

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

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# **Dogger Bank South Offshore Wind Farms**

**Environmental Statement**

**Volume 7**

**Appendix 26-1 Air Quality Consultation Responses**

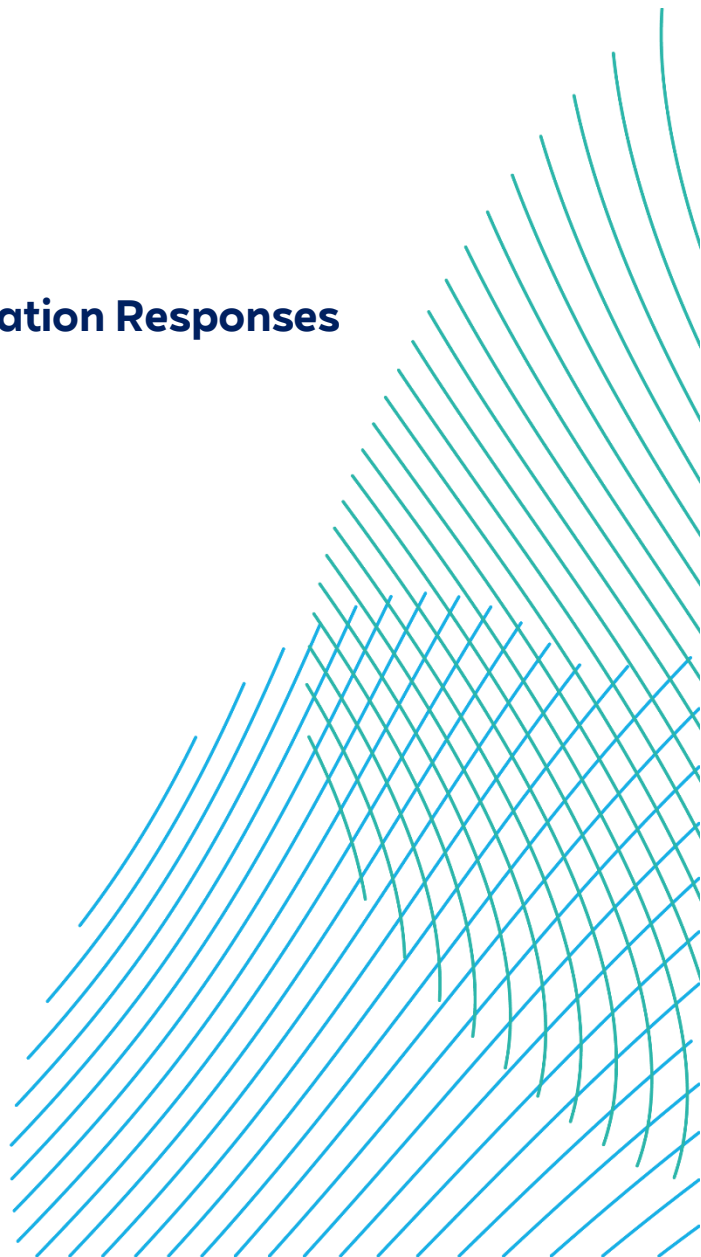
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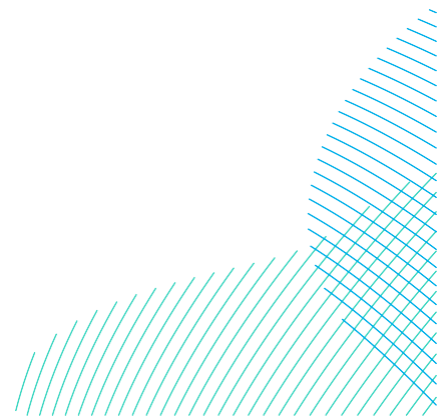
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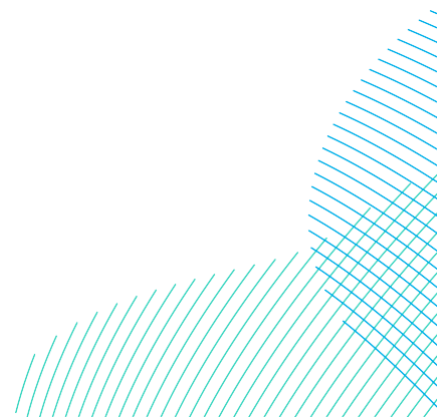
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## Glossary

