

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

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

Dogger Bank South Offshore Wind Farms

Environmental Statement

Volume 7

**Appendix 23-1 Landscape and Visual Impact Assessment
Consultation Responses**

June 2024

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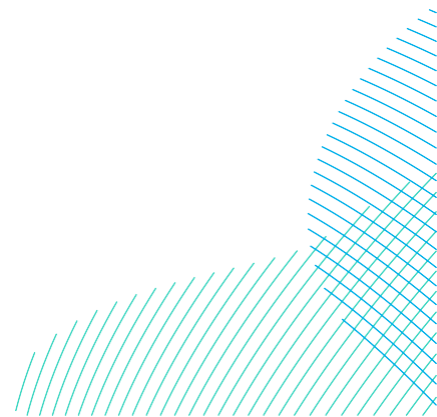
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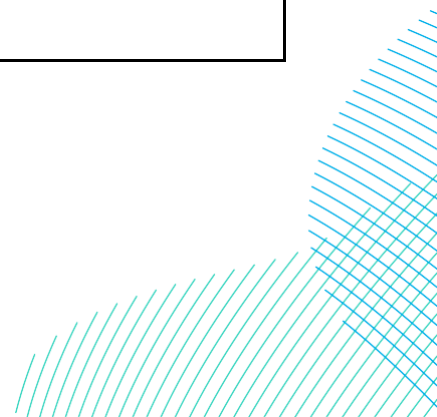
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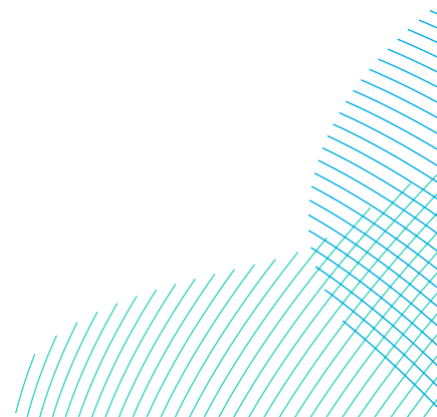
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Glossary

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.
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.
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 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 routeing) would be located.

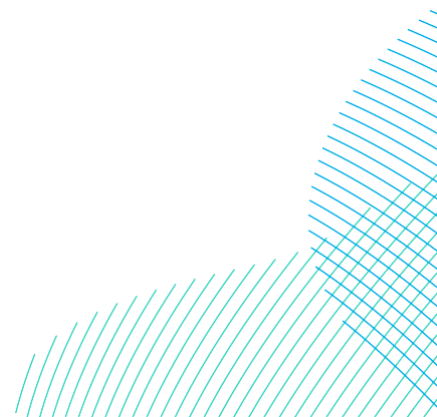


Term	Definition
The Applicants	The Applicants for the Projects are RWE Renewables UK Dogger Bank South (East) Limited and RWE Renewables UK Dogger Bank South (West) Limited. The Applicants are themselves jointly owned by the RWE Group of companies (51% stake) and Masdar (49% stake).



Acronyms

Term	Definition
AONB	Area of Outstanding Natural Beauty
ES	Environmental Statement
ETG	Expert Topic Group
HSC	Historic Seascape Characterisation
LEMP	Landscape and Environmental Management Plan
LVIA	Landscape and Visual Impact Assessment
NRW	Natural Resources Wales
PEIR	Preliminary Environmental Information Report
ZTV	Zone of Theoretical Visibility



23.1 Consultation Responses

23.1.1 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 Expect Topic Group (ETG) meetings.
2. Response from stakeholders and regard given by the Applicants have been captured in **Table 23-1-1**.

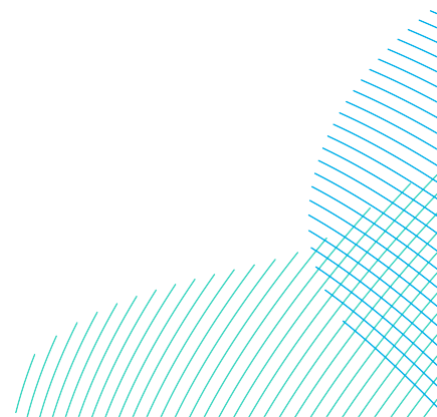
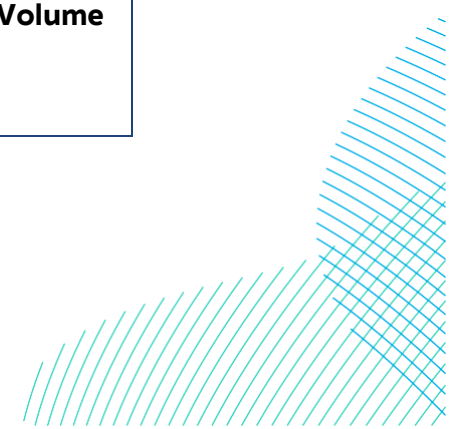
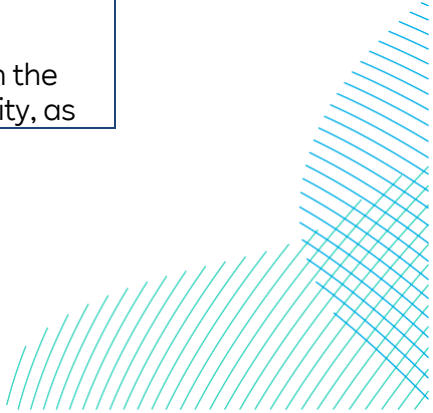


Table 23-1-1 Consultation Responses Related to **Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)**

