

**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 19-1 Geology and Land Quality Consultation  
Responses**

**June 2024**

**Application Reference: 7.19.19.1**

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

**Revision: 01**

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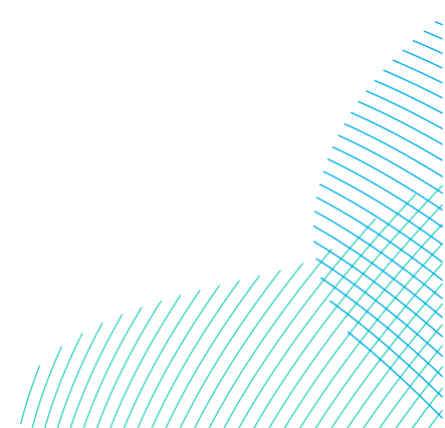
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01	June 2024	Final for DCO Application	RHDHV	RWE	RWE

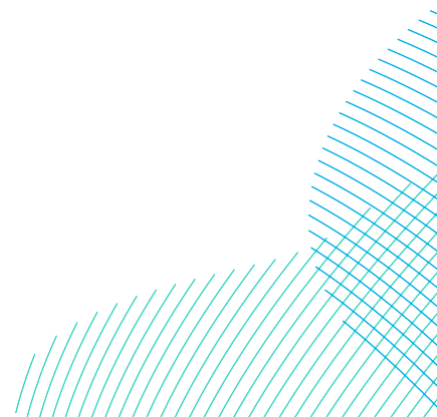


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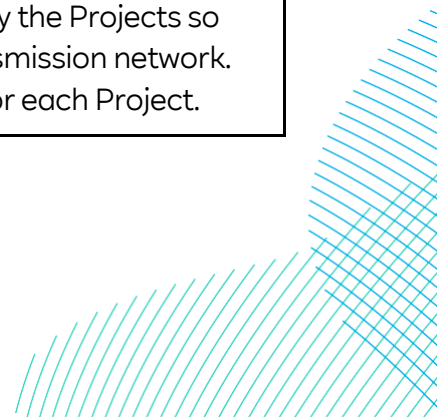
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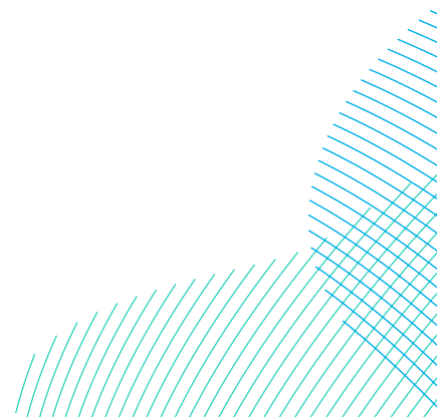


## Glossary

Term	Definition
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.
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.
Impact	Used to describe a change resulting from an activity via the Projects, i.e. increased suspended sediments / increased noise.
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.
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 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.



Term	Definition
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
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
ALC	Agricultural Land Classification
BS	British Standard
DCO	Development Consent Order
ERYC	East Riding of Yorkshire Council
ES	Environmental Statement
ETG	Expert Topic Group
HDD	Horizontal Directional Drilling
LCRM	Land Contamination Risk Management
MHWS	Mean High Water Spring
MMO	Marine Mammal Organisation
MSA	Mineral Safeguarding Areas
OCoCP	Outline Code of Construction Practice
PEIR	Preliminary Environmental Information Report
PRA	Preliminary Risk Assessment
SMP	Soil Management Plan
SSSI	Site of Special Scientific Interest
SWMP	Site Waste Management Plans
UXO	Unexploded Ordnance
WFD	Waste Framework Directive

## 19.1 Consultation Responses

### 19.1.1 Introduction

1. This appendix covers those statutory consultation responses that have been received as a response to the scoping report (2022), the Preliminary Environmental Information Report (PEIR) (2023) and Expert Topic Group (ETG) meetings.
2. Response from stakeholders and regard given by the Applicants have been captured in **Table 19-1-1**.