Term	Definition
Dogger Bank South (DBS) Offshore Wind Farms	The collective name for the two Projects, DBS East and DBS West.
Evidence Plan Process (EPP)	A voluntary consultation process with specialist stakeholders to agree the approach, and information to support, the Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) for certain topics.
Horizontal Directional Drilling (HDD)	HDD is a trenchless technique to bring the offshore cables ashore at the landfall and can be used for crossing other obstacles such as roads, railways and watercourses onshore.
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
AQMA	Air Quality Management Area
ARN	Affected Road Network
ASR	Annual Status Report
CEA	Cumulative Effects Assessment
DCO	Development Consent Order
EPP	Evidence Plan Process
EPUK	Environmental Protection United Kingdom
ES	Environmental Statement
ETG	Expert Topic Group
HDD	Horizontal Directional Drilling
IAQM	Institute of Air Quality Management
JNCC	Joint Nature Conservation Committee
LAQM	Local Air Quality Management
NO <sub>x</sub>	Oxides of Nitrogen
NRMM	Non-Road Mobile Machinery
PEIR	Preliminary Environmental Information Report
PM	Particulate Matter
SAC	Special Area of Conservation
SO <sub>2</sub>	Sulphur Dioxide
SPA	Special Protection Area

Term	Definition
SSSI	Site of Special Scientific Interest



## 26.1 Consultation Responses

### 26.1.1 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 26-1-1**.

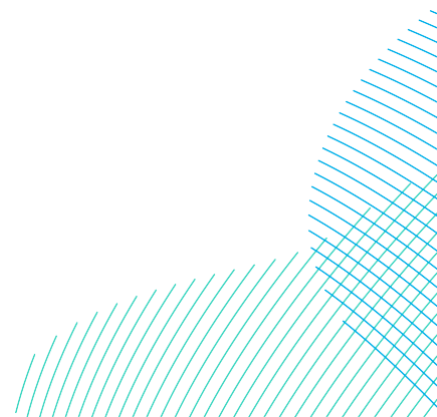
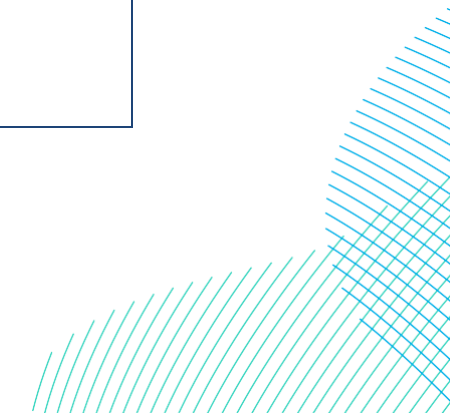


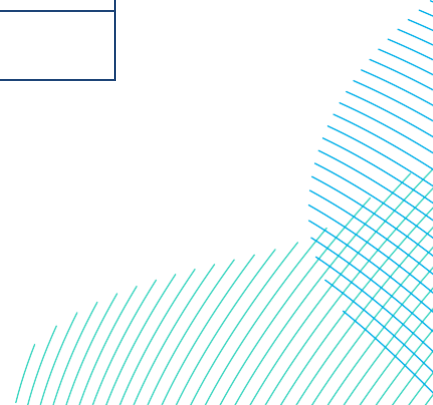
Table 26-1-1 Consultation Responses Related to **Volume 7 Chapter 26 Air Quality (application ref: 7.26)**

Comment	Project Response
<p><b>East Riding of Yorkshire Council (Environmental Control) / Dogger Bank South Traffic and Access, Onshore Noise and Air Quality Expert Topic Group – Pre-Scoping 14<sup>th</sup> September 2021</b></p>	
<p>No concerns or issues have been raised regarding the information or approach presented to stakeholders.</p>	<p>The Applicants presented the proposed scoped in and out air quality impacts, to be presented in the Scoping Report.</p>
<p><b>The Planning Inspectorate - Scoping Opinion 2<sup>nd</sup> September 2022</b></p>	
<p>ID 3.3.1: Offshore Air Quality: The Scoping Report (EN010125-000181-DBS, RWE 2022) states that the main source of emissions is likely to be from vessels used during construction, operation, and decommissioning emitting nitrogen oxides (NOx), particulate matter (PM) and sulphur dioxide (SO<sub>2</sub>). It is stated that vessels operating in the North Sea area are required to comply with Emission Control Area restrictions under Annex VI of the MARPOL Convention (IMO, 1973) in respect of NOx and SO<sub>2</sub> limits. It is stated that in the context of existing vessel traffic in the North Sea, the contribution would be small, although no data is presented in terms of the baseline position or likely number of vessel movements as a result of the Proposed Development. It is also stated that vessel movements</p>	<p>Noted. Offshore air quality impacts have been scoped out of the assessment.</p>