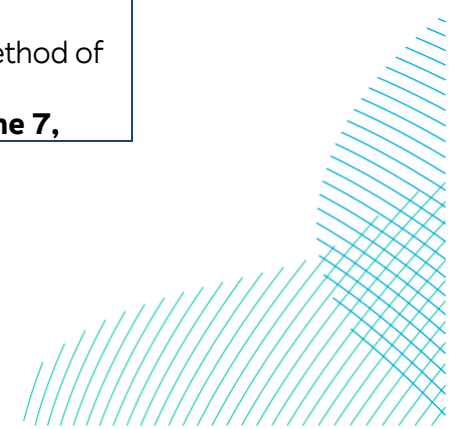
Comment	Project Response
Landscape and Visual ETG Pre-Scoping Meeting 23/09/2021	
<p>Yorkshire Wolds currently in the process of being designated as an Area of Outstanding Natural Beauty (AONB). This will need to be taken into account if designated during the projects lifecycle.</p>	<p>The landscape baseline refers to currently available information relating to the proposed Yorkshire Wolds AONB. See section 23.5.1 in Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23).</p>
<p>Stakeholders provided relevant baseline information and sought clarifications on the high-level information presented, but had no comments on the emerging approach to LVIA.</p>	<p>Noted.</p>
The Planning Inspectorate Scoping Opinion 02/09/2022 in relation to Seascape, Landscape and Visual Impact	
<p>3.14.1 Offshore Export Cables.</p> <p>The Scoping Report states that as the Offshore Export Cables will be submerged, they will not be considered further in the assessment. The Inspectorate agrees this matter can be scoped out. Any infrastructure which may be visible from the onshore study area, for example Transition Joint Bays, should be considered within the onshore landscape and visual impact chapter.</p>	<p>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23) presents the landscape and visual effects arising from the landfall works within the intertidal and inshore areas, where these may be visible from the landscape and visual study area as defined in section 23.3.1. See section 23.6 of Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23).</p>



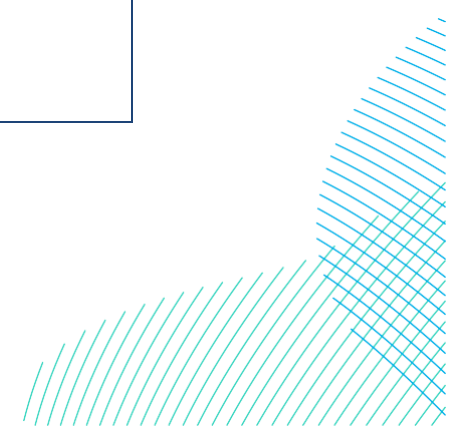
Comment	Project Response
<p>3.14.2 Visual receptors during operation.</p> <p>The Scoping Report seeks to scope this matter out on the basis that visual receptors in the offshore study area will have low susceptibility to change in their views in the surrounding areas. The Inspectorate agrees that effects from the arrays may be scoped out, however, considers that the ES should assess impacts from the presence in the seascape of the proposed offshore substations or other platforms.</p>	<p>Effects from the Offshore Cable Corridor and Array Areas have been scoped out by agreement with the Planning Inspectorate (see Scoping opinion (Volume 8, application ref: 8.7)), dated 2nd September 2022) due to their considerable distance offshore. The Planning Inspectorate did not agree that offshore platforms could be similarly scoped out, as these could be closer to shore.</p> <p>As stated in Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23) the Projects may include up to two offshore platforms (up to 100m high) outside the Array Areas. These would be a minimum of 52km from the landfall point, which equates to over 37km from the closest location on land (Flamborough Head). The 'Ready reckoner of visual effects related to turbine size' (White et al., 2019), published by Natural Resources Wales (NRW), indicates that 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. Effects of offshore infrastructure have not been considered further in this assessment.</p> <p>Offshore seascape, and visual receptors located in the marine environment, are likely to be of low sensitivity, as</p>



Comment	Project Response
	<p>set out in the Scoping report. Therefore, the platform(s) would not have likely significant effects on offshore seascape and visual receptors.</p> <p>Therefore, effects of the platforms outside the Array Areas are not likely to be significant and they have not been considered further in this assessment.</p>
<p>3.14.3 Impacts on seascape and coastal character, and visual receptors during construction and decommissioning.</p> <p>The Scoping Report seeks to scope this out on the basis that impacts during the temporary construction phase of the offshore infrastructure will never be greater than the operational effects of the completed wind farm. The Inspectorate considers that no information has been provided in the Scoping Report to validate this statement. It is also noted that Paragraph 513 (within Chapter 2.13) proposes to scope in Historic Seascape character during construction. As such, the Inspectorate does not agree to scope this matter out and considers the ES should include information regarding the types of construction activities which could create impacts, such as vessel movements, lighting on construction vessels, and impacts relating to the construction of offshore platforms.</p>	<p>The operational effects of the arrays have been scoped out, in agreement with the Planning Inspectorate (see Scoping Opinion (Volume 8, application ref: 8.7)), dated 2nd September 2022), due to the low susceptibility of offshore receptors, including seascape. The same low susceptibility applies during construction.</p> <p>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23) describes the landscape and visual effects arising from the landfall works within the intertidal and inshore areas, where these may be visible from the landscape and visual study area as defined in section 23.3.1. See section 23.6 of Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23).</p> <p>Historic Seascape Characterisation (HSC) is a method of describing historic and cultural influences and is unconnected to LVIA. HSC is considered in Volume 7,</p>



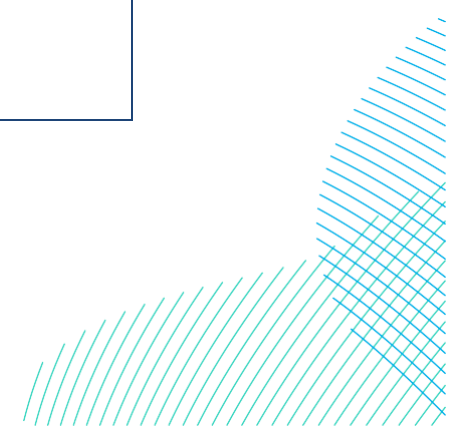
Comment	Project Response
	<p>Chapter 17 Offshore Archaeology and Cultural Heritage (application ref: 7.17).</p> <p>Construction works in the Offshore Development Area are detailed in Volume 7, Chapter 5 Project Description (application ref: 7.5). The closest offshore infrastructure (up to two offshore platforms) are located at least 52km from the landfall, and at least 37km from the closest land at Flamborough Head. At this distance, any temporary construction activities would not have likely significant effects on views from land. Effects of construction of offshore infrastructure have not been considered further in this assessment.</p>
<p>3.14.4 Impacts on seascape and coastal character during operation.</p> <p>The Scoping Report seeks to scope this matter out on the basis that the operation of the offshore wind farm is unlikely to impact on the key characteristics of the Dogger Bank Marine Character Area or other Marine Character Areas within the Seascape, Landscape and Visual Impact Assessment (SLVIA) study area due to the presence of existing and consented wind farms.</p>	<p>Agreement noted.</p>