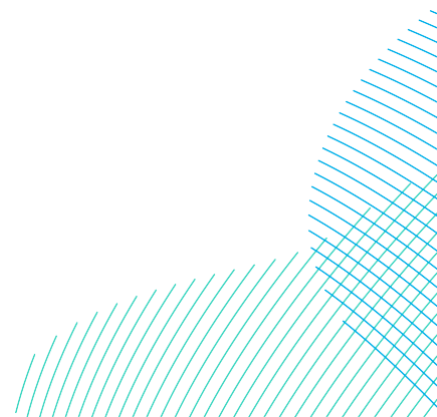
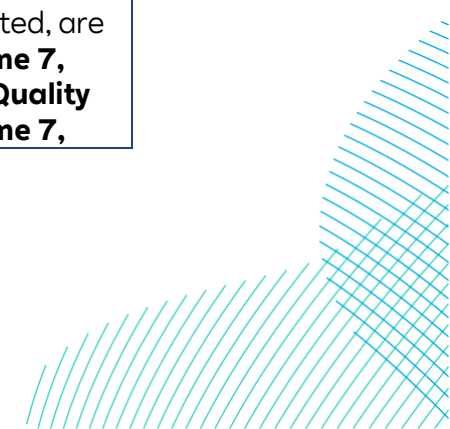


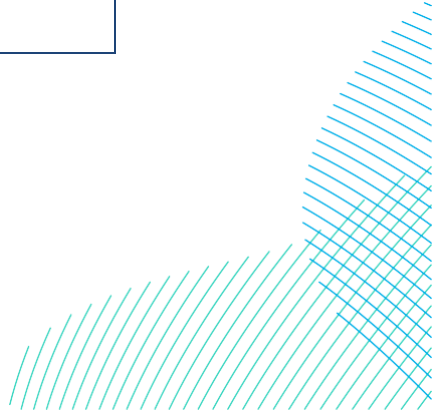
Table 19-1-1 Consultation Responses Related to **Volume 7, Chapter 19 Geology and Land Quality (application ref: 7.19)**

Comment	Project Response
<b>The Planning Inspectorate Scoping Opinion 02/09/2022</b>	
<p>Planning Inspectorate ID 4.2.2: Reference is made within this paragraph to the vulnerability of aquifers (ranging from low to high), however this information is not presented within Table 3-5 (Aquifer Designation). The ES should ensure that all available information is utilised to assess the sensitivity of the identified receptors. The receptors and other relevant baseline information should also be indicated on an appropriate figure.</p>	<p>Groundwater vulnerability within each of the identified aquifer units is presented within <b>Table 19-10</b>. Information in relation to existing baseline for the Onshore Development Area can also be found in <b>Table 19-10</b> and <b>Volume 7, Appendix 19-2 (application ref: 7.19.19.2)</b>. Figures illustrating baseline information, and potential receptors can be found as <b>Volume 7, Figures 19-2 - 19-9 (application ref: 7.19.1)</b>.</p>
<p>Planning Inspectorate ID 4.2.3: The Scoping Report refers to the potential for diffuse and point source pollution to be present across land that is currently in agricultural use within the onshore study area. Whilst land quality is addressed in section 3.4, the Scoping Report does not address how the effects from mobilisation of existing contamination or introduction of pollution during construction, operation, or decommissioning, for example fuel spills, could impact on agricultural land quality. The Inspectorate advises that the ES assess these impacts where significant effects are likely and describe any mitigation requirements.</p>	<p>Information in relation to potential sources of contamination within the Onshore Development Area are provided in <b>Table 19-10</b>. The potential contaminants associated with each of the sources, and which area of the Onshore Development Area may be impacted, are provided in <b>Table 19-11 of Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b> and <b>Volume 7,</b></p>