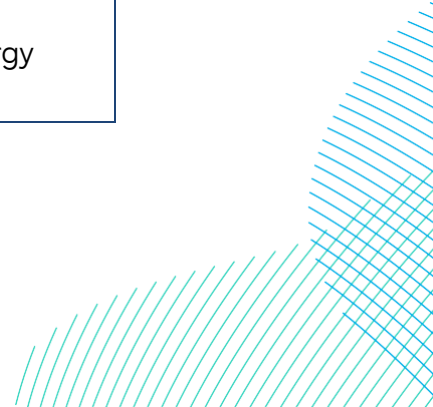




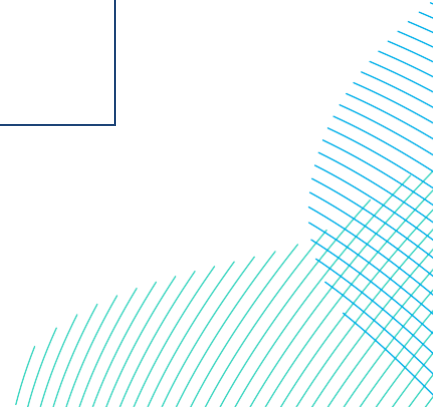
Comment	Project Response
<p>would be carried out at some distance from the shore and are therefore unlikely to impact on land based human and ecological receptors, although no information is presented as to the likely routes of vessel movements.</p> <p>The Inspectorate agrees that this matter may be scoped out of the ES on the basis that the main source of emissions would be exhaust emissions from vessels, and due to the nature and location of the offshore components of the Proposed Development associated vessel movements would only generate a small increase in emissions in all phases, which is unlikely to result in significant effects to land based human and ecological receptors.</p>	
<p>ID 3.3.2: Cumulative effects:</p> <p>As no pathway for effects has been identified, the Proposed Projects are not expected to contribute to cumulative effects with other offshore emission sources. The Inspectorate agrees that cumulative effects on offshore air quality can be scoped out of the assessment.</p>	<p>Noted.</p> <p>Cumulative effects on offshore air quality have been scoped out of the assessment.</p>
<p>ID 4.9.1: Operational Impacts:</p>	<p>Noted.</p>



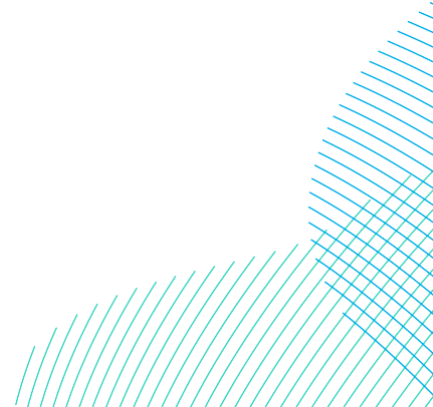
Comment	Project Response
<p>The Inspectorate has considered the information in the Scoping Report and agrees that significant effects are unlikely. However, the information on the likely emissions to air during operation and the receptors which could be affected is very limited. The Inspectorate considers that back-up generators, and other equipment in particular battery storage infrastructure if proposed, has the potential to result in air quality effects during the operational phase.</p> <p>The Inspectorate would expect the ES to provide a reasoned justification supported by evidence to demonstrate why a detailed assessment is not required. Cross-reference should be made to the assessments of effects on ecology and on human health.</p>	<p>It has been agreed with stakeholders as part of the EPP via the Dogger Bank South Traffic and Access, Onshore Noise and Air Quality Expert ETG workshops that operational dust, NRMM and traffic emissions can be scoped out as significant effects are unlikely.</p> <p>Details of the number and capacity of back-up generators are not yet known; however, any local air quality impact is very unlikely to be significant. Given their purpose, such plant operate very infrequently, although need to be regularly tested, but typically this is for a short time, on a periodic basis, such as weekly or monthly. Generators which have a thermal input rating greater than 1MWth will require an operational Environmental Permit. Emergency standby generators which are tested &lt;50 hours/year are exempt from the 'Specified Generator' requirements, but they are still classed as 'Medium Combustion Plants'. The new units would be considered in aggregate capacity, according to the rated thermal input not electrical output. Depending on various factors including the location, a Standard Rules Permit may be available. The Applicants will apply for and have in place the requisite Permit(s) for its back-up power provision at the appropriate time.</p> <p>The design of the Projects does not include Battery Energy Storage Systems (BESS).</p>



