless crossing technique, most likely HDD will be selected based on the outputs of further geotechnical investigation and physical processes modelling that would consider the nearshore coastal processes. This work will also assess the proposed works taking place in the intertidal area should, the ground conditions only be suitable for a short trenchless installation technique that	N



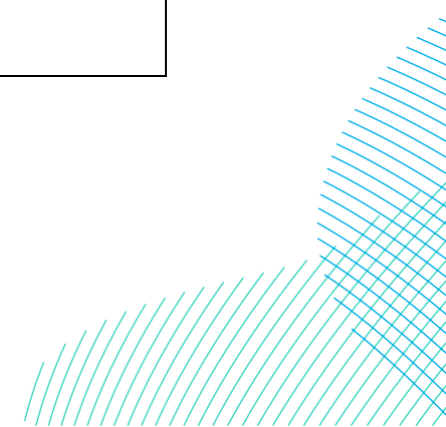
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				<p>The east coast landfall section includes beaches and cliffs, and some hard engineered structures. When finalising a suitable method of works, you should consider the impact on:</p> <ul style="list-style-type: none"> <li>• Nearshore coastal processes (including any trenching or temporary activities that could disrupt sediment transport)</li> <li>• Natural features that influence wave action and local flood risk – for example cliffs and beaches</li> <li>• Any temporary access requirements (e.g., ramps) to the coast, and whether this could introduce a mechanism for increased wave impacts (e.g., ramping or spray).</li> <li>• Other existing development, ensuring no increase in flood risk.</li> </ul>	<p>would exit in the intertidal (between MHWS and MLWS) - further details on worst case intertidal works will be included in the ETG presentation.</p> <p>No direct access to the beach from the Landfall Zone is proposed. An emergency beach access and small compound have been proposed using an existing access track, north of Ulrome. Works would be required to widen the existing access track.</p>	
SEA 004	17/07/2023	The Environment Agency	Flood Risk and Hydrology	<p>Flood Risk - You will need to consider the implications of coastal change on your chosen landfall siting and construction methodology. This will also need to consider the impact on coastal processes both within the development site, and the consequences elsewhere. We recommend you also speak to East Riding of Yorkshire Council as the Coastal Risk Management Authority to obtain latest data and projections on coastal erosion and change. You should also consider precautionary estimates for coastal change, ensuring you set back any infrastructure where</p>	<p>Coastal monitoring data from East Riding of Yorkshire Council is presented in section 8.5.16 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b> and has been used to predict future coastal erosion using the precautionary UK Climate Projections Representative Concentration Pathway 8.5 in section 8.6.2 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>. This information has been used in the design of the Projects, e.g. to inform the appropriate setback distance for the transition joint bays at landfall to allow for predicted erosion of the nearby cliffs over the lifetime of the Projects.</p> <p>Coastal erosion rates from the National Coastal Erosion Risk Mapping data are also quoted in section 8.5.16 of <b>Volume 7, Chapter 8 Marine Physical Environment (application ref: 7.8)</b>.</p>	Y-M



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				coastal erosion is expected to occur. Where relevant, you should consider a credible maximum for coastal change, and consider any implications this may have on flood risk within your site(s). The National Coastal Erosion Risk mapping ( <a href="https://data.gov.uk/dataset/7564fcf7-2dd2-4878-bfb9-11c5cf971cf9/national-coastal-erosion-risk-mapping-ncerm-national-2018-2021">https://data.gov.uk/dataset/7564fcf7-2dd2-4878-bfb9-11c5cf971cf9/national-coastal-erosion-risk-mapping-ncerm-national-2018-2021</a> ) may be of relevance to your assessment.		
SEA 005	17/07/2023	The Environment Agency	Flood Risk and Hydrology	Please note that a new national product is in the process of being developed (NCERM2) mapping coastal erosion. This is likely to be available by the end of the year.	NCERM2 data was not published prior to 31 <sup>st</sup> March 2024, and thus was not available to inform this assessment.	N
SEA 006	17/07/2023	The Environment Agency	Flood Risk and Hydrology	Flood Risk - 5.1.6.4 bullet points – where the cable is crossing defences this will likely require monitoring to ensure there is no detrimental impact to defences (e.g., no settlement occurs as a result of trenchless techniques). This is to ensure that the standard of protection of defences is maintained.	The need for a monitoring programme during construction, to ensure flood defences continue to function, is referenced in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> , with the final CoCP secured as a requirement within the DCO.	Y-D
SEA 007	17/07/2023	The Environment Agency	Land Use	Flood Risk - Please note that the Environment Agency has land ownership in the vicinity of the preferred cable route at Holderness Drain, the River Hull & Beverley and Barmston Drain. We recommend discussing the necessary requirements with our	Noted. The Environment Agency have been contacted by the Applicants.	N



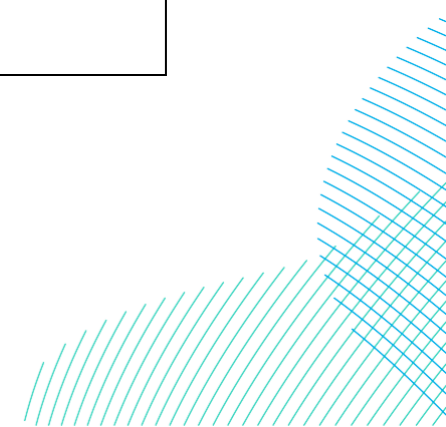
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				Estates Team as soon as is possible.		
SEA 008	17/07/2023	The Environment Agency	Flood Risk and Hydrology	<p>Flood Risk - We note that trenchless techniques are to be used for all main river crossings. All associated construction activities (e.g., reception pits and compounds) should be located at least 20metres from any 'main river,' or from the nearest toe of any flood defences. Where practical, we would advise ensuring all construction activities are located outside the floodplain, but if this is not possible you should consider the nature of risk and ensure there is suitable mitigation in place. We would ask that the depth of any permanent infrastructure below watercourses is maximised to minimise potential interaction with current, or any planned, infrastructure (e.g., sheet piles).</p> <p>You will also need to take account of any existing flood risk strategy, or any new emerging strategies. Specifically, we highlight ongoing review of options associated with flood defences within the catchment which could include removal or relocation of flood defences, although no decisions have been taken at this time</p>	<p>All trenchless construction activities would be located at least 20m from any 'Main River,' or from the nearest toe of any flood defences and would be installed at a depth to minimise potential interaction with current, or any planned, infrastructure (e.g., sheet piles).</p> <p>Where soil storage in Flood Zones 2 and 3 is unavoidable, spoil storage areas will be located such that they don't block or divert existing surface water flow paths. Topsoil and subsoil will be stored in separate stockpiles in line with DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites PB13298, or the latest relevant available guidance. Once the stockpile has been completed the area should be cordoned off with secure fencing to prevent any disturbance or contamination by other construction activities. If the soil is to be stockpiled for more than six months, the surface of the stockpiles would be seeded with a grass/clover mix to minimise soil erosion. In the worst case soil storage may need to be up to six years.</p> <p>The Projects will take account of any existing flood risk strategy, or any new emerging strategies, such as potential removal / relocation of flood defences, where this is identified.</p>	Y-D
SEA 009	17/07/2023	The Environment Agency	Flood Risk and Hydrology	<p>Flood Risk - A number of ordinary watercourses exist within the study area, and we recommend you also speak to relevant Internal</p>	<p>Crossing methods will be agreed with the relevant authority at the detailed design stage, to include the Environment Agency, IDB and East Riding of Yorkshire Council (as the LLFA).</p>	N



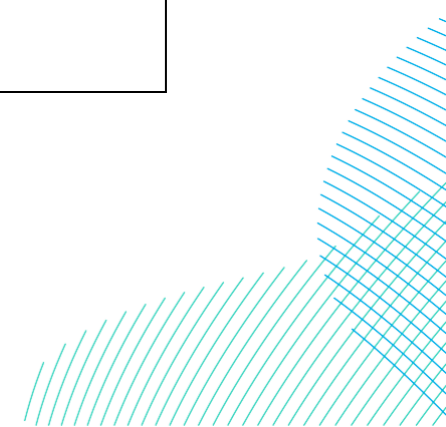
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>Drainage Boards and the Lead Local Flood Authority. It would be useful to align expectations around watercourse crossing methodology and consider the overall impact on flood risk management given the interconnection of drainage and flood risk within the study area.</p>	<p>The proposed crossing method has been included in <b>Volume 7, Appendix 5-2- Obstacle Crossing Register (application ref: 7.5.5.2)</b>. All Environment Agency Main Rivers will be crossed by trenchless crossing, whilst smaller drains and watercourses (i.e. Ordinary Watercourses) have been proposed to utilise an open cut crossing methodology.</p> <p>The following IDB drains will be crossed by open cut (trenching):</p> <ul style="list-style-type: none"> <li>• Dunnington Sewer</li> <li>• Arnold and Riston Drain (note there is a preference for HDD at this location but all options are retained)</li> <li>• South Bullock (N. Branch - Diggins Arms)</li> </ul> <p>There are two trenchless crossings of IDB drains:</p> <ul style="list-style-type: none"> <li>• Turf Gutter &amp; Eske River Side Drain</li> <li>• Skipsea Drain (West Branch)</li> </ul> <p>There are two haul road only crossings of IDB drains:</p> <ul style="list-style-type: none"> <li>• Storkhill Drain</li> <li>• South Bullock (S. Branch - Chalk Arm)</li> </ul> <p>There are a further 15 crossings (trenched and trenchless) within the IDB catchment. These are drains managed by riparian owners, not the IDB.</p> <p>There are seven HDD crossings of Main Rivers located in the IDB catchment area.</p> <p>Three sections of Ordinary Watercourse will be subject to redirection at the Onshore Converter Station(s). These along with surface water drainage from the site will be managed in accordance with the measures described in <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> (issued for review ahead of the ETG).</p>	
SEA 010	17/07/2023	The Environment Agency	Flood Risk and Hydrology	<p>Flood Risk - We would expect to see that your crossing methodology considers the impact of flood risk on your site, and flood risk from your site; ensuring it will not increase flood risk to others. A number of existing crossing points exist, and we would expect to see the number of watercourse crossing locations minimised. Where temporary crossings are required, we would ask for further details ensuring these will not increase flood risk; and are removed without causing damage</p>	<p>As noted above, crossing methods will be agreed with the relevant authority at the detailed design stage, to include the Environment Agency, IDB and East Riding of Yorkshire Council (as the LLFA).</p> <p>The proposed crossing method is included in <b>Volume 7, Appendix 5-2- Obstacle Crossing Register (application ref: 7.5.5.2)</b>. Key watercourse crossings are listed above, detailed in the ES chapter <b>Volume 7, Figure 20-5</b> and <b>Figure 20-6 (application ref: 7.20.1)</b> and shown on a figure to accompany the FRA, <b>Volume 7, Figure 20-4-1 (application ref: 7.20.20.1)</b>.</p> <p>As noted above, all 'Main Rivers' would also be crossed by a trenchless technique (likely HDD) and access to flood defences would be maintained throughout. Where we are required to pass under an Environment Agency flood defence suitable monitoring requirements would be agreed with the Environment Agency, as indicated in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>, with the</p>	N

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				to watercourses or flood defences. Where crossings are required, where possible we would expect to see clear span crossings used (especially on main rivers). The Environment Agency are likely to object to the use of culverts, in line with our position on their usage. Many of the 'main rivers' within the study area are unlikely to suitable candidates for culverts. Consideration will also need to be given to access to flood defences and avoiding or minimising potential damage to flood infrastructure (including flood embankments).	final CoCP secured as Requirement 19 within <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> ,	
SEA 011	17/07/2023	The Environment Agency	Flood Risk and Hydrology	<p>Flood Risk - The following aspects are likely to be of interest to the Environment Agency around flood risk aspects of your project during construction:</p> <ul style="list-style-type: none"> <li>(i) Crossing locations around watercourses / flood defences <ul style="list-style-type: none"> <li>a. Current infrastructure</li> <li>b. Future infrastructure</li> </ul> </li> <li>(ii) Working corridor within flood risk areas</li> <li>(iii) Need for EPR Flood Risk Activity Permits &amp; Byelaws (plus any other consents, e.g., IDB)</li> <li>(iv) Estates / EA land ownership</li> <li>(v) Haul roads</li> </ul>	<p>Crossing methods will be agreed with the relevant authority at the detailed design stage, to include the Environment Agency, IDB and East Riding of Yorkshire Council (as the LLFA).</p> <p>The proposed crossing method is included in <b>Volume 7, Appendix 5-2- Obstacle Crossing Register (application ref: 7.5.5.2)</b>. Key watercourse crossings are listed above, detailed in <b>Volume 7, Chapter 20 Flood Risk and Hydrology (application ref: 7.20)</b> and shown on a figure to accompany the FRA.</p> <p>The most extensive area of Flood Zone 3 that is crossed by the Projects is located to the north east of Beverley and also broadly coincides with the IDB catchment. The onshore export cable corridor through this area would be 75 to 90m in width.</p> <p>A haul road would be located within the Onshore Development Area and would be 5m wide (increasing to 8m at passing places) (<b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>). Construction of the temporary haul roads will include placement of suitable graded imported material onto a prepared sub-soil, potentially with a reinforcing geogrid(s) and / or a geotextile separator.</p> <p>Protective provisions have been included in <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> and shared with the Environment Agency for agreement with the disapplication of the permitting regime.</p>	N

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SEA 012	17/07/2023	The Environment Agency	Flood Risk and Hydrology	Flood Risk - Works in, over, under or close to main rivers or flood risk infrastructure are also likely to require Flood Risk Activity Permits under the 2016 Environmental Permitting Regulations. Please also read our comments with respect to the option of disapplying this permitting regime and the need to discuss this with us early if you are considering it. If you are considering seeking disapplication of the flood risk permitting regime as part of your DCO, please contact us early to discuss this. We are likely to request the use of protective provisions if we do agree to disapply; or we may ask for legal agreements around specific aspects.	Protective provisions have been included in <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> and shared with the Environment Agency for agreement with the disapplication of the permitting regime.	Y-M
SEA 013	17/07/2023	The Environment Agency	Flood Risk and Hydrology	Flood Risk - With respect to the FRA, we note that it takes into account East Riding Yorkshire Council's SFRA & Mapping, and that the Substations and TJB's are located in flood zone 1. The flood zones in this area are based on generalised modelling, and therefore you are likely to want to revisit this to ensure it meets your requirements and gives confidence to any conclusions. We also recommend speaking to the LLFA about any other evidence they hold, along with other developers.	As part of <b>Volume 7, Appendix 20-4 - Flood Risk Assessment (application ref: 7.20.20.4)</b> , Product 4, 5, 6 and 8 data request was submitted to the Environment Agency, via email, on 19th October 2023 and a response provided on 28th November 2023. The information provided as part of this data request has been considered within the FRA.  Flood risk from all sources, identified by the NPPF, is considered in the FRA as well as all data from relevant stakeholders.	Y-M

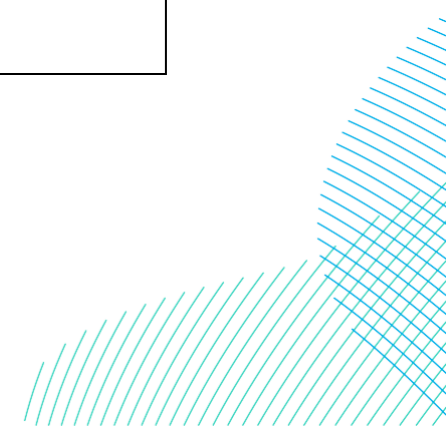


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SEA 014	17/07/2023	The Environment Agency	Flood Risk and Hydrology	Flood Risk - Care must also be taken to avoid reducing flood storage or affecting flood conveyance routing. Land raising in areas of flood zone 3 will not be permitted where this would reduce flood storage or conveyance as this could increase flood risk elsewhere. If modifying ground levels in areas of flood zone 3 is required then you will be required to demonstrate that this will not have an adverse impact on storage and conveyance, through use of flood routing and compensatory storage. This should also consider the impact of climate change (noting that the existing flood map does not include any allowances for climate change).	Flood risk from all sources and taking into account climate change impacts and risks associated with flood storage and conveyance is fully addressed in <b>Volume 7, Appendix 20-4 - Flood Risk Assessment (application ref: 7.20.20.4)</b> .  Construction works in Flood Zone 3 are limited to the excavation and installation of the onshore export cables, trenched and trenchless crossings, temporary construction compounds and the temporary haul road. During the construction phase the Projects will include measures, outlined in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> and to be secured as part of the DCO, to ensure there is no impact on flood risk.  Once the Projects are constructed there will be no above ground infrastructure in Flood Zone 3 and the land will be reinstated to ensure there is no flood risk impact.	N
SEA 015	17/07/2023	The Environment Agency	Flood Risk and Hydrology	Flood Risk - We also note that for the cable route that ground levels will be reinstated to existing levels so that long term there is no change to flood storage or flow routes (para 148). Paragraph 308 states that entry exit points for trenchless techniques will be a minimum of 9m from the banks of any watercourse. This will also need to take into account the presence of any defences - i.e., will need to be a minimum of 9m from the landward toe of any defences.	Entry and exit points will take into account any defences and maintain a minimum set back of 9m, as detailed in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> and <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> . In the worst case soil storage may need to be up to six years in a sequential construction scenario for the two Projects.	Y-M
SEA 016	17/07/2023	The Environment Agency	Flood Risk and Hydrology	Flood Risk - Paragraph 310 we concur that the final depths of the watercourse crossings will need to be informed by detailed Site	The crossing methodology (which is described in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> for water crossings and flood defences	N



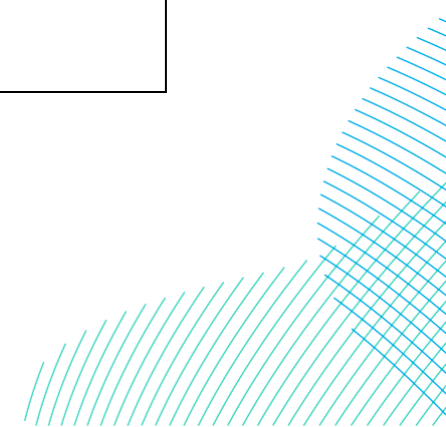


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				investigation. This is especially important where any defences are present, and we would recommend early engagement with respect to these works.	will be agreed prior to construction at the detailed design stage with the Environment Agency.	
SEA 017	17/07/2023	The Environment Agency	Flood Risk and Hydrology	Flood Risk - Paragraph 314 states that following construction any temporary access roads, and compounds will be reinstated. You should still ensure that any temporary roads / compounds conform to existing levels, or do not displace flood flows onto others or divert existing flow routes (as stated above).	Where temporary access roads and compounds are required during construction, existing ground levels will be used so as not to alter surface water flow paths. Following construction, the ground surface will also be reinstated to its pre-development status. This is set within <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> included as part of the DCO application., to be secured.	Y-D
SEA 018	17/07/2023	The Environment Agency	Flood Risk and Hydrology	Flood Risk - We would recommend that any flood warning and evacuation plan is agreed with the Emergency Planners at East Riding of Yorkshire Council.	A flood warning and evacuation plan (FWEP) will be agreed with the Emergency Planning Officer(s) at East of Riding of Yorkshire Council prior to construction. This is referenced in <b>Volume 7, Appendix 20-4 - Flood Risk Assessment (application ref: 7.20.20.4)</b> and the requirements related to the Emergency Response, Evacuation and Pollution Control Plan which will be developed post-consent as part of the detailed CoCP.	N
SEA 019	17/07/2023	The Environment Agency	Geology and Land Quality	Groundwater and Contaminated Land Overall, in relation to groundwater and contaminated land, we are satisfied that the *project has recognised sources of pollution/risks and receptors throughout the construction phase. The mitigation measures stated to be put in place will be able to effectively alleviate the potential risks to groundwater and contaminated land. We note that all details have not been finalised at this stage.	An updated assessment of potential sources of contamination within the Onshore Development Area are provided in Table 19-10 and supported by <b>Volume 7, Appendix 19-2 - Geo-Environmental Desk Study and Preliminary Risk Assessment Report (application ref: 7.19.19.2)</b> . The potential contaminants associated with each of the sources, and which area of the Onshore Development Area may be impacted, are provided in Table 19-11 of the chapter and <b>Volume 7, Figures 19-4 and Figure 19-5(application ref: 7.19.1)</b> .  The updated assessment has identified the potential impacts, and mitigation measures, associated with the mobilisation of pre-existing sources of contamination, and the introduction of new sources, during construction and operation are discussed in section 19.6.1 and 19.6.2 of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b> . Potential impacts to human health and controlled waters are discussed within section 19.6.1 and 19.6.2 of <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> .	N



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				We agree with the Outline Code of Construction Practice, but recognise that is in an outline, and further details need to be confirmed.		
SEA 020	17/07/2023	The Environment Agency	Geology and Land Quality	<p>Source Protection Zones We are pleased to see that source protection zones and licensed abstraction points are acknowledged along the route. Please ensure you contact the council regarding their records for private water supplies. The Environment Agency do not hold records, or would be made of aware, of any small, private boreholes, streams or abstractions which do not require a license. The local council will hold this information.</p> <p>We agree that source protection zone 1 is classed as a high sensitivity receptor, and source protection zones 2 and 3, the principle aquifer and off site (250m) potable abstractions are classed as medium sensitivity receptors.</p>	<p>Information in relation to private groundwater abstractions has been received from ERYC. A review of the additional information has been included within <b>Volume 7, Appendix 19-2 (application ref: 7.19.19.2)</b> with a summary provided in Table 19-10 of the <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b>.</p> <p>An updated impact assessment has been undertaken in light of the additional information for the construction and operation phases (see section 19.6 of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b>).</p>	Y-M
SEA 021	17/07/2023	The Environment Agency	Geology and Land Quality	<p>Groundwater The Outline Code of Construction Practice recognises the bedrock (Chalk Group) and importance of the Principal Aquifer which the project is situated on. It is noted that relevant controls for drilling on this aquifer will be included in a later version of the OCoCP. We would welcome this.</p>	<p>The refinement of the Onshore Development Area has not resulted in the exclusion of Principal Aquifers or other sensitive water features.</p> <p>Measures protective of controlled waters as a whole, including SPZs and groundwater abstractions, form part of the embedded mitigation measures discussed within <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b> (see Table 19.3). Measures such as adhering to best practice and strategies for dealing with spillages are incorporated into <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>. Additional measures, such as undertaking pre-construction ground investigations, hydrogeological risk assessments and piling risk assessments will also be protective of controlled waters within the Onshore</p>	N

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					Development Area and its surroundings (see Table 19-3 and sections 19.6.1.2, 19.6.1.3 and 19.6.2.2 of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b> ).	
SEA 022	17/07/2023	The Environment Agency	Geology and Land Quality	We welcome the acknowledgment that all works on site are planned in accordance with the locations of sensitive ground water features to ensure their protection, and that hydrogeological risk assessments will be undertaken in advance of construction of the onshore export cable.	The refinement of the Onshore Development Area has not resulted in the exclusion of Principal Aquifers or other sensitive water features.  Measures protective of controlled waters as a whole, including SPZs and groundwater abstractions, form part of the embedded mitigation measures discussed within <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b> (see Table 19.3). Measures such as adhering to best practice and strategies for dealing with spillages are incorporated into <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> . Additional measures, such as undertaking pre-construction ground investigations, hydrogeological risk assessments and piling risk assessments will also be protective of controlled waters within the Onshore Development Area and its surroundings (see Table 19-3 and sections 19.6.1.2, 19.6.1.3 and 19.6.2.2 of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b> ).	N
SEA 023	17/07/2023	The Environment Agency	Geology and Land Quality	Contaminated Land We are pleased to see acknowledgement of potentially contaminated land and industrial past land usage marked along the route, including, landfills, garages, petrol stations etc. We recommend that developers should: <ul style="list-style-type: none"> <li>• Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination,</li> <li>• Refer to our Guiding principles for land contamination for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health</li> </ul>	The Preliminary [Geo environmental] Risk Assessment (PRA) ( <b>Volume 7, Appendix 19-2 (application ref: 7.19.19.2)</b> ) has been undertaken in line with all relevant and up to date guidance and legislation. The 2023 updates to the Land Contamination Risk Management framework have also been taken into consideration when completing the risk assessment.	N



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				<ul style="list-style-type: none"> <li>• Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed</li> <li>• Refer to the contaminated land pages on gov.uk for more information</li> </ul>		
SEA 024	17/07/2023	The Environment Agency	Geology and Land Quality	<p>Waste</p> <p>We are pleased to see discussion on waste which could be produced during the works, including hazardous material from contaminated land. We note and welcome the plan to produce a 'Site Waste Management Plan', and a Materials Management Plan. Please note the following:</p> <p>Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:</p> <ul style="list-style-type: none"> <li>• Duty of Care Regulations 1991</li> <li>• Hazardous Waste (England and Wales) Regulations 2005</li> <li>• Environmental Permitting (England and Wales) Regulations 2016</li> <li>• The Waste (England and Wales) Regulations 2011</li> </ul> <p>Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN</p>	<p>A Waste Assessment has been produced to support the DCO application (<b>Volume 7, Appendix 19-3 (application ref: 7.19.19.3)</b>) of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b>. This considers this waste management legislation.</p> <p>We do not expect any wastes to require sampling to characterise their properties, however the Site Waste Management Plan that will be produced for the construction phase, based on <b>Volume 8, Appendix E -Outline Site Waste Management Plan of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> will include procedures to review any unknown wastes, and where required will undertake sampling and characterisation through suitably qualified contractors to inform hazards and appropriate management options.</p>	N

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				<p>14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.</p> <p>If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on GOV.UK for more information.</p>		
SEA 025	17/07/2023	The Environment Agency	Geology and Land Quality	<p>General Pollution Prevention Measures</p> <p>We note that pollution prevention measures have been included in the Outline CoCP, and we agree. We are particularly pleased to note that special pollution measures will be implemented in SPZ1 and SPZ2, which is in line with The Environment Agency's approach to groundwater protection.</p>	<p>The refinement of the Onshore Development Area has not resulted in the exclusion of Principal Aquifers or other sensitive water features.</p> <p>Measures protective of controlled waters as a whole, including SPZs and groundwater abstractions, form part of the embedded mitigation measures discussed within <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b> (see Table 19.3). Measures such as adhering to best practice and strategies for dealing with spillages are incorporated into <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>. Additional measures, such as undertaking pre-construction ground investigations, hydrogeological risk assessments and piling risk assessments will also be protective of controlled waters within the Onshore Development Area and its surroundings (see Table 19-3 and sections 19.6.1.2, 19.6.1.3 and 19.6.2.2 of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b>).</p>	N
SEA 026	17/07/2023	The Environment Agency	Flood Risk and Hydrology	<p>Drainage</p> <p>It is noted that drainage details have not been finalised yet. We are pleased that drainage solutions will be developed and agreed with the appropriate regulators, and that</p>	<p><b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> will form the basis for the detailed surface water drainage scheme, which would be submitted to East Riding of Yorkshire Council, as the LLFA for approval prior to the commencement of construction of the Projects. This will include a temporary construction drainage scheme which will also be developed prior to construction, in consultation with</p>	N

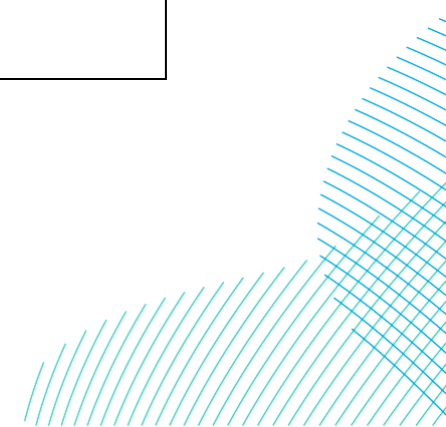
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				reference has been made for the need to apply for permits from The Environment Agency for discharge and dewatering/abstraction activities. Please note; where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.	landowners, the LLFA (East Riding of Yorkshire Council), the Environment Agency and relevant Internal Drainage Board(s), where appropriate.  A hydrogeological risk assessment for SuDS has been incorporated into <b>Volume 7, Appendix 20-3 Water Environment Regulations Compliance Assessment (application ref: 7.20.20.3)</b> and is detailed in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> .	
SEA 027	17/07/2023	The Environment Agency	Terrestrial Ecology and Ornithology	Chapter 18 18.3.1 Study Area (page 10) Has a decision been made on what are the gaps in the data collected to date, that will require additional surveying in 2023?	All survey access was granted in 2023 and the full suite of surveys have been completed to support the ES and agreed with the EA and NE at the Terrestrial Ecology and Ornithology ETG. The findings of these surveys are presented in the ES and survey reports appended to the ES ( <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> ).	N
SEA 028	17/07/2023	The Environment Agency	Terrestrial Ecology and Ornithology	Fish - Page 17 - it is good to see that Horizontal Directional Drilling (HDD) is to be used to go under watercourses and therefore avoid any negative ecological impacts. Will the cable route need to cross Leven Canal via HDD?	No, Leven Canal SSSI is outside of the development area and there will be no need to cross it with the cable route. See <b>Volume 7, Figures 18-2, 18-3 and 18-4 (application ref: 7.18.1)</b> .	N
SEA 029	17/07/2023	The Environment Agency	Terrestrial Ecology and Ornithology	Page 42 18.4.7 Biodiversity Net Gain We would welcome confirmation as to when RWE will be in a position to announce what BNG will be undertaken as part of this project.	BNG proposals are summarised in <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> and detailed in the BNG Strategy ( <b>Volume 7, Appendix 18-10 Biodiversity Net Gain Strategy (application ref: 7.18.18.10)</b> ).	N
SEA 030	17/07/2023	The Environment Agency	Terrestrial Ecology and Ornithology	General points The mitigation proposed for the scheme will avoid all adverse ecological impacts on	Noted.	N

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				the priority habitats and species present in this part of East Yorkshire.		
SEA 031	17/07/2023	The Environment Agency	Terrestrial Ecology and Ornithology	It would be preferable to have an ecologist on site while the work is going ahead. They could check the area to be cleared a short while before work starts.	The details of when an Ecological Clerk of Works (ECoW) will be present on site are in <b>Volume 8, Outline Ecological Management Plan (application ref: 8.10)</b> that is submitted with the DCO application.	N
SEA 032	17/07/2023	The Environment Agency	Terrestrial Ecology and Ornithology	Page 82 'In locations where this measure cannot be accommodated, certain habitats (such as hedgerows and small amounts of scrub) would be checked by an ecologist for the presence of active birds' nests. Where this check confirms the absence of active nests, clearance works can proceed shortly after, within no more than 48 hours of the check'.	The requirement for an ECoW is included in <b>Volume 8, Outline Ecological Management Plan (application ref: 8.10)</b> .	N
SEA 033	17/07/2023	The Environment Agency	Terrestrial Ecology and Ornithology	Page 86 - Fish Any over-pumping of a watercourse where fish could be present, should have pumps fitted with a 2mm diameter wide mesh over the intakes to prevent elvers and other small fish becoming sucked in (as per the Eel Regulations).	Crossings of Main Rivers will be undertaken via a trenchless technique such as HDD. Temporary crossings of other watercourses may comprise an appropriately sized culvert installed within the ditch with the Haul Road being installed over the top of the culvert. If culverts are needed, they will be adequately sized to avoid impounding flows (including allowing for increased winter flows as a result of climate change) and the invert set below bed level to allow bedload transport.	N
SEA 034	17/07/2023	The Environment Agency	Terrestrial Ecology and Ornithology	Page 95 - INNS East Yorkshire is fortunate that it is does not have a significant problem with invasive non-native plant species including Himalayan Balsam. The working area must be checked for invasive non-native	Results of the habitat survey including search for INNS are presented in the ES <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> and <b>Volume 7, Appendix 18-2 Habitat Survey Report (application ref: 7.18.18.2)</b> . All mitigation measures are provided in the <b>Volume 8, Outline Ecological Management Plan (application ref: 8.10)</b> submitted with the DCO application.  Prior to the commencement of construction works, an INNS Management Plan will be developed for approval by the relevant stakeholders. This plan will likely include the	N

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				plant species such as Himalayan Balsam and Japanese Knotweed prior to starting work. If these species are present, an eradication plan should be put in place. Himalayan Balsam can be pulled up or sprayed with a Glyphosate based herbicide. Japanese Knotweed can either be stem injected or treated with a hand-held backpacker sprayer using a Glyphosate based herbicide.	following measurements: <ul style="list-style-type: none"> <li>• A plan of all INNS locations and extents;</li> <li>• A protocol for removing INNS and or managing the waste generated;</li> <li>• Good site practice measures for managing the spread of INNS during works at watercourses; and</li> <li>• A requirement for an ECoW and details of their responsibilities with respect to INNS.</li> </ul>	
SEA 035	17/07/2023	The Environment Agency	Terrestrial Ecology and Ornithology	When bringing plant and equipment to site from elsewhere, it must be thoroughly checked for invasive non-native plant species and cleaned in the site compound before being allowed on site. This procedure should be repeated before the plant and equipment leaves the site to go to another location.	Noted, this is stated in the <b>Volume 8, Outline Ecological Management Plan (application ref: 8.10)</b> that is submitted with the DCO application.	N
SEA 036	17/07/2023	The Environment Agency	Geology and Land Quality	Waste Movement of Waste Off-Site The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes. The code of practice applies to you if you produce, carry, keep, dispose of, treat, import, or have control of waste in England or Wales. The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly and only given to businesses authorised to take it.	A Waste Assessment has been produced to support the DCO application ( <b>Volume 7, Appendix 19-3 Onshore Waste Assessment (application ref: 7.19.19.3)</b> ) of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b> .  We do not expect any wastes to require sampling to characterise their properties, however the Site Waste Management Plan that will be produced for the construction phase, based on <b>Volume 8, Appendix E - Outline Site Waste Management Plan of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> will include procedures to review any unknown wastes, and where required will undertake sampling and characterisation through suitably qualified contractors to inform hazards and appropriate management options.	N