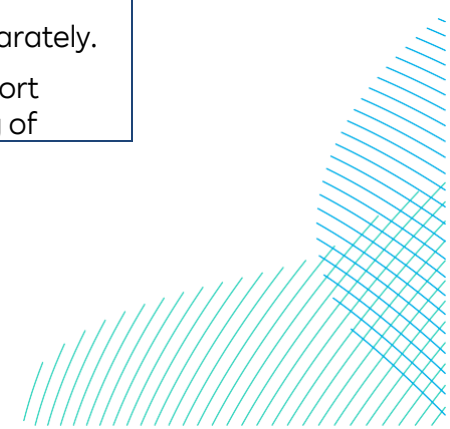
Comment	Project Response
<p>The Inspectorate agrees that significant effects are unlikely and agrees to scope out this matter out.</p>	
<p>3.14.5 Impacts on landscape character during operation.</p> <p>The Scoping Report states that the operation of the offshore wind farm is unlikely to significantly impact on landscape character or landscape designations due to the distance. The Inspectorate agrees that significant effects are unlikely and agrees to scope out this matter out.</p>	<p>Agreement noted.</p>
<p>3.14.6 Impacts during decommissioning.</p> <p>The Scoping Report states that impacts during the decommissioning phase will never be greater that during construction or operation and therefore seeks to scope this matter out. The Inspectorate considers that no information has been provided in the Scoping Report to validate this statement. As such, the Inspectorate does not agree to scope this matter out and considers the ES should include information regarding the types of decommissioning activities which could create impacts, such as vessel movements, lighting on construction vessels and the removal of the offshore substation platforms.</p>	<p>The operational effects of the arrays have been scoped out, in agreement with the Planning Inspectorate (see Scoping Opinion (Volume 8, application ref: 8.7), dated 2nd September 2022), due to the low susceptibility of offshore receptors, including seascape. The same low susceptibility applies during decommissioning.</p> <p>Decommissioning works in the offshore area are detailed in Volume 7, Chapter 5 Project Description (application ref: 7.5). It is not considered likely that any significant effects would arise from these types of activities taking place within the Offshore Development Area, and these are therefore scoped out.</p> <p>Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23) describes the</p>



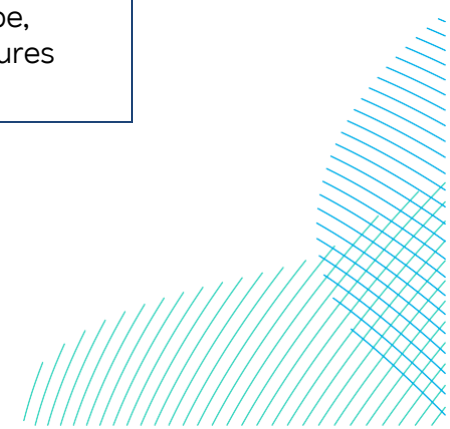
Comment	Project Response
	<p>landscape and visual effects arising from the landfall works within the intertidal and inshore areas, where these may be visible from the landscape and visual study area as defined in section 23.3.1. See section 23.6 of Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23).</p>
<p>3.14.7 Cumulative impacts</p> <p>The Scoping Report seeks to scope out cumulative seascape effects with Dogger Bank A, B and C and Sofia offshore wind farms on the basis that the susceptibility of potential seascape and visual receptors is low. The Inspectorate agrees that significant effects are unlikely and agrees to scope this matter out.</p>	<p>Agreement noted.</p>
<p>3.14.8 Designated landscapes during operation.</p> <p>The Scoping Report seeks to scope this matter out due to the intervening distance between the land area and the Proposed Development, and therefore the Proposed Development is unlikely to significantly effect landscape character or the special qualities of landscape designations. The Inspectorate agrees this matter may be scoped out.</p>	<p>Agreement noted.</p>



Comment	Project Response
<p>The Planning Inspectorate Scoping Opinion 02/09/2022 in relation to Landscape and Visual Impact</p>	
<p>4.6.1 Impacts resulting from the construction and decommissioning of the landfall(s) and Onshore Export Cable(s).</p> <p>The Inspectorate considers that construction of these elements is likely to involve multiple compounds and substantial working areas and haul routes and does not agree with the characterisation of 'localised'. In addition, the Inspectorate does not agree with the characterisation of 'short-term', in particular if the two projects making up the Proposed Development are constructed sequentially. In the absence of information about the 'good practice measures' mentioned in Paragraph 751 or other mitigation, and the anticipated timescales of construction for the Proposed Development, the Inspectorate does not agree to scope this matter out.</p>	<p>Effects arising from the construction and decommissioning of the landfall and Onshore Export Cables were scoped into the assessment at PEIR stage. The assessment in the PEIR identified no significant effects with relation to these elements. Section 42 consultation did not raise any disagreement with these findings.</p> <p>Since the PEIR, there have been no substantive changes to the Onshore Export Cable Corridor except that it has reduced in width, and further mitigation has been identified as part of the OCoCP (Volume 8, application ref: 8.9). On the basis that significant effects are not anticipated. Section 23.6 of Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23) includes a summary assessment of landscape and visual effects arising as a result of construction of the Onshore Export Cable. Effects of decommissioning the Onshore Export Cable are anticipated to be the same or less as those of construction and are not therefore assessed separately.</p> <p>The approach to assessment of the Onshore Export Cable was discussed and agreed with East Riding of</p>



