

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

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South (East) Limited**

# **Dogger Bank South Offshore Wind Farms**

**Environmental Statement**

**Volume 7**

**Appendix 16-1 - Infrastructure and Other Users  
Consultation Responses**

**June 2024**

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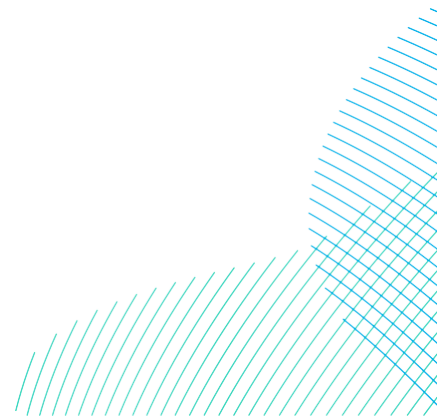
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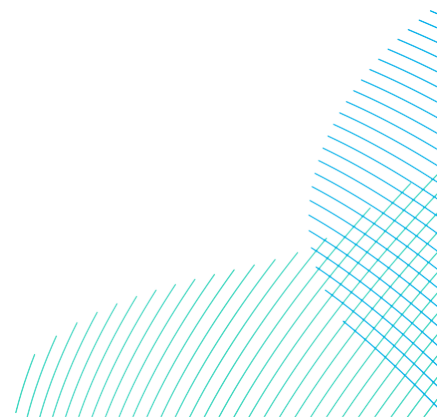


## Contents

16.1. Consultation Responses .....	9
16.1.1. Introduction.....	9

## Tables

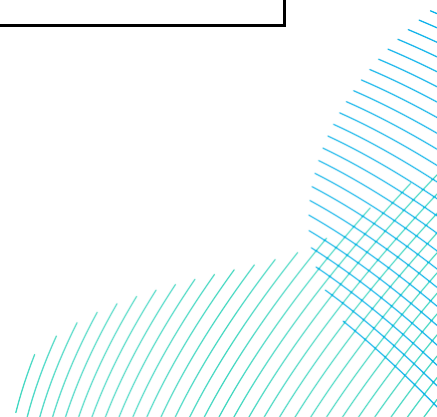
Table 16-1-1 Consultation Responses Related to Chapter 16 Infrastructure and Other Users.....	10
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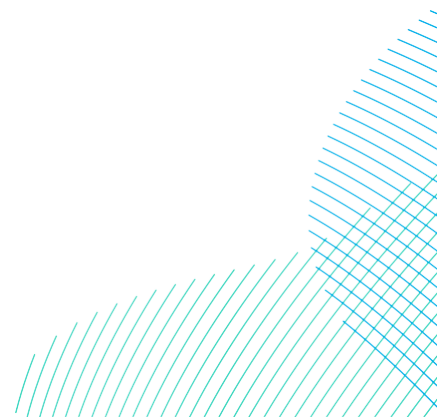
## Glossary

Term	Definition
Accommodation Platform	An offshore platform (situated within either the DBS East or DBS West Array Area) that will provide accommodation and mess facilities for staff when carrying out maintenance activities for the Projects.
Array Areas	The DBS East and DBS West offshore Array Areas, where the wind turbines and array cables will be located. The Array Areas do not include the Offshore Export Cable Corridor or the Inter-Platform Cable Area.
Array cables	Offshore cables which link the wind turbines to the Offshore Converter Platform(s).
Concurrent Scenario	A potential construction scenario for the Projects where DBS East and DBS West are both constructed at the same time.
Development Scenario	Description of how the DBS East and / or DBS West Projects would be constructed either in isolation, sequentially or concurrently.
Dogger Bank South (DBS) Offshore Wind Farms	The collective name for the two Projects, DBS East and DBS West.
Electrical Switching Platform (ESP)	The Electrical Switching Platform (ESP) (if required) would 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 Design Network. This platform may be located either within one of the Array Areas (alongside a converter station) or the Export Cable Platform Search Area.
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.

Term	Definition
Inter-Platform Cable Corridor	The area where Inter-Platform Cables would route between the DBS East and DBS West Array Areas, should both Projects be constructed.
Inter-Platform Cables	Buried offshore cables which link offshore platforms.
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).
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.
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 platform foundations due to water flow.