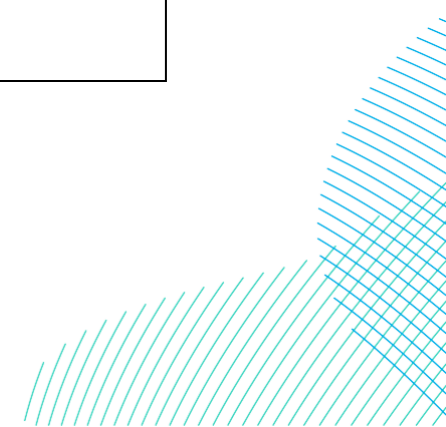


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				<p>The code of practice can be found here:  <a href="https://www.gov.uk/government/publications/waste-duty-of-care-code-of-practice">https://www.gov.uk/government/publications/waste-duty-of-care-code-of-practice</a>.</p>		
SEA 037	17/07/2023	The Environment Agency	Geology and Land Quality	<p>Waste - The developer must apply the waste hierarchy as a priority order of prevention, re-use, recycling before considering other recovery or disposal options. Government guidance on the waste hierarchy in England can be found here:  <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf</a>                      Site Waste Management Plans (SWMP) are no longer a legal requirement, however, in terms of meeting the objectives of the waste hierarchy and your duty of care, they are a useful tool and considered to be best practice. In order to meet the applicant's objectives for the waste hierarchy and obligations under the duty of care, it is important that waste is properly classified. Proper classification of the waste both ensures compliance and enables the correct onward handling and treatment to be applied. More information on this can be found here: <a href="https://www.gov.uk/how-to-classify-different-types-of-waste">https://www.gov.uk/how-to-classify-different-types-of-waste</a></p> <p>Where a development involves any significant construction or related</p>	<p>A Waste Assessment has been produced to support the DCO application (<b>Volume 7, Appendix 19-3 (application ref: 7.19.19.3)</b>) of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b>.</p> <p>We do not expect any wastes to require sampling to characterise their properties, however the Site Waste Management Plan that will be produced for the construction phase, based on <b>Appendix E - Outline Site Waste Management Plan of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> will include procedures to review any unknown wastes, and where required will undertake sampling and characterisation through suitably qualified contractors to inform hazards and appropriate management options.</p>	N

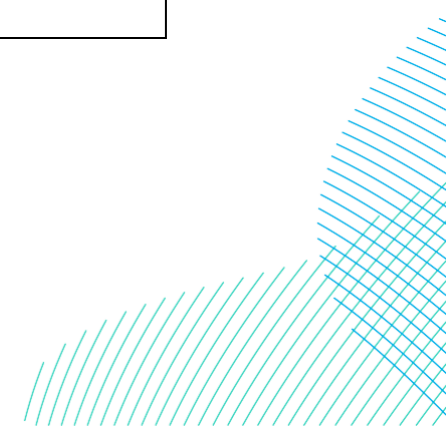


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				activities, we would recommend using a management and reporting system to minimise and track the fate of construction wastes, such as that set out in PAS402: 2013, or an appropriate equivalent assurance methodology. This should ensure that any waste contractors employed are suitably responsible in ensuring waste only goes to legitimate destinations.		
SEA 038	17/07/2023	The Environment Agency	Geology and Land Quality	<p>Waste - Use of Waste On-Site If materials that are potentially waste are to be used on-site, the applicant will need to ensure they can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc...' in order for the material not to be considered as waste. Meeting these criteria will mean waste permitting requirements do not apply.</p> <p>Where the applicant cannot meet the criteria, they will be required to obtain the appropriate waste permit or exemption from us.</p> <p>A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as:</p> <ul style="list-style-type: none"> <li>• any operation the principal result</li> </ul>	<p>A Waste Assessment has been produced to support the DCO application (<b>Volume 7, Appendix 19-3 Onshore Waste Assessment (application ref: 7.19.19.3)</b>) of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b>.</p> <p>We do not expect any wastes to require sampling to characterise their properties, however the Site Waste Management Plan that will be produced for the construction phase, based on <b>Appendix E - Outline Site Waste Management Plan of Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> will include procedures to review any unknown wastes, and where required will undertake sampling and characterisation through suitably qualified contractors to inform hazards and appropriate management options.</p>	N

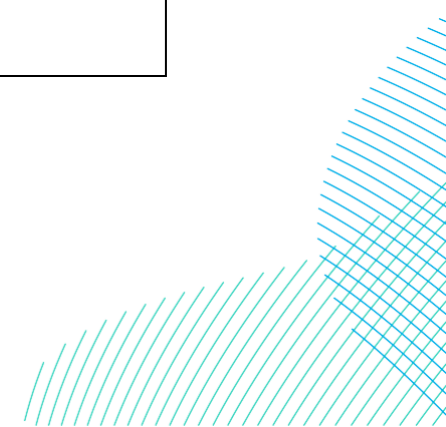
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				<p>of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.</p> <ul style="list-style-type: none"> <li>We have produced guidance on the recovery test which can be viewed at <a href="https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery-permits#how-to-apply-for-an-environmental-permit-to-permanently-deposit-waste-on-land-as-a-recovery-activity">https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery-permits#how-to-apply-for-an-environmental-permit-to-permanently-deposit-waste-on-land-as-a-recovery-activity</a>.</li> </ul> <p>You can find more information on the Waste Framework Directive here: <a href="https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-framework-directive">https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-framework-directive</a> More information on the definition of waste can be found here: <a href="https://www.gov.uk/government/publications/legal-definition-of-waste-guidance">https://www.gov.uk/government/publications/legal-definition-of-waste-guidance</a>. More information on the use of waste in exempt activities can be found here: <a href="https://www.gov.uk/government/collections/waste-exemptions-using-waste">https://www.gov.uk/government/collections/waste-exemptions-using-waste</a></p> <p>Non-waste activities are not regulated by us (i.e., activities carried out under the CL:ARE Code</p>		



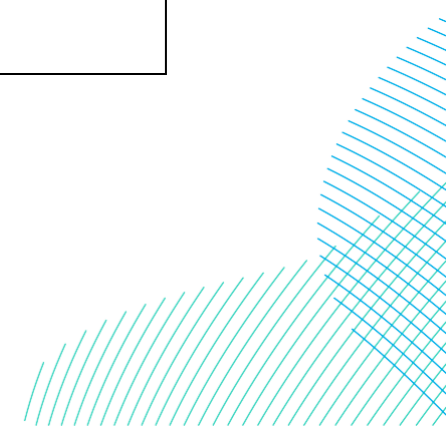
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				of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the Waste Framework Directive). The 'Is it waste' tool, allows you to make an assessment and can be found here: <a href="https://www.gov.uk/government/publications/isitwaste-tool-for-advice-on-the-by-products-and-end-of-waste-tests">https://www.gov.uk/government/publications/isitwaste-tool-for-advice-on-the-by-products-and-end-of-waste-tests</a>		
SEA 039	17/07/2023	The Environment Agency	EIA Methodology	Scoping Comments Finally, please note that the advice provided in our EIA scoping responses to PINS; - PINS ref: EN010125-000010 and our ref: RA/2021/143813/01 (8 December 2021) - PINS ref: EN010125-000181 and our ref: RA/2022/144749/01 (23 August 2022) This advice still applies and should be accounted for during the preparation of future assessments.	Noted reference to the scoping comments is made in in <b>Volume 7, Appendix 19-1 Geology and Land Quality Consultation Responses (application ref: 7.19.19.1).</b>	N
STH 012	14/07/2023	Trinity House	Shipping and Navigation	Any navigable channel or corridor between Dogger Bank A and the DBS array areas should comply with MGN 654.	Refinement of the DBS array areas following PEIR have resulted in the length of the gap between DBS West and Dogger Bank A being shortened and is MGN 654 compliant as discussed in section 14.6 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14).</b>	Y-D
STH 001	14/07/23	Trinity House	Consultation	1) The undertaker must inform the MMO Coastal Office in writing at least 5 days prior to the commencement of the authorised project or any part thereof, and	Noted.	N



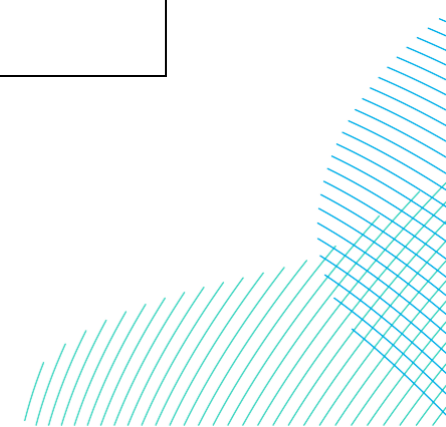
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				within 5 days of completion of the authorised project.		
STH 002	14/07/23	Trinity House	Shipping and Navigation	<p>2) The Kingfisher Information Service of Seafish, must be informed of details of the vessel routes, timings and locations relating to the construction of the authorised project or any part thereof by email to kingfisher@seafish.co.uk :-</p> <p>a) at least 14 days prior to the commencement of offshore activities, for inclusion in the Kingfisher Fortnightly Bulletin and offshore hazard awareness data, and;</p> <p>b) as soon as reasonably practicable and no later than 24 hours of completion of all offshore activities.</p> <p>Confirmation of notification must be provided to the MMO within 5 days.</p>	<p>Noted, the Applicants have committed to this through the following DMLs within <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b>:</p> <ul style="list-style-type: none"> <li>• DML 1 &amp; 2 - Condition 9</li> <li>• DML 3 &amp; 4 - Condition 7</li> <li>• DML 5 - Condition 5</li> </ul>	Y-M
STH 003	14/07/23	Trinity House	Shipping and Navigation	<p>3) The undertaker must ensure that a local notification to mariners is issued at least 14 days prior to the commencement of the authorised project or any part thereof advising of the start date of each Work No.&lt;insert&gt; and the expected vessel routes from the construction ports to the relevant location.</p> <p>Copies of all notices must be</p>	<p>Noted, the Applicants have committed to this through the following DMLs within <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b>:</p> <ul style="list-style-type: none"> <li>• DML 1 &amp; 2 - Condition 9</li> <li>• DML 3 &amp; 4 - Condition 7</li> <li>• DML 5 - Condition 5</li> </ul>	Y-M



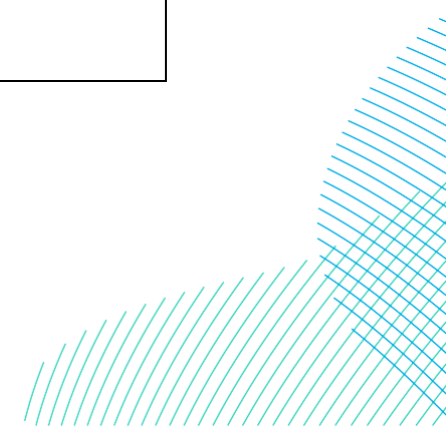
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				provided to the MMO, MCA and UKHO within 5 days.		
STH 004	14/07/23	Trinity House	Shipping and Navigation	<p>4) The undertaker must ensure that local notifications to mariners are updated and reissued at weekly intervals during construction activities and at least 5 days before any planned operations (or otherwise agreed) and maintenance works and supplemented with VHF radio broadcasts agreed with the MCA in accordance with the construction and monitoring programme approved under deemed marine licence condition &lt;insert&gt;.</p> <p>Copies of all notices must be provided to the MMO and UKHO within 5 days.</p>	<p>Noted, the Applicants have committed to this through the following DMLs within <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b>:</p> <ul style="list-style-type: none"> <li>DML 1 &amp; 2 - Condition 9</li> <li>DML 3 &amp; 4 - Condition 7</li> <li>DML 5 - Condition 5</li> </ul>	Y-M
STH 005	14/07/23	Trinity House	Shipping and Navigation	<p>5) The undertaker must notify the UKHO of the completion (within 14 days) of the authorised project or any part thereof in order that all necessary amendments are made to nautical charts.</p> <p>Copies of all notices must be provided to the MMO and MCA within 5 days.</p>	<p>Noted, the Applicants have committed to this through the following DMLs within <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b>:</p> <ul style="list-style-type: none"> <li>DML 1 &amp; 2 - Condition 10</li> <li>DML 3 &amp; 4 - Condition 8</li> <li>DML 5 - Condition 6</li> </ul>	Y-M
STH 006	14/07/23	Trinity House	Shipping and Navigation	<p>6) In case of damage to, or destruction or decay of, the authorised project seaward of MHWS or any part thereof, excluding the exposure of cables, the undertaker shall as soon as reasonably practicable and no</p>	<p>Noted, the Applicants have committed to this through the following DMLs within <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b>:</p> <ul style="list-style-type: none"> <li>DML 1 &amp; 2 - Condition 9 and 18</li> <li>DML 3 &amp; 4 - Condition 7 and 20</li> <li>DML 5 - Condition 5 and 14</li> </ul>	Y-M



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				later than 24 hours following the undertaker becoming aware of any such damage, destruction or decay, notify MMO, MCA, Trinity House, UKHO, the Kingfisher Information Service of Seafish and regional fisheries contacts.		
STH 007	14/07/23	Trinity House	Shipping and Navigation	7) In case of buried cables becoming exposed on or above the seabed, the undertaker must within three days following identification of a cable exposure, notify mariners, regional fisheries contacts and the Kingfisher Information Service of Seafish of the location and extent of exposure. Copies of all notices must be provided to the MMO, MCA, Trinity House, and the UKHO within 5 days.	Noted, the Applicants have committed to this through the following DMLs within <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> : <ul style="list-style-type: none"> <li>DML 1 &amp; 2 - Condition 9 and 18</li> <li>DML 3 &amp; 4 - Condition 7 and 20</li> <li>DML 5 - Condition 5 and 14</li> </ul>	Y-M
STH 008	14/07/23	Trinity House	Project Description	8) Pre-construction plans and documents:  The authorised project shall not commence until the following have been submitted to and approved by the MMO. Each programme, statement, plan, protocol, scheme or other detail required to be approved under this condition must be submitted to the MMO for approval at least 6 months prior to the commencement of the authorised project except where otherwise stated. 1) A plan to be agreed in writing with the MMO following	Noted	N

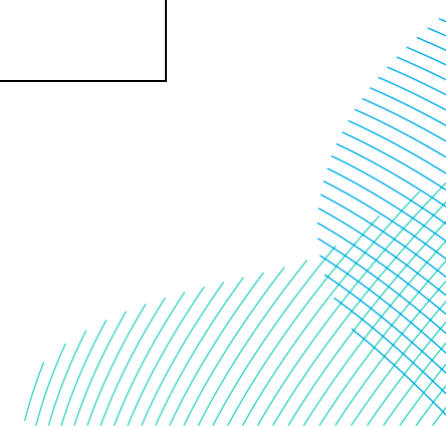


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				<p>appropriate consultation with Trinity House, the MCA and UKHO, setting out proposed details of the authorised project, including the:</p> <ul style="list-style-type: none"> <li>a) number, dimensions, specification, foundation type(s) and depth for each WTGs, offshore platforms, substations and meteorological masts;</li> <li>b) the grid coordinates of the centre point of the proposed location for each WTG, platform, substation and meteorological mast;</li> <li>c) proposed layout of all cables; and</li> <li>d) location and specification of all other aspects of the authorised project.</li> </ul> <p>2) An Aids to Navigation Management Plan to be agreed in writing by the MMO following appropriate consultation with Trinity House specifying how the undertaker will ensure compliance with conditions (1) to (4) of 'Aids to Navigation' from the commencement of construction of the authorised project to the completion of decommissioning.</p> <p>3) No part of the authorised project may commence until the MMO, in consultation with the MCA, has confirmed in writing that the undertaker has taken into account and, so far as is applicable to that stage of the project, adequately addressed all MCA</p>		

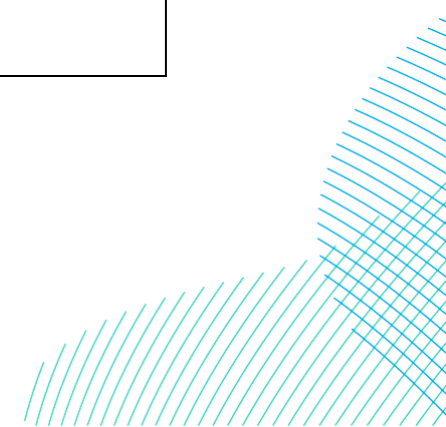




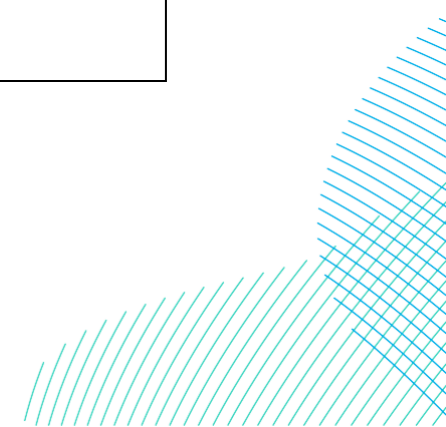
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				<p>recommendations as appropriate to the authorised project contained within MGN654 "Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response Issues" and its annexes.</p> <p>4) A construction method statement in accordance with the construction methods assessed in the environmental statement and including details of - i) Cable specification, installation and monitoring, to include:</p> <p>a) technical specification of offshore cables below MHWS;                      b) a detailed cable laying plan for the Order limits, incorporating a burial risk assessment encompassing the identification of any cable protection that exceeds 5% of navigable depth referenced to chart datum and, in the event that any area of cable protection exceeding 5% of navigable depth is identified, details of any steps (to be determined following consultation with the MCA and Trinity House) to be taken to ensure existing and future safe navigation is not compromised or such similar assessment to ascertain suitable burial depths and cable laying techniques, including cable protection; and                      c) proposals for monitoring offshore cables including cable</p>		



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				protection during the operational lifetime of the authorised scheme which includes a risk based approach to the management of unburied or shallow buried cables		
STH 009	14/07/23	Trinity House	Marine Physical Environment	<p>9) Pre-construction monitoring and surveys</p> <p>5) A swath bathymetric survey to IHO Order 1a of the area within the Offshore Order Limits extending to an appropriate buffer around the site, must be undertaken. The survey shall include all proposed cable routes. This should fulfil the requirements of MGN654 and its supporting 'Hydrographic Guidelines for Offshore Renewable Energy Developers', which includes the requirement for the full density data and reports to be delivered to the MCA and the UKHO for the update of nautical charts and publications. This must be submitted as soon as possible, and no later than [three months] prior to construction. The Order Limit shapefiles must be submitted to MCA. The Report of Survey must also be sent to the MMO.</p>	Noted	N
STH 010	14/07/23	Trinity House	Shipping and Navigation	<p>10) Aids to Navigation:</p> <p>1) The undertaker shall during the whole period from the commencement of construction of the authorised project to the completion of decommissioning exhibit such lights, marks, sounds, signals and other aids to</p>	<p>Noted, the Applicants have committed to this through the following DMLs within <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b>:</p> <ul style="list-style-type: none"> <li>• DML 1 &amp; 2 - Condition 9, 10 and 18</li> <li>• DML 3 &amp; 4 - Condition 7, 8 and 20</li> <li>• DML 5 - Condition 5, 6 and 14</li> </ul>	Y-M

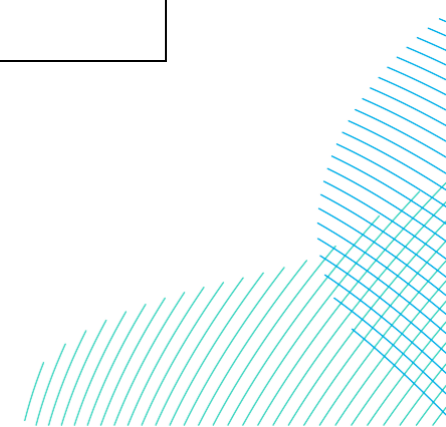


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				<p>navigation, and to take such other steps for the prevention of danger to navigation as Trinity House may from time to time direct.</p> <p>2) The undertaker must during the whole period from the commencement of construction of the authorised project to the completion of decommissioning keep Trinity House and the MMO informed of progress of the authorised project including;</p> <p>a. notice of commencement of construction of the authorised project within 24 hours of commencement having occurred;</p> <p>b. notice within 24 hours of any aids to navigation being established by the undertaker; and</p> <p>c. notice within 5 days of completion of construction of the authorised project.</p> <p>3) The undertaker must provide reports to Trinity House on the availability of aids to navigation in accordance with the frequencies set out in the aids to navigation management plan agreed pursuant to condition &lt;insert&gt; using the reporting system provided by Trinity House.</p> <p>4) The undertaker must during the whole period from the commencement of construction of</p>		

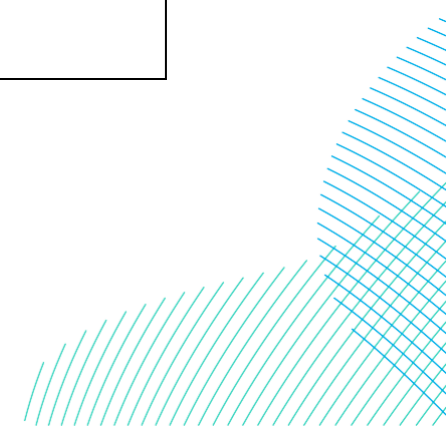


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				the authorised project to the completion of decommissioning notify Trinity House and the MMO of any failure of the aids to navigation and the timescales and plans for remedying such failures, as soon as possible and no later than 24 hours following the undertaker becoming aware of any such failure.		
STH 011	14/07/23	Trinity House	Shipping and Navigation	11) Colouring of structures:  1) Except as otherwise required by Trinity House the undertaker must paint all structures forming part of the authorised project yellow (colour code RAL 1023) from at least HAT to a height as directed by Trinity House. Unless the MMO otherwise directs, the undertaker must paint the remainder of the structures grey (colour code RAL 7035).	Noted.	N
STH 013	14/07/23	Trinity House	Shipping and Navigation	12) Construction Monitoring  1) Construction monitoring must include vessel traffic monitoring by automatic identification system for the duration of the construction period. An appropriate report must be submitted to the MMO, Trinity House and the MCA at the end of each year of the construction period.	Monitoring of vessel traffic will be undertaken for the duration of the construction phase and during the first three years of the operation and maintenance phase.  This would be secured through carrying out vessel traffic monitoring in accordance with <b>Volume 8, Outline Vessel Traffic Monitoring Plan (application ref: 8.30)</b> .  The Applicants have committed to this through the following DMLs within <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> : <ul style="list-style-type: none"> <li>• DML 1 &amp; 2 - Conditions 19 &amp; 20</li> <li>• DML 3 &amp; 4 - Conditions 21 &amp; 22</li> <li>• DML 5 - Conditions 15 &amp; 16</li> </ul>	Y-M

ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
STH 014	14/07/23	Trinity House	Marine Physical Environment	<p>13) Post-construction plans and documents</p> <p>1) The undertaker must conduct a swath bathymetric survey to IHO Order 1a of the installed export cable route and provide the data and survey report(s) to the MCA and UKHO. The MMO should be notified once this has been done, with a copy of the Report of Survey also sent to the MMO.</p> <p>2) On post decommissioning, the undertaker must conduct a swath bathymetric survey to IHO Order 1a of the cable route and the installed generating assets area and provide the data and survey report(s) to the MCA and UKHO. [Decommissioning is not consented at this stage so this can't be included in the DCO/DML].</p> <p>This should fulfil the requirements of MGN654 and its supporting 'Hydrographic Guidelines for Offshore Renewable Energy Developers', which includes the requirement for the full density data and reports to be delivered to the MCA and the UKHO for the update of nautical charts and publications.</p> <p>3) Post construction monitoring must include vessel traffic monitoring by automatic identification system for a duration</p>	<p>Monitoring of vessel traffic will be undertaken for the duration of the construction phase and during the first three years of the operation and maintenance phase.</p> <p>This would be secured through carrying out vessel traffic monitoring in accordance with <b>Volume 8, Outline Vessel Traffic Monitoring Plan (application ref: 8.30)</b>.</p> <p>the Applicants have committed to this (with the exception of the post-decommissioning points) through the following DMLs within <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b>:</p> <ul style="list-style-type: none"> <li>• DML 1 &amp; 2 - Conditions 19 &amp; 20</li> <li>• DML 3 &amp; 4 - Conditions 21 &amp; 22</li> </ul> <p>DML 5 - Conditions 15 &amp; 16</p>	Y-M

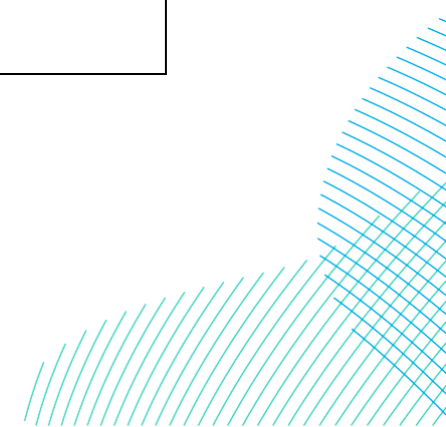


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				of three consecutive years following the completion of construction of authorised project, unless otherwise agreed in writing by the MMO. An appropriate report must be submitted to the MMO, Trinity House and the MCA at the end of each year of the three year period.		
STH 015	14/07/23	Trinity House	Project Description	<p>14) Completion of Construction</p> <p>(1) The undertaker must submit a close out report to the MMO, MCA, UKHO and the relevant statutory nature conservation body within three months of the date of completion of construction. The close out report must confirm the date of completion of construction and must include the following details—</p> <p>(2) the final number of installed wind turbine generators;</p> <p>(3) as built plans; and</p> <p>(4) latitude and longitude coordinates of the centre point of the location for each wind turbine generator and offshore platform, substation, booster station and meteorological mast; provided as Geographical Information System data referenced to WGS84 datum.</p> <p>(5) latitude and longitude coordinates of the inter array and export cable routes; provided as</p>	Noted.	N



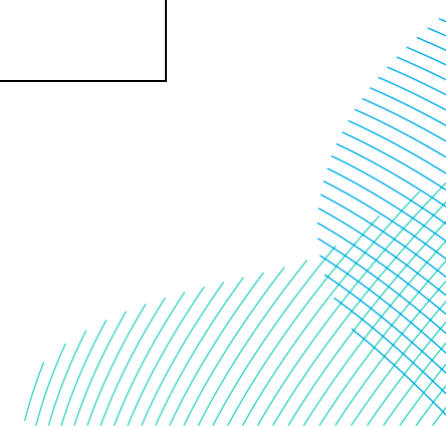
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				Geographical Information System data referenced to WGS84 datum.		
STH 016	09/10/2023	Trinity House (and MCA)	Shipping and Navigation	Clarity should be made between the rationale behind which array layout is worst case for each impact.	The array layout defined as worst case for each impact has been outlined in section 6 of <b>Volume 7, Appendix 14-2 Navigational Risk Assessment (application ref: 7.14.14.2)</b> .	N
STH 017	09/10/2023	Trinity House (and MCA)	Shipping and Navigation	A commitment to a desk-based High Voltage Direct Current (HVDC) engineering study should be made in the NRA.	Necessity of a desk-based study has been described in section 13 of <b>Volume 7, Appendix 14-2 Navigational Risk Assessment (application ref: 7.14.14.2)</b> .	N
STH 018	09/10/2023	Trinity House (and MCA)	Shipping and Navigation	Agree that the worst case location of the ESP should be at the southern edge of the export cable platform search area.	This has been applied for the allision modelling in section 16 of <b>Volume 7, Appendix 14-2 Navigational Risk Assessment (application ref: 7.14.14.2)</b> .	Y-M
STH 019	09/10/2023	Trinity House (and MCA)	Shipping and Navigation	It is a reasonable assumption that vessels on Route 9, unlike Route 8, will around the DBS array areas given the ability to passage plan and the available sea room to the north.	Route 9 has been deviated around the DBS array areas as shown in section 15 of Appendix 14-1 Navigational Risk Assessment.	N
STH 020	09/10/2023	Trinity House (and MCA)	Shipping and Navigation	Acknowledge that the gap between DBS West and Dogger Bank A abides by the 20-degree rule from MGN 654, and all parties agree that no further detailed assessment is required.	The compliance of the gap between DBS West and Dogger Bank A with MGN 654 is discussed in section 14.6 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> .	N
SUK CoS 003	17/07/2023	UK Chamber of Shipping	Project Description	The red line boundary of the Projects should be reduced to create additional available sea room.	The DBS array areas have been refined as described in Section 6 of <b>Volume 7, Appendix 14-2 Navigational Risk Assessment (application ref: 7.14.14.2)</b> .	Y-D
SUK CoS 004	17/07/2023	UK Chamber of Shipping	Shipping and Navigation	Strongly advocate for the full removal of all infrastructure above	No final decision regarding the final decommissioning policy for the offshore project infrastructure has yet been made, as discussed in section 14.3 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> .	N

ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				and below the seabed when decommissioning, including cables		
SUK CoS 005	17/07/2023	UK Chamber of Shipping	Shipping and Navigation	Second Hazard Workshop feedback from the UK Chamber of Shipping: Cumulatively it would be useful to present the main commercial routes in relation to the wider scope of developments within 50nm.	Future case commercial traffic routing on a cumulative level has been presented with a wide extent encompassing the screened in CEA developments in section 15 of Appendix 14-1 Navigational Risk Assessment.	N
SUK CoS 006	17/07/2023	UK Chamber of Shipping	Shipping and Navigation	Second Hazard Workshop feedback from the UK Chamber of Shipping: Previous concerns with the south-west corner of DBS West for allision risk have now been alleviated.	Noted.	N
SUK CoS 001	17/07/23	UK Chamber of Shipping	Shipping and Navigation	1. Decommissioning  The Chamber notes from Chapter 14 Shipping and Navigation that no final decision regarding decommissioning has been made yet.  The Chamber strongly advocates for the full removal of all infrastructure above and below the seabed, acknowledging BATNEEC when it comes to turbine foundations which penetrate deep into the seabed. The Chamber is aware that various developments have a preference for cabling to remain in situ. The Chamber objects to this for a number of reasons as detailed below.	No final decision regarding the final decommissioning policy for the offshore project infrastructure has yet been made, as discussed in section 14.3 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> .	N

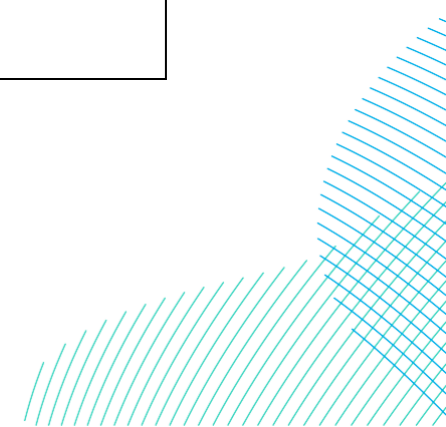




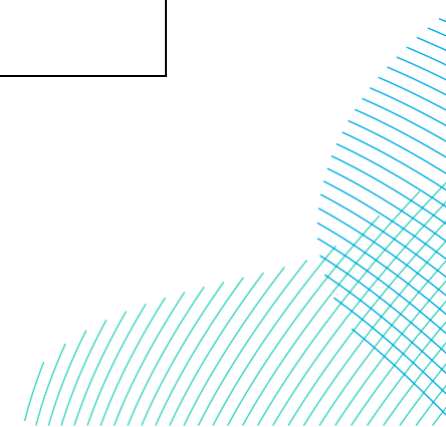
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>Firstly, the Chamber has concerns that buried cables left in situ may become exposed and therefore pose a hazard to anchoring activity, especially in an emergency when such activity is most likely to take place. This has been highlighted by the International Hydrographic Organization (IHO) who at their Assembly meeting held at Monaco in April 2017 highlighted:</p> <p>“Mariners are also warned that the seafloor where cables were originally buried may have changed and cables become exposed; therefore particular caution should be taken when operating vessels in areas where submarine cables exist especially where the depth of water means that there is a limited under-keel clearance”</p> <p>Such risk is minimised during the economic life of the wind farm, as navigational traffic through the development will be reduced and it is expected that regular monitoring of the cabling and its protection will be carried out with any necessary remedial works. However once decommissioned, the site will be open to a greater extent to surface navigation and other activity. The Chamber is not aware of commitments by developers post commissioning to regularly monitor and rebury or remove cabling which has become</p>		



ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>exposed.</p> <p>Secondly, it is widely recognised that ships' anchors pose a significant hazard to submarine cables as they are designed to penetrate the seabed. The depth of penetration will depend on the size and type of anchor and the nature of the seabed. Hence, the Chamber is concerned that cable burial at typical depths does not fully safeguard against anchor fouling and entanglement. This was exemplified through the incident of the Stema Barge II incident in the English Channel when emergency anchoring led to the IFA interconnector being fouled and cut through. Passing the cost of potential fouling and disentanglement to the shipping company, authorities, insurers and any Search and Rescue (SAR) services required is not desirable.</p> <p>Thirdly, through the leaving of cabling in situ, future seabed activity in the area is significantly constrained, either rendered unfeasible, or costly for the next seabed user to remove or work around such cabling.</p>		
SUK CoS 002	17/07/23	UK Chamber of Shipping	Shipping and Navigation	<p>2. Cumulative Spatial Build Out of OWF in UK Exclusive Economic Zone</p> <p>The Chamber notes that the two proposed developments of DBS</p>	The Array Areas have been refined as described in Section 6 of <b>Volume 7, Appendix 14-2 Navigational Risk Assessment (application ref: 7.14.14.2).</b>	Y-D

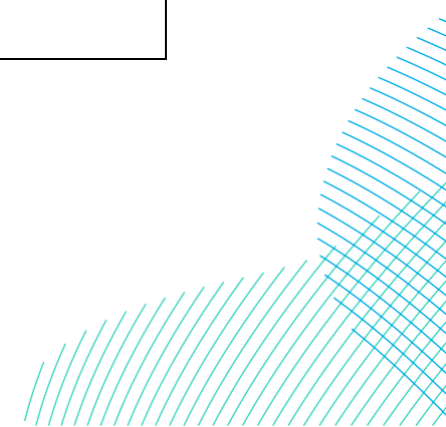


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				<p>have a total power rating of 1500MW and areas for lease of approximately 500km<sup>2</sup>. This equates to an energy generating density of approximately 3MW per km<sup>2</sup>, which by modern and present development standards is a low density and may be considered unnecessarily so.</p> <p>The Chamber recognises the necessity for large scale deployment of offshore wind as part of the UK energy mix to reach net zero and therefore calls upon the developer to be frugal in its usage of the seabed and reduce the footprint of the OWF or not build out to the full red line boundary.</p> <p>The UK EEZ is finite and unnecessary use of the seabed squanders the valuable wind resource the UK has. Through reducing the seabed area developed by DBS, it means there is available sea-room set aside for other activities, including commercial navigation, along with the potential for more build out of offshore wind in later rounds.</p>		
SS0 01	05/07/2023	Uni-Fly	Aviation and radar	Thank you, very informative, no questions.	Noted	N
SWS K02	27/07/2023	Walter Stuart Kirkwood	Site Selection and Assessment	Land parcel 166. There is an outfall from this field which drains across the field immediately to the north owned by Messrs Mewburn,	Land Drainage Consultancy Ltd have been appointed to develop conceptual pre- and post-construction drainage plans that will be shared with the main works contractor once appointed to implement where reasonably practicable. These will be	N