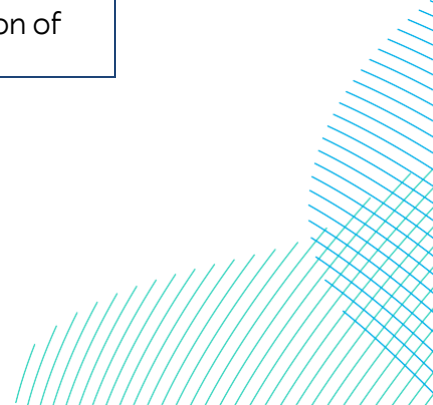
Comment	Project Response
<p>ID 4.9.2: Affected Road Network:</p> <p>The ES should explain how the affected road network (ARN) has been identified and provide a clear definition of the ARN including appropriate figures where possible.</p>	<p>Noted.</p> <p>The affected road network is defined in section 26.3.2 and the air quality study area is presented in <b>Volume 7, Figure 26-1 (application ref: 7.26.1)</b>.</p>
<p><b>Principal Officer, East Riding of Yorkshire Council - Detailed Proposed Methodology Sent via Email 9<sup>th</sup> December 2022</b></p>	
<p>The Principal Officer had no issues with the proposed scope of the air quality assessment.</p>	<p>The methodology agreed with the Environmental Protection Officer at East Riding of Yorkshire Council has been used within the air quality assessment.</p>
<p><b>Air Quality Officer, Hull City Council - Detailed Proposed Methodology Sent via Email 13<sup>th</sup> December 2022</b></p>	
<p>For the traffic impacts, the EPUK and IAQM Guidance is not appropriate for Hull, and we require Air Quality to be assessed using the guidance in Appendix E of SPD3 of the Local Plan. This can be accessed via the following link. <a href="https://www.hull.gov.uk/environment/pollution/air-quality">https://www.hull.gov.uk/environment/pollution/air-quality</a></p>	<p>Noted.</p> <p>During consultation with the Highways Department, traffic data was not available in sufficient detail to allow the Highway Department to determine the key junctions of concern.</p> <p>It has been agreed with Hull City Council and National Highways that, for the junctions within the Council's administration area (junctions 1 to 13,) rather than</p>



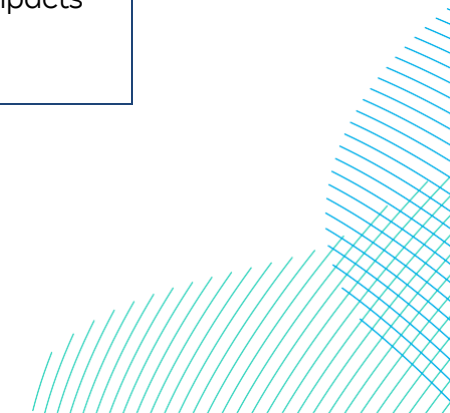
Comment	Project Response
<p>One of the main differences is the assessment of significance, which in Hull relates to the change from the monitored concentrations rather than a comparison to the air quality objectives and includes the whole of the area rather than focussing on the AQMA.</p> <p>I would also draw your attention to the concerns raised by the Highways Department relating to key junctions and the potential for issues around them. These are also of concern from an air quality perspective and will require specific assessments at these key points. These junctions could influence which local monitoring sites are appropriate for use in model validation rather than background sites or maps.</p> <p>It should also be noted that there are other applications that are liable to coincide with this proposal, and the considerations given to those should also be identified in the proposed air quality assessment.</p>	<p>undertaking detailed junction capacity modelling for the DCO application submission, it would be appropriate to defer any assessment until post determination when baseline conditions have consolidated following major highway improvements to the A63 Castle Street. Detailed information regarding forecast traffic flows for each of these junctions (junction 1 to 13) would be provided to the respective highway authorities by the TMCo once a PC is appointed and greater certainty is available. This is as outlined in the <b>Outline Construction Traffic Management Plan (Volume 8, application ref: 8.13)</b>.</p> <p>The assessment presented in the Air Quality chapter has been undertaken following the Hull Air Quality Guidance SPD3.</p> <p>A Cumulative Effects Assessment (CEA) is provided in section 26.7.</p>
<p><b>Hull City Council and East Riding of Yorkshire Council Noise and Air Quality - ETG Meeting 3<sup>rd</sup> July 2023</b></p>	