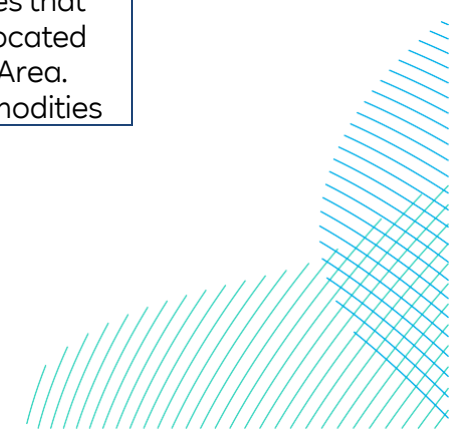




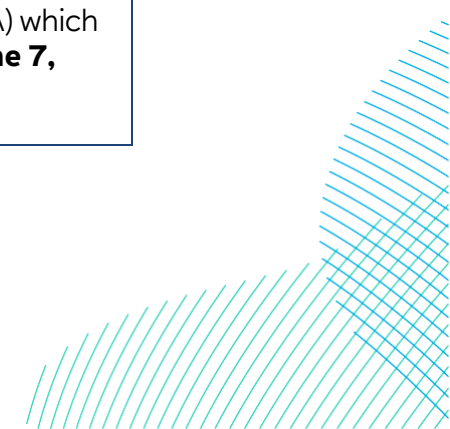
Comment	Project Response
	<p><b>Figures 19-4 (application ref: 7.19.1) and 19-5 (application ref: 7.19.1).</b></p> <p>Potential impacts, and mitigation measures, associated with the mobilisation of pre-existing sources of contamination, and the introduction of new sources, during construction and operation are discussed in sections 19.6.1 and 19.6.2. Potential impacts to human health and controlled waters are discussed within sections 19.6.1 and 19.6.2 and <b>Volume 7, Chapter 27 Human Health (application ref: 7.27).</b></p> <p>Impacts associated with contamination and impacts on agricultural land are discussed in sections 19.6.1.7 and 19.6.2.6 of this chapter. Additional discussions around potential impacts to agricultural land use outside of the risk posed by potential contamination are provided in <b>Volume 7, Chapter 21 Land Use (application ref: 7.21).</b></p>



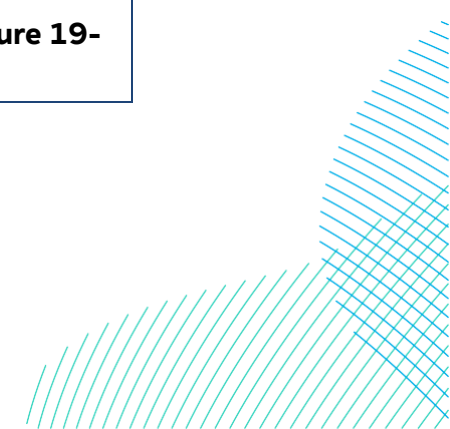
Comment	Project Response
<p>Planning Inspectorate ID 4.2.4: The Scoping Report does not refer to the potential for damage to new and existing infrastructure from potentially contaminated land, water, or ground gas. The ES should describe any design measures required to manage this issue.</p>	<p>Potential sources of ground gas and vapour generating materials on and within 250m of the Onshore Development Area are discussed in <b>Table 19-10</b> and <b>19-11</b> with further detail provided in <b>Volume 7, Appendix 19-2 (application ref: 7.19.19.2)</b>.</p> <p>The potential impacts to existing and new infrastructure from potentially contaminated soils, groundwater and/or ground gases/vapours within and surrounding the Onshore Development Area are discussed in sections 19.6.1.5 and 19.6.2.4 of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b>. These sections also discuss potential mitigation measures to lower the significance of effect to the built environment.</p>
<p>Planning Inspectorate ID 4.2.5: The Scoping Report states that the ES will assess the potential for temporary and permanent mineral sterilisation within the onshore study area. The ES should provide information on the geographic location of Mineral Safeguarding Areas (MSA) and the types of minerals or</p>	<p>A review of available data indicates that Mineral Safeguarding Areas are located within the Onshore Development Area. Details of their location and commodities</p>