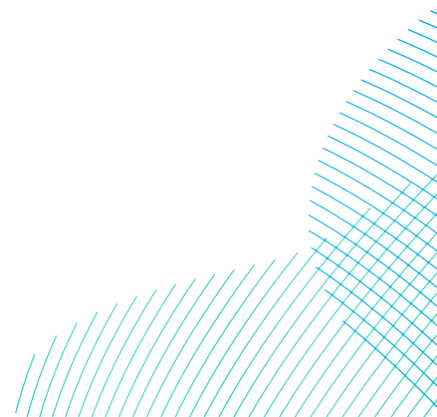
Term	Definition
Sequential Scenario	A potential construction scenario for the Projects where DBS East and DBS West are constructed with a lag between the commencement of construction activities. Either Project could be built first.
The Applicants	The Applicants for the Projects are RWE Renewables UK Dogger Bank South (East) Limited and RWE Renewables UK Dogger Bank South (West) Limited. The Applicants are themselves jointly owned by the RWE Group of companies (51% stake) and Masdar (49% stake).
The Projects	DBS East and DBS West (collectively referred to as the Dogger Bank South Offshore Wind Farms).



## Acronyms

Term	Definition
AEP	Annual Energy Production
CAA	Civil Aviation Authority
CCS	Carbon Capture and Storage
DBS	Dogger Bank South
DC	Direct Current
DCO	Development Consent Order
DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
EPP	Evidence Plan Process
ES	Environmental Statement
ESP	Electrical Switching Platform
ETG	Expert Topic Group
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IPMP	In Principle Monitoring Plan
km	Kilometre
MCA	Maritime Coastguard Agency
MW	Megawatt
MGN	Marine Guidance Note
MHWS	Mean High Water Springs

Term	Definition
MMO	Marine Management Organisation
MoD	Ministry of Defence
NPS	National Policy Statement
NSTA	North Sea Transition Authority
OCP	Offshore Converter Platform
PEIR	Preliminary Environmental Information Report
PEXA	Practice and Exercise Area
SAR	Search and Rescue
SNS	Southern North Sea
UKHO	United Kingdom Hydrographic Office
UXO	Unexploded Ordnance





## 16.1 Consultation Responses

### 16.1.1 Introduction

1. This appendix covers those statutory consultation responses that have been received as a response to the scoping report (2022) and the Preliminary Environmental Information Report (PEIR) (2023).
2. Response from stakeholders and regard given by the Applicants have been captured in **Table 16-1-1**.

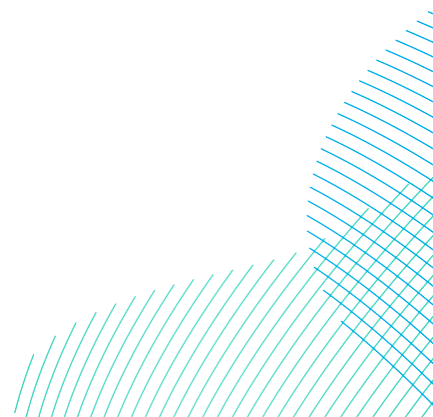


Table 16-1-1 Consultation Responses Related to Chapter 16 Infrastructure and Other Users

Comment ID	Comment	Project Response
<b>Planning Inspectorate, Scoping Responses 02/09/2022</b>		
3.12.1	<p>Paragraph 469 states that there are no licenced aggregate production areas or mining sites within the study area. No further discussion is presented to support the conclusion to 'scope out' this matter in Table 2-38. Disposal sites are also stated as absent from the study area (Paragraph 470) however, Paragraph 477 identifies potential operational impacts on disposal sites. Disposal sites do not feature in Table 2-38.</p> <p>The rationale presented for these two matters is not clear in the scoping report. The Inspectorate expects the ES to be based on robust evidence to demonstrate that features are absent or would otherwise be unaffected by the Proposed Development in reaching any subsequent conclusion to exclude significant effects.</p>	<p>The closest licenced offshore minerals aggregates site to the Projects is the Humber 2 production area, located approximately 47km south-east of the offshore export cable corridor. Further discussion of the potential impacts on aggregate extraction is provided in section 16.6.1 of this chapter.</p> <p>There are no disposal sites located within the Array Areas or offshore export cable corridor, with the closest site being the closed Bridlington Bay B, located 5.2km north-west of the export cable corridor. Further discussion of the potential impacts on disposal sites has been undertaken and is provided in section 16.6.1 of this chapter.</p> <p>The operational impacts on disposal sites originally scoped in in paragraph 477 of the scoping report was an error in the original document. The potential for impacts on disposal sites and offshore wind farm disposal sites during all stages of the Projects are discussed in section 16.6.1 of this chapter.</p>
3.12.2	<p>The Inspectorate does not agree that this matter (Potential cumulative impacts from construction, operation, and decommissioning) can be scoped out at this stage. In the absence of any detail of proposed mitigation measures referred to (i.e., development of crossing agreement or similar) the Inspectorate considers that pathways for effects remain and therefore there is potential for cumulative effects to arise. The ES should assess all impacts with the potential to result in significant cumulative effects with other development, or provide adequate information on the mitigation measures to demonstrate that these impacts can be discounted from that assessment.</p>	<p>A full cumulative effects section is presented in section 16.7 within <b>Volume 7, Chapter 16 Infrastructure and Other Users (application ref: 7.16)</b>.</p>
3.12.3	<p>In addition to the Northern Endurance Carbon Capture and Storage (CCS) project noted in section 2.12.1.4 of the scoping report the Inspectorate is also aware (as presented on the National Infrastructure Website) of a number of other CCS Pipelines, and areas of Saline Aquifer Injection within the North Sea and associated land infrastructure.</p> <p>The ES should ensure to include reference to all existing or proposed CCS activities with which the Proposed Development may interact (onshore cable corridor and substations, offshore cable corridor and offshore Array Areas).</p>	<p>Other Carbon Capture and Storage infrastructure and new licensing areas have been detailed and assessed in this chapter, see section 16.5.4 within <b>Volume 7, Chapter 16 Infrastructure and Other Users (application ref: 7.16)</b>.</p>
3.12.4	<p>The Inspectorate notes that there is potential for wartime UXO to be located in the southern North Sea, but at Paragraph 473 it states that it is not proposed to ascertain the locations and develop any mitigation until after any DCO is granted. The Inspectorate considers that there is potential for UXO to give rise to significant effects if</p>	<p>The potential impacts to benthic and intertidal ecology, fish and shellfish, marine mammals and offshore archaeology from UXO is addressed in <b>Volume 7, Chapter 9 Benthic and Intertidal Ecology (application ref: 7.9), Volume 7, Chapter</b></p>