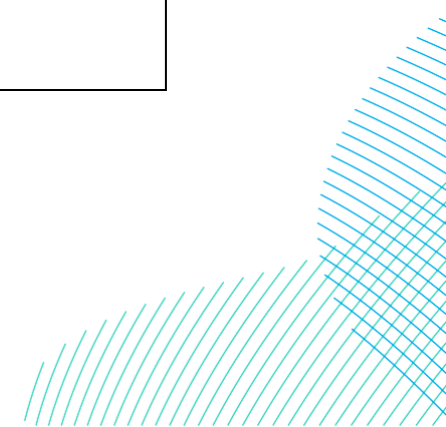


ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
			of Alternatives	which is critical to our clients fields drainage, which needs accounting for in the positioning of the cable route	developed with landowners and agents outside the limitations of the DCO and will be agreed by private treaty, committed to as part of the Option Agreements.	
SWS K01	27/07/2023	Walter Stuart Kirkwood	Land Use	In relation to land parcel 237, please 'push' the proposed cable route as far north in this field as works are likely to affect the enjoyment of our client's holiday letting property 'The Poplars'.	<p>The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>. We believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>, on balance achieves the optimum design.</p> <p>All construction activities will be managed in accordance with <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> submitted with the application as stipulated by the consented scheme. All efforts will be made to mitigate the impact of construction activities on nearby properties. No significant residual effects have been identified in <b>Volume 7, Chapter 25 Noise (application ref: 7.25)</b> or <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b> during construction.</p> <p>Technology choice to take forward HVDC and consultation with ERYC regarding mineral reserves has allowed the projects to move cable corridor north of constraint and therefore removing the potential impact on quiet enjoyment of The Poplars' property.</p>	Y-D
SYW TOO 1	17/07/23	Yorkshire Wildlife Trust	Consultation	1. Question 2 -At the current time our comments relate to the onshore elements. However, we may have comments on the offshore elements at a future date. We concur with the comments submitted by Lincolnshire Wildlife Trust (dated 14th October 2022) in relation to the Scoping Report.	Noted.	N
SYW TOO 2	17/07/23	Yorkshire Wildlife Trust	Consultation	2. Question 3 - Yorkshire Wildlife Trust has contributed to previous discussion groups (see minutes of May 22 meeting) and have been invited to join an Expert Topic Group in relation to the on-shore	Noted.	N

ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				elements of the scheme. We look forward to contributing to this group. Please note that this relates to terrestrial elements only and we will need to consult with our marine colleagues regarding any offshore elements.		
SYW TOO 3	17/07/23	Yorkshire Wildlife Trust	Terrestrial Ecology and Ornithology	<p>3. Question 4 - We have the following expectations for linear project such as the on-shore elements of the scheme:</p> <ul style="list-style-type: none"> <li>• We expect that everything within the red line is assessed as being impacted habitat.</li> <li>• Off easement drainage runs and connections into existing water courses should be assessed as part of the scheme.</li> <li>• Yards, lay down areas and pipe dumps and the access routes linking these to the main works which are not yet decided must be subject to rigorous ecological assessment.</li> <li>• Due to the protracted nature of the project, we expect updating surveys to be undertaken in accordance with best practice guidelines, and appropriate walkthrough surveys undertaken prior to works in particular areas, where required e.g. badger sett walkover surveys.</li> <li>• Excavating sections of cable route for repair would fall out of the scope of the consent (and the planning system), but could still have impacts and therefore must undergo rigorous ecological assessment.</li> </ul>	<p>All of the Onshore Development Area has been subject to a full suite of ecological surveys. Effects to watercourses and drainage are addressed in <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> and also in <b>Volume 7, Chapter 20 Flood Risk and Hydrology (application ref: 7.20)</b>. The requirement for pre-construction surveys are set out in the ES and <b>Volume 8, Outline Ecological Management Plan (application ref: 8.10)</b>. The ES chapter assess effects from maintenance activities.</p> <p>The activities assessed within the ES are identified within section 18.6.1 (<b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b>).</p>	N

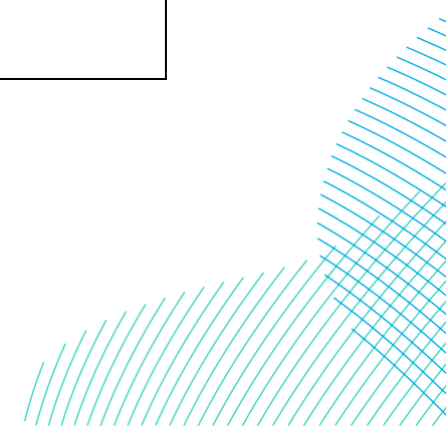


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SYW T00 4	17/07/23	Yorkshire Wildlife Trust	Consultation	4. Question 5 - We will provide further input via the Expert Topic Group - see also comments in relation to the published PEIR.	Noted.	N
SYW T00 5	17/07/23	Yorkshire Wildlife Trust	Terrestrial Ecology and Ornithology	5. Question 6 - • We expect a full time Ecological Clerk of Works team with proven experience of managing large scale linear projects such as this. • The project timetable should ensure 'temporary loss of habitat' is minimised, as in minimal time (only for one breeding season in that area) and not all/a majority of habitat along the route or in that locality lost at the same time to ensure there is suitable alternative habitat sufficient to support the assemblages on this temporary basis. • Reduced working width should be used for sensitive habitats. • A 'reverse spread' should be used for short sections if this could move the impact of the works further away from a sensitive receptor.	Noted. The details of when an ECoW will be present on site is in <b>Volume 8, Outline Ecological Management Plan (application ref: 8.10)</b> submitted with the DCO application.  Temporary loss has been minimised as part of the project design and addressed in the ES along with measures for working around sensitive habitats ( <b>Volume 7, Appendix 18-10 Biodiversity Net Gain Strategy (application ref: 7.18.18.10)</b> ).	N
SYW T00 6	17/07/23	Yorkshire Wildlife Trust	Terrestrial Ecology and Ornithology	6. Question 7 - Nitrogen deposition and its impact upon sensitive habitats should be explored as part of the application.	This is addressed in the ES using the data and conclusions of the air quality assessment ( <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b> ).	N
SYW T00 7	17/07/23	Yorkshire Wildlife Trust	Consultation	7. Question 10 - The consultation process for NSIP's is long in duration and the amount of information submitted is considerable. We therefore request that the process is made as accessible as possible for	Noted.	N



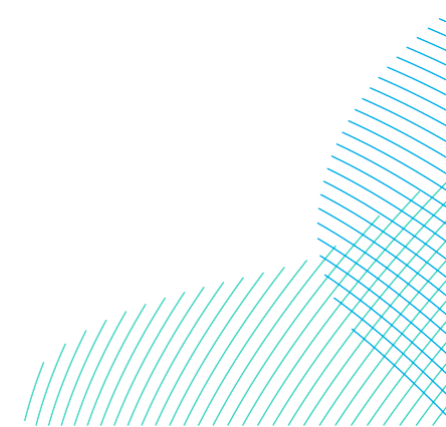
ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				stakeholders, who in many cases have limited resources.		
SYW T00 8	17/07/23	Yorkshire Wildlife Trust	Terrestrial Ecology and Ornithology	<p>8. Question 13 - Our primary concern is impacts on nature conservation sites, including statutory and non-statutory protected sites. The potential to impact upon land 'functionally linked' to protected sites is also a relevant consideration, particularly as the habitat surveys indicate that the majority of the onshore cable route impacts agricultural land, which can form important foraging, loafing and overwintering sites for bird species. Such habitats are also used by ground nesting birds such as skylark. A high-level overview suggests it is in proximity to two Yorkshire Wildlife Trust reserves - Keldmarsh and Pulfin Bog (also SSSI). If we can be provided with the up to date cable route files in GIS shape file format we will be able to undertake a more detailed assessment of impacts on protected sites. We would like to explore potential impacts on our reserves through the project development. We have particular concern about the 17 non-statutory Local Wildlife Sites which are wholly or partially within the onshore development area. We are pleased to see that HDD (or trenchless technology) is proposed where Local Wildlife Sites may be affected. However, use of HDD is not without impacts and it is</p>	<p>Details of the cable routes, temporary access and egress locations for trenchless works are presented in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>, and the approach to BNG is presented in the ES (<b>Appendix 18-10 Biodiversity Net Gain Strategy (application ref: 7.18.18.10)</b>).</p> <p>A full suite of surveys has been completed and the findings of these are presented in the ES (<b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b>) and reports appended to the ES (<b>Volume 7, Appendix 18-2 to 18-9 (application ref: 7.18.18.2 to 7.18.18.9)</b>).</p> <p>The HRA screening concluded that there would be no pathway for effects on Functionally Linked Land (FLL) for the Humber Estuary SPA and that the land within the Onshore Development Area that could qualify as FLL "does not provide suitable foraging/breeding habitats or is considered critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which the Humber Estuary SPA / Ramsar site has been designated" (<b>Volume 6, Report to Inform Appropriate Assessment, Habitats Regulations Assessment (application ref: 6.1)</b>). Natural England is satisfied that the survey effort is sufficient to rule out impacts to the SPA in this case.</p> <p>Following the refinement of the Onshore Development Area there are now six non-statutory designated nature conservation sites (LWSs) wholly or partially within or adjacent to the Onshore Development Area and impacts have been avoided and/ or minimised where possible. No mechanisms or pathways have been identified likely to impact Yorkshire Wildlife Trust Reserves. Effects on LWSs and other designated sites are assessed in section 18.6 of <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> and are not considered significant in EIA terms.</p>	N

ID #	Date Received	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants' Response	Project Change? Y/N
				<p>essential that thrusting and receiving pits are carefully located outside of sensitive habitats. In addition, we are concerned about the number of different projects in this area which is very constrained, and the potential for cumulative impacts, both temporally and spatially. We note the information provided indicating that a Biodiversity Net Gain Assessment will be addressed as part of the on-shore elements of the scheme. We would appreciate a firm commitment to a BNG percentage figure, rather than reference to 'measurable net gain'. Completed metrics should be submitted for scrutiny, along with the appropriate supporting information such as habitat condition assessments. We note that some surveys are outstanding or ongoing and full results are not yet available.</p>		
SMM O10 1	17/07/2023		Marine Mammals	<p>13.15. For marine mammals, the predicted ranges are similar to those predicted for a single monopile, although an increase in the predicted ranges can be seen in some cases. The time it takes to install one monopile is 5 hours 20 minutes. Therefore, by the time the subsequent pile is installed, the fleeing receptor (in the case of marine mammals) is at such a distance that the additional exposure is minimum (assuming the animal continues to flee</p>	Noted.	N





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				throughout the piling period). However, when considering a stationary animal (as in the case of fish), the ranges are increased because the receptor is receiving noise from double the number of strikes.		



## 3 Supplementary Statutory Consultation Responses from Section 42 Consultees

Table 3-1 Supplementary Statutory Consultation

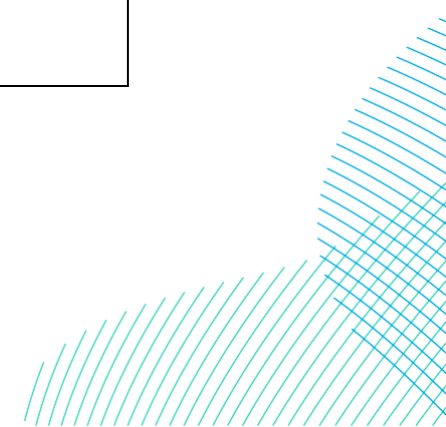
ID #	Date Received	Organisation	ES Chapter Theme 1	ES Chapter Theme 12	Comment/ Questions	The Applicants Response	Project Change? Y/N
SDBD001	14/09/2023	Dogger Bank D - SSE Renewables	Consultation	N/A	Dogger Bank South – Localised Supplementary Statutory Consultation We are writing to you regarding the localised supplementary statutory consultation which RWE Renewables Dogger Bank South (West) Limited and RWE Renewables Dogger Bank South (East) Limited (“RWE”) are undertaking in respect of the Preliminary Environmental Information Report (“PEIR”) for the Dogger Bank South Offshore Wind Farms (“DBS”). We note that the Consultation runs from 4 August to 15 September 2023.	Noted with thanks, consultation with Dogger Bank D will continue through the development of the Projects’ lifespan.	N
SDBD002	14/09/2023	Dogger Bank D - SSE Renewables	Policy and Legislative Context	N/A	Dogger Bank D Offshore Wind Farm SSE Renewables and Equinor will be applying for a development consent order to reconfigure the Dogger Bank zone, enabling additional capacity to be delivered under a further project (“Dogger Bank D” or “DBD”) in the eastern part of the original Dogger Bank C site. The generating capacity of DBD is expected to be significantly greater than the Nationally Significant Infrastructure Project threshold and, as such, DBD will require to be consented by the Secretary of State under the Planning Act 2008.	Noted with thanks, consultation with Dogger Bank D will continue through the development of the Projects’ lifespan.	N
SDBD003	14/09/2023	Dogger Bank D - SSE Renewables	EIA Methodology	Policy and Legislation	In April 2023, the Environmental Impact Assessment (“EIA”) Scoping Report for DBD was submitted to the Planning Inspectorate. The Scoping Report was prepared in accordance with Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (“EIA Regulations”). The Planning Inspectorate subsequently consulted various bodies in accordance with the EIA Regulations and published its EIA Scoping Opinion in June 2023. Documents relating to DBD, including the Scoping Report and Scoping Opinion, are available on the Project Website 1 and via the National Infrastructure Planning Portal maintained by the Planning Inspectorate.	Noted with thanks, consultation with Dogger Bank D will continue through the development of the Projects’ lifespan.	N
SDBD004	14/09/2023	Dogger Bank D - SSE Renewables	Consultation	Policy and Legislation	The PEIR for DBD is in preparation, and extensive work is being undertaken in relation to EIA, Habitats Regulations Assessment and early stage DCO drafting. At the time of	Noted with thanks, consultation with Dogger Bank D will continue through the	N

ID #	Date Received	Organisation	ES Chapter Theme 1	ES Chapter Theme 12	Comment/ Questions	The Applicants Response	Project Change? Y/N
					<p>writing, it is expected that our PEIR will be consulted on contemporaneously with the submission of your DCO application.</p> <p>We are happy to provide an update to you on matters such as our cable route as DBD develop to assist in your consideration of DBD. Non-statutory consultation will commence imminently (running from 26 September to 7 November 2023), and we welcome any comments from DBS in respect of our proposals.</p>	development of the Projects' lifespan.	
SDBD005	14/09/2023	Dogger Bank D - SSE Renewables	Other Marine Users	Consultation	<p>Response to your Consultation</p> <p>Given the proximity of DBD to DBS and need for each to take the other into account when preparing their EIA and any Habitats Regulations Assessment ("HRA") it is in the interest of both projects to share knowledge where possible. A substantial number of detailed surveys and assessments have been carried out in respect of DBD to date, and, looking forward, we will continue to gather data regarding DBD and the offshore environment.</p> <p>We would welcome the chance to open a dialogue with you on EIA and HRA in particular so that we can collaborate on issues facing both projects in relation to coordinate and strategic compensation matters.</p>	Noted with thanks, consultation with Dogger Bank D will continue through the development of the Projects' lifespan.	N
SDBD006	14/09/2023	Dogger Bank D - SSE Renewables	Other Marine Users	Cumulative Effects	<p>We would expect DBD to be included in any cumulative and in-combination assessments undertaken for DBS, both within the Environmental Statement and any Report to Inform an Appropriate Assessment for HRA purposes. As noted above, details of DBD can be found in the Scoping Report submitted in April 2023 and, in due course, the PEIR that will be circulated for consultation. If, however, RWE considers that further information would be helpful or necessary in carrying out a cumulative or in-combination or in-combination assessment, we would be happy to provide this.</p> <p>Please do let us know if any further information is needed to support in your consideration of DBD.</p>	Dogger Bank D has been included in the cumulative assessment for this topic, in addition to all other relevant topics within the ES.	N
SDBWF001	15/09/2023	Dogger Bank Wind Farms A-C	Consultation	Other Marine Users	We are writing to you regarding the localised supplementary statutory consultation which RWE Renewables Dogger Bank	Noted.	N

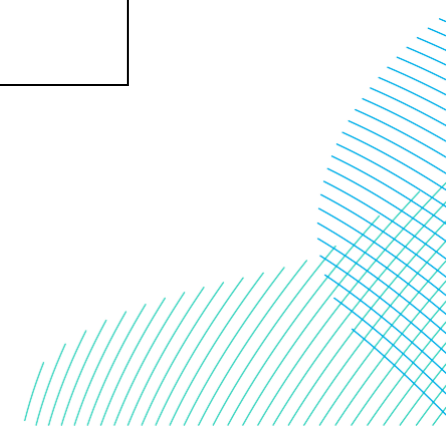
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					<p>South (West) Limited and RWE Renewables Dogger Bank South (East) Limited (“RWE”) are undertaking in respect of the Preliminary Environmental Information Report (“PEIR”) for the Dogger Bank South Offshore Wind Farms (“DBS”). We note that the Consultation runs from 4 August to 15 September 2023.</p> <p>Dogger Bank Wind Farm is an offshore wind farm being developed in three phases – Dogger Bank A, B and C – located between 130km and 190km from the North East coast of England at their nearest points (“Dogger Bank Wind Farm”). You will also be aware of Dogger Bank D is which is a potential new fourth phase of the Dogger Bank Wind Farm, on which a separate consultation response will be submitted.</p>		
SDBWF 002	15/09/2023	Dogger Bank Wind Farms A-C	Consultation	Cumulative Effects	Contextual information relating to the Dogger Bank Wind Farm Offshore construction began in 2022 with contractors using specialist vessels to install the offshore infrastructure, beginning with the monopile turbine foundations. In total, the Dogger Bank Wind Farm will feature 277 GE Haliade-X wind turbines. Onshore construction began in January 2020 when our contractors, Jones Bros, broke ground near the village of Ulrome in the East Ridings of Yorkshire. This marked the start of the installation of the c.30km of onshore cable from Ulrome to the Creyke Beck substation to service the Dogger Bank A and B projects. Onshore works for Dogger Bank C are also underway in close cooperation with the team from the Sofia offshore wind farm which is being developed by RWE. The cooperative approach is due to the close proximity of the projects and will reduce the impact on local residents along the cable route between Redcar and Marske-by-the-Sea on Teesside.	Noted	N
SDBWF 003	15/09/2023	Dogger Bank Wind Farms A-C	Other Marine Users	Cumulative Effects	<p>The first phase, Dogger Bank A, is expected to be operational in 2023. Based on your DCO submission target we would ask that your submission plans are updated – for example: PC2340-RHD-OF-ZZ-DR-Z-0365 Offshore Wind Farms within 50km of the Project will need to be updated.</p> <p>In terms of DBS, we note that there are two Project Development Scenarios that will be the subject of a single DCO</p>	Figure PC2340-RHD-OF-ZZ-DR-Z-0365 Offshore Wind Farms within 50km of the Offshore Development Area has been updated to reflect this comment. Assessments of both the Projects in isolation or together	Y-M

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					<p>application (with a combined EIA process and associated submissions), each Project is assessed individually, so that mitigation is Project specific (where appropriate). As such, both assessments will need to take account of the operation of the Dogger Bank Wind Farm and ongoing construction of Dogger Bank C and Dogger.</p> <p>We have adopted the issues on which you asked for feedback as headings in this submission.</p>	<p>account for potential interactions with other nearby wind farms, including the Dogger Bank Wind Farms.</p>	
SDBWF 004	15/09/2023	Dogger Bank Wind Farms A-C	Project Description	Other Marine Users	<p>DBS Proposals for array areas</p> <p>We note that the Dogger Bank A area is 8km from DBS West and 7km from DBS East while Dogger Bank B is 17km from DBS West and 25km from DBS East. [Dogger Bank C is more than 50km from your array area]</p> <p>Given the close proximity of your proposed export cables to those of Dogger Bank A and Dogger Bank B we will expect adequate protective provisions to be in place prior to your works commencing. We also ask that your submission plans are amended to show the cable corridors and existence of Dogger Bank C and the proposed Dogger Bank D – for example Drawing No. PC2340-RHD-OF-ZZ-DR-Z-0365 (“Offshore Wind Farms within 50km of the Project</p>	<p>Dogger Bank C and its associated export cable corridor have been added to <b>Volume 7, Figure 16-2 (application ref: 7.16.1)</b>. The proposed Dogger Bank D array area and Offshore Export Cable Corridor options have not been added to this figure due to no publicly available files being available to incorporate into <b>Volume 7, Figure 16-2 (application ref: 7.16.1)</b>.</p>	Y-M
SDBWF 005	15/09/2023	Dogger Bank Wind Farms A-C	Other Marine Users	N/A	<p>Chapter 16 – Infrastructure and Other Users, Table 16-9 and paragraph 40 recognise that: “The Projects’ offshore export cable corridor runs parallel to the Dogger Bank A and B export cable route for approximately 90km in the worst-case scenario (see Figure 16-2 for further context), with the majority of this route falling within the temporary construction area of the Dogger Bank A and B export cable route.”</p>	<p>Due to the distance of the Dogger Bank C array area and export cable route, there exists no potential for interactions between the Projects and the Dogger Bank C offshore wind farm. This is noted in section 16.6.1.1 of the ES chapter <b>Volume 7, Chapter 16 Infrastructure and Other Users (application ref 7.16)</b>. Publicly available information regarding Dogger Bank A, B and D has been used to inform the assessment conducted.</p>	N

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SDBWF 006	15/09/2023	Dogger Bank Wind Farms A-C	Other Marine Users	N/A	<p>Paragraph 64 of Chapter 16 also notes that:                      “As a result of the site selection process undertaken for the Projects, there will be no overlap with any other offshore wind farm sites. The only interaction between the Projects and other offshore wind farms will be the potential crossing of the export cables for the Hornsea Project Four offshore wind farm, and the overlap of the offshore export cable corridor to the working area buffer for the Dogger Bank A and B export cable corridor. There also exists the possibility that the Dogger Bank D export cable corridor may route close to/within the Projects development area. However, this cannot be confirmed at the time of writing due to the lack of publicly available information regarding this project’s export cable corridor”.</p> <p>We ask that consideration is also given to Dogger Bank C explicitly in your assessments. In respect of Dogger Bank D, we refer you to the scoping report and scoping opinion which you should take account of in your assessments.</p>	Due to the distance of the Dogger Bank C array area and Offshore Export Cable Corridor, there exists no potential for interactions between the Projects and the Dogger Bank C offshore wind farm. This is noted in section 16.6.1.1 of <b>Volume 7, Chapter 16 Infrastructure and Other Users (application ref 7.16)</b> . Publicly available information regarding Dogger Bank D has been used to inform the assessment conducted.	N
SDBWF 007	15/09/2023	Dogger Bank Wind Farms A-C	Shipping and Navigation	N/A	It is noted that you have addressed potential interference with other wind farms also in Chapter 4 Shipping and Navigation because of the navigational hazard to shoring associated with shipping related to other wind farms and the potential for vessels diversion when in transit.	Noted.	N
SDBWF 008	15/09/2023	Dogger Bank Wind Farms A-C	Other Marine Users	N/A	<p>In respect of the potential for wake loss to the Dogger Bank projects as a result of DBS we expect the environmental statement which accompanies the application for a DCO for DBS to fully assess these impacts in respect of the Dogger Bank projects. At present, there is insufficient information presented in the PEIR to understand the impacts of DBS. Chapter 16 of the PEIR identifies wake and productivity losses as a potential impact of DBS, but only on a cumulative basis. We expect a full assessment of wake loss impacts as a result of the project alone and cumulatively, and for any potential impacts to be adequately mitigated through protective provisions in favour of the Dogger Bank projects.</p>	Potential impacts regarding wake loss are assessed in section 16.6.1.1 of the ES ( <b>Volume 7, Chapter 16 Infrastructure and Other Users (application reference 7.16)</b> ).	N
SDBWF 009	15/09/2023	Dogger Bank Wind Farms A-C	Consultation	Project Description	DBS Landfall Scenarios	Noted.	N



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					<p>Onshore construction began in January 2020 when our contractors, Jones Bros, broke ground near the village of Ulrome in the East Ridings of Yorkshire. This marked the start of the installation of the c.30km of onshore cable from Ulrome to the Creyke Beck substation to service the Dogger Bank A and B projects.</p> <p>Onshore works for Dogger Bank C are also underway in close cooperation with the team from the Sofia offshore wind farm which is being developed by RWE. The cooperative approach is due to the close proximity of the projects and will reduce the impact on local residents along the cable route between Redcar and Marske-by-the-Sea on Teesside.</p> <p>We welcome your removal of Landfall CB6 from the Landfall short list due to the uncertainty over the space requirements for Dogger Bank A &amp; B and the risk that there would not be adequate space left to accommodate your project and would ask that you continue to liaise with us in relation to impacts going forward of your potential landfall choices.</p>		
SDBWF 010	15/09/2023	Dogger Bank Wind Farms A-C	Land Use	Consultation	<p>DBS The onshore cabling and substation locations.</p> <p>The Dogger Bank A and B wind turbines will come ashore via subsea export cables to the north of Ulrome and will then travel via around 19km of underground cables to two converter stations near Beverley. The Dogger Bank C cables will come ashore near Marske-by-the-Sea on Teesside and travel by around 7km of underground cables to a converter station near Lazenby.</p> <p>Our contractors are building three converter stations with two located in the East Riding of Yorkshire and one located in Teesside.</p>	The Projects have been engaged with SSE Renewables since May 2023 to discuss interactions with Dogger Bank A&B onshore cables at Routh. Negotiations are ongoing to agree a Crossing and Proximity Agreement which will provide appropriate protections and mechanisms for relevant approvals prior to construction.	N
SDBWF 011	15/09/2023	Dogger Bank Wind Farms A-C	Land Use	Consultation	<p>We note that Chapter 20 on Land Use at section 21.7.2 (Plans/Projects considered for cumulative impacts) references Dogger Bank A and B as Tier 2 and that your project: "crosses onshore export cable corridor".</p> <p>And at Paragraph 149: "The onshore export cable corridor crosses the Dogger Bank A and B offshore wind farm</p>	As above. The Onshore Development Area has since been refined removing Substation Zone 1 and subsequently the second interaction with Dogger Bank A&B cables.	N



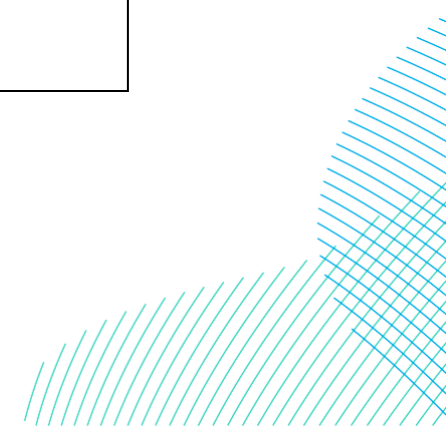
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					<p>underground cable route to the west of Routh and again at the eastern onshore substation zones boundary".</p> <p>Further information will be needed for the Dogger Bank Windfarm to fully understand and assess the impact of DBS onshore cabling and substation location.</p>		
SDBWF 012	15/09/2023	Dogger Bank Wind Farms A-C	Cumulative Effects	Consultation	<p>On potential cumulative impacts Paragraphs 172 of your Scoping Opinion notes that:</p> <p>"The CIA will be based on a zone of influence identified during the Projects alone impact assessment, which will define the geographical extent within which effects of the wind farms are expected to occur. Recognising that the DBS arrays are in close proximity to the Dogger Bank A, B and C, and Sofia Offshore Wind Farms, the CIA will consider cumulative impacts with the existing wind farms and any other projects and marine users within the zone of influence including the Humber Estuary (aggregate extraction and dredging, subsea cables and oil and gas activity)".</p> <p>The position of Dogger Bank C and Dogger Bank D need to be more fully (or explicitly) accounted for in your assessments so that impacts can be assessed.</p> <p>Please do let us know what, if any, further information is needed to understand the Dogger Bank Wind Farm in general or account for the Dogger Bank Wind Farm in cumulative assessments in particular.</p> <p>We look forward to working with you in the negotiation of appropriate Protective Provisions to be included in your Development Consent Order.</p>	<p>Noted with thanks.</p> <p>Dogger Bank C and D have been included in the cumulative assessment for this topic, in addition to all other relevant topics within the ES.</p>	N
SDRNO 01	15/09/2023	Dutch Reaction <sup>1</sup> - Netherlands, with inputs provided by the	Consultation	N/A	<p>Thank you very much for the opportunity to react on the Preliminary Environmental Information Report (PEIR) for the proposed development Dogger Bank South Offshore Wind Farms (ref nr. EN010125). Please find below the response</p>	Noted.	N

<sup>1</sup> 'Dutch Reaction' is a term used by the Projects to describe the response to the DBS Section 42 consultation returned by the Dutch Ministry of Infrastructure and Water Management, the Ministry of Economic Affairs and Climate Policy and the Netherlands Ministry of Agriculture, Nature and Food Quality.



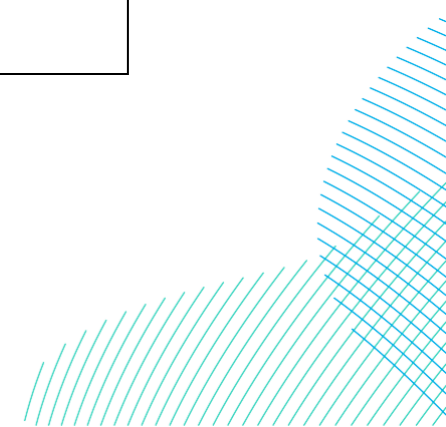
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		Dutch Ministry of Infrastructure and Water Management, the Ministry of Economic Affairs and Climate Policy, and the Ministry of Agriculture, Nature and Food Quality.			<p>from the Netherlands, with inputs provided by the Dutch ministry of Infrastructure and Water Management, the Ministry of Economic Affairs and Climate Policy, and the Ministry of Agriculture, Nature and Food Quality. We are interested in hearing your reaction on our response.</p> <p>We very much appreciate the systematic approach and the stakeholder process, and we would welcome the opportunity to stay involved in the remainder of the process on a regular basis. At this point of the process we have the following comments.</p>		
SDRNO 03	15/09/2023	Dutch Reaction - Netherlands, with inputs provided by the Dutch Ministry of Infrastructure and Water Management, the Ministry of Economic Affairs and Climate Policy, and the Ministry of Agriculture, Nature and Food Quality.	Marine Physical Environment	N/A	<p><b>Physical marine environment</b> Regarding the physical marine environment we would like to note that according to the documentation provided, no direct transboundary ecosystem effects are expected. However, we feel the need to emphasise that transboundary effects cannot be ruled out solely based on the 40 km distance from the nearest EEZ boundary. This is especially true when considering indirect ecosystem effects. As such, we would like to bring to your attention ecosystem effect modelling studies by Deltares which show that ecosystem effects might be incurred over longer distances than 40 km (see Annex for ecosystem effect modelling study from Deltares). Furthermore, there are indications that turbidity caused by construction has a more significant impact than thus far assumed. Sediment from the construction of one turbine might settle within a few days and therefore is not likely to create significant negative effects. However, a total of 200 wind turbines (100 per area) are planned to be constructed, which encompasses a large proportion of the entire construction period and may well have a more significant impact on turbidity than is assumed.</p>	As noted in <b>Volume 7, Appendix 8-3 Marine Physical Processes Modelling Technical Report (application ref: 7.8.8.3)</b> , project specific modelling undertaken for the Projects details that the maximum extent of the sediment plume during peak tidal currents from installation activities reaches 18km from the Offshore Development Area. As such, there is no potential for transboundary effects resulting from the Projects.	N
SDRNO 04	15/09/2023	Dutch Reaction - Netherlands, with inputs provided by the Dutch Ministry of	Fish and Shellfish Ecology	N/A	<p><b>Fish and shellfish ecology</b> It is mentioned that there may be temporary and permanent loss of spawning and nursery grounds of several vulnerable and endangered species, including shark species (see OSPAR List of Threatened and/or Declining Species &amp; Habitats). We</p>	It is acknowledged that temporary and permanent habitat loss associated with the Projects has the potential to occur in regions where spawning	N

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		Infrastructure and Water Management, the Ministry of Economic Affairs and Climate Policy, and the Ministry of Agriculture, Nature and Food Quality.			would appreciate additional mitigation and compensation plans for these species, as the loss of spawning and nursery grounds for vulnerable species seems more substantial than the minor adverse effects that are described.	<p>and nursery grounds of fish and shellfish species are present. However, it should be noted that the assessment made within the EIA gives consideration to impacts on receptor groups at a population level scale, and not at an individual scale.</p> <p>The assessments undertaken within sections 10.6.1.1; 10.6.2.1. and 10.6.2.6 of <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> determine that the scale of this disturbance is not considered to have an adverse effect beyond minor, which is not significant in EIA terms. This determination is based on both the limited scale of habitat loss when compared to the wider availability of suitable habitat across the study area and the wider North Sea, combined with the mobility of Fish and Shellfish species allowing for the utilisation of alternate suitable spawning and nursery grounds beyond the footprint of the Projects. Due to the determination of no significant impact, mitigation and compensation are not considered further within this assessment.</p>	
SDRNO 05	15/09/2023	Dutch Reaction - Netherlands,	Marine Mammals	Cumulative Effects	<b>Marine mammals</b> We are not aware that any information on (best available	The EIA has presented the worst case scenario with no noise	N