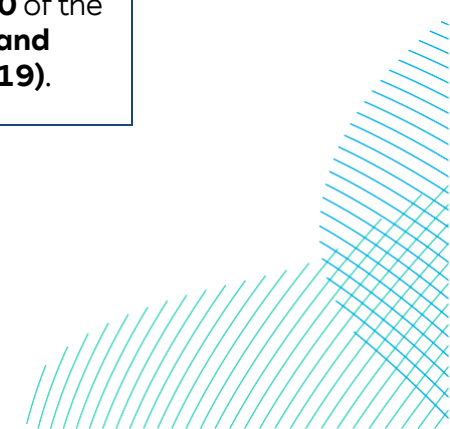
Comment	Project Response
<p>other resources that are protected, with reference to supporting figures as necessary.</p>	<p>present are discussed in <b>Table 19-10</b> and illustrated on <b>Volume 7, Figures 19-7 (application ref: 7.19.1)</b> with further detail provided in <b>Volume 7, Appendix 19-2 (application 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. Mitigation measures, including liaising with East Riding of Yorkshire Council, to reduce the significance of effect are also discussed in these sections.</p>
<p>Planning Inspectorate ID 4.2.6: The Scoping Report does not refer to the potential for the presence of Unexploded Ordnance (UXO) within the onshore study area. The ES should provide desk study information including a risk assessment to inform the ES.</p>	<p>Information in relation to the potential risks posed by UXO within the Onshore Development Area can be found in the Geo-Environmental Desk Study and Preliminary Risk Assessment (PRA) which accompanies this chapter (<b>Volume 7, Appendix 19-2 (application ref: 7.19.19.2)</b>). This is a high level</p>



Comment	Project Response
	assessment of regional bombing densities; a more detailed risk assessment will be provided post-consent (if required).
<b>Flood Risk and Hydrology and Geology and Land Quality - ETG July 2023</b>	
No comments were raised in relation to geology and land quality during the ETG meeting.	N/A
<b>Section 42 Consultation - Environment Agency July 2023</b>	
<p>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.</p> <p>We agree with the Outline Code of Construction Practice, but recognise that is in an outline, and further details need to be confirmed.</p>	<p>An updated assessment of potential sources of contamination within the Onshore Development Area are provided in <b>Table 19-10</b> and supported by the PRA (<b>Volume 7, Appendix 19-2 (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 <b>Table 19-11</b> of the chapter and <b>Volume 7, Figures 19-4 (application ref: 7.19.1)</b> and <b>Figure 19-5 (application ref: 7.19.1)</b>.</p>



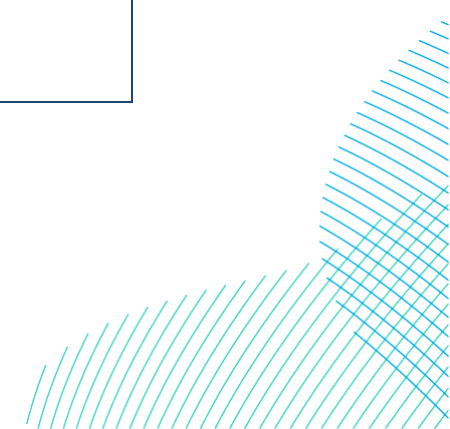
Comment	Project Response
	<p>The updated assessment has identified the potential impacts, and mitigation measures, associated with the mobilisation of pre-existing sources of contamination, and the introduction of new sources, during construction and operation are discussed in section 19.6.1 and 19.6.2 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>.</p>
<p>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 principal 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 <b>Table 19-10</b> of the <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b>.</p>



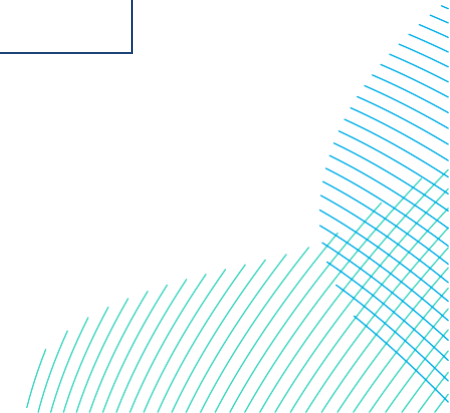
Comment	Project Response
	An updated impact assessment has been undertaken in light of the additional information for the construction and operation phases (see section 19.6 of <b>Volume 7, Chapter 19, Geology and Land Quality (application ref: 7.19)</b> ).
The Outline Code of Construction Practice recognises 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.	The refinement of the Onshore Development Area has not resulted in the exclusion of Principal Aquifers or other sensitive water features.
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.	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 <b>Table 19.3</b> ). Measures such as adhering to best practice and strategies for dealing with spillages are incorporated into the <b>OCoCP (Volume 8, application ref: 8.9)</b> . Additional measures, such as undertaking pre-construction ground investigations, hydrogeological risk assessments and
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.	