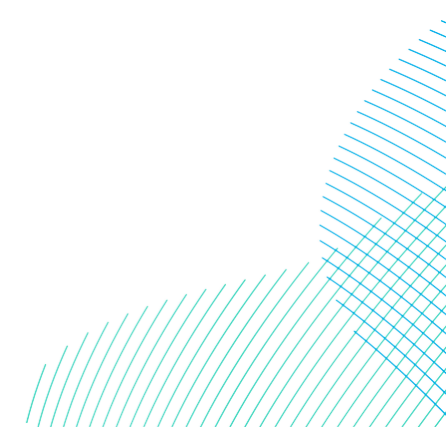
Comment ID	Comment	Project Response
	<p>they are present within the scoping boundary, e.g., in relation to clearance activities there could be impact to marine mammal ecology (section 3.7) and offshore archaeology (see section 3.13).</p> <p>The ES should be supported by survey information to identify the potential location of UXO within the DCO boundary and an outline mitigation plan, in order to support an assessment of the worst-case scenario associated with UXO clearance.</p>	<p><b>10 Fish and Shellfish Ecology (application ref: 7.10), Volume 7, Chapter 11 Marine Mammals (application ref: 7.11), and Volume 7, Chapter 17 Offshore Archaeology and Cultural Heritage (application ref: 7.17)</b> of the ES. Specific surveys to identify potential locations of UXO will not be undertaken until the DCO is granted. This is to allow more detailed engineering work to be carried out on the cable routes and locations of turbines to allow a targeted survey for potential UXO to be undertaken.</p> <p>However, data from the geophysical surveys undertaken have been used to determine the potential for UXO within the Offshore Development Area. See section 16.5.7 of the main chapter for further information.</p> <p>A Marine Licence application would be applied for post-consent to allow the investigation and clearance of any UXO to ensure appropriate mitigation is put in place. To note, the Applicants have a hierarchy document in place for UXO disposal operations.</p>
3.12.5	<p>The scoping report states at paragraph 484 that the “EIA will be based on existing data and information gathered through consultation”. There is no information presented about the methodology that will be used to assess impacts, nor is any criteria presented to identify how significance of effect will be determined. The ES should be clear on how the assessment has been undertaken, taking into account relevant guidance, and using an aspect specific methodology where possible.</p>	<p>Section 16.4 of <b>Volume 7, Chapter 16 Infrastructure and Other Users (application ref: 7.16)</b> presents the assessment methodology used to assess the impacts on infrastructure and other users.</p>
<p><b>Marine Management Organisation, Scoping Responses 02/09/2022</b></p>		
3.14.2	<p>If dredge &amp; disposal is required, a disposal method should be provided including the estimated volume of material to be disposed of. This must be provided in order to make an assessment of the proposed activity and to allow the proposed volumes to be included on any Development Consent Order. The MMO can provide further comment on this issue once more detail on disposal activities is provided.</p>	<p>Information regarding the dredging and disposal of sediment is detailed in the <b>Disposal Site Characterisation Report (application ref: 8.18)</b> that forms part of the Projects’ DCO application.</p>
<p><b>Ministry of Defence, Scoping Responses 02/09/2022</b></p>		
N/A	<p>Through paragraph 443 of the scoping report, it is acknowledged that the offshore array may fall wholly or partially within Southern Managed Danger Area (MDA) Practice and Exercise Areas (PEXA) D323B, D323C, and D323D. The lower vertical limits of blocks of danger area airspace are also noted.</p> <p>In addition, the cable route indicated in the scoping report passes through Practice and Exercise Areas (PEXA) D323K, D323D, and D323C. The applicant should be advised to take account of the current published MOD Practice and Exercise Areas (PEXA) in preparation of their development proposal. The MOD has highly surveyed</p>	<p>See section 16.5.7 and section 16.6.1.5 of the main chapter for consideration of relevant PEXAs with regards to the Projects.</p>