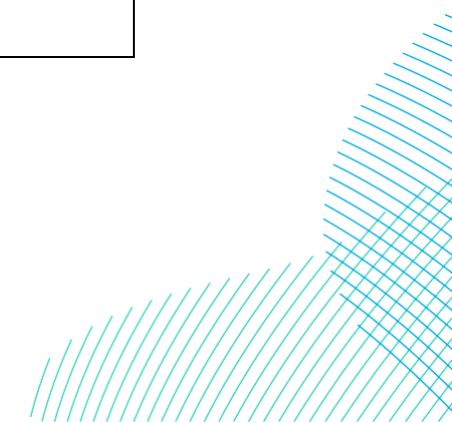


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		with inputs provided by the Dutch Ministry of Infrastructure and Water Management, the Ministry of Economic Affairs and Climate Policy, and the Ministry of Agriculture, Nature and Food Quality.			<p>techniques for) underwater noise reduction by applying mitigating measures has been included in your study. We hope this nevertheless will be included in an updated Environmental Impact Assessment (EIA) and further construction process, as major effects are predicted for the harbour porpoise, minke whale and the grey seal due to underwater noise as a result of pile driving during the construction of Dogger Bank South Offshore Wind Farms. This was also a real concern for Dogger Bank Teesside A and B. The Netherlands mitigate this issue by setting requirements for maximum underwater noise exposure during pile driving. Various noise mitigation measures can reduce noise exposure, for example using a bubble screen during pile driving. We hope that these suggestions can be taken into account in your further activities.</p> <p>Impacts on harbour porpoises and grey seals are transboundary as both populations do not keep to national boundaries. International cumulative effects should be included, as transboundary effects on the Dutch marine mammal population and Dutch Natura 2000 areas are expected. The Dogger Bank and Cleaver Bank Natura 2000 areas have both been designated for the protection of harbour porpoises and grey seals under the EU Habitats Directive. We also want to highlight that the migration routes of the grey seal between the United Kingdom and the Netherlands cross the area of the proposed wind farms. Moreover, the highest densities of harbour porpoises in the southern part of the North Sea can be found in and closely around the suggested project site according to previous analyses. We would value a thorough assessment as the proposed development is likely to affect our conservation objectives for these species.</p>	<p>reduction at source to assess the potential effect. As outlined in section 11.7 of <b>Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)</b>, a SNS SAC Site Integrity Plan (SIP) would be prepared which will set out the approach to deliver any project mitigation, such as the requirement for any noise abatement technologies, or management measures to reduce the potential for any significant disturbance of harbour porpoise in relation to the SNS SAC conservation objectives.</p> <p>The SIP would be an adaptive management tool, which can be used to ensure that the most adequate, effective and appropriate measures, if required, are put in place to reduce the significant disturbance of harbour porpoise in the SAC.</p> <p>Any measures implemented for the SNS SAC would be appropriate for the wider North Sea harbour porpoise population.</p>	
SDRNO 06	15/09/2023	Dutch Reaction - Netherlands, with inputs provided by the Dutch Ministry of Infrastructure and Water	Offshore Ornithology	Terrestrial Ecology and Ornithology	<p><b>Birds and bats</b></p> <p>As already mentioned before, attention for cumulative effects on a transboundary scale is a crucial issue of this PEIR. Since the southern part of the North Sea already harbours various wind farms in the United Kingdom and neighbouring countries in combination with other activities, the combination of all these activities will cause negative cumulative effects on birds.</p>	<p>Cumulative and transboundary effects on offshore ornithology, including the species referenced, are assessed within section 12.7 of <b>Volume 7, Chapter 12 Offshore</b></p>	Y-D

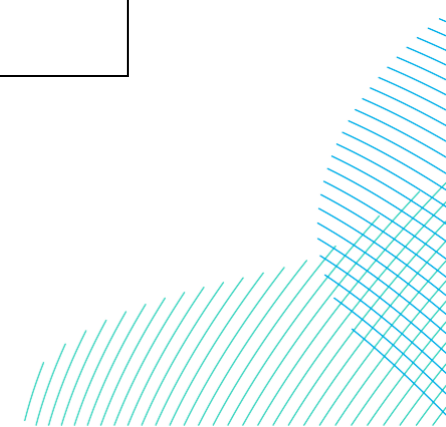
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		Management, the Ministry of Economic Affairs and Climate Policy, and the Ministry of Agriculture, Nature and Food Quality.			<p>We suggest you consider this in further stages of the process. This is possible with comprehensive monitoring data that is available in the European Seabirds at Sea2 database. We offer our assistance to analyse these data so that a proper transboundary analysis can be made, if desired.</p> <p>Assessing cumulative impacts is challenging indeed. The Netherlands, however, has been quite successful in conducting such ecological research. We would therefore like to refer to the Framework for Assessing Ecological and Cumulative Effects in which international cumulative effects of wind farms have been calculated.</p> <p>We expect considerable habitat loss for various bird species by this new development and thus we would be grateful if you will pay extra attention and mitigation measures to this aspect in the updated EIA and further activities. Bird species that are of special interest due to possible conservation targets in the Netherlands are razorbill, guillemot, great black-backed gull, northern gannet and kittiwake. It is probable that the construction of this wind farm will have an external effect on bird species living in the four Dutch Natura 2000 areas Dogger Bank, Cleaver Bank, Frisian Front and Central Oyster Grounds, especially considering international cumulative effects. In the Netherlands, bird collisions with wind turbines and habitat loss due to wind farms are perceived to be an essential issue. Unfortunately, in the PEIR bird collisions are only described for the northern gannet and thus the Netherlands proposes to pay extra attention to the great black-backed gull and the kittiwake as we believe these might also be affected by collisions. Mitigation measures should be considered to avoid such collisions<sup>4,5</sup>.</p> <p>Furthermore, the migration route of razorbill and guillemot from the breeding grounds in the United Kingdom to the moult areas (e.g., Frisian Front) in the Netherlands are not included in the assessment. Also during non-breeding time these species are expected to experience negative effects from additional offshore wind farms. We would appreciate if you would look into mitigation measures to avoid collisions, habitat loss, and barrier effects.</p>	<p><b>Ornithology (application ref: 7.12).</b></p> <p>The maximum estimated area of habitat loss resulting from the Projects has been reduced considerably since PEIR, with both the Array Areas and Offshore Export Cable Corridor boundaries being reduced, the removal of suction bucket and gravity-base foundations from the design envelope within the Array Areas, the reduction of the number of offshore platforms from eleven to eight and reduction of the potential number of offshore export cables from six to four.</p> <p><b>Volume 6, Report to Inform Appropriate Assessment Habitats Regulations Assessment (application ref: 6.1)</b> presents and assessment of the effects of the Projects on areas protected for avian conservation reasons. Compensation for adverse effects on such sites has been proposed where relevant.</p> <p>Updated collision risk modelling has been undertaken since PEIR within <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> with the results detailed within the chapter.</p> <p>Investigations into the recent Highly Pathogenic Avian</p>	



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					<p>The PEIR mentions that research is being done on avian flu, however it is not clear how this has been done. It would be highly appreciated if attention will be paid to avian flu, especially in relation to the northern gannet. Research on impacts on bat species is still in preliminary stages and much is yet unknown. Nevertheless we do know that their migration routes cross the North Sea and thus we would like to point out that they ought to be given attention6.</p>	<p>Influenza (HPAI) outbreak are currently being undertaken by the appropriate statutory nature conservation bodies and non-governmental organisations. Data collected for the Projects to aid this assessment across the 2022 and 2023 breeding seasons are included in <b>Volume 7, Appendix 12-3 to 12-9 (application ref: 7.12.12.3 to 7.12.12.9)</b> of this submission. It is hoped this data may be used in these investigations to provide an indication of the health of the affected colonies in the vicinity of the Projects in the year following the avian flu outbreak.</p> <p>Indications to date are that the gannet colony at Flamborough and Filey Coast SPA has continued to increase despite apparent losses from HPAI, and there is no clear evidence for changes in the numbers of any species recorded at the DBS Array Areas between 2021 (pre-HPAI in English colonies) and 2022 (during and post HPAI noted at English colonies). It thus appears that despite concerns for a wide range of species, colony numbers have remained relatively unaffected, at least in counts made to date. It should also be noted that NE has specifically requested a breakdown of survey estimates</p>	

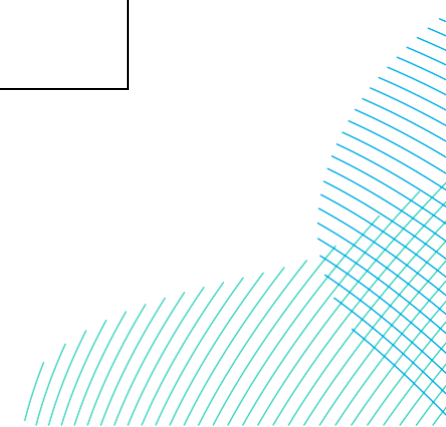


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						across all months of survey data in order to review this aspect.	
SDRNO 07	15/09/2023	Dutch Reaction - Netherlands, with inputs provided by the Dutch Ministry of Infrastructure and Water Management, the Ministry of Economic Affairs and Climate Policy, and the Ministry of Agriculture, Nature and Food Quality.	Other Marine Users	Commercial Fisheries	<p><b>2. Other activities</b></p> <p>In our analysis of the transboundary effect of the Dogger Bank South Offshore Wind Farms we considered various activities such as international shipping, protection of marine protected areas, cables and pipelines, other offshore wind projects and commercial fishing. From this analysis, only commercial fishing expects effects on their activities.</p> <p>The PEIR acknowledges that Dutch vessels are present in the area and record catches. Mitigation measures such as opportunities for co-use functions are discussed, which the Netherlands would appreciate. The area consists of important fishing grounds for various demersal and pelagic fisheries that use beam trawls and seine netting (demersal) and midwater otter trawls (pelagic). Chapter 14 already analyses the expected short- and long-term impact for different fisheries on access to the fishing grounds.</p> <p>The Netherlands would like to request that the analysis also looks at the economic value of the fisheries and accounts for possible economic losses that may occur due to lack of or lesser access to important fishing grounds. It is important to note that whilst the Dutch do not have historic rights in the given area, the Netherlands does have a share in the quota in these waters, for instance plaice (PLE/2A3AX4) and horse herring (HER/1/2-). The construction of the park poses the risk that fisheries may fail to take advantage of fishing their share of quota due to the construction in these specific areas. This is not yet considered in the PEIR as a risk. Therefore the Netherlands would be interested to learn more what the United Kingdom's government or wind farm operators can and will do to further mitigate potential losses and facilitate commercial fisheries in the area.</p>	Given the prevalence of non-UK registered fishing vessels within the Commercial Fisheries Study Area, impacts that might arise on the interests of EEA states within UK waters, e.g. Dutch fishing vessels, have been considered throughout assessments on the commercial fisheries sector in <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> .	N
SDRNO 08	15/09/2023	Dutch Reaction - Netherlands, with inputs provided by the Dutch Ministry of	Cumulative Effects	Consultation	<p>Conclusion</p> <p>The mentioned issues emphasise the necessity of international coordination related to the exploitation of new activities in the North Sea, in order to create a common understanding on ecological cumulative effects of wind farms and management</p>	Noted with thanks. The Applicants confirm that the Environmental Impact Assessment (application reference no. Volume 7) and	N



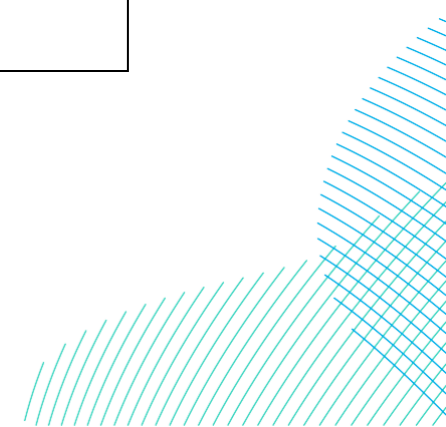
ID #	Date Received	Organisation	ES Chapter Theme 1	ES Chapter Theme 12	Comment/ Questions	The Applicants Response	Project Change? Y/N
		Infrastructure and Water Management, the Ministry of Economic Affairs and Climate Policy, and the Ministry of Agriculture, Nature and Food Quality.			<p>options for protection of the marine environment. As Dutch government, we hope to intensify contacts with UK governmental bodies, and in parallel, we aim to discuss this issue in OSPAR or NSEC. At the same time we hope that wind farm developers will keep improving applied methodologies, taking into account a broader international perspective when predicting environmental effects of wind farm construction activities in the North Sea.</p> <p>Concerning the development of the Dogger Bank South Offshore Wind Farms, the Netherlands would like to be involved in the process of assessing the ecological (and other) effects of this development and think along about the required mitigation measures.</p> <p>We hope that our response is helpful to your process. We would appreciate it to keep in touch about the mentioned issues and hope you will provide us with more information on the further process. If there are any questions, please contact [Redacted], Advisor North Sea</p>	Report to Inform Appropriate Assessment Habitats Regulations Assessment (application reference no. Volume 6) have been completed in alignment with relevant best practice in the UK and internationally, and in consultation with Natural England. Consultation with Natural England will continue as the development of the Projects continues.	
SDRNO 09	15/09/2023	Dutch Reaction - Netherlands, with inputs provided by the Dutch Ministry of Infrastructure and Water Management, the Ministry of Economic Affairs and Climate Policy, and the Ministry of Agriculture, Nature and Food Quality.	Cumulative Effects	N/A	<p><b>Ecological effects with transboundary perspective</b></p> <p>There are several offshore transboundary effects we would like to highlight, give advice or comment on.</p> <p>One serious concern is the inconsistency we found in the assessments of cumulative effects on ecology. In the PEIR, a distinction is made between cumulative and transboundary effects. Effects on neighbouring countries are considered, yet only with UK activities taken into account. By doing so, results become heavily skewed; ecological effects should be considered internationally and the effects of wind farms and other activities are therefore better tested at a relevant geographical scale, appropriate to the scope of the effects. In other words, if a North Sea population is considered then all activities occurring in the same area should be included in the impact assessment.</p> <p>Many North Sea countries are developing offshore wind farms in order to meet their net zero goals to combat climate change. When using the seas more intensively, there is an increased need for us all to assess impacts on ecology and implement adequate measures to limit these impacts. This is</p>	Potential transboundary effects have been assessed where relevant throughout the ES. All topic-specific study areas have been informed by project-specific survey data or the best available publicly available datasets.	N

ID #	Date Received	Organisation	ES Chapter Theme 1	ES Chapter Theme 12	Comment/ Questions	The Applicants Response	Project Change? Y/N
					necessary because we have a shared duty to maintain the important ecological services the North Sea provides us with.		
SNGIH 004	15/09/2023	National Grid Interconnector Holdings (NGIH)	Site Selection and Assessment of Alternatives	Consultation	<p>The Continental Link and DBS projects are located within close proximity of each other. In light of surrounding technical, environmental and land constraints, NGIH asks that DBS actively engage with NGIH to ensure DBS proposals do not preclude the Continental Link project from securing a connection and coming forwards. In ensuring the above, NGIH requests:</p> <p>1) Further consideration of proposals and corridors that would represent the most efficient use of land;</p>	<p>Email response sent 19/09/2023 requesting availability for a Teams call to discuss both project interactions in more detail.</p> <p>The Projects and NGIH held Teams meetings on the 31/01/2024 and 14/02 2024 to discuss project interactions, project timelines and ongoing consultation between the two Projects to share updates going forward. Both parties agree to continue to work together to notify any key Project updates.</p> <p>The Project is considered cumulatively in the ES chapter, where potential impacts have been identified and included in <b>Volume 7, Appendix 6-1 Onshore Cumulative Effects Assessment Methodology (application ref: 7.6.6.1).</b></p>	N
SNGIH 005	15/09/2023	National Grid Interconnector Holdings (NGIH)	Site Selection and Assessment of Alternatives	Consultation	<p>2) Further refinement in relation to cable alignments, substation optionality and cable connection route within the Proposed Order Limits. Greater clarity on this would inform Continental Link project's</p>	<p>Email response sent 19/09/2023 requesting availability for a Teams call to discuss both project interactions in more detail.</p> <p>The Applicants and NGIH held Teams meetings on the 31/01/2024 and 14/02 2024 to discuss project interactions, project timelines and ongoing consultation between the two projects to share updates going</p>	N

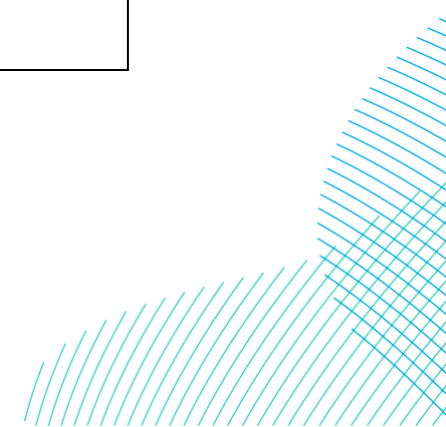




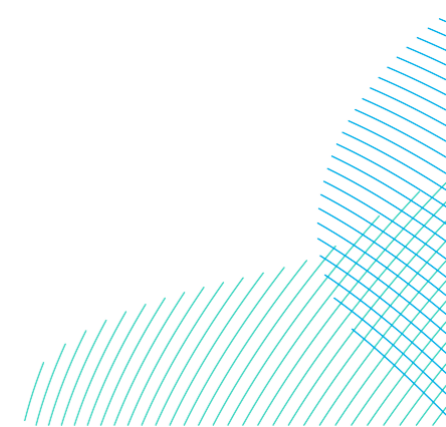
ID #	Date Received	Organisation	ES Chapter Theme 1	ES Chapter Theme 12	Comment/ Questions	The Applicants Response	Project Change? Y/N
						forward. The Projects supplied updated Onshore Export Cable Corridor plans and proposed order limits providing further clarification to NGIH on the likely interaction points. No concerns were identified. Both parties agree to continue to work together to notify any key project updates.	
SNGIH 001	15/09/2023	National Grid Interconnector Holdings (NGIH)	Cumulative Effects	N/A	<p>National Grid Interconnector Holdings (NGIH) welcomes the opportunity to respond to the RWE Dogger Bank South (DBS) supplementary statutory consultation. NGIH previously submitted representations to the non-statutory consultation in October 2022.</p> <p><b>Background</b>                      NGIH, as part of National Grid Ventures (NGV), is a division of National Grid plc, responsible for both developing and operating businesses in our U.K. and U.S. territories. NGIH has entered into a connection agreement with National Grid Electricity System Operator Limited (ESO) for a 1.8 GW interconnector connection, currently known as the Continental Link Multi-Purpose Interconnector (MPI).</p> <p>The Continental Link MPI is a proposed high voltage direct current (HVDC) electricity link between the British transmission system and that of a Nordic partner nation. NGIH is developing the MPI to be capable of connecting offshore windfarm(s) to the NTS in each nation. Further details on MPIs can be found here:  <a href="https://www.nationalgrid.com/document/146131/download">https://www.nationalgrid.com/document/146131/download</a></p> <p>Continental Link is in the pre-application stage of the Development Consent Order (DCO) process, with siting and routing well progressed and targeted stakeholder engagement due to commence in Q4 2023.</p> <p>This includes dialogue with Statutory organisations, the Planning Inspectorate and relevant third-party development applications over the potential form and content of its future</p>	<p>Email response sent 19/09/2023 requesting availability for a Teams call to discuss both project interactions in more detail.</p> <p>The Projects and NGIH held Teams meetings on the 31/01/2024 and 14/02 2024 to discuss project interactions, project timelines and ongoing consultation between the two projects to share updates going forward. Both parties agree to continue to work together to notify any key project updates.</p>	N



ID #	Date Received	Organisation	ES Chapter Theme 1	ES Chapter Theme 12	Comment/ Questions	The Applicants Response	Project Change? Y/N
					DCO application. The DCO extent will be inclusive of the terrestrial and marine environments.		
SNGIH 002	15/09/2023	National Grid Interconnector Holdings (NGIH)	Cumulative Effects	N/A	<b>National Policy and Objectives</b> NGIH participated in the Offshore Transmission Network Review (OTNR), the findings of which are being implemented by the Department for Energy Security and Net Zero (DESNZ, formerly BEIS). NGIH recognises the objective of the OTNR to encourage developers to work together to co-ordinate and develop transmission infrastructure, understanding the ability to optimise the delivery of in-flight projects and minimising impacts on local communities and stakeholders. NGIH further recognises the draft National Policy Statements (NPS) encourage co-ordinated transmission systems.	Email response sent 19/09/2023 requesting availability for a Teams call to discuss both project interactions in more detail.  The Projects and NGIH held Teams meetings on the 31/01/2023 and 14/02 2024 to discuss project interactions, project timelines and ongoing consultation between the two projects to share updates going forward. Both parties agree to continue to work together to notify any key project updates.	N
SNGIH 003	15/09/2023	National Grid Interconnector Holdings (NGIH)	Policy and Legislative Context	N/A	<b>Response</b> NGIH welcomes the development of DBS's proposal as a government supported infrastructure project and the contribution it would make to the national renewable energy generation capacity, in line with the U.K. government's net zero commitments.	Email response sent 19/09/2023 requesting availability for a Teams call to discuss both project interactions in more detail.  The Projects and NGIH held Teams meetings on the 31/01/2024 and 14/02 2024 to discuss project interactions, project timelines and ongoing consultation between the two projects to share updates going forward. Both parties agree to continue to work together to notify any key project updates.	N
SNGIH 006	15/09/2023	National Grid Interconnector Holdings (NGIH)	Policy and Legislative Context	Consultation	3) Ongoing and regular coordination with the DBS project. In line with the direction of national policy and the government's ambition, NGIH seeks closer co-ordination to maximise mutual benefits of progressing nationally significant infrastructure	Email response sent 19/09/2023 requesting availability for a Teams call to	N



ID #	Date Received	Organisation	ES Chapter Theme 1	ES Chapter Theme 12	Comment/ Questions	The Applicants Response	Project Change? Y/N
					<p>projects in close proximity, and to limit potential impacts on local communities, stakeholders and the environment.</p>	<p>discuss both project interactions in more detail.</p> <p>The Projects and NGIH held Teams meetings on the 31/01 and 14/02 2024 to discuss project interactions, project timelines and ongoing consultation between the two projects to share updates going forward. Both parties agree to continue to work together to notify any key project updates.</p>	
SNGIH 007	15/09/2023	National Grid Interconnector Holdings (NGIH)	Cumulative Effects	Consultation	<p>NGIH recommends the impact of the DBS project on Continental Link is taken into account and assessed as part of the application. NGIH further recommends that the Continental Link project is assessed as part of the cumulative assessment of the Project. Notably in Chapter 16, where the PEIR does not currently identify Continental Link. NGIH expects asset protection matters to be addressed through the DCO in due course.</p> <p>Should you have any questions on our consultation response or require any further information please do not hesitate to contact me via email: {Redacted.}</p>	<p>Email response sent 19/09/2023 requesting availability for a Teams call to discuss both project interactions in more detail.</p> <p>DBS and NGIH held Teams meetings on the 31/01 and 14/02 2024 to discuss project interactions, project timelines and ongoing consultation between the two projects to share updates going forward. Both parties agree to continue to work together to notify any key project updates.</p>	N



## 4 Targeted Consultation Responses from Section 42 Consultees – Landowners and PILs

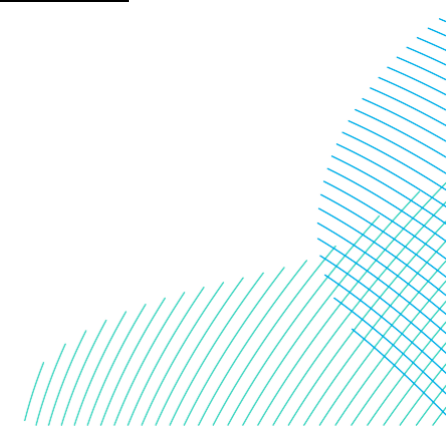
Table 4-1 Targeted Consultation

ID #	Date Received	Type	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants Response	Project Change? Y/N
SRPC001	29/11/2023	S42	Royal Yachting Association and Cruising Association	Shipping and Navigation	If layouts are compact, then it is more likely that a recreational vessel would go around the arrays altogether.	Acknowledged in section 14.6 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> .	N
SRPC002	29/11/2023	S42	Royal Yachting Association and Cruising Association	Shipping and Navigation	Construction is the most sensitive phase with use of guard vessels and notifications as required important.	Use of guard vessels and promulgation of information are included as mitigation embedded in the design in section 14.3 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> .	N
SRPC003	29/11/2023	S42	Royal Yachting Association and Cruising Association	Shipping and Navigation	It is displacement of larger vessels tends to cause issues for recreational vessels but is not a major issue in this area.	Acknowledged in section 14.5 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> .	N
SRPC004	29/11/2023	S42	Royal Yachting Association and Cruising Association	Shipping and Navigation	There is very limited recreational activity at the location of the DBS array areas.	Acknowledged in section 14.5 of <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> .	N
SWSK03	14/11/2023	S42	Walter Stuart Kirkwood	Site selection and assessment of alternatives	My field at Catfoss (166 I think), the route goes right over the outfall for the field drainage, as well as Mewburn's to the north where the outfall ends in the dyke. A small movement to the west for the cable route would make a big difference to the cost in renewing the outfall across both fields and still leave us with some sort of drainage while the work is carried out.	Land Drainage Consultancy Ltd have been appointed to develop conceptual pre- and post-construction drainage plans that will be shared with the main works contractor once appointed to implement were reasonably practicable. These will be developed with landowners and agents outside the limitations of the DCO and will be agreed by private treaty, committed to as part of the Option Agreements.	N
SWSK04	14/11/2023	S42	Walter Stuart Kirkwood	Consultation	Request to meet DM & RWE representatives in due course to discuss proposals	Technology choice to take forward HVDC and consultation with ERYC regarding mineral reserves has allowed the Projects to move Onshore Export Cable Corridor north of constraint and therefore removing the potential impact on quiet enjoyment of The Poplars' property.	N

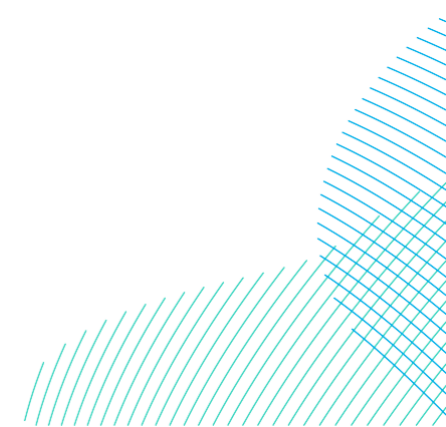
ID #	Date Received	Type	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants Response	Project Change? Y/N
						On site consultation meetings continue regarding project design routeing and siting, which has seen significant positive change to the project design envelope. Template HoT for Option / Deed of Grant have been issued to land agents with populated HoT's being issued to landowners in June 2024.	
SEYC001	09/12/2023	S42	East Yorkshire Concrete Ltd	Cumulative Effects	The Clients are already impacted by two similar schemes (Dogger Bank A and B and Hornsea 4) and cumulative impact of this Project on their land-holding is significant, both in the short and long-term	The Projects are in direct collaboration with all other developers in the vicinity to agree mitigation measures such as sharing access provisions where possible with a view to agreeing Statements of Common Ground at the earliest opportunity to mitigate the impact on landowners. The cumulative impact of temporary land use during construction are assessed in section 21.8 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21).</b>	N
SEYC002	09/12/2023	S42	East Yorkshire Concrete Ltd	Land Use	The proposed accesses to the Work Area to be removed as they are not considered necessary if the hedges are to be removed (as shown on the interactive map on the Project website)  Two accesses should not be needed in any event.	The Projects have identified a need through consultation with Highways for areas of potential road widening which could include areas of passing places to enable continuous use of the public highway without the need for temporary traffic control measure being put in place. Construction access are considered in <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24).</b>	N
SEYC003	09/12/2023	S42	East Yorkshire Concrete Ltd	Land Use	The landowners do not wish to have a Temporary Construction Compound on their land and notwithstanding this the Temporary Construction Compound is considered to be too large	The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4). We believe the proposed Project Development Envelope, set out in <b>Volume 7, Chapter 5 Project Description</b>	N

ID #	Date Received	Type	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants Response	Project Change? Y/N
						<p><b>(application ref: 7.5)</b>, on balance achieves the optimum design.</p> <p>Temporary compound size and locations have been optimised to offer the best location and proximity to public highway at proportionate distances along the cable corridor to facilitate construction. It is expected that the areas of search identified on the land in question will not be taken in full and only the area required will be taken temporarily for construction.</p>	
SEYC004	09/12/2023	S42	East Yorkshire Concrete Ltd	Land Use	<p>The cables to be installed using HDD under Dunnington Lane rather than full the width of their hedges being removed, diminishing the bio-diversity value of their farm. An access point can be created in the revised cable route rather than impacting more of their retained land by using the two access points shown. No detail has been provided on the proposed road widening of Dunnington Lane. Please provide specific detail on what is proposed</p>	<p>The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>. Dunnington Lane is an area proposed to be installed by trenchless technology. An area of off route access has also been proposed to utilise existing gaps in the hedge to further mitigate the impact on biodiversity. The Project has identified a need through consultation with the local Highways Authority for areas of potential road widening which could include areas of passing places to enable continuous use of the public highway.</p>	N
SEYC005	10/12/2023	S42	East Yorkshire Concrete Ltd	Land Use	<p>The Clients wish for the cable route to be moved eastwards where it impacts their land at Moor Grange to avoid the field being severed into two.</p>	<p>The Projects Onshore Export Cable Corridor has been carefully developed considering design constraints such as engineering, ecological and heritage, as well as proximity to residential property and designated landscapes, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>. Unfortunately, the request for the cable route to be moved eastwards has not been able to</p>	N

ID #	Date Received	Type	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants Response	Project Change? Y/N
						<p>be accommodated due to constraints in the adjoining field to the South. We anticipate up to five Hectares of agricultural could be severed during construction, but all efforts will be made to mitigate severance of agricultural land by providing crossing points on the Onshore Export Cable Corridor.</p> <p>Any reasonable loss of business will be a compensable matter and dealt with by our lands team.</p>	
SM001	09/12/2023	S42	Mewburn - Landowner (Alnwick agent)	Land Use	The revised cable route is still too close to the farmstead, potentially impacting on the ground source heating for the farmhouse and the amenity of the property. The revised route still sterilises land which (due to the proximity to the existing established steading) could have alternative use potential in the future.	The electrical infrastructure technology included in the Projects design is HVDC, this has reduced the Onshore Export Cable Corridor width presented at statutory consultation (excluding crossings) from 100m to 75m. The Applicants are unable to route further east due to other constraints. There would be a temporary construction impact across a 75m corridor. The Projects would have a permanent easement of up to 24m during operation that would return to productive agricultural use and any reasonable loss of development will be a compensable matter.	N
SM002	09/12/2023	S42	Mewburn - Landowner (Alnwick agent)	Air Quality	The proximity of the construction work next to the farmstead and existing dwelling is also naturally not welcomed due to issues with noise, dust, vibration etc	All construction activities will be managed in accordance with <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> submitted with the application. All efforts will be made to mitigate the impact of construction activities on nearby properties. No significant residual effects have been identified in <b>Volume 7, Chapter 25 Noise (application ref: 7.25)</b> or <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b> during construction.	N



ID #	Date Received	Type	Organisation	ES Chapter Theme 1	Comment/ Questions	The Applicants Response	Project Change? Y/N
SM003	09/12/2023	S42	Mewburn - Landowner (Alnwick agent)	Land Use	Client is a mineral operator and in December 2022 we requested (via DM) that the Project conduct investigations to ascertain whether the proposed corridor route would impact any potential mineral reserves, as extraction is taking place nearby. In December 2022 we enquired whether the Project would fund test bores in the proposed cable corridor to ascertain the quantity and potential value of any mineral reserves.	<p>The Applicants are aware, Mineral Safeguarding Areas are located within the Onshore Development Area. Details of their location and commodities present are discussed in <b>Volume 7, Chapter 19 Geology and Land Quality (application ref: 7.19)</b> Table 19-10 and illustrated on <b>Volume 7, Figure 19-7 (application ref: 7.19.1)</b> with further detail provided in <b>Volume 7, Appendix 19-2 Geo-Environmental Desk Study and Preliminary Risk Assessment Report (application ref: 7.19.19.2)</b>.</p> <p>Potential impacts relating to temporary and permanent sterilisation during construction and operation of the Projects are discussed in sections 19.6.1.4 and 19.6.2.3 of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b> respectively and are not considered significant. Mitigation measures include undertaking a Mineral Resource Assessment (MRA) (if required), post consent, and prior to the commencement of construction works, to provide an indication of the likely quality and ex-tent of the mineral resource, the commercial viability of extraction and environmental impact. This would be undertaken in consultation with East Riding of Yorkshire Council and the relevant landowner.</p> <p>No test boreholes have been undertaken.</p>	N





**RWE**

MASDAR 

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

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

# **Dogger Bank South Offshore Wind Farms**

**Consultation Report**

**Volume 5**

**Appendix G2 - Responses Received from Section 47  
Consultees and Applicants Regard**

**June 2024**

**Application Reference: 5.8**

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

**Revision: 02**

**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>
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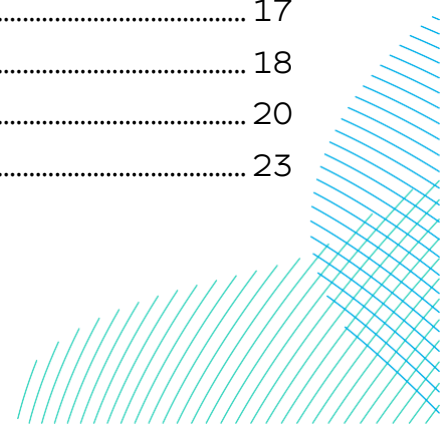
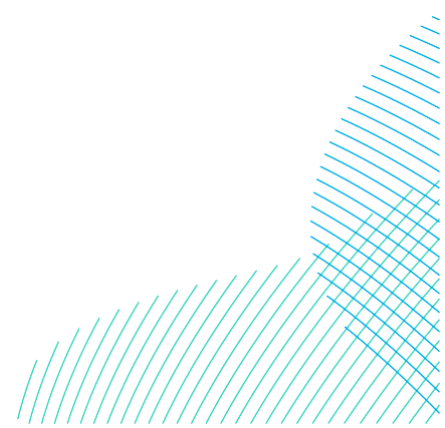
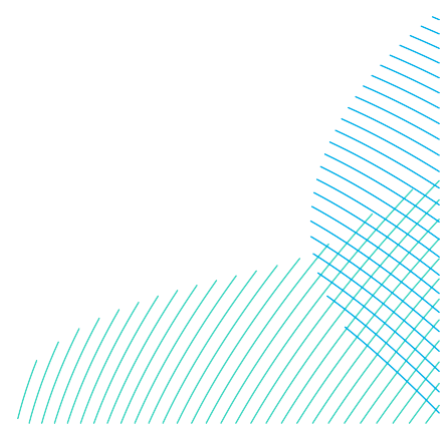


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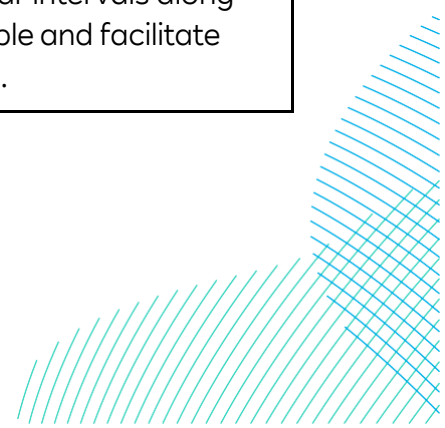


## Glossary

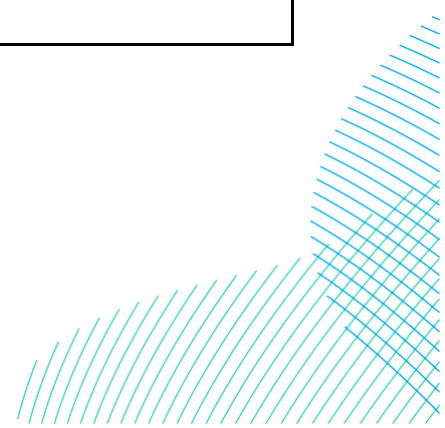
Term	Definition
Agricultural Land Classification	Agricultural Land Classification is a grading system used to assess and compare the quality of agricultural land in England and Wales. A combination of climate, topography and soil characteristics and their unique interaction determines the grade of the land. The grades range from 1 to 5. Grade 1 being excellent, Grade 2 very good, Grade 3a and 3b good to moderate (no subdivide), Grade 4 poor and Grade 5 very poor.
Aquifer	Geological strata that hold water.
Array Areas	The DBS East and DBS West offshore Array Areas, where the wind turbines, offshore platforms and array cables would be located. The Array Areas do not include the Offshore Export Cable Corridor or the Inter-Platform Cable Corridor within which no wind turbines are proposed. Each area is referred to separately as an Array Area.
Cumulative Effects	The combined effect of the Projects in combination with the effects of a number of different (defined cumulative) schemes, on the same single receptor / resource.
Cumulative Effects Assessment (CEA)	The assessment of the combined effect of the Projects in combination with the effects of a number of different (defined cumulative) schemes, on the same single receptor/resource.
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.