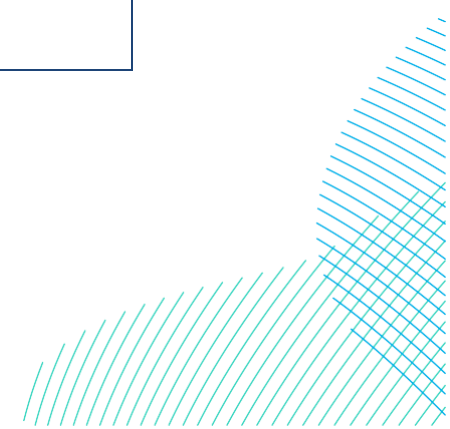
Comment	Project Response
	<p>Yorkshire Council (ERYC) at the LVIA ETG meeting held on 26th January 2024 and detailed in Volume 7, Appendix 23-1 Consultation Table (application ref: 7.23.23.1).</p> <p>The potential effects of construction of the landfall are considered in Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23), as further detail has been developed since PEIR on the potential extent of works at the beach.</p> <p>Section 23.3.2 of Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23) presents the assumptions forming the 'worst case scenario' for construction activities.</p> <p>Section 23.3.4 of Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23) presents good practice measures that are considered as embedded mitigation.</p>
<p>4.6.2 Operational impacts resulting from the landfall(s) and Onshore Export Cable(s).</p> <p>The Scoping Report seeks to scope this matter out on the grounds that following installation and restoration of ground, underground cables which are part of the onshore</p>	<p>Section 23.8 of Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23) presents the approach to restoration of landscape, including principles for reinstatement of any features affected by the construction works.</p>



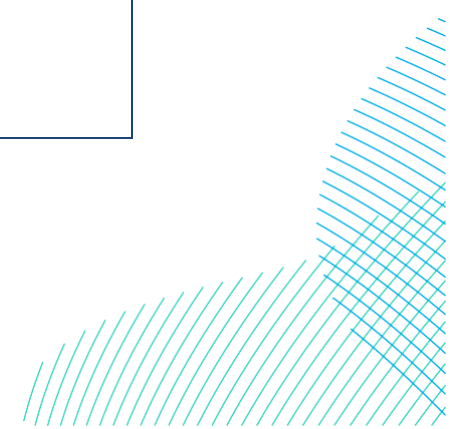
Comment	Project Response
<p>infrastructure would not significantly impact landscape or visual receptors. At this stage, the nature of any restoration and planting works have not been finalised. The inspectorate understands that the ‘worst-case’ in terms of overlap of the two projects will be assessed. The ES should include sufficient information, including on restoration measures and timescales, to allow understanding of any change in appearance of land resulting from the Proposed Development. The ES should therefore assess any likely significant effects of these changes or demonstrate that no significant effects would occur. The ES should also demonstrate how consultation with the relevant consultation bodies and stakeholders has been taken into account.</p>	<p>Application of these principles, to be secured through an Outline Landscape Management Plan (Volume 8, application ref: 8.11) which accompanies the draft DCO (Volume 3, application ref: 3.1), will ensure that long term operational effects resulting from the landfall and Onshore Export Cables will not be significant.</p> <p>This approach was discussed and agreed with East Riding of Yorkshire Council at the LVIA ETG meeting held on 26th January 2024.</p>
<p>4.6.3 Area of Outstanding Natural Beauty (AONB).</p> <p>The Scoping Report refers to the Yorkshire Wolds, on the edge of the Creyke Beck onshore study area as under consideration by Natural England for designation as an AONB, with consultation in 2022. The Scoping Report then states that the candidate boundary lies outside 10km from the Proposed Development scoping boundary (the Onshore Study area) and will not be considered further. No justification is provided for the use of this 10km distance. The Inspectorate expects the ES to identify landscape receptors on the basis of a Zone of Theoretical Visibility (ZTV) as stated in Paragraph 762 of the</p>	<p>The study area for assessment of landscape and visual effects is defined in section 23.3.1 of Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23), with reference to the ZTV and other considerations.</p> <p>The susceptibility and value of landscapes within the study area is evaluated using currently available baseline information, including material relating to the Yorkshire Wolds Important Landscape Area (ILA) and the emerging Yorkshire Wolds AONB.</p>



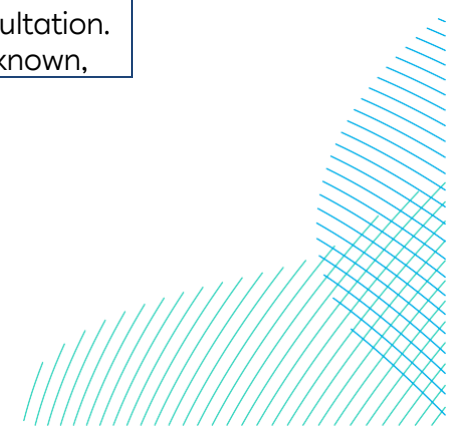
Comment	Project Response
<p>Scoping Report. If identified as a receptor, the Inspectorate advises that the ES should assess the Yorkshire Wolds as being of equivalent sensitivity and value to an AONB as part of ensuring that the worst case scenario is assessed.</p>	<p>The candidate Yorkshire Wolds AONB is over 11km to the north-west of the landscape and visual study area (and 12.5km and 15.5km from the Onshore Export Cable Corridor and Onshore Substation Zone, respectively). This lies outside the landscape and visual study area and has not been considered in detail in the onshore LVIA, as agreed with stakeholders.</p> <p>The landscape baseline is presented in section 23.5 of Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23).</p>
<p>4.6.4 Study Area.</p> <p>It is noted that the proposed study area for the onshore Landscape and Visual Impact Assessment is 5km radius from the substations and 1km from the onshore cable route(s). The Inspectorate appreciates that there is a current level of uncertainty regarding the location of onshore works, however the study area relied upon for the assessment should be based on a ZTV which demonstrates that the assessment of effects covers an appropriate area to capture potential impacts on receptors who will have views to the Onshore Development Area.</p>	<p>The study area for assessment of landscape and visual effects is defined in section 23.3.1 of Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23), with reference to the ZTV and other considerations.</p>