Comment ID	Comment	Project Response
	routes which maybe relevant to the installation of the export cables & associated infrastructure. MOD should be consulted at the next stage of any application.	
N/A	The potential for unexploded ordnance (UXO) to be present within the study area and the necessity for clearance is acknowledged within the scoping report. The potential presence of UXO and disposal sites should be a consideration during the installation and decommissioning of turbines, cables, and any other infrastructure, or where other intrusive works are necessary.	See section 16.5.7 of <b>Volume 7, Chapter 16 Infrastructure and Other Users (application ref: 7.16)</b> for further information presence of potential UXO within the Offshore Development Area for the Projects.
N/A	The landfall and onshore elements of the proposal, described in section 1.5.2 and 1.5.3 of the scoping report, identifies landfall at one of two sites close to Skipsea and an 80km <sup>2</sup> area within which two substations may be sited and an export cable will connect landfall with onshore substations. As the proposal matures MOD would hope to be consulted in order that any impact on MOD assets can be identified.	The MoD have been included in all further relevant consultation and requests for feedback following submission of the Projects' scoping report.
<b>PEIR Consultation, Lincolnshire Wildlife Trust 17/07/2023</b>		
N/A	<p>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 cumulative 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 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. 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>	<p>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>.</p> <p>Potential cumulative effects in relation to the Dogger Bank SAC is detailed in <b>Volume 6, Report to Inform Appropriate Assessment (application ref: 6.1)</b> that accompanies this application.</p>

Comment ID	Comment	Project Response
N/A	<p>9. Future Endorsement and Final Remarks</p> <p>LWT will consider endorsement of DBSOWF provided that the above concerns are addressed appropriately. LWT request a meeting with DBS to discuss the 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>	<p>Noted, engagement with the Lincolnshire Wildlife Trust has continued throughout the ETG process following PEIR submission and pre-DCO submission.</p>
<p><b>PEIR Consultation, Orsted Hornsea Project Four Limited 17/07/2023</b></p>		
N/A	<p>1) 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 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.</p>	<p>Noted with thanks.</p>
N/A	<p>3) 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.</p>	<p>Noted, potential interactions with Hornsea Project Four are detailed in <b>Volume 7, Chapter 16 Infrastructure and Other Users (application ref: 7.16)</b>.</p>
N/A	<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 Project Four has been included within the cumulative assessment for the Projects, where relevant in each topic chapter.</p>
N/A	<p>c) 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>
<p><b>PEIR Consultation, Dogger Bank D - SSE Renewables 15/09/2023</b></p>		
N/A	<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>Noted with thanks, consultation with Dogger Bank D will continue through the development of the Projects' lifespan.</p>

Comment ID	Comment	Project Response
	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.	
N/A	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.	Dogger Bank D has been included in the cumulative assessment for this topic, in addition to all other relevant topics within the ES.
<b>PEIR Consultation, Dogger Bank A, B and C – Dogger Bank Wind Farm 15/09/2023</b>		
N/A	<p>On potential cumulative impacts Paragraphs 172 of your Scoping Opinion notes that:</p> <p><i>"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)"</i></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/A	<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 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. We have adopted the issues on which you asked for feedback as headings in this submission.</p>	<p>Figure PC2340-RHD-OF-ZZ-DR-Z-0365 Offshore Wind Farms within 50km of the Project has been updated to reflect this comment.</p> <p>Assessments of both the Projects in isolation or together account for potential interactions with other nearby wind farms, including the Dogger Bank Wind Farms.</p>
N/A	<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</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 export cable corridor options have not been added to this figure due</p>

Comment ID	Comment	Project Response
	<p>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>to no publicly available files being available to incorporate into <b>Volume 7, Figure 16-2 (application ref: 7.16.1).</b></p>
N/A	<p>Chapter 16 – Infrastructure and Other Users, Table 16-9 and paragraph 40 recognise that:  <i>“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.”</i></p> <p>Paragraph 64 of Chapter 16 also notes that:  <i>“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”.</i></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>	<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 chapter. Publicly available information regarding Dogger Bank D has been used to inform the assessment conducted.</p>
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 full 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>	<p>Potential impacts regarding wake loss are assessed in section 16.6.1.1 of the chapter.</p>



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