Comment	Project Response
	<p>piling risk assessments will also be protective of controlled waters within the Onshore Development Area and its surroundings (see <b>Table 19-3</b> 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>
<p>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.</p> <p>We recommend that developers should:</p> <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> <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> </ul>	<p>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.</p>

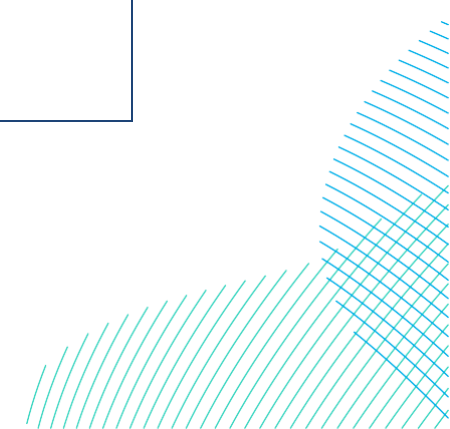


Comment	Project Response
<ul style="list-style-type: none"> <li>Refer to the contaminated land pages on gov.uk for more information.</li> </ul>	
<p>Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 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>	<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 the <b>Outline Site Waste Management Plan (OSWMP), Appendix E</b>, of the <b>OCoCP (Volume 8, 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</p>
<p>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. 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>	

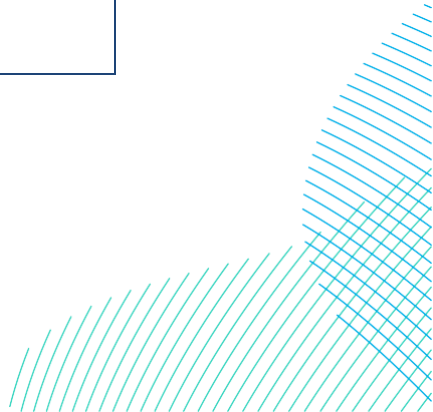




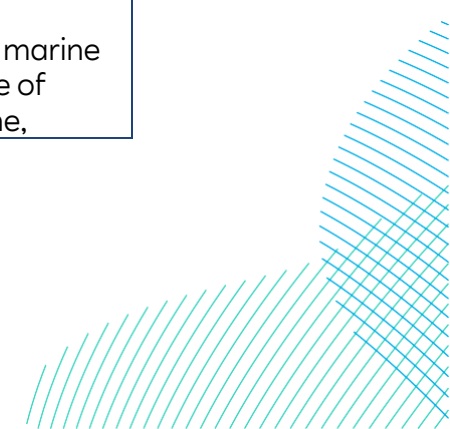
Comment	Project Response
<p>The developer must apply the waste hierarchy as a priority order of prevention, re-use, recycling before considering other recovery or disposal options. Government guidance on the waste hierarchy in England can be found here:  <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530_waste_hierarchy_guidance.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530_waste_hierarchy_guidance.pdf</a></p>	<p>hazards and appropriate management options.</p>
<p>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.</p>	
<p>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 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.</p>	



Comment	Project Response
<p>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 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.</li> <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>	



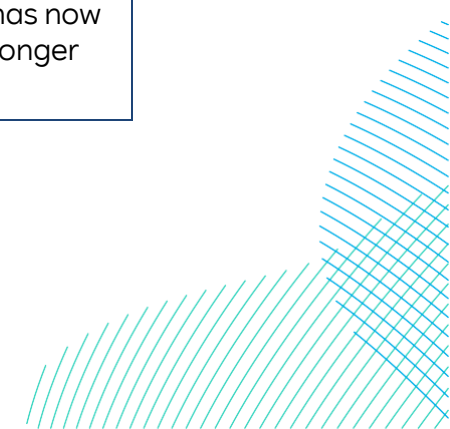
Comment	Project Response
<p>Non-waste activities are not regulated by us (i.e., activities carried out under the CL:ARE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the Waste Framework Directive). The 'Is it waste' tool, allows you to make an assessment and can be found here:  <a href="https://www.gov.uk/government/publications/isitwaste">https://www.gov.uk/government/publications/isitwaste</a> tool for advice on the by products and end of waste tests</p>	
<p>If you require any local advice or guidance, please contact your local Environment Agency office: YorkshireWaste@environment agency.gov.uk</p>	
<p><b>Section 42 Consultation - Marine Mammal Organisation July 2023</b></p>	
<p>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 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).</p>	<p>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.</p>
<p>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</p>	<p>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,</p>