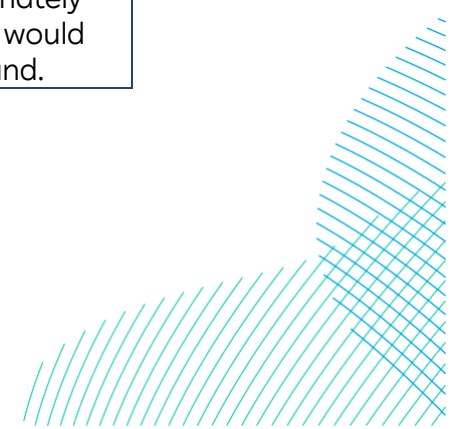
Comment	Project Response
<p>4.6.5 Viewpoints.</p> <p>The Scoping Report states that viewpoints will be agreed with Natural England and East Riding of Yorkshire Council. The Inspectorate considers this consultation should be expanded to include other relevant consultees such as Historic England and local planning authorities in addition to East Riding of Yorkshire Council. A range of viewpoints should be used to represent the various receptors who could be affected by the Proposed Development, including night-time receptors if construction lighting or lighting at the substations are to be used. This could include designated and non-designated heritage assets and their settings. A figure showing locations of viewpoints used for the assessment should be provided in the ES.</p>	<p>Historic England, Hull City Council and East Riding of Yorkshire Council have been consulted on viewpoints as part of the Landscape and Visual ETG.</p> <p>Viewpoints used for the LVIA are set out in section 23.5.2.2, and are shown in Volume 7, Figures 23-2 to 23-4 (application ref: 7.23.1). Viewpoints have been agreed with the members of the Landscape and Visual ETG.</p> <p>Night-time effects during construction are considered as part of the assessment of effects on visual receptors (section 23.6 in Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)). No permanent lighting is required during operation. Therefore, night-time visualisations have not been prepared as part of the ES.</p> <p>Discussion with the authors of Volume 7, Chapter 22 Onshore Archaeology and Cultural Heritage (application ref: 7.22) have informed the selection of viewpoints for use in the LVIA.</p>
<p>4.6.6 Mitigation.</p> <p>No specific mitigation measures are proposed in the Scoping Report; however, landscape restoration is referred to in</p>	<p>This chapter includes information on:</p>



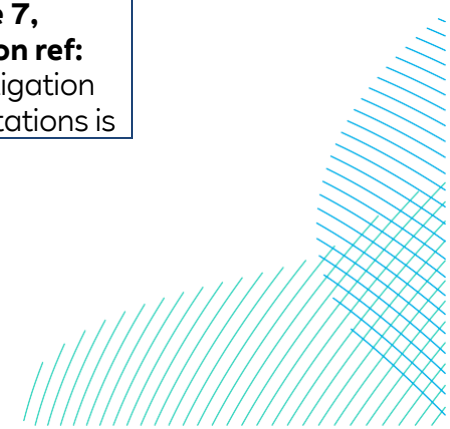
Comment	Project Response
<p>Paragraph 763. Mitigation measures should be described in the ES and details of any monitoring requirements including how these will be secured should also be included in the ES.</p>	<ul style="list-style-type: none"> Principles for restoration of the landscape along the cable corridor, following completion of the temporary works; and Principles for landscape mitigation around the permanent substation. <p>These principles are included within the Outline Landscape Management Plan (Volume 8, application ref: 8.11) which accompanies the draft DCO (Volume 3, application ref: 3.1).</p>
<p>Natural England Email Correspondance 08/11/2022</p>	
<p>With respect to the Yorkshire Wolds AONB, provided the cables will be underground to the new Onshore Converter Stations and the substation will be an extension to an existing substation located to the west of Beverley, Natural England will have no concerns regarding potential adverse effects this scheme presents to the candidate Yorkshire Wolds AONB and have no further comment to make.</p>	<p>The Onshore Export Cables will be buried underground.</p> <p>The Onshore Converter Stations will not be an extension to any existing convertor station, but will be located in the context of other electrical infrastructure to the south of Beverley.</p> <p>The Onshore Substation Zone is at least 15.5km from the Yorkshire Wolds candidate AONB boundary. The candidate boundary has been published for consultation. At this stage the finalised AONB boundary is not known,</p>



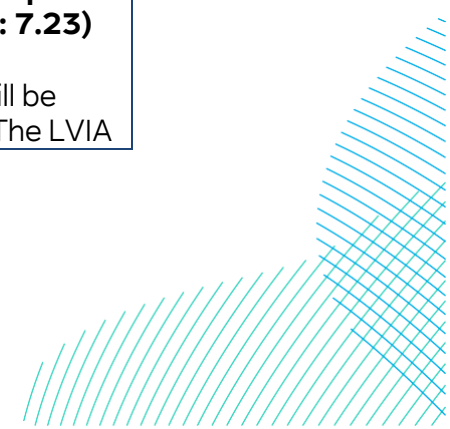
Comment	Project Response
	<p>but this matter would be revisited should an alternative boundary be published by Natural England.</p> <p>Effects on the candidate AONB are scoped out of this LVIA.</p>
<p>Landscape and Visual ETG 29/11/2022</p>	
<p>Proposed approach to PEIR was outlined at the meeting, including:</p> <ul style="list-style-type: none"> • Scope of the onshore LVIA; • Use of a worst case scenario combining maximum parameters of different substation solutions; • Definition of study areas; • Representative viewpoint locations; and • Approach to visualisations. <p>ETG were in agreement that the proposed approach to assessment is suitable.</p>	<p>Since the ETG, it has been confirmed that any potential offshore platform(s) along the Offshore Export Cable Corridor will be located further offshore than originally identified, and therefore effects are scoped out of the LVIA (refer to Scoping comment 3.14.2 in this table).</p> <p>The Projects may include up to two offshore platforms (up to 100m high) outside the Array Areas. These would be a minimum of 52km from the landfall point, which equates to over 37km from the closest location on land (Flamborough Head). The 'Ready reckoner of visual effects related to turbine size' (White et al., 2019), published by Natural Resources Wales (NRW), indicates that 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.</p>



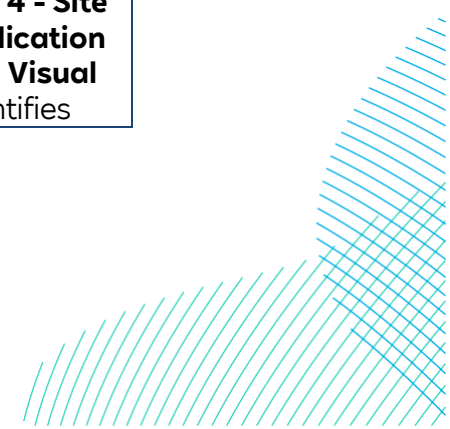
Comment	Project Response
	<p>Effects of offshore infrastructure have not been considered further in this assessment.</p> <p>Otherwise the approach described at the meeting has been applied to the LVIA presented within this chapter.</p>
<p>Section 42 Consultation - Natural England 2023</p>	
<p>Natural England confirmed their position that potential impacts on the Yorkshire Wolds candidate AONB can be scoped out.</p>	<p>Noted.</p>
<p>Section 42 Consultation - Landowner (Onshore Substation Zone)</p>	
<p>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 affect on the visual amenity of the area.</p>	<p>Moderate adverse temporary construction impacts are identified in section 23.6.1.2.3.1 of Volume 7, Chapter 23 Landscaper and Visual Impact Assessment (application ref: 7.23). 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 Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29) on Butt Farm campsite. By year 10, the mitigation planting to the north of the Onshore Converter Stations is</p>