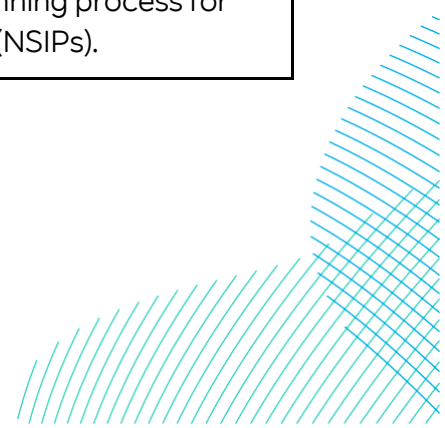
Term	Definition
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Directive and EIA Regulations, including the publication of an Environmental Statement (ES).
Environmental Statement (ES)	A document reporting the findings of the EIA and produced in accordance with the EIA Directive as transposed into UK law by the EIA Regulations.
Erosion	Wearing away of the land or seabed by natural forces (e.g. wind, waves, currents, chemical weathering).
Haul Road	The track along the Onshore Export Cable Corridor used by traffic to access different sections of the onshore export cable route for construction.
Heavy Goods Vehicle (HGV)	HGV is the term for any vehicle with a Gross Weight over 3.5 tonnes. This is also used as a proxy for HGVs and buses / coaches recognising the similar size and environmental characteristics of the respective vehicle types.
Horizontal Directional Drill (HDD)	HDD is a trenchless technique to bring the offshore cables ashore at the landfall and can be used for crossing other obstacles such as roads, railways and watercourses onshore.
High Voltage Alternating Current (HVAC)	High voltage alternating current is the bulk transmission of electricity by alternating current (AC), whereby the flow of electric charge periodically reverses direction.
High Voltage Direct Current (HVDC)	High voltage direct current is the bulk transmission of electricity by direct current (DC), whereby the flow of electric charge is in one direction.
Jointing Bays	Underground structures constructed at regular intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.



Term	Definition
Landfall	The point on the coastline at which the Offshore Export Cables are brought onshore, connecting to the onshore cables at the Transition Joint Bay (TJB) above mean high water.
Landfall Zone	The generic term applied to the entire landfall area between Mean Low Water Spring (MLWS) and the Transition Joint Bays (TJBs) inclusive of all construction works, including the landfall compounds, Onshore Export Cable Corridor and intertidal working area including the Offshore Export Cables.
Landscape character	A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.
Link Boxes	An underground metal box placed within a concrete pit where the metal sheaths between adjacent export cable sections are connected and earthed, installed with a ground level manhole to allow access to the link box for regular maintenance or fault-finding purposes.
Local Authority	The Local Authority is a body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and the Broads Authority, as set out in Section 43 of the Planning Act 2008. East Riding of Yorkshire Council (ERYC) is the Local Authority for the entirety of the Onshore Development Area onshore project footprint.
Main River	"Main Rivers are usually large rivers or streams that are designated under the Water Resources Act (1991) and are shown on the statutory
Non-statutory consultee	Organisations that the Applicants may choose to engage (if, for example, there are planning policy reasons to do so) who are not designated in law but are likely to have an interest in a proposed development.

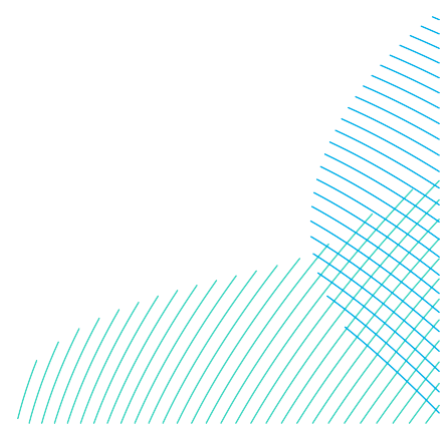


Term	Definition
Offshore Export Cable Corridor	This is the area which will contain the offshore export cables (and potentially the ESP) between the Offshore Converter Platforms and Transition Joint Bays at the landfall.
Onshore Converter Stations	A compound containing electrical equipment required to transform and stabilise electricity generated by the Projects so that it can be connected to the electricity transmission network. There will be one Onshore Converter Station for each Project.
Onshore Development Area	The Onshore Development Area for ES is the boundary within which all onshore infrastructure required for the Projects would be located including Landfall Zone, Onshore Export Cable Corridor, accesses, Temporary Construction Compounds and Onshore Converter Stations
Onshore Export Cable Corridor	This is the area which includes cable trenches, haul roads, spoil storage areas, and limits of deviation for micro-siting. For assessment purposes, the cable corridor does not include the Onshore Converter Stations, Transition Joint Bays or temporary access routes; but includes Temporary Construction Compounds (purely for the cable route).
Onshore Export Cables	Onshore Export Cables take the electric from the Transition Joint Bay to the Onshore Converter Stations.
Onshore Substations Zone	Parcel of land within the Onshore Development Area where the Onshore Converter Station infrastructure (including the haul roads, Temporary Construction Compounds and associated cable routing) would be located.
Ordinary watercourse	Rivers which are not Main Rivers are called 'ordinary watercourses'. Lead local flood authorities, district councils and internal drainage boards carry out flood risk management work on ordinary watercourses.
Planning Inspectorate (PINS)	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects (NSIPs).

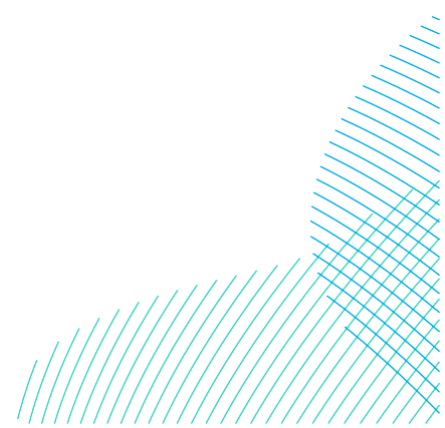




Term	Definition
Preliminary Environmental Information Report (PEIR)	Defined in the EIA regulations as information referred to in part 1, Schedule 4 (information for inclusion in environmental statements) which has been compiled by the applicant and is reasonably required to assess the environmental effects of the development.
Projects Design (or Rochdale) Envelope	A concept that ensures the EIA is based on assessing the realistic worst-case scenario where flexibility or a range of options is sought as part of the consent application.
Sequential Scenario	A potential construction scenario for the Projects where DBS East and DBS West are constructed with a lag between the commencement of construction activities. Either Project could be built first.
Special Area of Conservation (SAC)	Strictly protected sites designated pursuant to Article 3 of the Habitats Directive (via the Habitats Regulations) for habitats listed on Annex I and species listed on Annex II of the Directive
Special Protection Area (SPA)	Strictly protected sites designated pursuant to Article 4 of the Birds Directive (via the Habitats Regulations) for species listed on Annex I of the Directive and for regularly occurring migratory species
Statutory Consultation	The statutory consultation ran in two periods. The first period ran between 6th June and 17th July 2023, with a second period running between 4th August and 15th September 2023 to gather responses from third-parties missed during the initial consultation period. The PEIR was presented as part of this consultation.
Temporary Construction Compound	An area set aside to facilitate construction of the Projects. These will be located adjacent to the Onshore Export Cable Corridor and within the Onshore Substation Zone, with access to the highway.

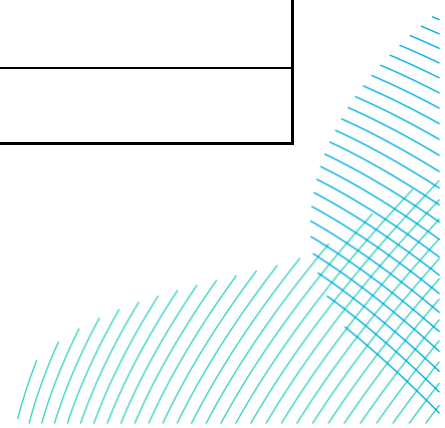


Term	Definition
The Applicants	The Applicants for the Projects are RWE Renewables UK Dogger Bank South (East) Limited and RWE Renewables UK Dogger Bank South (West) Limited. The Applicants are themselves jointly owned by the RWE Group of companies (51% stake) and Masdar (49% stake).
The Projects	DBS East and DBS West (collectively referred to as the Dogger Bank South Offshore Wind Farms).
Transition Joint Bay (TJB)	The Transition Joint Bay (TJB) is an underground structure at the landfall that houses the joints between the Offshore Export Cables and the Onshore Export Cables.
Transition Joint Bay Compound	A temporary construction compound located with the 'Landfall Zone' to undertake the trenchless crossing technique e.g. Horizontal Directional Drilling (HDD) and for the construction of the Transition Joint Bays.

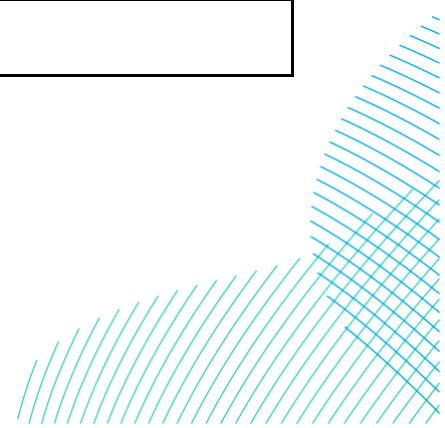


## Acronyms

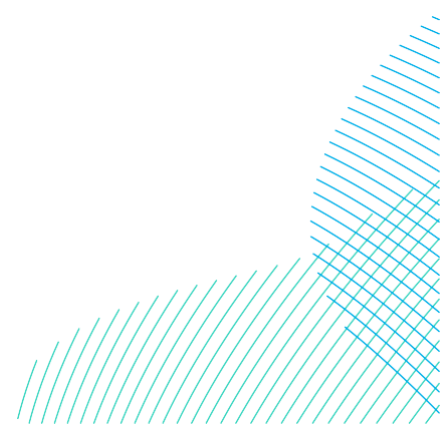
Term	Definition
ALC	Agricultural Land Classification
ALO	Agricultural Liaison Officer
AONB	Areas of Outstanding Natural Beauty
CEA	Cumulative Effects Assessment
CO2	Carbon Dioxide
CTMP	Construction Traffic Management Plan
DAS	Design Access Statement
DBS	Dogger Bank South
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EMF	Electro-magnetic Fields
ES	Environmental Statement
ESO	National Grid Electricity System Operator
EYRC	East Riding of Yorkshire Council
GHG	Greenhouse Gas
GW	Gigawatts
HDD	Horizontal Directional Drill
HGV	Heavy Goods Vehicle
HND	Holistic Network Design
HVAC	High Voltage Alternating Current



Term	Definition
HVDC	High Voltage Direct Current
ICNIRP	International Commission on Non-ionizing Radiation Protection
ILA	Important Landscape Area
Km	Kilometre
kWh	Kilowatt-hour
LMP	Lighting Management Plan
LNR	Local Nature Reserve
LVIA	Landscape and Visual Impact Assessment
NGT	National Gas Transmission
NSIPs	Nationally Significant Infrastructure Projects
NTS	Non-Technical Summary
OCoCP	Outline Code of Construction Practice
OCTMP	Outline Construction Traffic Management Plan
OSMP	Outline Soil Management Plan
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PRoW	Public Right of Way
SAC	Special Area of Conservation
SoCC	Statement of Community Consultation
SPA	Special Protection Area

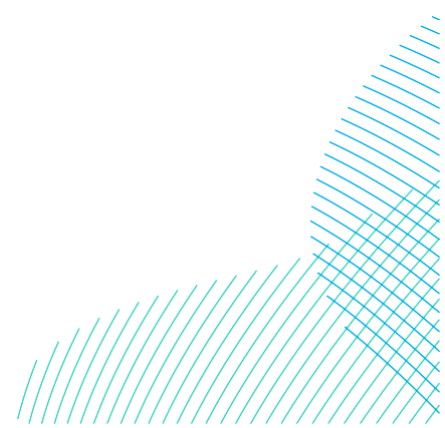


Term	Definition
SSSI	Site of Special Scientific Interest
SuDs	Sustainable Urban Drainage
TCC	Temporary Construction Compound
TCPA	Town and Country Planning Act 1990
TJB	Transition Joint Bay



## 1 Section 47 Consultation Responses and Applicants Regard

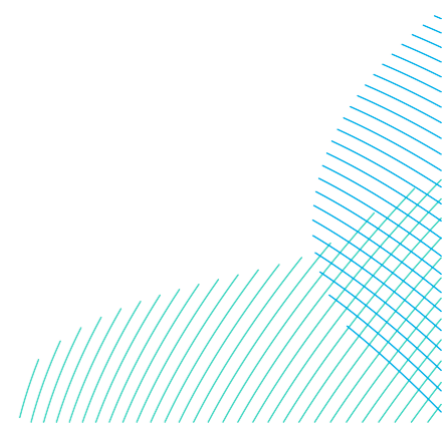
1. As part of the statutory consultation, the Applicants provided a questionnaire to enable respondents to easily comment on the key aspects of the Projects. The purpose of this was to enable the Applicants to make better informed decisions, and also to help mitigate any risks to the Projects raised at an early enough stage for issues and concerns to be mitigated.
2. The questionnaire was made available at local deposit points, public consultation events and was also available to complete electronically via the Projects consultation website.
3. The total of 67 unique responses were received from 547 respondents through the questionnaire. These responses have been themed broadly by question and Environmental Theme corresponding with the PEIR and ES document format (where applicable).
4. The Consultation Questionnaire responses were reviewed, with individual comments grouped into a 'theme', alongside any similar responses received. For example, all comments relating to construction traffic noise were grouped together into a 'concerns regarding construction traffic noise' theme, within a broader topic of 'Noise concerns'. Professional judgement was used in assigning themes.
5. Each individual questionnaire response was assigned a 'theme code' (or multiple theme codes were multiple issues were raised in one response). This has allowed the data to be analysed to demonstrate how many times an issue was raised.
6. Key themes were raised across multiple questions in the questionnaire. The 'number of times raised' count refers to the number of times an issue was raised across all of the questions.
7. Within the 'Project Change' column:
  - Y-D means there was a Project change made relating to design;
  - Y-M means there was a Project change made relating to methodology; and
  - N means there was no Project change made.



## 1.1 Need and Rationale

Table 1-1 Need and Rationale

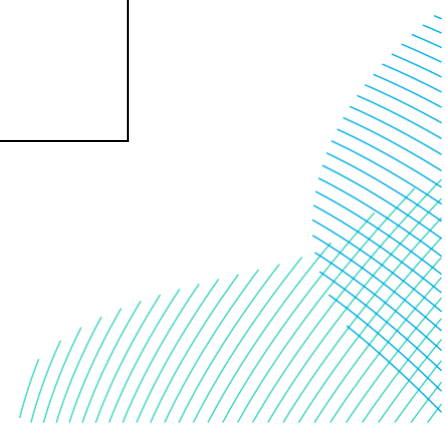
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
Agreed with the statement 'Do you believe that Offshore Wind has a role to play in the UK's energy future?'	33	<p>The UK Government recognises that electricity generation from renewable sources is 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). The Overarching NPS for Energy EN-1 (Department for Energy Security &amp; Net Zero (DESNZ)) 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"</p> <p>As discussed in <b>Volume 7, Chapter 1 Introduction (application ref: 7.1)</b>, the Projects would contribute towards the UK Government meeting the overarching key national policy aims of:</p> <ul style="list-style-type: none"> <li>• Achieving Net Zero by 2050 and reducing emissions;</li> <li>• Increasing the security of energy supply;</li> <li>• Lowering the cost and increasing the affordability of generated electricity; and</li> <li>• Contributing to sustainable development and economic opportunities.</li> </ul> <p>The Projects constitute low carbon infrastructure as they make provision for offshore electricity generation that does not involve fossil fuel combustion. Resultingly, the Projects are recognised as a Critical National Priority (CNP) infrastructure. For a more detailed assessment of the need case for the Projects, see <b>Volume 7, Chapter 2 Need for the Project (application ref: 7.2)</b>.</p>	N
Disagreed with the statement 'Do you believe that Offshore Wind has a role to play in the UK's energy future?'	10		



## 1.2 General Comments Relating to Consultation, Engagement and Communications

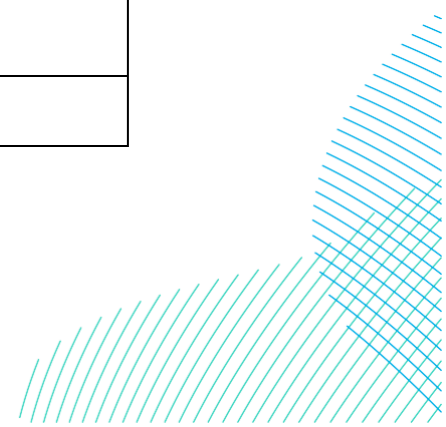
Table 1-2 General Comments Relating to Consultation, Engagement and Communications

Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
<p>Concerns about Website including:</p> <ul style="list-style-type: none"> <li>• Difficulty navigating and ease of use of online mapping;</li> <li>• Not been able to find the PEIR information;</li> <li>• Substation visualisation not showing to the correct scale and size; and</li> <li>• Request for an 'ask the expert' link on the website for any technical queries.</li> </ul>	4	<p>The Applicants had a dedicated consultation website where documents including the Statement of Community Consultation (SoCC) and project newsletters were available to download. The consultation materials including banners introducing the Projects, information about the proposals and a questionnaire were also available during the statutory consultation period and are still available to view in the 'Document Library' section of the website.</p> <p>Comments about the website have been noted and will be considered by the Applicants for any future statutory consultation and during the Examination.</p>	N
<p>Concerns about publicity of events including:</p> <ul style="list-style-type: none"> <li>• Should have been advertised more and was not known about;</li> <li>• Providing more notice for consultations; and</li> <li>• Why it wasn't advertised more widely in the press/free press.</li> </ul>	9	<p>The Applicants distributed a press release to all local media outlets to advertise the statutory consultation. Unfortunately, local media did not publicise the events as hoped. Statutory consultation letters were sent to all addresses located within the consultation zones. This included all properties within 3km of the proposed Substations Zones, within 1.5km of proposed Landfall Zones and within 1km of the Proposed Onshore Export Cable Corridor. Adverts were also placed in Just Beverley, Beverley Life, Driffield &amp; Wolds Weekly and the Holderness &amp; East Riding Gazette to advertise the consultation and consultation events. Posters were also displayed in local villages to advertise the dates and times of consultation events.</p> <p>The Applicants have also issued project newsletters to provide updates to the public. Newsletter publication dates were aligned with key project milestones during the Development Phase. DBS newsletters issued:</p> <ul style="list-style-type: none"> <li>• To summarise the outcomes from Statutory Consultation – Winter 2023; and</li> <li>• Summarise details of the Planning Application Submission – Spring 2024</li> </ul> <p>Following submission of the application for a DCO, the Applicants propose to release another newsletter during the DCO examination period. Following a decision on the DCO from the Secretary of State, during pre-construction and construction, newsletters will be published approximately every 6 months.</p>	N
<p>Concerns about Consultation events including:</p> <ul style="list-style-type: none"> <li>• Why a 3D model/Video was not available;</li> <li>• More events are required;</li> </ul>	7	<p>Four public consultation events were held during the non-statutory consultation period from September 27<sup>th</sup> to October 8<sup>th</sup> 2022, at Skipsea, Beverley and Catwick. A total of 393 people attended the events.</p> <p>Five statutory consultation events were held from the 6<sup>th</sup> June to the 17<sup>th</sup> July 2023 at Skipsea, Beverley and Leven. A total of 382 people attended the events. The Applicants arranged a proportionate number of events, located the allow members of the public to meet the team and ask their questions directly as close to where they live as possible. Events at the Landfall</p>	N

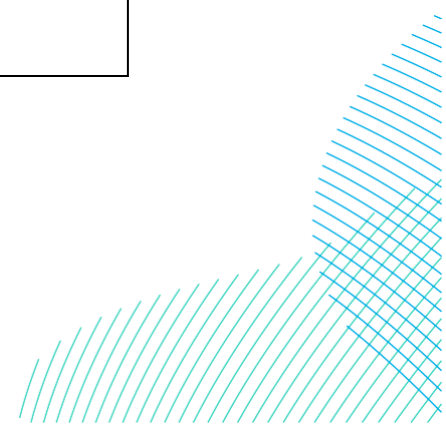




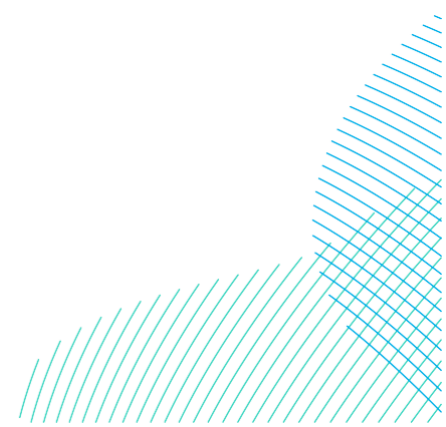
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
<ul style="list-style-type: none"> <li>• That not enough detail about location of cable route and certainty about the final design was provided to make an informed decision;</li> <li>• Further information on impacts at the Converter Stations required;</li> <li>• Maps/plans at the events too small;</li> <li>• Not enough info about wildlife;</li> <li>• Request to use different colours on the boards; and</li> <li>• Staff not able to provide specific answers.</li> </ul>		<p>and the Substation Zones, at Beverley and Skipsea, were considered key locations and where likely significant environmental effects would be most likely to occur.</p> <p>Each of the public events were staffed by specialists from the Projects team including onshore, offshore, land, engineering, environment, stakeholder and community experts. There were also support staff on hand at each event to ensure that attendees with specific issues would be able to speak to the relevant specialist. A process was also in place to ensure that any issues that could not be answered on the day would be followed up and responded to directly. Attendees were also able to provide feedback through one of the following methods:</p> <ul style="list-style-type: none"> <li>• A paper questionnaire was printed and made available at events;</li> <li>• A digital version of the questionnaire was available to complete online, linked from the consultation information pages;</li> <li>• A freepost address (Freepost DBS) was set up so people could send either the completed questionnaire or any other feedback to the projects team; and</li> <li>• Feedback could also be emailed directly to the projects team via a dedicated email address: <a href="mailto:dbs@rwe.com">dbs@rwe.com</a>.</li> </ul> <p>During the statutory consultation events the proposed design of the Projects was presented, including options for Substation Zone 1 and 4 and a 200m wide Onshore Export Cable Corridor with an indicative 100m onshore cable corridor. Although some comments were raised that the proposal were not certain enough at statutory consultation, presenting a wider area allowed for potential changes in response to consultation feedback received. The Preliminary Environmental Information Report (PEIR) was available for review, based on the indicative designs presented at the events. This included Terrestrial and Offshore Ecology and Ornithology chapters and was summarised in a Non-Technical Summary.</p> <p>Comments on the presentation of the material including colours used and scale of maps has been noted, for future events.</p>	
Questionnaire too daunting	1	<p>As part of the consultation carried out under Section 47, members of the public were invited to complete a consultation questionnaire, which asks for responses to pre-defined questions about their main areas of concern and the project design. A copy of the consultation questionnaire is provided in <b>Volume 5, Appendix D7 (application ref: 5.5)</b>. In total, 67 completed questionnaires were received from members of the public.</p> <p>The questionnaire was designed to guide responses and included questionnaire included 14 questions, however all respondents had the option to provide comments directly at the events or via email.</p>	N
Positive feedback about the consultation events	22	All positive feedback has been noted.	N



Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
<ul style="list-style-type: none"> <li>• Knowledgeable staff;</li> <li>• Good material;</li> <li>• Well presented;</li> <li>• In no technical language;</li> <li>• Lots of detail;</li> <li>• Very informative; and</li> <li>• Friendly and approachable.</li> </ul>			
<p>Comments on PEIR presented at Statutory Consultation including:</p> <ul style="list-style-type: none"> <li>• Too much detail in PEIR documents, difficult to digest;</li> <li>• Greater detail to support the responses/conclusions reached; and</li> <li>• Poor Quality of the PEIR.</li> </ul>	8	<p>The PEIR was available for review, based on the indicative designs presented at the statutory consultation. This included a Non-Technical Summary providing a high level summary of each chapter in the Environmental Statement (ES). A consultation brochure was also provided at statutory consultation which included further detail about the Projects in non-technical language for those members of the public that did not want to review the full chapters.</p> <p>Where comments have been received that there was not enough detail in the PEIR, it is considered that the PEIR provided a thorough draft assessment, based on the parameters of the design available, to provide a summary of the likely significant effects and proposed mitigation. Where survey information was not available this has now been completed and is included in the ES documents submitted with the DCO.</p>	N
<p>Comments the NTS was too technical</p>	8	<p>A Non-Technical Summary providing a high-level summary of each chapter in the ES and a consultation brochure were provided at statutory consultation which included detail about the Projects in non-technical language. Comments on the technical nature are noted and have been considered in the ES NTS.</p>	Y-M
<p>Concerns about how feedback will be considered?</p> <ul style="list-style-type: none"> <li>• Concerns decisions have already been made prior to consultation;</li> <li>• Concerns feedback will not be actioned, listed too;</li> <li>• how will this feedback be addressed, taken on board and managed - or not; and</li> <li>• Clarity on responses to questions raised at events and in S47 responses; and</li> <li>• Concerns decisions are being justified based on economic factors for the Projects.</li> </ul>	15	<p>Details of the responses to the Section 47 consultation are included in this Appendix and Section 42 consultation in <b>Volume 5, Appendix G1 (application ref: 5.8)</b>. Individual Section 47 (public) consultation responses have been combined into a number of 'themes' and a specific response provided.</p> <p>Where possible, comments received during the statutory consultation have been considered and updates made to the design or the relevant assessment report or methodology. No decision had been made on the options presented at statutory consultation, e.g. in relation to the Substation Zones 1 and 4 in advance.</p>	N



Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
More information requested on how to take part pre examination or to be kept informed of Project updates	6	Members of the public and stakeholders will have further opportunity to engage and discuss the progress of the projects during the examination period following the DCO submission.	N
Missing stakeholders identified: <ul style="list-style-type: none"> <li>• Beverley Barge Preservation Society</li> <li>• church groups</li> </ul>	2	Contact details have been added to Mailing List for any non-statutory consultees identified.	N
Need to engage with those with long term impacts directly.	2	A letter was sent to 44,500 residents and businesses located within the consultation zone in advance of the consultation launch. The consultation zone included people living within 3km of the proposed Substations Zones, within 1.5km of proposed Landfall Zones and within 1km of the Proposed Onshore Export Cable Corridor were consulted on the Project. This invited them to the consultation events or, to view the material available on the Projects' websites.	N
Not enough engagement with landowners <ul style="list-style-type: none"> <li>• More consultation on Survey timings</li> </ul>	4	<p>The process used to identify all landowners and people with interest in land is summarised in section 4.3 of <b>Volume 5, Consultation Report (application ref: 5.1)</b>.</p> <p>The Applicants appointed Dalcour Maclaren to carry out the land agency work, including land referencing, managing communications with identified landowners and arranging access as might be required. Outside of the consultation phases conducted under Section 47 and Section 42 of the Planning Act 2008, Dalcour Maclaren consulted extensively with landowners along the proposed Onshore Export Cable Corridor options.</p>	N

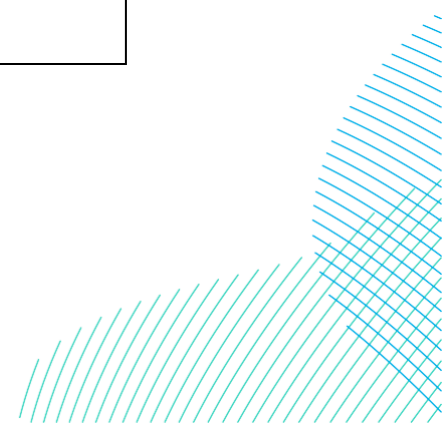


## 1.3 Project Description

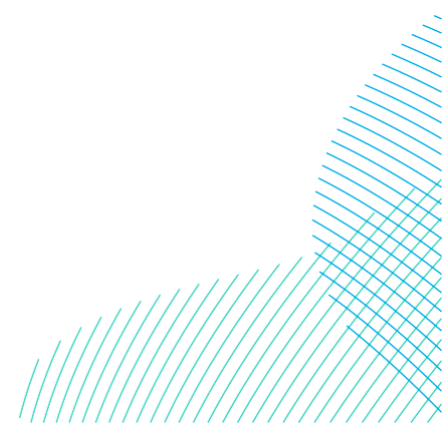
Table 1-3 Project Description

Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
<b>Construction Programme</b>			
Concerns about construction impacts and timescales for the Projects	7	<p>Construction impacts are assessed in each Environmental Statement (ES) chapter. An indicative construction programme is included in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>, construction works would take place over seven years from the point at which the DCO consent is granted. Onshore construction works should be completed within six years.</p> <p>The Onshore Export Cables will be installed underground from the TJBs to the Onshore Converter Station(s). Associated Jointing Bays and link boxes will need to be installed underground along the Onshore Export Cable Corridor every 0.75 to 1.5km. Where possible, areas between Jointing Bays would be reinstated within two years from the start of construction and returned to agriculture or the habitat reinstated. All other areas at the Landfall Zone and the Substation Zone would be reinstated at the end of the construction period.</p> <p>Mitigation measures related to construction phase impacts and timings are contained within <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b> and <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b>.</p>	N
<b>Converter Station(s)</b>			
Concerns about the size of the Converter Stations [Substations]	3	The Onshore Converter Stations are sized to accommodate the requirement of the Projects electrical transmission system. They represent a realistic worst case scenario, as set out in section 5.7.2 of <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> .	N
<b>Onshore Export Cable Corridor</b>			
Concerns there will be overhead lines, associated with the Projects and one request for overhead lines	5	<p>There are no overhead lines associated with the Projects. All cables will be buried, as set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> and <b>Volume 8, Commitments Register (application ref: 8.6)</b>.</p> <p>Overhead lines were discounted as part of the consideration of alternatives set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>.</p>	N
Concerns about the width of the Onshore Export Cable Corridor [presented 200m corridor at statutory consultation and unclear about the location of the 100m wide corridor within it]	1	A larger 200m corridor with a preferred 100m corridor within that area was present at the statutory consultation. Following Statutory Consultation carried out from the 6 <sup>th</sup> June to the 17 <sup>th</sup> July 2023 the HVAC electrical transmission system was not taken forward, this allowed the width of the Onshore Export Cable Corridor to be reduced to 75m, as detailed in as described in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b> and the <b>Volume 8, Consultation Report (application ref: 5.1)</b> . The Onshore Development Area is described in <b>Volume</b>	N

Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
		<b>7, Chapter 5 Project Description (application ref: 7.5)</b> and shown on <b>Volume 2, Onshore Order Limits and Grid Co-ordinates Plan (application ref: 2.4)</b> .	
Concerns about depth of the buried cables [must be 1.2 to 1.5m depth [for farming]	2	All Onshore Export Cables will be buried a minimum of 1.35m below ground and farming including ploughing will be able to take place above them, following reinstatement, as set out in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> . Where possible, areas between Jointing Bays would be reinstated within two years and returned to agriculture or the original habitat e.g. hedgerows. All other areas at the Landfall Zone and the Substation Zone would be reinstated at the end of the construction period.	N
<b>Other Concerns Raised</b>			
Concerns about the robustness of the offshore Wind Turbines	2	All offshore infrastructure, described in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> has been designed to withstand the conditions of the North Sea and for the operational lifetime of the Projects, 32 years.	N
Concerns about terrorist threat to the Projects and significant weather events	2	Major Accidents and Disasters are considered in <b>Volume 7, Chapter 6 EIA Methodology (application ref: 7.6)</b> . This considers risks to the Projects and the proposed mitigation from human error, equipment failure and Natural Hazards. Overall, no significant risks from major accidents and disasters have been identified.	N
Concerns about waste management	1	An Outline Site Waste Management Plan is included in <b>Appendix E of Volume 8, Outline Code of Construction Practice (application ref 8.9)</b> . This includes details of how the Projects will apply the waste hierarchy during construction to ensure materials are reused or recycled wherever possible.	N
Coordination with other Projects to plan strategic grid connections	5	<p>The Applicants have developed DBS East and DBS West transmission infrastructure as co-ordinated Projects in accordance with the National Grid Electricity System Operator (ESO) evolving Holistic Network Design (HND), as updated in February 2024. The HND has confirmed the Projects will have a radial connection to the proposed National Grid Substation at Birkhill Wood.</p> <p>Hornsea Project Four, Dogger Bank A and B and the National Grid substation projects at Creyke Beck and Birkhill Wood have been identified as a cumulative development in the cumulative environmental affects assessment, as discussed in <b>Volume 7, Appendix 6-1 - Onshore Cumulative Effects Assessment Methodology (application ref: 7.6.6.1)</b>. The Applicants will work closely with them where our construction areas overlap.</p> <p>Due to uncertainty about construction infrastructure requirements for other Projects, and the environmental and engineering constraints identified in the vicinity of other Projects, which have already been consented. It is not possible to locate the Projects together with Dogger Bank (A and B). Thermal spacing is also required between the Onshore Export Cables or they will overheat. This</p>	N