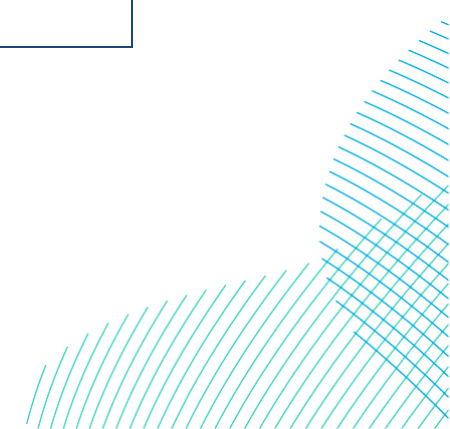
Comment	Project Response
<p>environment including breach and potential loss of drill strings etc of the activity to ensure that the most appropriate chemicals and methodology are used to reduce the risk of hazardous materials entering the marine environment. Please engage with the MMO as soon as possible in regard to chemical use.</p>	<p>against potential contamination are included within the <b>OCoCP (Volume 8, application ref: 8.9)</b>. The OCoCP also includes measures to be implemented should an uncontrolled leak of hazardous material occur.</p>
<p>Geological impacts as identified in Chapter 19 are largely terrestrial concerns. <b>Table 19-10</b> 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 avoidance (<b>Table 19-15</b>). 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>	<p>Refinement of the Onshore Development Area has resulted in the landfall option that interacts with the SSSI being withdrawn.</p>
<p><b>Section 42 Consultation - Natural England July 2023</b></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 Geology and Land Quality effects, several impact magnitudes and receptor sensitivities</p>	<p>The significance of effect is evaluated with reference to definitive standards, accepted criteria, technical guidance or legislation where these exist.</p>



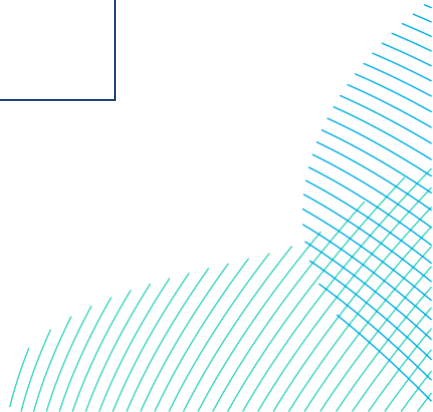
Comment	Project Response
<p>appear to have been underestimated. The matrix approach adopted in this EIA for determining effect significance relies, in part upon expert judgement, particularly for receptor value and sensitivity, which can be quite subjective. Moreover, having a cut-off between those effects 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>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.</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>	<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.</p>
<p>Withow Gap, Skipsea SSSI: Coastal Erosion</p> <p>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</p>	<p>The Onshore Development Area has now been refined and the Projects no longer</p>



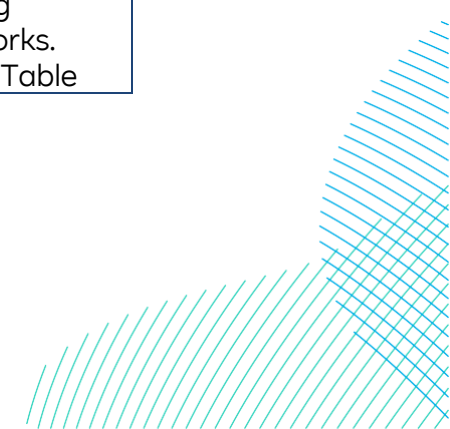
Comment	Project Response
<p>context of the Holderness Coast. Changes to coastal sediment pathways therefore have the potential to significantly damage or destroy features for which the SSSI has been notified.</p> <p>The most concerning pathway stems from the potential for a coastal cofferdam to the north 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.</p> <p>Include this site in impact assessments and consider any requirements for changes to project design so operations likely to damage are avoided.</p>	<p>interact with the SSSI as part of the landfall works.</p>
<p>Withow Gap. Skipsea SSSI: Subsurface Features</p> <p>'Withow Gap, Skipsea – SSSI, SSSI Unit and SSSI impact risk zone designated due to its geological properties (exposed at the cliff face)'.</p> <p>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>	