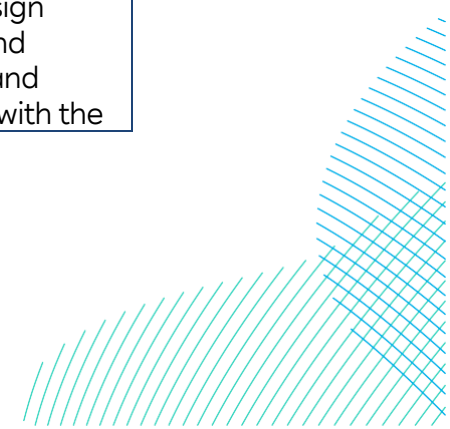
Comment	Project Response
	<p>expected to be effective in partly screening and filtering views of the Onshore Converter Stations, with residual effects at the Butt Farm viewpoint assessed as moderate adverse at year 10. Vegetation is expected to be around 8-10 m in height (modelled in the photomontage). 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.</p>
<p>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. 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.</p>	<p>The largest structures within the Substation Zone would be the valve hall being 244m x 264m with an approximate height of 24m. An Outline Landscape Management Plan (OLMP) (application ref: 8.11) 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. Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23) 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</p>



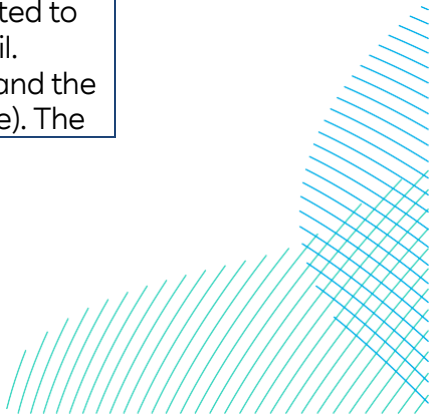
Comment	Project Response
	<p>also reports on effects at year 10, assuming that planting is maturing and beginning to be more effective in mitigating the effects.</p> <p>Bunding is considered in the Design and Access Statement (application ref: 8.8), as an option for the detailed design. However, to form 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.</p>
<p>Section 42 Consultation – Rowley Parish Council</p>	
<p>1. Zone 4 Substation 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</p>	<p>An extensive site selection process has been undertaken to identify the site as detail in Volume 7, Chapter 4 - Site Selection and Assessment of Alternatives (application ref: 7.4). Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23), identifies</p>



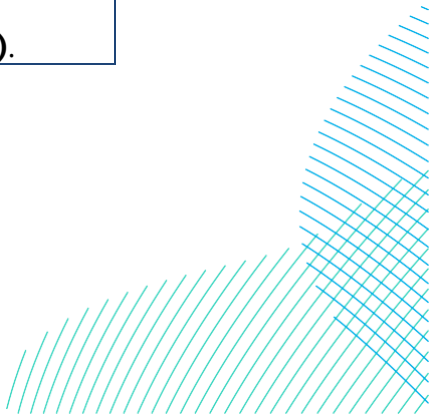
Comment	Project Response
<p>and detrimental impact on the residents of Bentley, there will also be harm to the visual amenity in an area of high landscape value. The sheer amount of land required for this project will have a sizeable impact on local farmers.</p>	<p>significant adverse effects from a 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>An Outline Landscape Management Plan (OLMP (application ref: 8.11)) 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 Volume 7, Figure 23-8 (application ref: 7.23.1) therefore include effects on the view from Copleflat Lane 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. The Design and Access statement (application ref: 8.8) 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</p>



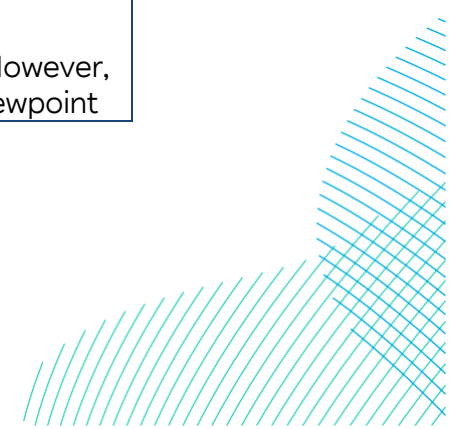
Comment	Project Response
	<p>Planning Authority, who will work with the engineers at the detailed design stage to consider the external appearance of the buildings and ensure the detailed Landscape Management Plan maximises the screening opportunities set out in the Outline Landscape Management Plan (OLMP) (application ref: 8.11). Effects on agricultural land are assessed in Volume 7, Chapter 21 - Land Use (application ref: 7.21), 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 the Outline Landscape Management Plan (OLMP) (application ref: 8.11) 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>
<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</p>	<p>DBS Local Liaison Meetings were held in February 2024 where the Outline Landscape Management Plan (OLMP) (application ref: 8.11) 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 (e.g. to include crab apple). The</p>



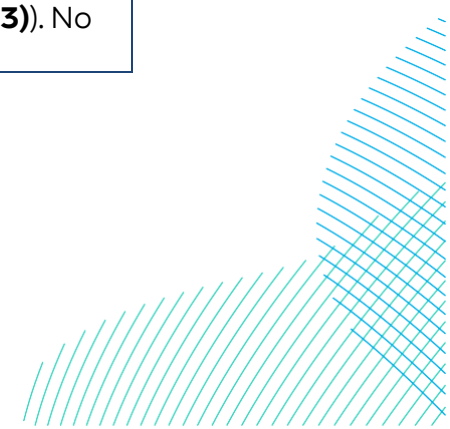
Comment	Project Response
<p>need to be as low as possible in the land to reduce the visual impact.</p>	<p>Substation Zone has been designed to take account of the high-pressure gas pipelines and tree planting has been moved to the South of the site closer to the receptors at Bentley, to provide more effective screening. The area directly above the pipeline will be returned to agriculture. A native species, shallow rooted hedge is proposed along the western boundary of the site.</p> <p>The photomontages and viewpoints in Volume 7, Chapter 23 Landscape and Visual Impact Assessment (Application ref: 7.32) were also presented at the DBS Local Liaison meetings held in February 2024 and comments were received on the indicative external appearance. The Design and Access statement (application ref: 8.8) 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 the Outline Landscape Management Plan (OLMP) (application ref: 8.11).</p>