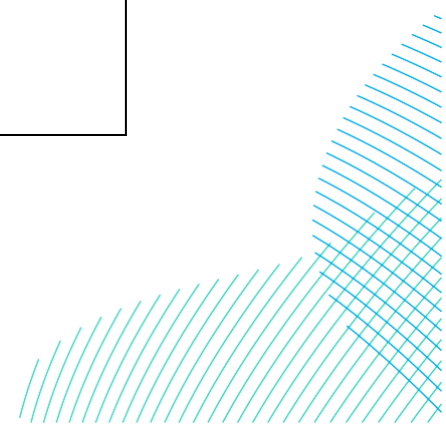
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
		means that routes cannot be shared with other projects unless significant space is available to accommodate the thermal requirements.	
Comments and queries in relation to the proposed Birkhill Wood National Grid Substation	1	The proposed Birkhill Wood National Grid Substation is not part of the Projects and therefore not part of the DCO application. National Grid will seek separate planning permission under the Town and Country Planning Act 1990 (TCPA) for the proposed Birkhill Wood National Grid Substation, submission of the planning application is planned for late 2024, with a decision expected in 2025 and the earliest commencement of construction works in 2026. The Projects require the new Substation to be granted planning permission and be fully constructed by National Grid, prior to connection, the earliest proposed connection date is 2029. National Grid will be the owner of the proposed Birkhill Wood National Grid Substation. Connection to the National Grid substation itself would be completed by National Grid or their appointed contractors. The development of the proposed Birkhill Wood National Grid Substation is considered as a cumulative development as construction of both Projects would take place at the same time, further detail is provided in <b>Volume 7, Appendix 6-1 - Onshore Cumulative Effects Assessment Methodology (application ref: 7.6.6.1)</b> . The Applicants are in regular discussions with National Grid and will seek to collaborate with them as their planning proposals develop.	N
Request for power to feed a proposed large scale commercial electrolysis plant	1	The Projects are not designed to allow the connection of other projects to the Onshore Export Cable Corridor. Other Projects must seek their own connection agreement with National Grid.	N



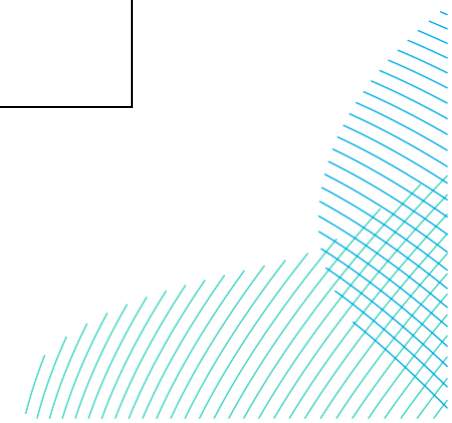
## 1.4 Site selection

Table 1-4 Site Selection

Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
<p>Requests for environmentally sensitive sites to be avoided / project to be constructed in the most environmentally sensitive way. Includes requests to:</p> <ul style="list-style-type: none"> <li>Avoid residential properties; and</li> <li>Avoid Old Hall Farm and Millenium Orchard.</li> </ul>	3	<p>We have followed a comprehensive, iterative site selection process to develop the most appropriate Onshore Export Cable Corridor, as set out in <b>Volume 7, Chapter 4 Site Selection &amp; Assessment of Alternatives (application ref: 7.4)</b>. The process aimed to minimise impacts on the environment and local residents. The process took into account engineering assessments and technical feasibility, environmental considerations including ecology, designated sites, nature reserves, land use and historic features, local communities and consultation feedback as well as feedback from discussions with landowners. Beverley Westwood and the Burton Bushes which are designated as Ancient Woodland and a Site of Special Scientific Interest (SSSI), these areas and designations have been avoided and the Onshore Export Cable Corridor is routed to the west of these sites.</p> <p>During the site selection process the Applicants have sought to minimise impacts on trees through avoidance, use of trenchless crossing techniques to go underneath woodland areas and minimise any hedgerow clearance to the width of the haul road where trenchless crossing techniques are employed. Any indirect potential impacts are detailed in <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b>. Full details of the consultation process is presented in <b>Volume 5, Consultation Report (application reference: 5.1)</b> submitted alongside the DCO application.</p>	Y-D
<p>Concerns about routing through Beverley Westwood</p>	20	<p>The Onshore Export Cable Corridor avoids Beverley Westwood.</p>	Y-D
<p>Concerns about use of agricultural / greenfield land. Specific comments relate to:</p> <ul style="list-style-type: none"> <li>Request to choose a brownfield site for the Substation Zone; and</li> <li>Statements that prime agricultural land would be lost.</li> </ul>	11	<p><b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application reference 7.4)</b>, details the methodology and steps undertaken to identify the preferred locations of landfall, Substation Zone and the Onshore Export Cable Corridor.</p> <p>The Applicants did a full review of available sites within a 3km search area around Creyke Beck and completed a comprehensive, iterative site selection process to develop the most appropriate locations. The process aimed to minimise impacts on the environment and local residents. The process took into account engineering assessments and technical feasibility, environmental considerations including ecology, designated sites, nature reserves, land use (including green and brown field site), landscape and visual, and historic features, local communities and consultation feedback as well as feedback from discussions with landowners. Please see <b>Volume 7, Chapter 21 Land Use (application reference: 7.21)</b> for further details.</p>	N
<p>Comments about choice of cable route including:</p> <ul style="list-style-type: none"> <li>Routing to the north of Beverley;</li> <li>Why cable route cannot go to the south of Beverley;</li> </ul>	17	<p>The Onshore Development Area was carefully developed in line with a multitude of design constraints such as engineering, ecological, designated sites, nature reserves, land use and historic features, as well as proximity to residential property and designated landscapes.</p>	Y-D

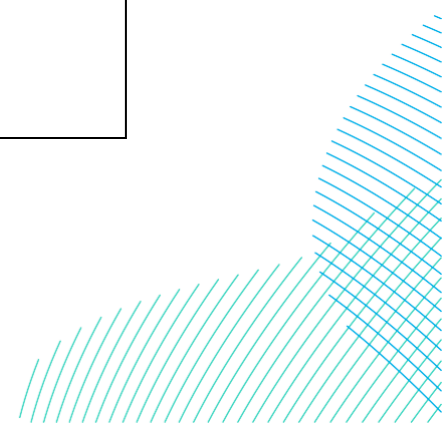


Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
<ul style="list-style-type: none"> <li>Avoiding Yarrow Quarry;</li> <li>Avoiding Historic Beverley and Racecourse;</li> <li>Why cable route is so long; and</li> <li>General support for the cable route.</li> </ul>		<p>The site selection process also took into account local communities and consultation feedback as well as feedback from discussions with landowners. The applicants believe the proposed project development envelope on balance achieves the optimum design with all factors considered.</p> <p><b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application reference 7.4)</b> details how the preferred Onshore Export Cable Corridor was selected, the removal of options 1, 2, 4 and 5 and for Option 3 to be selected as the preferred Onshore Export Cable route. Volume 7, <b>Volume 7, Figure 4-25 (application ref: 7.4.1)</b> presents the preferred options for the Onshore Export Cable Corridor. Option 1 was removed as <i>'This option was assessed as least favourable due to poor ground conditions, the crossing of a residential property, increased flood risk in comparison to other options and difficult access and therefore was removed from the process.'</i> Option 2 was removed as <i>'this Onshore Export Cable Corridor option was not taken forward as it would require a crossing of Figham Common which is common land and therefore the Projects may require Special Parliamentary Procedures to undertake the work.'</i> The Applicants will continue to develop and refine the design of the Projects within the Order Limits as they move towards construction.</p> <p>By design the Applicants have sought to avoid preferred areas of search for sand and gravel to mitigate the impact. The Onshore Export Cable Corridor was also amended to avoid Yarrow Quarry at Long Riston.</p>	
<p>General comments on landfall selection. Comments include:</p> <ul style="list-style-type: none"> <li>A request to only choose one landfall; and</li> <li>Concerns about the environmental impact at the landfall location.</li> </ul>	4	<p>As detailed in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application reference 7.4)</b> following the statutory consultation the Applicants chose to progress with Landfall Zone 8 which delivers the following advantages:</p> <ul style="list-style-type: none"> <li>Provides beach emergency access without accessing Seaside Caravan Park at Ulrome;</li> <li>Avoids the Holderness Inshore Marine Conservation Area;</li> <li>Avoids Withow Gap SSSI; and</li> <li>Simplifies the earthworks required for a trenchless crossing compound.</li> </ul> <p><b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> sets out details of the landfall located at Skipsea. Only one landfall location has been selected for the Projects.</p>	Y-D
Choice of landfall – preference for Landfall 9	5	<p>As detailed in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application reference 7.4)</b> following the statutory consultation the Applicants removed Landfall 9 from the Projects design envelope for the following reasons:</p> <ul style="list-style-type: none"> <li>It would result in installation of the Offshore Export Cable within the Holderness Inshore MCZ;</li> <li>There was an increased intensity in static fishing in comparison with landfall 8;</li> <li>The Withow Gap SSSI is located within this option; and</li> </ul>	N





Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
		<ul style="list-style-type: none"> <li>There was high potential for significant archaeological remains to be impacted.</li> </ul>	
<p>General commentary on Substation Zone selection; including:</p> <ul style="list-style-type: none"> <li>Requests to put the Onshore Converter Stations close to the landfall</li> <li>Statements regarding the high pressure gas pipeline in Zone 4</li> <li>A request to choose a site closer to the existing Creyke Beck substation</li> <li>Comments on Substation Zone screening and access</li> <li>Questions about the space required for the Onshore Converter Stations</li> </ul>	18	<p><b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application reference 7.4)</b>, details the methodology and steps undertaken to identify the preferred location for the Substation Zone.</p> <p>To maximise efficiencies in electricity transmission it is necessary to locate the Onshore Converter Stations as close to the National Grid Birkhill Wood substation as possible.</p> <p>The Applicants did a full review of available sites within a 3km search area around Creyke Beck and completed a comprehensive, iterative site selection process to develop the most appropriate locations. The process aimed to minimise impacts on the environment and local residents. The process took into account engineering assessments and technical feasibility, environmental considerations including ecology, designated sites, nature reserves, land use (including green and brown field site), landscape and visual, historic features, local communities and consultation feedback as well as feedback from discussions with landowners.</p> <p>Following PEIR feedback a decision was made to remove High Voltage Alternating Current (HVAC) technology, to transmit electricity from the offshore array to the Substation Zone, from the Projects design envelope. HVAC technology required a larger footprint for a substation which meant two Substation Zones would have been required as an HVAC substation and High Voltage Direct Current (HVDC) Converter Station could not be accommodated within one Substation Zone. HVAC would also have required a wider cable corridor.</p> <p>HVDC is included in the Projects design envelope to transmit electricity from the offshore arrays to the Substation Zone for both Projects.</p> <p>A Onshore Converter Station is required for each project to convert the electricity generated from HVDC to HVAC prior to connection to the National Grid.</p> <p>Due to the smaller footprint required for HVDC Converter Stations it was possible to collocate the Converter Stations on Substation Zone 4, to the south west of Beverley. Details of the size of the Onshore Converter Stations are included in <b>Volume 7, Chapter 5 Project Description (application reference 7.5)</b>.</p>	N
Choice of Substation Zone – preference for Zone 1	6	<p>As detailed in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application reference 7.4)</b> following the statutory consultation the Applicants removed Substation Zone 1 from the Projects design envelope for the following reasons:</p> <ul style="list-style-type: none"> <li>Presence of 33kV overhead power lines;</li> <li>Geological risk from a linear feature traversing the eastern part of the Substation Zone 1 footprint;</li> <li>Crossing of the National Gas Transmission (NGT) High Pressure Gas Main;</li> <li>Areas of poor ground associated with alluvium to the north of the Zone;</li> </ul>	N

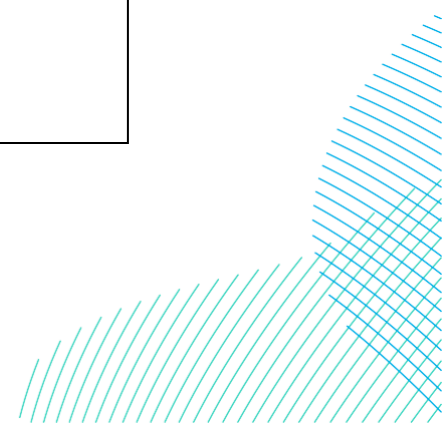


Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
		<ul style="list-style-type: none"> <li>Small areas at risk of surface water flooding within the north of the Substation Zone 1 footprint;</li> <li>A co-located option was the overall preference across all environmental topic areas;</li> <li>Substation Zone 1 could only accommodate one Converter Station and a split substation design was the least favourable from a construction costs and land rights perspective; and</li> <li>Having two HVDC Converter Station construction sites would be less favourable from a health and safety management perspective.</li> </ul>	
Choice of Substation Zone – preference for Zone 4	1	<p>As detailed in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application reference 7.4)</b> following the statutory consultation the Applicants chose to progress with Substation Zone 4 which delivers the following advantages:</p> <ul style="list-style-type: none"> <li>Two Converter Stations could be accommodated within the Substation Zone enabling co-location;</li> <li>A co-located option was the overall preference across all environmental topic areas;</li> <li>Avoid splitting the Converter Stations over two Substation Zones which would be more favourable from a health and safety management perspective; and</li> <li>Avoid crossing the National Gas Transmission (NGT) High Pressure Gas Main.</li> </ul>	Y-D

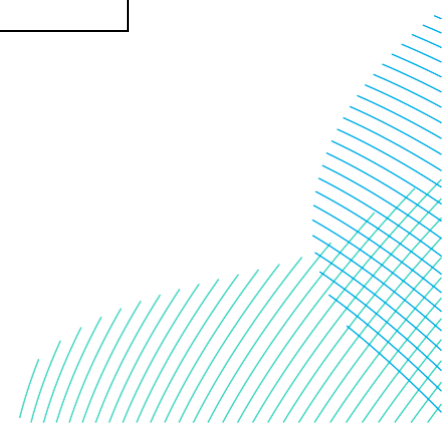
## 1.5 Terrestrial Ecology

Table 1-5 Terrestrial Ecology

Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
<p>Concerns regarding the effects of the Project on the following:</p> <ul style="list-style-type: none"> <li>Burton Bushes (SSSI);</li> <li>Beverley Parks Local Nature Reserve (LNR); and</li> <li>Beverley Westwood (LWS).</li> </ul>	13	<p>We have followed a comprehensive, iterative site selection process to develop the most appropriate Onshore Export Cable Corridor, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>. As detailed in <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> Burton Bushes and Beverley Parks Local Nature Reserve are statutory designated sites, located on <b>Volume 7, Figure 18-3 (application ref: 7.18.1)</b>. With the reduction of the Onshore Development Area since the PEIR, Burton Bushes SSSI and Beverley Parks LNR are no longer adjacent to the Onshore Development Area. Burton Bushes SSSI is now approximately 0.12km away, and Beverley Parks LNR is 0.62km away. Beverley Westwood Local</p>	N



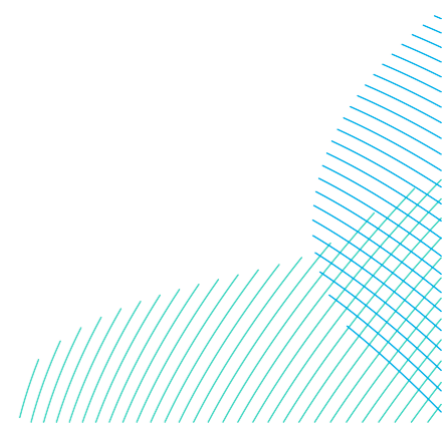
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
		<p>Wildlife Sites (Newbald Rd and Waxcaps), shown on <b>Figure 18-4 (application ref: 7.18.1)</b> have also been avoided.</p> <p>There is the potential for disturbance caused by works associated with the Onshore Export Cable Corridor and Onshore Converter Station(s) due to activities which generate fugitive emissions (i.e. dust and emissions from an increase in construction traffic and road access), noise disturbance from increased traffic, and trenchless crossing such as Horizontal Directional Drilling (HDD). However, this would be controlled through <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b> and <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b>, and the effects are not considered significant.</p>	
Request to plant more trees and not remove them	5	<p>Where possible trees within the Onshore Development Area will be retained. Trees identified to be retained will be fenced off and root protection zones established according to best practice and professional advice. Where this is not possible, any trees that require removal would be replanted in a suitable location within the Onshore Development Area, but not directly over the Onshore Export Cables.</p> <p>Further tree surveys across the whole Onshore Development Area are to be undertaken in 2024 and an Arboricultural Impact Assessment will be undertaken prior to construction. The surveys will adhere to the British Standard 5837:2012 for trees.</p> <p>Mitigation measures in relation to trees are provided in <b>Volume 8, Outline Ecological Management Plan (application ref: 8.10)</b> and <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b>. They would form the basis of the Ecological Management Plan and Landscape Management Plan, to be developed post-consent. The Landscape Management Plan would set out details of mitigation planting, including number, location, species, and details of management and maintenance of planting. Species selected would be appropriate to the local environment and of local provenance. Species would be planted in an organic layout which seeks to mimic the canopy layers found in the wider countryside. <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b>, also commits to seek opportunities to explore working with organisations including the Humber Forest to deliver offsite planting, post DCO consent.</p>	N
A concern was raised about Sand Martins nesting in the cliffs at the landfall.	1	Potential construction impacts on Sand Martins are assessed in <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> , mitigation is included in <b>Volume 8, Outline Ecological Management Plan (application ref: 8.10)</b> .	N
General concerns regarding wildlife / ecological impacts	5	Terrestrial ecology is assessed in <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> , no significant impacts have been identified except on Breeding Birds during construction and one area of ancient woodland in relation to Nitrogen Deposition, and indirect effect associated with contraction vehicle movements.	N



## 1.6 Geology and Land Quality

Table 1-6 Geology and Land Quality

Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
Concerns about Withow Gap specific scientific interest (SSSI)	3	<p>Refinement of the Onshore Development Area has resulted in the landfall option that interacts with the Withow Gap SSSI being withdrawn, as detailed in <b>Volume 7, Appendix 19-1 Geology and Land Quality Consultation Responses (application ref: 7.19.19.1)</b> and <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>. Natural England and the Environment Agency have agreed there will be no significant effects on the designated site from construction or operation of the Projects.</p> <p>Potential impacts of the Projects on Geological Sites of Special Scientific Interest (SSSIs) are considered in <b>Volume 7, Chapter 19 Geology and Land Quality (application ref: 7.19)</b> and also in <b>Volume 7, Chapter 22 Onshore Archaeology and Cultural Heritage (application ref: 7.22)</b> of the ES.</p>	Y-D
Is the Applicant aware of a potential consultation process by East Riding Council for a waste disposal site on the north side of Beverley.	1	<p>The Applicants are aware of the Proposed Beverley Household Recycling Centre (22/03331/CM), which is identified as a cumulative receptor in <b>Volume 7, Appendix 6-1 - Onshore Cumulative Effects Assessment Methodology (application ref: 7.6.6.1)</b>. It should be noted, the application has not been granted planning consent by East Riding of Yorkshire Council but, as a precautionary approach the cumulative environmental assessment for the Projects has considered the scheme, where relevant.</p>	N

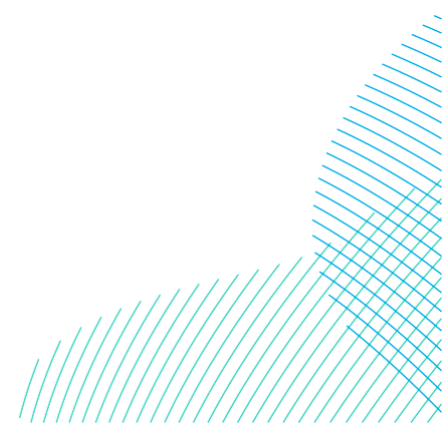


## 1.7 Hydrology and Flood Risk / Marine Physical Environment

Table 1-7 Hydrology and Flood Risk / Marine Physical Environment

Issue from Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
Concerns about the Onshore Converter Stations increasing surface water runoff.	1	The Onshore Converter Station areas include drainage design in line with current best practice, utilising Sustainable Urban Drainage (SuDs) principles, with infiltration and/or attenuation to not adversely impact any local watercourses. This is detailed in <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> . Additionally, a Surface Water Management Plan will be prepared by the Contractor, to manage surface water during construction as detailed in the <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b> .	N
Concerns about high water tables in vicinity of the Substation Zone and possible increased flood risk at the Landfall Zone. <ul style="list-style-type: none"> <li>Request for more detail on flood plains / maps.</li> </ul>	2	A Flood Risk Assessment is included in <b>Volume 7, Appendix 20- 4 Flood Risk Assessment (application ref: 7.20.20.4)</b> , this includes consideration of potential risks of ground water flooding and flooding at the Landfall in section 20.4.4. Flood zones are also considered in <b>Volume 7, Chapter 20 Flood Risk and Hydrology (application ref: 7.20)</b> , the location of Flood Zones 2 and 3 is shown on <b>Figure 20-4 (application ref: 7.20.1)</b> . Additionally, a Surface Water Management Plan will be prepared by the Contractor, to manage surface water during construction as detailed in <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b> . This includes the requirement for managing ground water, should a shallow aquifer be identified during construction.	N
Concerns about the stability of the cliffs at the landfall, coastal erosion and that the design of the Projects has taken this into account future erosion rates and climate change and will not fall into the sea before during the operational life-time. An additional question was raised about what mitigation measures are available now and in future?	14	The landfall location near Skipsea was chosen as the result of a site selection process, considering environmental and technical constraints which considered natural erosion rates as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 8.6)</b> . The Projects have liaised with the East Riding of Yorkshire Council and the Environment Agency to discuss erosion risk to the Projects during the construction and operational phases and to obtain erosion rates for the landfall location. The Landfall Zone has been designed to account for the coastal erosion rates, provided by the Coastal Risk Management Authority in October 2023. As described in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> the Transition Joint Bay's will be located a sufficient distance from the cliff edge to allow up to 32 years of operation. Embedded mitigation included in the design is primarily the use a trenchless crossing technique e.g. HDD and allowing flexibility to locate the TJB's a suitable distance from the cliff within the Landfall Zone. This will be determined at the detailed design stage. There will also be no direct access to the beach over the unstable cliff during construction.	N
Concerns about coastal erosion and that the Projects will not be impacting [increasing] the rate of coastal erosion along the coastline.	2	Each trenchless crossing e.g. HDD would start from the TJB Compound in the Landfall Zone, travel beneath the beach, and will exit either in the intertidal or subtidal zone at a suitable water depth. The drill will be of sufficient depth below the coastal shore platform to have no effect on coastal erosion. There would be up to 6 exit pits located in the intertidal for a short trenchless crossing e.g. HDD these are considered in <b>Volume 7, Chapter 8 Marine Physical Processes (application ref: 7.8)</b> . <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b> states these will be located at least 50m from the eroding cliff face.	Y-D

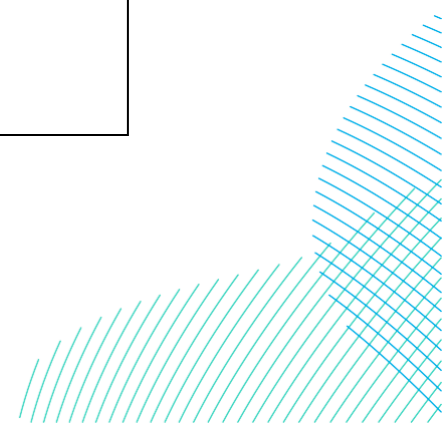
Issue from Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
Concern about polluting Main Rivers and the impacts on fish.	1	All Main Rivers will be crossed by a trenchless crossing, there will therefore, be no impact on fish or Lamprey. As detailed in section 18.5.4 of <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> , there are numerous watercourses within the Onshore Study Area which could provide suitable habitat for protected fish species. However, as trenchless technique is being implemented under all Main Rivers and most Ordinary Watercourses, they have been scoped out of the Terrestrial Ecology assessment. Lamprey have also been scoped out as the River Hull is not considered a hotspot for the species as advised by the Environment Agency. The River Hull will be crossed using trenchless techniques. The cable entry and exit pits will be at least at least 20m from any 'Main River,' or from the nearest toe of any flood defences and would be installed at a depth to minimise potential interaction with current, or any planned, infrastructure (e.g., sheet piles), at least 2m below the channel bed. The crossing methodology will be agreed with the Environment Agency prior to construction. As referenced in the <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b> where temporary dams are used to cross Ordinary Water Courses measures will be put in place to reduce any potential water pollution, any pumps used for over-pumping of watercourses would be fitted with a with 2mm diameter mesh where fish could be present.	N
The depth of cabling and future access to put right any faults which may arise is also a concern as water storage in our area is in aquifers.	1	Potential effects on aquifers are included in <b>Volume 7, Chapter 20 Flood Risk and Hydrology (application ref: 7.20)</b> . No significant effects are identified with the inclusion of the mitigation measures set out in <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b> .	N
Comments Flood Zone maps are not correct [in the PEIR].	2	<b>Volume 7, Figure 20-4 Environment Agency Flood Zones and Historic Flood Extent (application ref: 7.20.1)</b> is included in the DCO application and includes all the latest flood zone data that has been assessed in <b>Volume 7, Chapter 20 Flood Risk and Hydrology (application ref: 7.20)</b> .	N



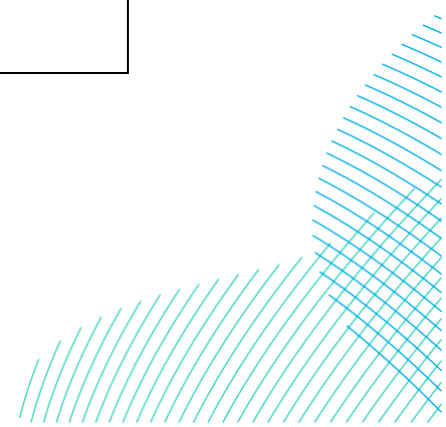
## 1.8 Land Use and Agriculture

Table 1-8 Land Use and Agriculture

Issue From feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
A question was raised as to whether existing infrastructure had been considered?	1	The Applicants have followed a comprehensive, iterative site selection process to develop the most appropriate Onshore Development Area, as set out in <b>Volume 7, Chapter 4 Site Selection &amp; Assessment of Alternatives (application ref: 7.4)</b> . This has included consideration of existing infrastructure and proposed developments. <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> , section 21.6.1.5 considers the disruption to existing utilities. The Applicants would undertake utility crossings in accordance with industry standard practice and safety guidance as agreed with the utilities owners. Therefore, no change associated with existing utilities are anticipated under any of the construction scenarios.	N
<p>Various comments with a general preference not to develop agricultural land:</p> <ul style="list-style-type: none"> <li>• Location of the Onshore Export Cable across predominantly agricultural land;</li> <li>• Statements that prime agricultural land would be lost;</li> <li>• Request to choose a brownfield site for the Substation Zone; and</li> <li>• Change of use from farming to industrial use at the Substation Zone.</li> </ul>	12	<p>The Applicants have followed a comprehensive, iterative site selection process to develop the most appropriate Onshore Development Area, as set out in <b>Volume 7, Chapter 4 Site Selection &amp; Assessment of Alternatives (application ref: 7.4)</b>. This has included consideration of the permanent and temporary loss of land for agriculture. Due to the location of the grid connection point all sites considered during the optioneering stage were predominantly agricultural in nature and impacts on agricultural land loss could not be avoided with any option presented.</p> <p>The Applicants did a full review of available sites within a 3km search area around Creyke Beck and completed a comprehensive, iterative site selection process to develop the most appropriate locations. The process aimed to minimise impacts on the environment and local residents. The process took into account engineering assessments and technical feasibility, environmental considerations including ecology, designated sites, nature reserves, land use (including green and brown field site), landscape and visual, and historic features, local communities and consultation feedback as well as feedback from discussions with landowners.</p> <p>As detailed in <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> the majority of the Onshore Development Area is located within areas currently associated with agricultural production. The footprint of the Onshore Development Area, including Landfall Zone, Onshore Export Cable Corridor, TCCs and construction accesses would all contribute to the temporary loss of land for agriculture.</p> <p>The quality of the agricultural land present within the Onshore Development Area primarily consists of ALC Grade 2 and 3 agricultural land and the sensitivity is considered to be high. Agricultural land would be reinstated between Jointing Bays following the installation of cable ducts, within 2 years (24 months), although in certain sections a Haul Road may need to stay in place for longer. This would limit the areas temporarily restricted for agricultural use for longer than two years to the TCCs along the Onshore Export Cable Corridor, TJB Compound, located within the Landfall Zone and the Jointing Bays located approximately every 0.75 to 1.5km. Taking this into consideration, most importantly the fact that farms would have the majority of their agricultural land returned to them reinstated to its original condition, within two years or following the completion of construction, the works are deemed temporary (short-term) and the magnitude of impact is considered to be low adverse. In addition, private agreements (or compensation in line with the compulsory purchase</p>	N

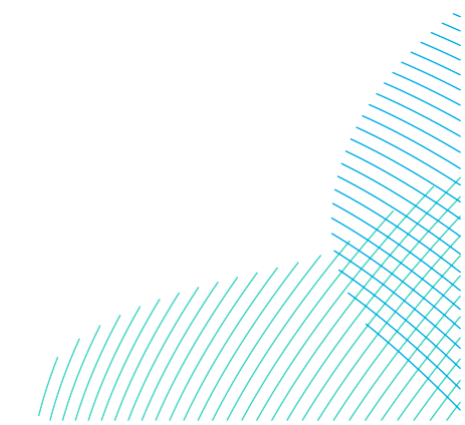


Issue From feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
		<p>completion code) will be sought with relevant landowners / occupiers. Therefore, the temporary loss of agricultural land associated with the construction of the Projects is considered a minor adverse significance of effect and not significant in EIA terms.</p> <p>During operation, the impacts to land use along the Onshore Export Cable are limited. This is because the Onshore Export Cables would be buried. Jointing Bays would be required along the route of the Onshore Export Cables to connect sections of cable, approximately every 0.75 to 1.5km (dependent on the size of the cable drum). Up to four Transition Joint Bays (TJBs) would also be located at the landfall, where the Offshore and Onshore Export Cables are connected. Jointing Bays and Link Boxes would be located below ground level and would be accessed via a permanent covered man-hole. The dimensions of the Link Boxes at the Landfall and along the Export Cable Corridor are 2.5 x 4m, as detailed in section 5.6.2 of <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> and would be the only areas of permanent agricultural loss. Each Link Box would be marked with a permanent marker at each location. This is not considered to represent a significant loss of agricultural land.</p> <p>However, residual impacts to changes in land use and agri-environmental schemes during operation have been assessed as potentially major adverse (significant), at the Substation Zone as the total permanent land take associated with the Substation Zone for the Projects is approximately 33ha (based on two Onshore Converter Stations, landscaped areas, access route and drainage requirements). The significance of effect in relation to the loss of agricultural land during the operation of the Projects cannot be reduced as the land would be unavailable for use in the medium to long-term. However, it should be noted, that following completion of construction, land within the Onshore Substation Zone will be returned to agriculture, as shown in <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b>.</p>	
<p>Permanent and/or major changes to [Agricultural Land Classification] ALC Land Classification must be avoided. Pre-construction condition of land needs to be benchmarked including soil tests (with organic matter levels and trace elements), topographical surveys and commitments to management during the construction period and post construction, which are binding on the contractor with easy redress for impacted landowners.</p>	1	<p>A baseline Agricultural Land Classification (ALC) survey has been completed for the Substation Zone which has fed into the Outline Soil Management Plan (OSMP), submitted in <b>Appendix A</b> of the <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b>. This will be updated with an ALC survey for the Onshore Export Cable Corridor and the Landfall Zone in summer 2024. The ALC surveys have included soil test in line with the Natural England guidance. The OSMP would include requirements for pre and post construction condition surveys and the requirement for an Agricultural Liaison Officer (ALO).</p>	N
<p>Concerns raised about Soil heating (heat dissipation) from the buried Onshore Export Cable Corridor.</p>	3	<p>For onshore electrical infrastructure, the Electro-magnetic Fields (EMF) risks are scoped out of the environmental assessment on the basis that the Projects would adopt the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines (ICNIRP, 1998) and Government voluntary Code of Practice on EMF public exposure (Department for Energy and Climate Change, 2012). This</p>	N





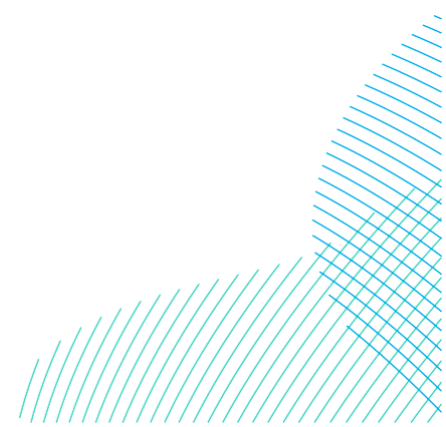
Issue From feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
		is referenced within <b>Volume 8, Commitments Register (application ref: 8.6)</b> and <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b> .	
Comments were received that works should be undertaken concurrently to mitigate project impacts during construction on Land Use.	2	If a Sequential Construction Scenario is taken forward the construction of the trenchless duct installation works at the landfall, trenchless crossings and the trenching and installation of cable ducts along the Onshore Export Cable Corridor would be completed for both Projects onshore at the same time. In addition, earthworks, drainage and permanent access for the second Onshore Converter Station would be completed simultaneously. Once the initial construction works for both Projects have been completed, there may be a period of construction inactivity until the second Project is ready for connection. Further construction works would then commence at the landfall TJBs, Onshore Converter Station and Jointing Bays along the cable corridor to pull cables for the second project through the pre-installed ducts for the second Project. These works would take place within the Maximum Onshore Construction Duration of six years, as detailed in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b> .	N
Comment received relating to impacts on Beehives along the route	1	Beehives have not been specifically assessed in the Environmental Statement, however potential temporary construction impacts of dust, noise and light would be managed by <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b> and <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> .	N
Loss of agricultural will impact food security	1	Food security is not specifically scoped into <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> however, the temporary and permanent loss of agricultural land, which includes ALC grade 2 and 3a i.e. best and most versatile land used for growing food crops land is considered.	N
Concerns about land drainage [agricultural]	1	Mitigation for existing land drainage is included in <b>Volume 8, Outline Drainage Strategy (application ref: 8.12)</b> . Impacts on land drainage are assessed in <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b> .	N
General concerns about Public rights of Way (PROW)	2	All significant effects on PROW are mitigated with the implementation of the measures set out in <b>Appendix C - Public Rights of Way Management Plan</b> of <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> .	N