Comment	Project Response
<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>	
<p>‘It is however noted that HDD would have to be below the Withow Gap Skipsea SSSI as it is in a cliff face’.</p> <p>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>	
<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>	
<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</p>	



Comment	Project Response
<p>to be mitigated for through conditions. For SSSI's EIA measures of significance are not appropriate.</p>	
<p>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 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>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 the <b>Outline Soil Management Plan, Appendix A of the OCoCP (Volume 8, 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</p>
<p>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>Sections 19.6.1.1.5, 19.6.1.2.5 and 19.6.1.3.4 do not include 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>	

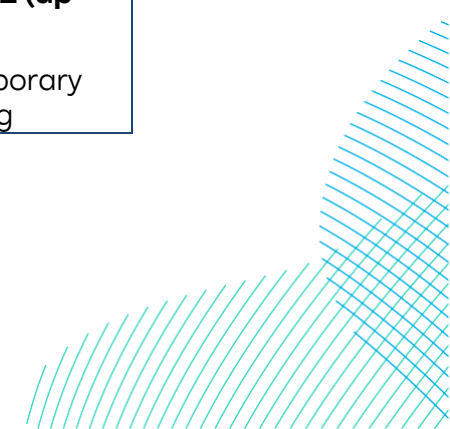




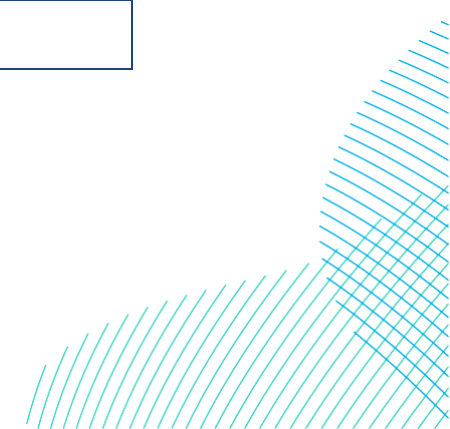
Comment	Project Response
	<p>21.3 of <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>.</p> <p>The <b>Outline Soil Management Plan, Appendix A</b> of the <b>OCoCP (Volume 8, application ref: 8.9)</b>, also sets out the procedures for the appropriate handling of soils during the works, which 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>



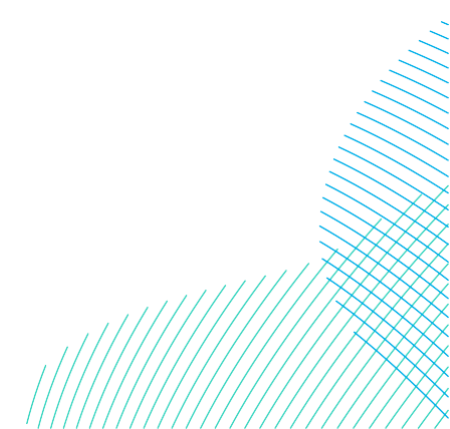
Comment	Project Response
<p>It is noted that the proposed operational lifespan is approximately 30 years. There needs to be a firm commitment to decommission the site after 30 years (or sooner if no longer operational), remove all infrastructure and equipment and return the land to its original condition 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 the requirement in the DCO.</p>
<p><b>PEIR Consultation – Land Owner</b></p>	
<p>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>	<p>The Applicants are aware, Mineral Safeguarding Areas are located within the On-shore 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, Figures 19-7 (application ref: 7.19.1)</b> with further detail provided in <b>Volume 7, Appendix 19-2 (application ref: 7.19.19.2)</b>.</p> <p>Potential impacts relating to temporary and permanent sterilisation during</p>



Comment	Project Response
	<p>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. 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 extent 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 land owner.</p>
<p><b>Flood Risk and Geology - ETG December 2023</b></p>	
<p>No comments were raised in relation to geology and land quality during the ETG meeting.</p>	<p>N/A</p>
<p><b>Flood Risk and Geology - ETG March 2024</b></p>	



Comment	Project Response
No comments were raised in relation to geology and land quality during the ETG meeting.	N/A



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Bank South (West) Limited**

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