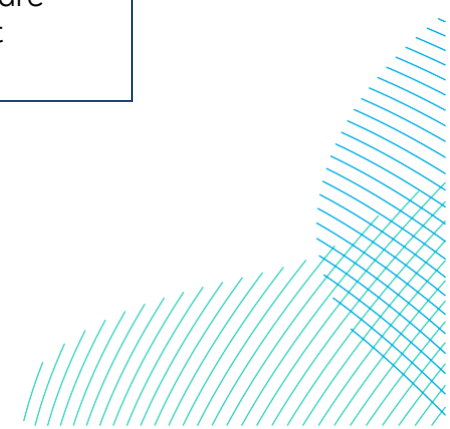
Comment	Project Response
	<p>The Project Design Envelope includes a maximum building height of 24m and is a realistic worst-case scenario based on the design of the HVDC electrical infrastructure. Further detail is provided in Volume 7, Chapter 5 Project Description (application ref: 7.5) on the design of the HVDC Converter Station(s). The assessment in Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23), is based on this maximum height and includes lightening masts of up to 27m.</p>
<p>Landscape and Visual ETG 26/01/2024</p>	
<p>East Riding of Yorkshire Council accepted that the operational effects of the onshore cable corridor have been scoped out of the assessment at ES stage but queried how loss of hedgerows would be considered. Agree in principle to the approach set out provided hedgerow loss was documented in the LVIA.</p>	<p>Consideration of hedgerow loss along the onshore cable corridor is considered in section 23.3.3 of Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23).</p>
<p>East Riding of Yorkshire Council agreed with the scope of the study area and landscape and visual receptors. It was queried if the Hull-Beverley railway line is too far away to be considered and pointed out a location along the B-road between outer</p>	<p>The Hull-Beverley railway line is not included in the assessment due to the intervening distance and limited visibility.</p> <p>There is no viewpoint located along the B-road. However, Viewpoint 3: Beverley 20 near Broadgate and Viewpoint</p>



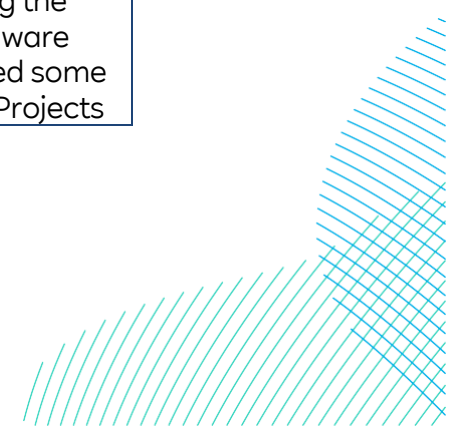
Comment	Project Response
<p>Beverley and Walkington which is a fairly open, elevated location.</p> <p>Overall was agreed that the spread of viewpoint was sensible.</p>	<p>5: Walkington represent views from the area between Beverley and Walkington. Additionally, Viewpoint 4: Oriel Close, off Broadgate, represents views from the B-road as well since it looks across the A1079 to land rising to the other side.</p>
<p>With relation to mitigation planting, East Riding of Yorkshire Council queried if there are potential opportunities to plant woodland to the west to screen views from the direction of Bentley Park Farm.</p>	<p>No mitigation woodland planting is proposed in the west for several reasons. Firstly, there are limited numbers of receptors in the west, and there are existing blocks of woodland to the west of the Onshore Substation Zone that partly screen views. Secondly, it is not technically feasible to plant on the field to the west due to the underlying gas pipelines that run through this area.</p>
<p>East Riding of Yorkshire Council expressed concern that the colours of the converter stations in the photomontages presented appeared muted and that in reality they could appear much brighter. It was stated that any lighting effects should be considered in the assessment.</p>	<p>The Design and Access Statement (Volume 8, application ref: 8.8), submitted with the DCO application, sets out the proposed final colour, palette and finishes of the Projects.</p> <p>Night-time effects during construction are considered as part of the assessment of effects on visual receptors (section 23.6 in Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23)). No permanent lighting is required during operation.</p>



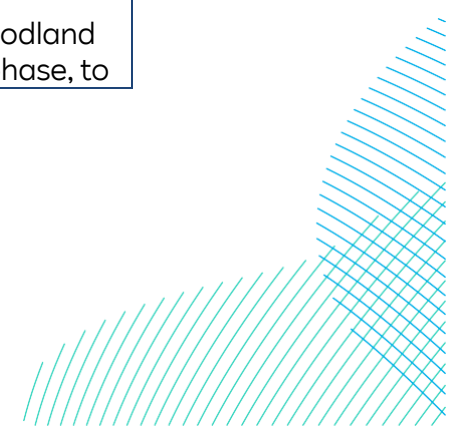
Comment	Project Response
	Therefore, night-time visualisations have not been prepared as part of the ES.
Landscape and Visual ETG 15/03/2024	
<p>ERYC queried whether earth curvature would screen views of the offshore wind turbines from land.</p>	<p>Reference to the screening effect of earth curvature was included in the Scoping Report to provide evidence to scope out the offshore array areas of the Projects. Additional wording about the curvature of the earth has been included within section 23.3.1 and 23.4.4. of Volume 7, Chapter 23 Landscape and Visual Impact Assessment (application ref: 7.23).</p>
<p>In terms of the Landscape Mitigation Plan, ERYC requested as much information as possible at the application stage rather than relying on more detail being provided post-consent.</p> <p>Queries were raised about the location and design of the SuDS feature, and the woodland planting proposed in the east of the Onshore Substation Zone, noting that the width of this woodland is largely constrained by the SuDS.</p>	<p>It was confirmed during the ETG that as much information would be provided as part of the DCO application as possible, but that the Outline Landscape Management Plan (OLMP) (Volume 8, application ref: 8.11) and the Indicative Landscape Plan Figure 23-6 in Volume 7 (application ref: 7.23.1) at this stage are indicative and will require further refinement post consent.</p>