## 1.9 Onshore Archaeology and Cultural Heritage

Table 1-9 Onshore Archaeology and Cultural Heritage

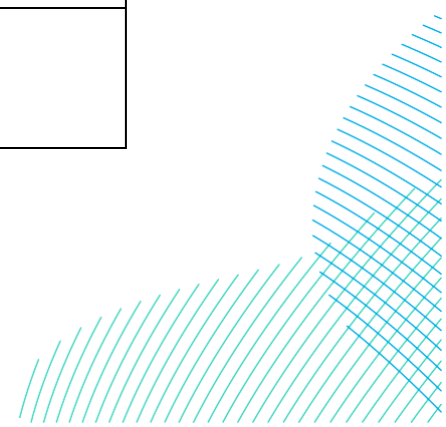
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
Potential impacts on ancient woodland / archaeological resources at Beverley Westwood	8	<p>We have followed a comprehensive, iterative site selection process to develop the most appropriate Onshore Export Cable Corridor, as set out in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>. As detailed in <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b> Burton Bushes and Beverley Parks Local Nature Reserve are statutory designated sites, located on <b>Volume 7, Figure 18-3 (application ref: 7.18.1)</b>. With the reduction of the Onshore Development Area since the PEIR, Burton Bushes SSSI and Beverley Parks LNR are no longer adjacent to the Onshore Development Area. Burton Bushes SSSI is now approximately 0.12km away, and Beverley Parks LNR is 0.62km away. Beverley Westwood Local Wildlife Sites (Newbald Rd and Waxcaps), shown on <b>Volume 7, Figure 18-4 (application ref: 7.18.1)</b> have also been avoided.</p> <p>Whilst the Onshore Development Area now avoids any impacts to the Beverley Westwood, as described above, the site does fall within the Study Area for the Onshore Archaeology and Cultural Heritage assessment. <b>Volume 7, Chapter 22 Onshore Archaeology and Cultural Heritage (application ref: 7.22)</b> considers any potential impacts to archaeological sites at the Beverley Westwood, including temporary changes to the setting of heritage assets on the Beverley Westwood, and concludes that no significant residual impacts are anticipated.</p>	Y-D
General response requesting that a full programme of archaeological evaluation is carried out including desk based assessment and fieldwork.	1	<p>A detailed assessment of the Projects' impact on onshore archaeology and cultural heritage is provided in <b>Volume 7, Chapter 22 Onshore Archaeology and Cultural Heritage (application ref: 7.22)</b>. The assessment provides details of the work that has been done to accurately characterise the existing environment for onshore archaeology based on publicly available heritage data, a setting and heritage condition walkover, targeted geophysics survey and archaeological trial trenching.</p> <p>The assessment goes on to describe the potential impacts that may occur on archaeological / cultural heritage receptors as a result of the construction, operation and decommissioning phases of the Projects.</p>	N



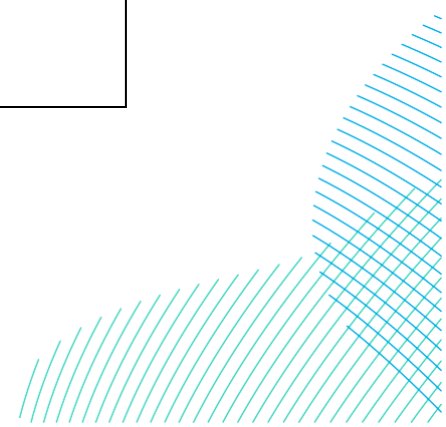
## 1.10 Landscape and Visual Impacts

Table 1-10 Landscape and Visual Impacts

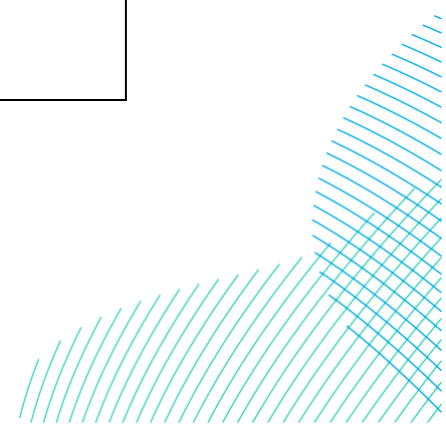
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
Concerns the Projects could be visible offshore	1	<p>Due to the distance offshore and the curvature of the earth, there would be no visibility of the wind turbines from sea level at the coast, over 100km from the Array Areas.</p> <p>The Planning Inspectorate did not agree that offshore platforms could be similarly scoped out, as these could be closer to shore. The Projects may include up to two offshore platforms (up to 100m high) outside the Array Area. These would be a minimum of 52km from the landfall point, which equates to over 37km from the closest location on land (Flamborough Head). Structures would need to be over 250m to have a 'low' magnitude of effect at distances of approximately 37km. At this distance, therefore, the platform(s) would not have likely significant effects on views from land. Therefore, effects of offshore infrastructure have not been considered further in <b>Volume 7, Chapter 23 Landscape and Visual (application ref: 7.23)</b>, as detailed in section 23.3.</p>	N
Concerns about what above ground infrastructure will be visible during operation at the landfall and along the Onshore Export Cable Corridor and will there be significant landscape and visual effects	8	<p>Landscape and visual effects associated with the operational stage of the landfall and Onshore Export Cable Corridor were scoped out of the assessment on the grounds that following installation and restoration of ground, underground cables which are part of the onshore infrastructure would not significantly impact landscape or visual receptors.</p> <p>The Transition Joint Bays (TJBs) are underground structure at the landfall that house the joint between the Offshore Export Cables and the Onshore Export Cables. Each TJB is accompanied by a Link Box to allow testing and monitoring of cable joints. The Link Boxes are smaller in footprint than the TJBs, with a manhole inspection cover at the surface. The Link Boxes manhole covers are the only permanent above ground infrastructure at the Landfall Zone. A maximum of 4 Link Boxes (one for each TJB) would be installed, the dimensions would be up to 2.5 x 4m, as detailed in section 5.6.2 of <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>. The Onshore Export Cables will be installed underground from the TJBs to the Onshore Converter Station(s). Associated Jointing Bays and link boxes will need to be installed underground along the Onshore cable corridor every 0.75 to 1.5km. During operation, the above ground infrastructure would be limited to up to 205 manhole covers measuring 2.5 x 4m each. Where possible, areas between Jointing Bays would be reinstated within two years and returned to agriculture or the habitat reinstated.</p> <p>Section 23.3.4 of <b>Volume 7, Chapter 23 Landscape and Visual (application ref: 7.23)</b> presents embedded mitigation, including the approach to restoration of landscape and principles for reinstatement of any features affected by the construction works. Application of these principles will be secured through <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b> and will ensure that long term operational effects resulting from the landfall and Onshore Export Cables will not be significant for landscape and visual receptors.</p>	N
Comments asking for the two HVDC Converter Stations be co-located and not on two separate Substation Zones [Zone 1 and Zone 4]	3	During statutory consultation, the Applicants presented four different Onshore Converter Station Options across two different Substation Zones (Zone 1 and 4). The options were based on two different ways to transmit electrical power through cabling: high voltage alternating current (HVAC)	Y-D



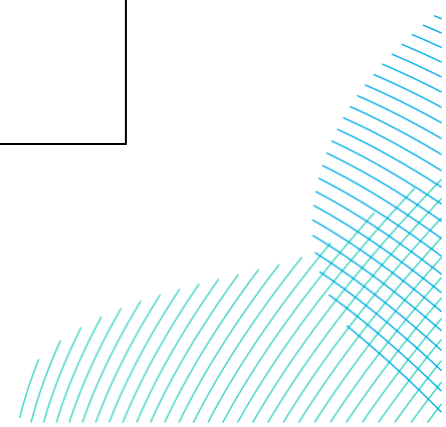
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
		<p>and high voltage direct current (HVDC). Following Statutory Consultation high voltage alternating current (HVAC) technology (previously assessed in Preliminary Environmental Information Report (PEIR)) was removed from the Projects' design envelope and it was possible to locate both HVDC Onshore Converter Stations in Substation Zone 4 as detailed in <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application ref: 7.4)</b>.</p> <p>As detailed in <b>Volume 7, Chapter 23 Landscape and Visual (application ref: 7.23)</b> the single Substation Zone for both Onshore Converter Stations avoided some of the most sensitive landscape and visual receptors. The chosen site is located in a relatively flat landscape, with some existing woodland planting place. The site also avoids the candidate Yorkshire Wolds Areas of Outstanding Natural Beauty (AONB) to the north, and large numbers of residential receptors located at Beverley in the north-east. In addition, the construction of the Projects on the site would not obstruct view of Beverley Minster, a key feature on the skyline, in views from the A1079. Selection of a single site for both Onshore Converter Stations ensures that effects on landscape and visual receptors are localised to a single area, rather than being more widely spread across two separate locations.</p>	
<p>Comments about the location of the Substation Zones, and the selection of the Substation Zones in relation to the following:</p> <ul style="list-style-type: none"> <li>• The potential significant effect of the Onshore Converter Stations on the Yorkshire Wolds Important Landscape Area (ILA);</li> <li>• The buildings are too large and will have significant landscape and visual effects, on neighbouring residential receptors located to the South of Beverley, the historic town of Beverley [on approach via the A1709] and Beverley Minster; and</li> <li>• Will there be views to Beverley parks and visual effects on PRoW?</li> </ul>	10	<p>A comprehensive, iterative site selection process for the Substation Zone in which the Onshore Converter Stations are located was undertaken. The final location for the Onshore Converter Stations was identified considering environmental and engineering assessments, existing and planned developments, engineering technical feasibility including proximity to the grid connection point, local communities and consultation feedback, landowner engagement and environmental considerations including designated sites, nature reserves, land use, historic features. The site selection process of the Projects aimed to minimise impacts on the environment and local residents. The findings from the site selection process are included in <b>Volume 7, Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b> of the Environmental Statement (ES).</p> <p>As detailed in <b>Volume 7, Chapter 23 Landscape and Visual (application ref: 7.23)</b> and above, the Substation Zone avoided some of the most sensitive landscape and visual receptors. The chosen site is located in a relatively flat landscape, with some existing woodland planting place. The site also avoids the candidate Yorkshire Wolds Areas of Outstanding Natural Beauty (AONB) to the north, and large numbers of residential receptors located at Beverley in the north-east. In addition, the construction of the Projects on the site would not obstruct view of Beverley Minster, a key feature on the skyline, in views from the A1079. There would be no theoretical visibility from locations around Beverley Minster or within the settlement of Beverley. Intervening built development would screen views of the Onshore Converter Stations from within Beverley and the elevated nature of Beverley Minster Tower offers very localised visibility of the Onshore Converter Stations.</p> <p>Significant effects on Landscape Character are predicted during the operational stage of the Onshore Converter Stations due to the loss of landscape features and the change in character from open arable fields to two Onshore Converter Stations. These effects would be localised, and would reduce with distance, falling below the threshold of significance at no more than 1km from the footprints of the Onshore Converter Stations.</p>	N



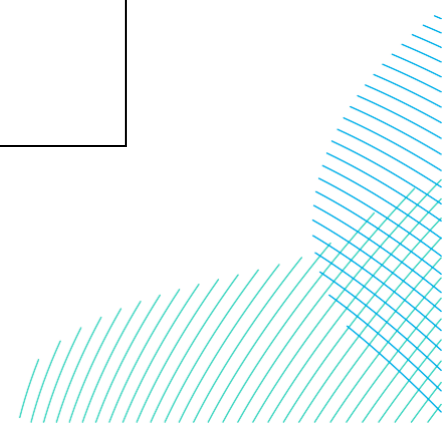
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
		<p>The operational stage would result in direct impacts on the Yorkshire Wolds Important Landscape Area (ILA). These impacts would be focussed within the Onshore Substation Zone near the eastern boundary of the ILA and would include the permanent loss of landscape features such as hedgerows and arable farmland, which are identified as key attributes for the Yorkshire Wolds ILA. However, the primary impacts would relate to the ongoing visual presence of the Onshore Converter Stations within this part of the ILA, which would affect key characteristics such as “<i>long distance views dominated by the sky</i>”. Given the undulating character of the landscape, and presence of existing plantations (trees) and hedgerows, close views of the Onshore Converter Stations would be somewhat contained and kept relatively localised. Mitigation has been embedded into the design of the Projects through <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b>. Once matured, this landscaping would help to integrate the Onshore Converter Stations into the existing landscape of the Yorkshire Wolds ILA, including arable fields and boundary trees / hedgerows. <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b> forms the basis of a Landscape Management Plan, which would be developed post-consent. It is judged that at Year 10 the effect would be of moderate adverse significance locally, which is significant in EIA terms. This would reduce with distance from the Onshore Substation Zone.</p> <p>In terms of visual effects of the operational Onshore Converter Stations, significant visual effects are predicted for sensitive receptors at the following viewpoints (VP), during the operational stage:</p> <ul style="list-style-type: none"> <li>• VP1: Butt Farm (major);</li> <li>• VP2: Copleflat Lane, Bentley (major);</li> <li>• VP3: Beverley 20 near Broadgate (moderate); and</li> <li>• VP4: Oriel Close, off Broadgate (moderate).</li> </ul> <p>A landscape mitigation scheme would be implemented (see <b>Volume 7, Figure 23-6 (application ref: 7.23.1)</b> and <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b>), around the Onshore Converter Stations. This would aim to reduce the level of effect. The effects identified above are assessed based on planting at year 1 providing little or no mitigation. Once more matured (year 10), the mitigation planting would help provide additional screening of the Projects and the residual significance of effect would be moderate (significant) for viewpoints 1, 2 and 3. The residual effect for viewpoint 4 would reduce to minor (not significant).</p> <p>All of these viewpoints represent higher sensitivity residential or recreational receptors and are contained within 1km of the proposed Onshore Converter Stations. It is concluded that significant effects on landscape and views, as a result of the Onshore Converter Stations, would be restricted to an area bounded approximately by the A1079 to the north, the A164 to the east, and Copleflat Lane to the south and west. Beyond this zone residual effects are unlikely to be significant. Visual receptors within this area will include: residents of Butt Farm and visitors to the camp site; residents of Bentley village; and users of the local sections of PRoWs and the Beverley 20 walking route. There are not expected to be significant effects on Beverley parks Nature Reserve.</p>	



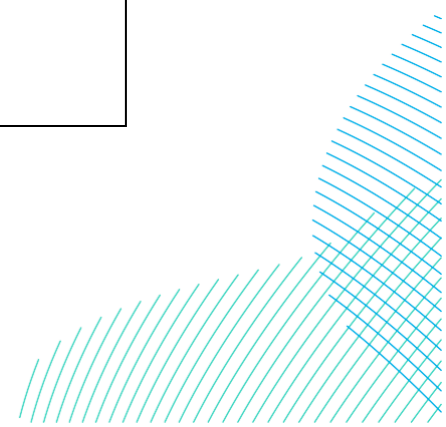
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
Concerns the Onshore Converter Stations, located in the Substation Zone look too industrial in the rural landscape, why can they not be in a more industrial area	13	<p>A comprehensive, iterative site selection process for the Substation Zone in which the Onshore Converter Stations are located was undertaken as detailed in <b>Volume 7, Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b> of the Environmental Statement (ES). This site selection process considered the location of the grid connection point at the Proposed Birkhill Wood Substation and the spatial requirements for the Onshore Convert Stations, landscaping and sustainable drainage design. These sites were then reviewed considering key environmental constraints including landscape and visual receptors. No existing brownfield or industrial areas in close proximity to the Grid connection point were identified as a suitable site.</p> <p>The Onshore Converter stations will be developed in line with <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b>, which includes screening for the Onshore Converter Stations. The buildings will also be designed in line with <b>Volume 8, Design and Access Statement (application ref: 8.8)</b>, which will be developed further at the detailed design stage.</p>	N
Comments about why the Onshore Converter Stations cannot be located with the Dogger Bank substation on the other side of the A1079? Why is the Substation Zone larger than Dogger Bank A&B? It seems to be very large. The location and the size of the development will have significant landscape and visual effects.	4	<p>A location closer to the Dogger Bank A and B HVDC Converter Station site was considered however, it was not considered suitable, as detailed in <b>Volume 7, Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b>. The Substation Zone has been developed to accommodate up to two Onshore Converter Stations, landscaping to provide visual screening and sustainable drainage. The maximum dimensions of the infrastructure are detailed in <b>Volume 7, Chapter 5 Project Description (application ref: 7.5)</b>. The area to the south of the Onshore Converter Stations has been designed to avoid existing high pressure gas pipelines, therefore it is not possible to plant trees directly adjacent to the buildings. Planting is therefore located further south, closer to the hamlet of Bentley. Areas within the Substation Zone will be returned to agriculture following construction. As detailed on <b>Volume 7, Figure 23-6 (application ref: 7.23.1)</b> and in <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b>.</p>	N
Queries about how the cumulative landscape and visual effects of the HVDC Converter Stations with other cumulative developments been assessed?	6	<p>The cumulative effects assessment (CEA) has identified seven schemes which may give rise to significant landscape and visual cumulative effects. This includes: Dogger Bank A&amp;B Converter Stations, A164 and Jocks Lodge Improvement Scheme; the Creyke Beck Solar Farm to the south of the Projects, the Hornsea 4 Offshore Wind Farm, North Humber to High Marnham (overhead line) Upgrade scheme; the proposed Birkhill Wood National Grid Substation and White Hall solar farm. A description of how these developments were identified is detailed in <b>Volume 7, Appendix 6-1 - Onshore Cumulative Effects Assessment Methodology (application ref: 7.6.6.1)</b> and they are located on Figure 6-1-1 within <b>Volume 7, Appendix 6-1 Onshore Cumulative Effects Assessment Methodology (application ref: 7.6.6.1)</b>.</p> <p>section 23.8 of <b>Volume 7, Chapter 23 Landscape and Visual (application ref: 7.23)</b> assess the additional cumulative effect, considering these schemes would be moderate and significant within the area between the Projects, Hornsea 4 substation and the Dogger Bank A &amp; B Converter Stations. The proposed Birkhill Wood National Grid Substation, essential to the Projects and the North Humber to High Marnham Grid Upgrade would expand the presence of energy and grid infrastructure development across a wider area of the landscape. For the Creyke Beck Substation Extension, impacts are not considered to be of any greater significance than those identified by the</p>	N



Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
		<p>Projects and no cumulative effects of significance are forecast. The whithall Solar Farm is an EIA screening application and as such this scheme is early in the planning process. Further detail assessing each cumulative Scheme is provided in Table 23-22 of <b>Volume 7, Chapter 23 Landscape and Visual (application ref: 7.23)</b>. The Applicants are in regular discussions with National Grid and other developers and will seek to collaborate with them as their planning proposals develop.</p>	
<p>Concerns how effects on LVIA receptors during construction be minimised and when will reinstatement take place?</p>	<p>2</p>	<p>During the construction stage, there would be no significant effects on Landscape and visual receptors along the Onshore Export Cable Corridor. This is due to the embedded mitigation measures including those to and keep hedgerow loss to a minimum and the commitment to restore habitats within 2 years between Jointing Bays, where possible minimising the disruption to the landscape during construction. The flat nature of the landscape and woodland and hedgerow cover also limits the potential for wider effects on Landscape Character. The only above-ground infrastructure that would remain would be manholes for link boxes.</p> <p>Moderate (significant) adverse effects are expected during construction for landscape at the landfall due to potential construction works on the beach. However, the residual level of effect on the Landfall Zone would reduce to minor (not significant) following the restoration of the landscape and the minimal permanent above ground infrastructure present (manhole covers for six link boxes).</p> <p>Moderate (significant) landscape effects are predicted during the construction stage of the Onshore Converter Stations due to the loss of landscape features and the change in character from open arable fields to a construction site. However, beyond the immediate geographical extent of the Onshore Substation Zone (no more than 1km), the impact on the landscape would not be significant. Following completion of construction, any construction related disturbance would be restored to pre-existing conditions in accordance with <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b>, and landscape screening of the Onshore Converter Stations structures would be implemented. The residual level of effect of the Onshore Converter Stations is minor adverse, which is deemed to be not significant.</p> <p>Significant visual effects of the construction stage are limited to the Landfall Zone and Onshore Substation Zone. These effects would be moderate (significant) for the landfall and from Viewpoint 1: Butt Farm with relation to the Onshore Converter Stations. Major (significant) visual effects are expected from Viewpoint 2: Coppleflat Lane, Bentley and Viewpoint 3: Beverley 20, near Broadgate with relation to the Onshore Converter Stations, due to their close proximity to the Onshore Substation Zone, lack of intervening vegetation, and proximity to Temporary Construction Compounds (TCC)s. Viewpoint 4: Oriel Close, off Broadgate is expected to have minor (not significant) effects with relation to construction of the Onshore Converter Stations due to intervening vegetation which would provide screening of the site. Following completion of construction, construction effects on landscape and visual receptors be superseded by the operational effects.</p> <p>The residual level of effect on visual receptors at the Landfall Zone would reduce to minor (not significant) following the restoration of the landscape and the minimal permanent above ground infrastructure present (manhole covers for six link boxes). The residual level of construction effect on</p>	

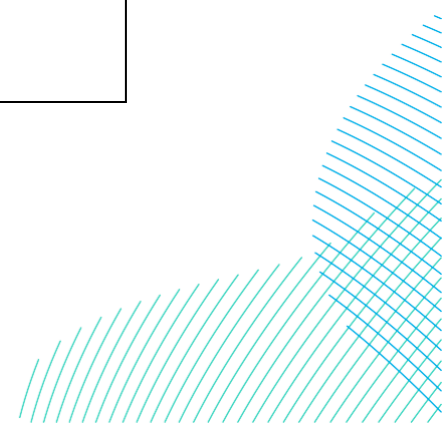


Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
		<p>the Onshore Substation Zone would reduce as a result of mitigation measures and planting undertaken during construction reducing to minor or negligible effects (not significant) from viewpoints 1-4. Following completion of construction, construction effects on landscape and visual receptors be superseded by the operational effects, described above.</p> <p>All temporary land take that cannot be restored within 2 years, will be fully restored following the completion of the onshore works in line with <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b>.</p>	
<p>Concerns about the landscape planting at the Substation Zone including:</p> <ul style="list-style-type: none"> <li>• What landscaping will be provided to screen the Onshore Converter Stations?</li> <li>• Will off-site tree planting or a contribution to tree planting initiatives locally be undertaken?</li> <li>• Can landscaping be planted before construction to allow more time for the trees to grow, could a separate planning application be made prior to the DCO?; and</li> <li>• How long will it take for the landscaping to reach maturity?</li> </ul>	8	<p><b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b> would form the basis of a Landscape Management Plan, to be developed post-consent. This sets out committed mitigation that has been identified as a result of the assessment at the Onshore Converter Stations, in the form of woodland and hedge planting to help screen or filter views and integrate the proposal into the landscape. It also sets out how planting would be established and maintained. As detailed in Requirement 8 of <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b>. LMP's may be developed for different phases of the onshore works and would be approved by the East Riding of Yorkshire Council as the relevant planning authority.</p> <p>The Landscape Mitigation Plan (see <b>Volume 7, Figure 23-6 (application ref: 7.23.1)</b>) has been developed in line with the Outline Landscape Management Plan for the Onshore Substation Zone. This plan illustrates committed mitigation that responds to the form and scale of the proposals, and the assessed landscape and visual effects. The intention is to help to integrate the Onshore Converter Stations into the existing landscape of arable fields, woodlands, boundary trees and hedgerows. The mitigation scheme also seeks to deliver landscape and biodiversity enhancements as outlined within <b>Volume 8, Outline Ecological Management Plan (application ref: 8.10)</b>. It also seeks to enable continued farming activity in line with the existing landscape character of the area. The following landscape mitigation principles were established:</p> <ul style="list-style-type: none"> <li>• Seek to provide screening along the northern and southern boundaries, where the closest visual receptors are located;</li> <li>• Integrate new landscape structure planting with existing woodland plantations at Johnson's Pit, Eleven Acre Plantation and Bentley Moor Wood, to utilise existing screening;</li> <li>• Consider wider views of the Onshore Converter Stations and the potential appearance of mitigation planting on the skyline in these views;</li> <li>• Seek to provide biodiversity connections or green corridors between these existing woodlands and remnant hedgerows within the Onshore Substation Zone; and</li> <li>• Identify useable land parcels that can be retained as, or returned to, agricultural use on completion of the works, to maintain the prevailing character of the area.</li> </ul> <p>The Landscape Mitigation Plan (see <b>Volume 7, Figure 23-6 (application ref:7.23.1)</b>) is considered to be standard mitigation. However, it is recognised that mitigation planting will not be fully effective</p>	N

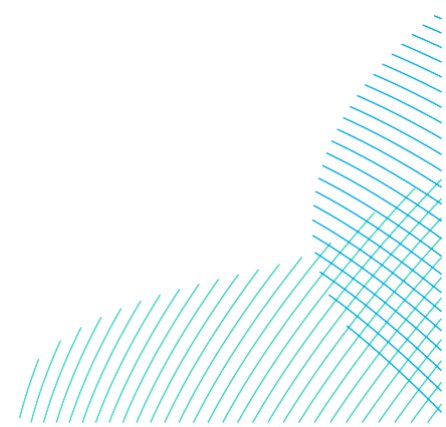




Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
		<p>until plants begin to grow and mature. The LVIA in <b>Volume 7, Chapter 23 Landscape and Visual (application ref: 7.23)</b> therefore, reports on effects at year 1 following completion, when the effectiveness of planting will be least. This represents a worst case assessment. The LVIA also reports on effects at year 10, assuming that planting is maturing and beginning to be more effective in mitigating the effects. This assessment is the residual effect.</p> <p><b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b> would form the basis of a Landscape Management Plan, to be developed post-consent. It is anticipated that this would set out details of mitigation planting, including number, location, species, and details of management and maintenance of planting. Species selected would be appropriate to the local environment and of local provenance. Species would be planted in an organic layout which seeks to mimic the canopy layers found in the wider countryside.</p> <p>Where practical, advance landscape mitigation planting would be established as early as reasonably practicable in the construction stage. However, it is not possible to start planting prior to DCO consent.</p> <p><b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b>, also commits to seek opportunities to explore working with organisations including the Humber Forest to deliver offsite planting, post DCO consent.</p>	
<p>Concerns about the Onshore Converter Stations design including:</p> <ul style="list-style-type: none"> <li>• The Onshore Converter Stations should be designed to be as attractive as possible;</li> <li>• If there will there be a design review?;</li> <li>• If the Applicants have considered lowering the ground level and building bunds to screen the development?; and</li> <li>• If there will be any night-time lighting and what the effects would be on residents and wildlife?</li> </ul>	7	<p><b>Volume 8, Design and Access Statement (application ref: 8.8)</b> sets out the design principles that would be applied to the detail design of the Projects. This would ensure that a sense of place is considered and integrated throughout the design process and adverse environmental effects are mitigated where possible whilst respecting Landscape Character.</p> <p>The indicative landscape mitigation plan (see <b>Volume 7, Figure 23-6 (application ref:7.23.1)</b>) illustrates the implementation of these design principles. In addition, the Projects would have a Design Champion who would engage with a Design Panel when developing the design going forward. High level design principles relate to:</p> <ul style="list-style-type: none"> <li>• Site Function and Layout</li> <li>• Built form, materials and colour</li> <li>• Flood risk, SuDS and Drainage</li> <li>• Hard and Soft Landscape</li> <li>• Biodiversity</li> <li>• Boundary treatments, fencing and hedgerows</li> <li>• Earthworks</li> <li>• Access</li> <li>• Lighting</li> </ul>	N



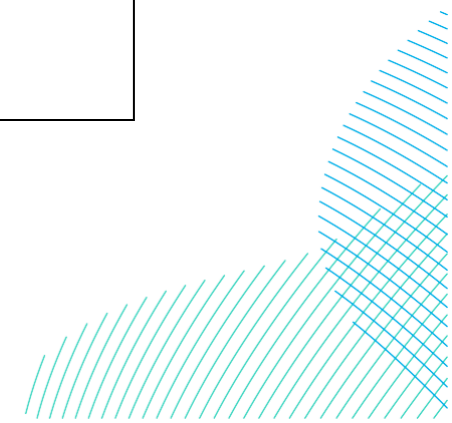
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
		<p>Operational lighting at the Onshore Converter Stations would be designed in accordance with latest guidance and legislation. The details of the location, height, design and luminance of lighting to be used would be provided as part of detailed design for the Onshore Converter Stations. No permanent night-time lighting would be required. Security lighting will be installed as agreed in the written scheme for the management and mitigation of artificial light emissions during the operation, which would be developed at the detailed design as set out in Requirement 22 of <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b>.</p> <p>Earth bunds have been included as an optional design feature in the DAS, however given the height of the building (up to 24m) it has not been considered appropriate to significantly lower the height of the building through excavation. Living rooves and walls have not been considered as part of the design due to the function of the Onshore Converter Stations.</p>	
Photomontages in consultation event	2	<p>Photomontages are submitted with the application and are shown on <b>Volume 7, Figure 23-7 to 23-14 (application ref: 7.32.1)</b>. They may have been presented without a scale in the Non-Technical summary and consultation booklet provided at the statutory consultation, all plans submitted with the DCO are presented at the correct scale and size.</p>	N



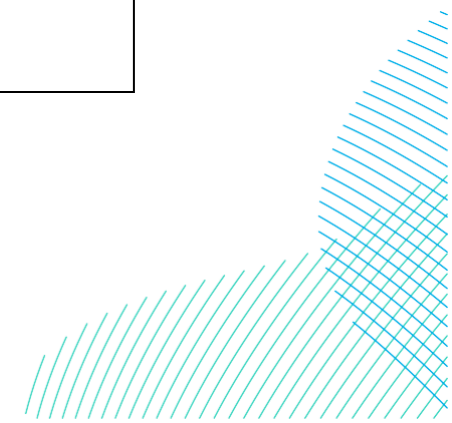
## 1.11 Traffic and Transport

Table 1-11 Traffic and Transport

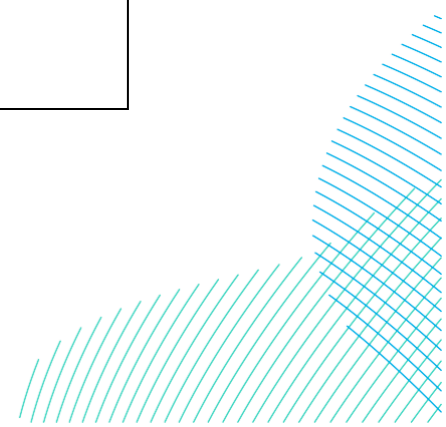
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
Concerns around the management of construction traffic – general	29	Construction traffic has been assessed in <b>Volume 7, Chapter 24 Traffic and Transport assessment (application reference 7.24)</b> . Construction traffic routes have been developed in consultation with East Riding of Yorkshire Council, Hull City Council and National Highways. Where possible this minimises routes through residential areas. Construction traffic will be managed through the implementation of a Construction Traffic Management Plan (CTMP), which will be in accordance with <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> , which is secured by DCO Requirement 14. The final CTMP will be approved by the relevant highway authorities (East Riding of Yorkshire Council, Hull City Council and National Highways).	N
Concerns about the management of construction traffic through Skipsea	10	Construction traffic has been assessed in <b>Volume 7, Chapter 24 Traffic and Transport assessment (application reference 7.24)</b> . Construction traffic routes have been developed in consultation with East Riding of Yorkshire Council, Hull City Council and National Highways. Construction traffic will be managed through the implementation of a Construction Traffic Management Plan (CTMP), which will be in accordance with <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> , which is secured by DCO Requirement 14. The final CTMP will be approved by the relevant highway authorities (East Riding of Yorkshire Council, Hull City Council and National Highways).  Specifically, for Skipsea, the traffic assessment has identified that there is a need to restrict HGV trips via links 5 (Beeford Road) and Link 6 (B1242 (Hornsea Road, which passes through Skipsea Village) due to potential amenity effects. The Outline CTMP commitment to manage HGV trips on these road links through Skipsea (to an agreed daily limit); and to restrict delivery times to avoid school start and finish times.	Y-M
Queries about the carbon footprint of construction traffic	2	At this stage it is not possible to specify the fuel source that will be used by construction traffic, although it is acknowledged in section 2.5.5.2 of <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> that the future 'baseline' environment assessed reflects the 'decarbonisation' (e.g. adoption of a greater number of electric vehicles) in all transport modes by the time of the Projects' construction. In addition, <b>Volume 7, Chapter 30 Climate Change (application ref: 7.30)</b> outlines the Projects commitment to ensuring that greenhouse gases are minimised throughout the design development process for the Projects wherever it is practicable to do so.	N
Concerns about potential conflict with the new A164 Jocks Lodge Improvement Scheme, and cumulative impacts with the Scheme	7	The Projects have been working closely with East Riding of Yorkshire Council (EYRC) and the revised Jock's Lodge design has been accommodated in the Projects' design.  <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> includes the traffic assessment completed for the Projects' construction, operation and decommissioning phases. The assessment also includes a cumulative effects assessment that considers the Projects' traffic cumulatively with other schemes, including schemes in the Beverley area such as the Jocks Lodge Improvement Scheme. The assessment concludes that, following the implementation of the	N



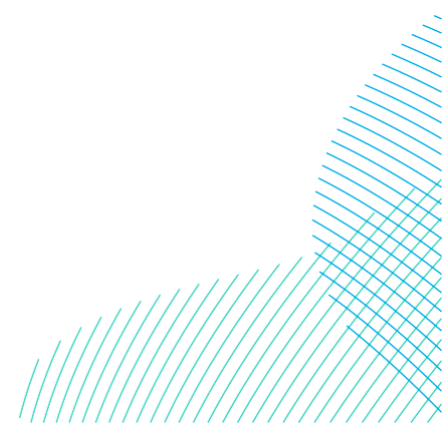
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
		mitigation measures contained within <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> there are no significant cumulative traffic and transport effects, arising from the Projects in conjunction with other schemes such as Jocks Lodge.	
Concerns about the impact of construction traffic on tourism and recreation	4	Construction traffic will be managed through the implementation of a Construction Traffic Management Plan (CTMP), which will be in accordance with <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> , which is secured by DCO Requirement 14. The OCTMP includes measures to limit the impacts of the Projects on tourism and recreation including: requirement to agree any exceptional working hours (e.g. weekend / holiday times) with East Riding of Yorkshire Council and local stakeholders in advance; and to work with local stakeholders to manage traffic during major events that impact on the highway (e.g. bike races, parades, etc.).	N
Concerns about construction traffic management at peak times	2	Construction traffic has been assessed in <b>Volume 7, Chapter 24 Traffic and Transport assessment (application reference 7.24)</b> . Construction traffic routes have been developed in consultation with East Riding of Yorkshire Council, Hull City Council and National Highways. Where possible this minimises routes through residential areas. Construction traffic will be managed through the implementation of a Construction Traffic Management Plan (CTMP), which will be in accordance with <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> , which is secured by DCO Requirement 14. The final CTMP will be approved by the relevant highway authorities (East Riding of Yorkshire Council, Hull City Council and National Highways).  The Projects proposed working hours for the onshore works are between 0700 hours and 1900 hours Monday to Saturday, with no activity on Sundays or bank holidays, except for specified exception activities (see <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> ). As specified in <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> , HGV construction traffic movements would not be permitted outside of these hours (excluding the exceptions listed in <b>Volume 3, Draft Development Consent Order (application ref: 3.1)</b> ). This does not preclude HGV travel to and from the site of the relevant work via the wider highway network which may occur during the mobilisation / demobilisation hours.	Y-M
Concerns about the Projects cumulative impacts combined with other schemes	1	<b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> includes the traffic assessment completed for the Projects' construction, operation and decommissioning phases. The assessment uses a traffic model to forecast the impact of the Projects on the 'baseline' for the construction phase of the Projects (2026 onwards), which takes account of anticipated changes to traffic flows (e.g. from new developments, forecast traffic levels). The assessment also includes a Cumulative Effects Assessment that considers the Projects' traffic cumulatively with other relevant Schemes, including new residential, transport, and energy schemes.  The assessment concludes that, following the implementation of the mitigation measures contained within <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> , and additional measures as outlined in the ES Chapter, there are no significant traffic and transport effects arising from the Projects (including cumulative effects with other Schemes).	Y-M



Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
Concerns about road safety including safety of PROW users – Copleflat /Bentley Lane	8	<p>Construction traffic has been assessed in <b>Volume 7, Chapter 24 Traffic and Transport (application reference 7.24)</b>. Construction traffic will be managed through the implementation of a Construction Traffic Management Plan (CTMP), which will be in accordance with the <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b>, which is secured by DCO Requirement 14. The final CTMP will be approved by the relevant highway authorities (East Riding of Yorkshire Council, Hull City Council and National Highways).</p> <p>The concerns regarding Bentley Lane / Copleflat Lane are noted. The traffic and transport impacts on Copleflat Lane are reported within <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b>, identified as Link 37 (note it is called Copleflat Lane in the ES Chapter). It should be noted that the assessment finds that, following the implementation of the Outline CTMP, severance impacts (which include pedestrian fear and intimidation) and road safety impacts on Copleflat Lane are expected to be negligible.</p>	N
Concerns about the location of construction accesses	1	<p>Construction accesses have been assessed in <b>Volume 7, Chapter 24 Traffic and Transport assessment (application reference 7.24)</b>. Construction accesses have been developed in consultation with East Riding of Yorkshire Council. The construction accesses are managed through <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b>. It has been agreed with East Riding of Yorkshire Council that these outline access and crossing designs would be refined post consent, to be included in the final CTMP.</p>	N
Concerns about impacts of construction traffic on road safety	1	<p>Construction traffic has been assessed in <b>Volume 7, Chapter 24 Traffic and Transport assessment (application reference 7.24)</b>. The assessment has included a road safety assessment, and concludes that following the implementation of mitigation measures outlined within the ES Chapter there are no significant residual effects relating to road safety.</p> <p>Construction traffic will be managed through the implementation of a Construction Traffic Management Plan (CTMP), which will be in accordance with <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b>, which is secured by DCO Requirement 14. The final CTMP will be approved by the relevant highway authorities (East Riding of Yorkshire Council, Hull City Council and National Highways). The Outline CTMP includes a number of road safety specific measures.</p>	N
Concerns about road closures where onshore export cable corridor crosses the highway network (e.g. trenchless crossing / open cut road crossing locations)	2	<p>In order to avoid disruption to transport users whilst the Projects' Onshore Export Cables are installed under roads, a trenchless crossing technology e.g. HDD will be used at all the following locations:</p> <ul style="list-style-type: none"> <li>• All A and B roads; and</li> <li>• The following local roads: Cliff Road, Dunnington Lane; Meaux Lane; Eske Lane; and Newbald Road.</li> </ul> <p>Only 9 minor local roads are proposed to be potentially crossed by 'open-cut' trenching methods. To provide a safe working area for the installation it would be proposed to close the roads for a short</p>	Y-D



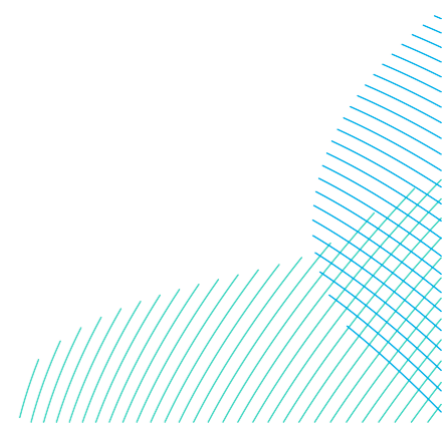
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
		period of time (up to two weeks). Suitable diversions would be provided, as described in <b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> .	



## 1.12 Noise

Table 1-12 Noise

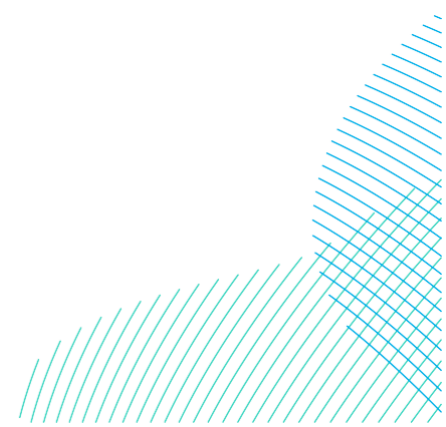
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
General concerns regarding noise impacts	12	<p>Potential noise impacts are assessed in <b>Volume 7, Chapter 25 Noise (application ref: 7.25)</b> of the ES. The assessment covers both the construction phase and operational phases. Noise and vibration effects can arise from construction traffic using the local highway network and from construction plant used to build the Onshore Export Cable Corridor. Operational noise effects can arise from the Onshore Converter Stations and associated plant.</p> <p>The assessment finds that potential effects during construction, including those from construction traffic are not considered to be significant with the implementation of the mitigation measures set out in <b>Volume 7 Chapter 25 Noise (application ref: 7.25)</b>. This includes the implementation of a Code of Construction Practice (in accordance with <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> submitted with the application.</p> <p>Noise effects during the operational phase (arising from the Onshore Converter Stations) have been assessed within the ES Chapter are not considered to be significant. Operational noise will be managed by DCO Requirement 21 (Control of noise during the operational phase).</p>	N
Concerns regarding construction traffic noise	2	<p>As reported in <b>Volume 7, Chapter 25 (application ref: 7.25)</b> of the ES, noise impacts during construction, including those from construction traffic, are not considered to be significant with the implementation of the measures set out in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>.</p> <p><b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> provides a mechanism through which construction traffic will be managed, including restrictions on deliveries at peak times and sensitive periods.</p>	N
Concerns regarding offshore vessel noise	2	<p>As reported in <b>Volume 7, Chapter 25 Noise (application ref: 7.25)</b> of the ES, noise impacts from offshore activities in wind farm Array Areas can be scoped out due to the distance of these activities from nearest onshore receptors (c.100km). Noise arising from nearshore activities (e.g. nearshore cable installation, construction of the landfall) are scoped into the assessment. Following the implementation of best practice noise management measures as outlined in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> no significant effects are anticipated.</p>	N



## 1.13 Air Quality

Table 1-13 Air Quality

Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project change? Y/N
Concern about construction phase air quality impacts	3	<p>Potential air quality impacts are assessed in <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b> of the ES. The assessment covers the following potential construction phase impacts:</p> <ul style="list-style-type: none"> <li>• Construction dust and fine particulate matter;</li> <li>• Emissions from road construction vehicles; and</li> <li>• Emissions from transportable industrial equipment</li> </ul> <p>The assessment finds that Projects' potential effects on air quality during construction are not considered to be significant with the implementation of the mitigation measures set out in <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b>. This includes the implementation of a Code of Construction Practice (in accordance with the <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> submitted with the application.</p>	N
Concerns about air quality impacts arising from construction traffic	1	<p><b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b> of the ES, includes an assessment of the potential for road traffic emissions to impact on human receptors. The assessment concludes that impacts on air quality from construction traffic are not considered to be significant on human receptors with the implementation of the measures set out in <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b>.</p>	N
Concerns about impacts on ecological sites / habitats, arising from construction traffic	1	<p>The potential for emissions from the Projects' construction traffic to impact sensitive ecological sites / habitats is considered in <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology (application ref: 7.18)</b>, <b>Volume 6, Report to Inform Appropriate Assessment (application ref: 6.1)</b> and <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b>.</p> <p>Section 2.6.1.3 of <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b> assesses the impact of construction traffic exhaust fumes on ecological receptors.</p> <p>The assessments conclude that following the implementation of the <b>Outline Code of Construction Practice (application ref: 8.9)</b>, impacts arising from road traffic emissions on sensitive ecological sites would not be significant, with the exception of Bentley Moor Wood Local Wildlife Site where temporary change in air quality during construction in-combination with other schemes remain significant in the assessment, but with no direct effects on the habitat within the Local Wildlife Site.</p>	N

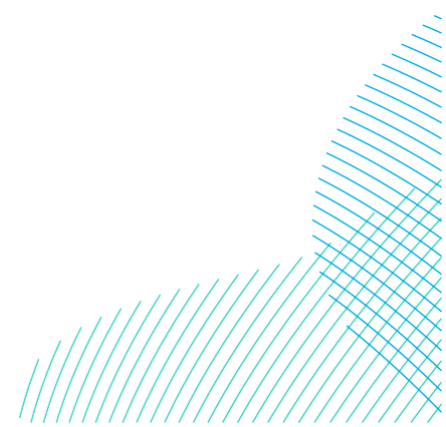




## 1.14 Human Health

Table 1-14 Human Health

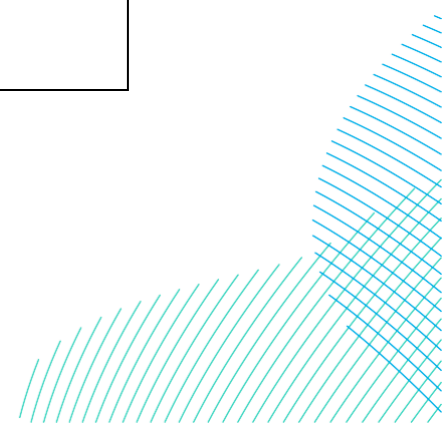
Issue From feedback	Number of times raised	The Applicants' Response and Consideration	Project change? Y/N
Impacts to human health	1	<p>An assessment of the Projects impact on human health is provided in <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> of the Environmental Statement (ES).</p> <p>The assessment draws upon relevant public health information and also considers the residual impacts from other Environmental Statement Chapters (e.g. noise, air quality, tourism and recreation, landscape and visual, etc). The assessment finds that there is a significant beneficial impact provided by the Projects, in relation to the positive impact of renewable energy generation to public health, including how it supports many aspects of life such as food safety, heating and healthcare operation. All other health impacts associated with the Projects (e.g. construction related noise, air quality impacts) are found to be not significant following the implementation of mitigation outlined in <b>Volume 8, Outline Code of Construction Practice (application ref:8.9)</b>.</p>	N
Concerns regarding Electro-magnetic Fields associated with the onshore electrical infrastructure	2	<p>All electrical systems, including natural processes and living organisms generate Electro-magnetic Fields (EMF). EMF effects diminish rapidly with distance, often requiring only a few metres, or less, to reach background levels.</p> <p>As detailed in the Projects' Scoping Report, health risks arising from EMF associated with the onshore infrastructure have been scoped out of the assessment, based the Projects' compliance with extant EMF guidance and regulations. This approach was agreed with the Planning Inspectorate (refer to <b>Volume 8, Scoping Opinion (application ref: 8.7)</b>).</p> <p>However, in line with good practice, the public understanding of risk in relation to operational EMF is assessed in <b>Volume 7, Chapter 27 Human Health (application ref 7.27)</b>. This includes considering how mental health effects can be avoided or reduced through provisions of timely and non-technical information explaining on how actual health risks are mitigated.</p> <p>The chapter concludes that impacts around public concerns on EMF are expected to be negligible. A commitment has been made to share non-technical information with local communities about how electromagnetic field standards for public health protection would be met.</p>	N



## 1.15 Socio-economics

Table 1-15 Socio-economics

Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
Questions about compensation measures for the residents of Bentley and community benefit	4	Working with local stakeholders, we will develop a community benefit package for the Projects in line with any relevant best practice guidance. The Applicants plan to start consultation on the community benefit package in 2024 but it is unlikely to be available until the pre-construction phase. Members of the public will be invited to take part in the consultation and their feedback will help shape proposals.	Y-M
Queries about local employment opportunities, apprenticeships, working with East Riding Technical College	5	The Applicants have already engaged with key stakeholders to discuss the creation of <b>Volume 8, Outline Skills and Employment Strategy (application ref: 8.5)</b> which sets the framework for the development of a Skills and Employment Plan to maximise the benefits of the Projects. We will continue to work with key local stakeholders (including local colleges) in the onward development of this strategy.  The Projects will be a major investment for the local area and wider region, and the Projects will ensure that this investment establishes a valuable and lasting legacy for local communities.	Y-M
Queries regarding using the local supply chain for components	1	Offshore wind is a core growth opportunity in the region. The Projects plan to maximise potential for the benefit of local businesses, create new, high quality long-term jobs, support new skills development, and wherever possible, ensure that all localised options are explored. Further information regarding skills and employment is included in <b>Volume 8, Outline Skills and Employment Strategy (application ref: 8.5)</b> .	N
Concerns that landscape and visual impacts of the Projects may reduce the value of homes	1	The Landscape and Visual Impact Assessment has only identified likely significant operational within 1km of the Onshore Converter Stations. Although the Applicants acknowledge the concerns of local residents, it is not considered house prices would be significantly affected. Where any resident feels the value of their property has significantly decreased in value this would be considered on case by case basis.	N
Queries about the Projects' Involvement with the local community, especially in schools helping improve understanding of climate change and the importance of renewable energy.	19	The Projects have developed <b>Volume 8, Outline Skills and Employment Strategy (application ref: 8.5)</b> in liaison with key local stakeholders. We will continue to work with key local stakeholders (including local schools and colleges) in the development of this strategy. The Projects will be working with local primary schools in 2024 to deliver an interactive STEM based workshop. Eight primary schools will take part in 2024 with the initiative hopefully being extended to more schools in 2025.	Y-M
Query / request as to whether the Project will lead to reduced energy bills	4	The price of energy is based on several factors including the cost the develop and construct different types of power generation such as Offshore Wind. The power generated by the operational Projects will be transmitted by the National Grid to where it is needed. Electricity is purchased by individual homes and business from suppliers and the costs are regulated by Ofgem.	N

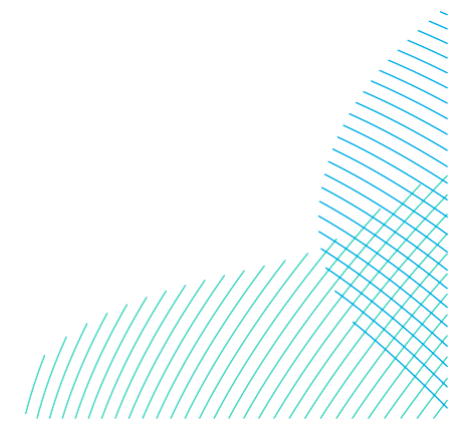


## 1.16 Tourism and Recreation

Table 1-16 Tourism and Recreation

Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
Impact on tourism and recreation at the landfall including: golf course, caravan parks and café	10	<p>Tourism and Recreation receptors including Skipsea beach and holiday, camping and caravan parks in the vicinity of the landfall are included in <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b>. No significant residual effects have been identified during construction or operation.</p> <p>During construction effects are not considered significant as they would be controlled by a Code of Construction Practice (CoCP) in accordance with <b>Volume 8, Outline Code of Construction Practice (application ref: 8.9)</b> and a Construction Traffic Management Plan (CTMP) in accordance with <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b>. During operation all works will be located below ground and the landscape reinstated.</p> <p>The proposed King Charles III England Coastal Path would remain open for the duration of the construction works. An Outline Public Rights of Way Management Plan is included in <b>Appendix A of Volume 8, Outline Code of Construction Practice (application ref 8.9)</b>.</p>	N
Concerns about Tourism and Recreation impacts at Beverley, a historic market town including on Beverley racecourse [fall in visitor numbers].	8	<p>No significant effects have been identified in relation to tourism and recreation assets or the economy in Beverley, further details are provided <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b>. There would be some limited views of the Onshore Converter Stations from Beverley Minster tower but no views from within the town itself, as detailed in <b>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)</b>. Potential Noise, dust, traffic and visual effects during construction and operation would be managed through <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b>, <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> and <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b> and are not considered significant.</p>	N
Concerns about impacts on PRow and walking groups, the cliff path and access to open space/common land and impacts on tourism	1	<p>A number of PRow cross the Onshore Development Area, these will be managed through the measures set out in Outline Public Rights of Way Management Plan which is included in <b>Appendix A of Volume 8, Outline Code of Construction Practice (application ref 8.9)</b>. A draft of the Public Rights of Way Management Plan has been shared with the East Riding of Yorkshire Council PRow officer, whilst the Definitive Map team and the Joint local access forum have also been consulted. The proposed King Charles III England Coastal Path would remain open for the duration of the construction works. Impacts on PRow are assessed in <b>Volume 7, Chapter 21 Land Use (application ref: 7.4)</b>, no significant effects have been identified. Impacts on long distance PRow and tourism are assessed in <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b>.</p> <p>There will be no direct impacts on common land in the vicinity of Beverley including Beverley Westwood, Burton Bushes (SSSI) or Beverley Parks Local Nature Reserve (LNR). The Skipsea beach will remain open to the public during construction but, there may be a requirement for some restrictions to access in certain areas during works on the beach (if required). Further detail can be found in <b>Volume</b></p>	Y-M

Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
		<b>7, Chapter 21 Land Use (application ref: 7.4) and Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29).</b>	
Concerns over two long distance routes are within Onshore Developments Area including the Beverley 20 and Minister Way.	3	A number of PRow cross the Onshore Development Area, these will be managed through the measures set out in Outline Public Rights of Way Management Plan which is included in <b>Appendix A of Volume 8, Outline Code of Construction Practice (application ref 8.9)</b> . Impacts on long distance PRow and tourism are assessed in <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b> . No significant effects are identified during construction or operation on either of these receptors.	N
Concerns over the River Hull as a tourism receptor	2	All Main Rivers, including the River Hull will be crossed by a trenchless Crossing, there will therefore, be no impact on recreational users of the river. The cable entry and exit pits will be at least at least 20m from any 'Main River,' or from the nearest toe of any flood defences.	N
Concerns about impacts at Butt Farm Campsite	1	A significant (major adverse) effect on the Butt Farm Campsite has been identified in <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b> . This is related to the major significant adverse landscape and visual effects identified during construction and operation of the Onshore Converter Stations at Butt Farm. These would be limited to within 1km of the Onshore Converter Stations and will be mitigated by the landscaping proposed in <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b> , after 10 years. This will reduce the residual significance of effect moderate adverse, still significant in EIA terms.	N
Concerns about impacts to campsites and caravan parks located along the Onshore Export Cable Corridor	2	No significant adverse environmental effects have been identified at campsites and caravan parks located along the Onshore Export Cable Corridor in <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b> . Potential noise, dust, traffic and visual effects during construction and operation would be managed through <b>Volume 8, Outline Code of Construction Practice (application ref 8.9)</b> , <b>Volume 8, Outline Construction Traffic Management Plan (application ref: 8.13)</b> and <b>Volume 8, Outline Landscape Management Plan (application ref: 8.11)</b> and are not considered significant.	N
Concerns about the impact to the local tourism economy	1	The effects on the tourism economy are assessed in <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b> as negligible and not significant in EIA terms.	N

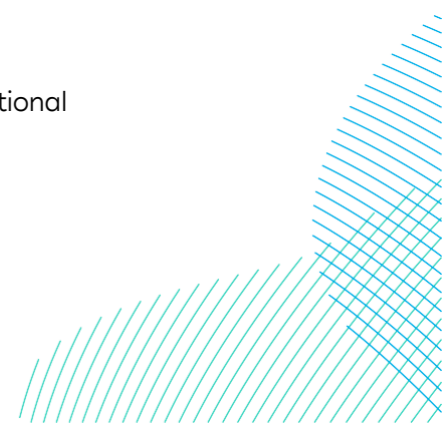


## 1.17 Climate Change

Table 1-17 Climate Change

Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
General support for renewable energy / projects which reduce reliance on fossil fuels	46	The support for renewable energy technology is noted and appreciated. Based on an estimated capacity of 3 gigawatts (GW) once fully operational, the 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> .	N
Request for projects to minimise the Projects' carbon footprint, and concerns about the carbon emissions associated with the Projects' construction	4	<p>As detailed in <b>Volume 7, Chapter 30 Climate Change (application ref: 7.30)</b>, the Projects will strive to reduce the amount of greenhouse gas (GHG) emissions through the design development process wherever it is practicable to do so. The prime purpose of the Projects is to generate low carbon renewable energy, and therefore sustainability and carbon reduction will be built into the Projects lifecycle.</p> <p>Whilst the Projects will produce some greenhouse gas emissions, mainly during the construction phase, overall, it is assessed as having significant beneficial effects on greenhouse gas emissions in operation, with an avoidance of 91.8 million and 183.4 million tonnes of CO<sub>2</sub> over the lifetime of one or both Projects taken forward respectively. All other effects were deemed not significant.</p>	Y-D
General opposition to renewable energy / offshore wind.	11	Comments are noted.	N

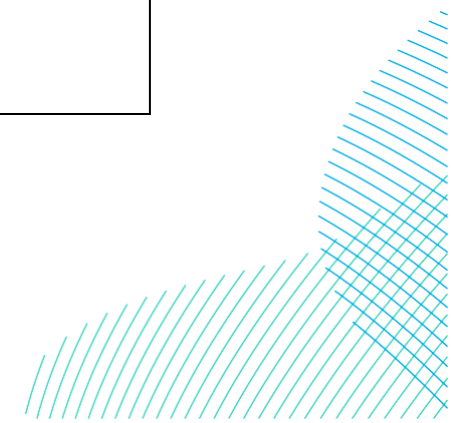
<sup>1</sup> Calculation based on 2021 generation, and assuming average (mean) annual household consumption of 3,509 kWh, based on latest statistics from Department of Energy Security and Net Zero (Subnational Electricity and Gas Consumption Statistics Regional and Local Authority, Great Britain, 2021,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



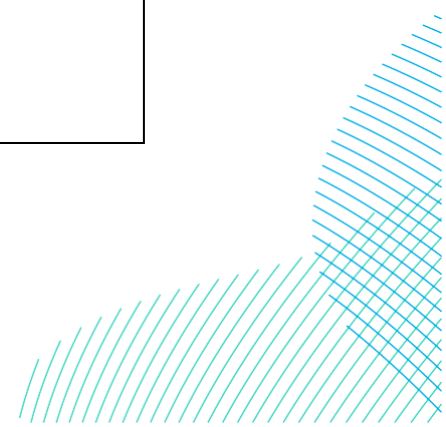
## 1.18 Offshore Matters

Table 1-18 Offshore Matters

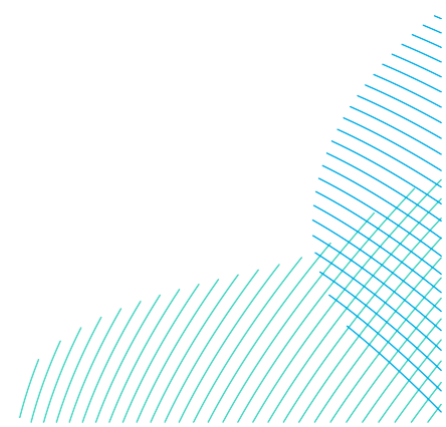
Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
A concern was raised on effects for fish/shellfish, particularly for nearshore waters in and around Skipssea	1	The potential impacts on fish and shellfish species are assessed in <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> of the Environmental Statement. Figure 10.1 outlines the Study Area for the assessment, which includes the nearshore area in the vicinity of the Offshore Export Cable Corridor. The data sources used to inform the assessment are outlined in section 10.5. A range of primary and secondary data sources have been used to consider fish populations likely to be impacted by the Projects both inshore and offshore. These sources have been agreed with key external stakeholders. The assessments undertaken conclude that there may be, at most, minor adverse effects on fish and shellfish receptors within the Fish and Shellfish Ecology Study Area across all phases of the Projects. A summary of the likely significant effects of the Projects on the offshore environment is present in <b>Volume 7, Environmental Statement Non-Technical Summary (application ref: 7.0)</b> that has been produced in support of the consent submission.	N
A comment was raised that the wind farm may interfere with migratory bird paths to and from the coast.	1	The potential impacts on offshore birds, including migratory species, are assessed in "Chapter 12 Offshore Ornithology" of the Environmental Statement ( <b>Volume 7, Chapters 9-12 (application refs: 7.9-12)</b> ). A full, detailed assessment of impacts to all bird receptors from all phases of the project are recorded therein. A summary of the likely significant effects of the Projects on the offshore environment is present in <b>Volume 7, Environmental Statement Non-Technical Summary (application ref: 7.0)</b> that has been produced in support of the consent submission.	N
A concern was raised about the possible impact on marine life at Dogger Bank, as well as the effect it will have on shipping lines. Concerns too about the robustness of the build itself, plus the expense involved in constructing offshore wind farms.	1	The Environmental Statement assesses potential impacts on marine ecological groups found across the Dogger Bank. The assessments cover benthos, fish, marine mammals and birds in <b>Volume 7, Chapter 9 to 12 (application ref: 7.9 to 7.12)</b> . Assessments of the likely impacts of the Projects on shipping activities are presented in <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> of the Environmental Statement. The Projects will have an estimated design life of 30 years and will be maintained as required as the life of the Projects. Further details relating to the construction and maintenance of the Projects are presented in the Project Description chapter of the Environmental Statement ( <b>Volume 7, Chapter 9 to 12 (application ref: 7.9 to 7.12)</b> ). A summary of the likely significant effects of the Projects on the offshore environment is present in <b>Volume 7, Environmental Statement Non-Technical Summary (application ref: 7.0)</b> that has been produced in support of the consent submission. The Applicants will give final consider to the financial case for developing the Projects after consent is awarded.	N
A statement was made requesting that sea life will be taken into account. Disturbance to feeding grounds for e.g. gannets, puffins etc, which rely on specific foods e.g. sand eels, is fatal to some of these populations.	1	The Environmental Statement assesses potential impacts on a number of marine species, including offshore birds. "Chapter 12 Offshore Ornithology" ( <b>Volume 7, Chapter 12 Offshore Ornithology (application ref: 7.12)</b> ) assesses impacts to birds. The assessment concluded that all effects were assessed as negligible to minor adverse and not significant in EIA terms, so there were no additional mitigation measures proposed. No significant Cumulative Effects (with other schemes) were identified in relation to ornithology except for Cumulative Effects of operational displacement for guillemot, and	N



Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
		operational collision risk for kittiwake and great black-backed gull which were assessed as minor to moderate adverse. A summary of the likely significant effects of the Projects on the offshore environment is present in <b>Volume 7, Environmental Statement Non-Technical Summary (application ref: 7.0)</b> that has been produced in support of the consent submission.	
A statement was made that the respondent assumed fishing / ferry stakeholders had been consulted.	1	Extensive consultation has been undertaken with fishers and shipping companies throughout the development phase of the Projects. This engagement work will continue as the development of the Projects progresses further. A summary of the consultation work undertaken to date is presented in <b>Volume 5, Consultation Report ((application ref: 5.1))</b> , with further details presented in <b>Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)</b> and <b>Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14)</b> of the ES. A summary of the likely significant effects of the Projects on the offshore environment is present in <b>Volume 7, Environmental Statement Non-Technical Summary (application ref: 7.0)</b> that has been produced in support of the consent submission.	N
A statement was made that Due consideration must be given to the impact of the construction on the environment, particularly to any disturbance of the fish stocks and marine life. All recommendations of the relevant environmental impact reports and the concerns of all wildlife and environment organisations should be undertaken. Particularly regarding the impact on fish stocks and the consequent impact on feeding seabirds.	1	The Environmental Statement assesses potential impacts on marine ecological groups including benthic ecology, fish, marine mammals and birds. Impacts to offshore receptors generally are covered in <b>Volume 7, Chapters 8 to 17 (application refs: 7.8 to 7.17)</b> . A summary of the likely significant effects of the Projects on the offshore environment is present in <b>Volume 7, Environmental Statement Non-Technical Summary (application ref: 7.0)</b> that has been produced in support of the consent submission.	N
A statement was made that the Projects are building within or very close to Special Areas of Conservation, Marine Conservation Zones and Special Protection Areas. The respondent queried whether it was possible to re-site due to adverse effects on the marine environment.	1	The site selection chapter ( <b>Volume 7, Chapter 4 Site Selection and Assessment of Alternatives (application refs: 7.4)</b> ) of the ES provides information on the site selection process and the means through which the Array Areas were chosen and the cable route corridors selected. The effects of the development on the marine environment are assessed across <b>Volume 7, Chapters 8 to 17 (application refs: 7.8 to 7.17)</b> , with impacts to protected sites covered within <b>Volume 6, Report to Inform Appropriate Assessment (application ref: 8.1)</b> and a <b>Volume 8, Stage 1 Marine Conservation Zone Assessment (application ref: 8.17)</b> . The cable corridor has been iterated to avoid a permanent overlap with any Marine Conservation Zones. Avoidance of Special Areas of Conservation and Special Protection Areas has not been possible, but impacts to these sites will be mitigated and / or compensated for where practicable. A summary of the likely significant effects of the Projects on the offshore environment is present in <b>Volume 7, Environmental Statement Non-Technical Summary (application ref: 7.0)</b> that has been produced in support of the consent submission.	Y
A request was made to avoid disrupting natural habitats, birds, fish and coastal resources. Avoid disrupting pleasant enjoyment of the beach and nature by local residents and visitors.	1	The Environmental Statement assesses potential impacts on marine physical processes and marine ecological groups including benthic ecology, fish, marine mammals and birds in <b>Volume 7, Chapters 8 to 12 (application refs: 7.8 to 7.12)</b> . Impacts on recreation activities are considered in <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b> . A summary of the likely significant effects of the Projects on the offshore environment is present in <b>Volume 7, Environmental Statement</b>	N



Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
		<p><b>Non-Technical Summary (application ref: 7.0)</b> that has been produced in support of the consent submission.</p>	
<p>A concern was raised that the Fish and Shellfish and Marine Mammals PEIR reports rely heavily on desk-based data rather than observable data from the offshore locations.</p>	<p>1</p>	<p>The desk-based reports used in the assessments are those commonly used in the development of offshore wind projects. Many of them are based on a broad array of survey and/or data obtained from the field. Desk-based information has been supplemented with primary data where necessary. The sources of information to be used to inform the assessments of project impacts were agreed with stakeholders throughout the Environmental Impact Assessment process. For these reasons we believe the information used to deliver the impact assessments for the projects is robust. Information used to inform the development of the fish and marine mammals chapter of the Environmental Statement is presented in <b>Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10)</b> and <b>Volume 7, Chapter 11 Marine Mammals (application refs: 7.11)</b> of the ES. A summary of the likely significant effects of the Projects on the offshore environment is present in <b>Volume 7, Environmental Statement Non-Technical Summary (application ref: 7.0)</b> that has been produced in support of the consent submission.</p>	<p>N</p>
<p>A statement was made that the respondent would like to see an impact study on the effects on wildlife, both marine + Avian.</p>	<p>1</p>	<p>The Environmental Statement assesses potential impacts on a number of marine species. Impacts to offshore receptors are covered in <b>Volume 7, Chapters 9 to 12 (application refs: 7.9 to 7.12)</b>. A summary of the likely significant effects of the Projects on the offshore environment is present in <b>Volume 7, Environmental Statement Non-Technical Summary (application ref: 7.0)</b> that has been produced in support of the consent submission.</p>	<p>N</p>

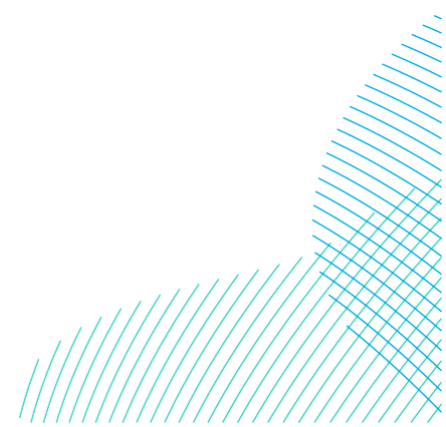




## 1.19 Cumulative Effects

Table 1-19 Cumulative Effects

Issue From Feedback	Number of Times Raised	The Applicants' Response and Consideration	Project Change? Y/N
Concerns over potential cumulative effects with Hornsea 4 and Dogger Bank A/B	1	<p><b>Volume 7, Chapter 23 Landscape and Visual (application ref: 7.23)</b> cumulative effects assessment (CEA) has identified seven schemes which may give rise to significant landscape and visual cumulative effects. This includes: Dogger Bank A&amp;B Converter Stations, A164 and Jocks Lodge Improvement Scheme; the Creyke Beck Solar Farm to the south of the Projects, the Hornsea 4 Offshore Wind Farm, North Humber to High Marnham (overhead line) Upgrade scheme; the proposed Birkhill Wood National Grid Substation and White Hall solar farm. A description of how these developments were identified is detailed in <b>Volume 7, Appendix 6-1 - Onshore Cumulative Effects Assessment Methodology (application ref: 7.6.6.1)</b>.</p> <p>Section 23.8 of <b>Volume 7, Chapter 23 Landscape and Visual (application ref: 7.23)</b> assess the additional cumulative effect, considering these schemes would be moderate and significant within the area between the Projects, Hornsea 4 substation and the Dogger Bank A &amp; B Converter Stations. Further detail assessing each cumulative Scheme is provided in Table 23-22 of <b>Volume 7, Chapter 23 Landscape and Visual (application ref: 7.23)</b>. The Applicants are in regular discussions with National Grid and other developers and will seek to collaborate with them as their planning proposals develop.</p>	Y-M



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