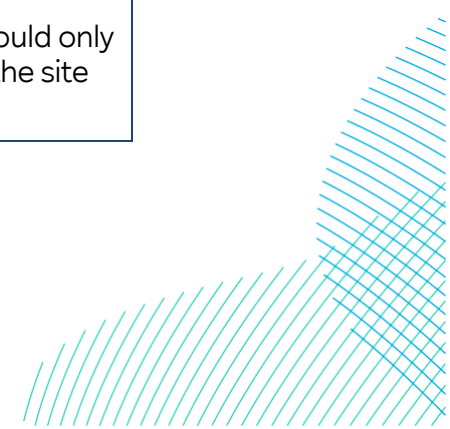
Comment	Project Response
	<p>RWE confirmed that the SuDS feature is indicative at this stage and will be further refined and developed post consent. The Design and Access Statement (DAS) (Volume 8, application ref: 8.8) sets out additional principles of relevance to the OLMP and LMP, including that it should include ecological and landscape enhancements and may take the form of attenuation ponds, swales and filter drains.</p> <p>The eastern boundary will be revisited during detailed design to strengthen the screening provided, once the exact size and location of the SuDS feature is known. At present the size of the SuDS represent the worst-case and if it can be reduced in size, the planting to the east will be increased.</p> <p>Any outstanding detailed design information (including final design of SuDS and the eastern boundary) would be developed post-consent, controlled by Requirements in the DCO, and will be subject to approval by ERYC.</p>
<p>ERYC noted that recent works to the neighbouring Jocks Lodge scheme has resulted in the removal of large areas of roadside vegetation along the A164 and A1079. ERYC advised that they would go out on site in this area and provide photographs of the works to assist in understanding changes</p>	<p>The planning drawings for the Jocks Lodge scheme indicate that vegetation will not be removed along the west side of the A164 however the Projects are aware that the nearby Jocks Lodge scheme has removed some vegetation along the west side of the A164. The Projects</p>



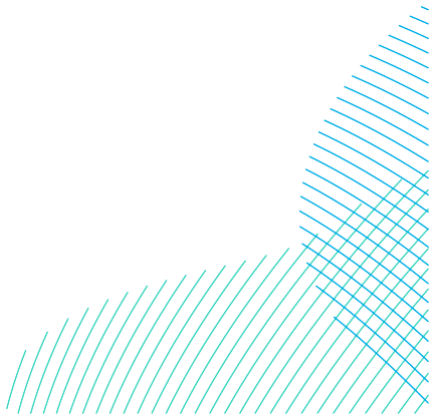
Comment	Project Response
<p>in the wider area and how these could affect views of the Projects.</p>	<p>will consider the loss of any vegetation associated with the Jocks Lodge scheme and will make appropriate amendments to the landscape mitigation plan at detailed design stage.</p>
<p>It was noted that the Public Right of Way diversion across the access road was required to maintain accessible slope gradients across the access road. Following this point, ERYC noted that from Viewpoint 3 (Beverley 20 near Broadgate), the access road does not appear to take into account earthworks and that this could be under-representing the likely views.</p>	<p>It was agreed that the photomontage for Viewpoint 3 would be updated to illustrate the earthworks along the access track. This visualisation is presented as Figure 23-9 in Volume 7 (application ref: 7.23.1).</p>
<p>Additional clarification was sought on the size of plant species when they are first planting. ERYC noted that smaller plant specimens (e.g., whips) do not provide effective screening for several years. However, it was pointed by LUC and ERYC's landscape advisor that larger plants are more prone to failure, and that smaller 'whips' are better at establishing and thriving over time.</p> <p>ERYC's landscape advisor is in agreement that planting should go in as whips. Although it will take longer to establish, the chance of survival is greater and ultimately will lead to more benefits. This approach is in line with best practice.</p>	<p>It was confirmed that post consent RWE will seek opportunities to explore working with Humber Forest to deliver offsite planting, noting that ERYC are already heavily involved with this organisation. This commitment is referenced in the Outline Landscape Management Plan (OLMP) (Volume 8, application ref: 8.11).</p> <p>The OLMP sets out commitments to establish the majority of mitigation planting as whips, although there is some potential for larger hedgerow trees to be planted.</p> <p>The OLMP sets out commitments to establish woodland planting as early as possible in the construction phase, to</p>



Comment	Project Response
<p>In addition, ERYC raised queries about the potential for wider offsite planting (i.e. within 2km of the Onshore Substation Zone).</p>	<p>ensure maximum benefit at the start of the operational phase.</p>
<p>ERYC raised concerns about lighting on the Onshore Converter Stations and that these would need to be considered in the assessment. It was clarified that there would be no permanent lighting required, and any lighting would only be needed during maintenance and operational visits which would average once a week. ERYC noted that additional information on timescale for lighting would be helpful.</p> <p>ERYC confirmed they are in agreement that no nighttime visualisation are required contingent on more lighting information being provided in the application.</p>	<p>The OCoCP (Volume 8, application ref: 8.9) includes measures to ensure construction site lighting is positioned and directed to avoid unnecessary illumination.</p> <p>Operational lighting at the Onshore Converter Stations will be designed in accordance with latest guidance and legislation. The details of the location, height, design and luminance of lighting to be used will be provided as part of detailed design for the Onshore Converter Stations. No permanent night-time lighting will 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 the draft DCO (Volume 3, application ref: 3.1).</p> <p>The Design and Access Statement (Volume 8, application ref: 8.8) sets out that the lighting should only operate when required and be directional within the site boundary only, to reduce light spill.</p>



Comment	Project Response
<p>ERYC asked for additional wireline imagery be included in the visuals to ensure that the Onshore Converter Stations have been placed at the correct level. They noted that it does appear that everything has been modelled correctly but that the wirelines would confirm this.</p>	<p>It was confirmed that wirelines will be prepared and sit within the figures presented within Volume 7 Figure 23-7 to 23-15 (application ref: 7.23.1).</p>



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

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