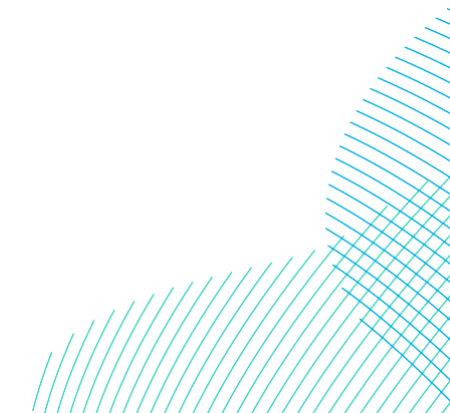
Comment	Project Response
<p>The approach to determining the air quality study area and the sources for air quality monitoring data within the PEIR</p>	<p>Both HCC and EYRC reached an agreement on the discussed matter. EHO from EYRC additionally recommended evaluating the baseline for PM<sub>2.5</sub>, highlighting the deployment of new monitors subsequent to the scoping report. Furthermore, the EHO proposed considering monitoring data from <a href="https://portal.earthsense.co.uk/EastRidingPublic/">https://portal.earthsense.co.uk/EastRidingPublic/</a> for future validation modelling.</p> <p>It was agreed that this data would be considered within the ES.</p>
<p><b>Section 42 Consultation Response – Hull City Council 17<sup>th</sup> July 2023</b></p>	
<p>Further information on junction assessment, and clarification on the source of materials and routes taken by vehicles, as well as potential cumulative impacts with other developments will be key to ascertaining air quality impacts within the city of Hull.</p>	<p><b>Volume 7, Chapter 24 Traffic and Transport (application ref: 7.24)</b> provides more in-depth information on the junctions analysed in the traffic model, details on materials and routes taken by vehicles and cumulative effects. The approach to junction capacity assessments has also been agreed with the relevant highway authorities.</p> <p>The Air Quality assessment can be found in section 26.6.</p>
<p>Paragraph 102 states that 2019 PM<sub>10</sub> and PM<sub>2.5</sub> monitoring data for the Hull City Council is not available to facilitate model verification. In fact, data sets are</p>	<p>Data pertaining to PM<sub>10</sub> and PM<sub>2.5</sub> monitoring provided in the 2023 Annual Status Report (ASR) for Hull City Council has been reviewed. Section 26.4.3.3.5.6 details the derivation of the PM adjustment factor used in the assessment, in</p>



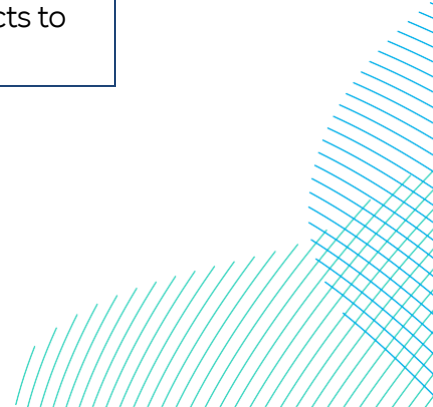
Comment	Project Response
available for Hull Freetown (PM <sub>2.5</sub> ), Holderness Rd (PM <sub>10</sub> ) and Hull Myton (PM <sub>10</sub> ).	accordance with the guidance in LAQM TG (22) (Defra, 2022b).
<b>Section 42 Consultation Response - Haven Leisure 17<sup>th</sup> July 2023</b>	
In addition, the air quality assessment identifies the potential for impact during the construction period within 350 metres of construction activities and which, in relation to Zone 9, would include part of Far Grange. Further analysis should be carried out to ensure that the low to medium risk of impact within that area is accurate given the nature of residents' occupancy.	It should be noted that Landfall 9 (i.e., referred to as Zone 9 in the comment) was not taken forward as the preferred landfall location. Therefore, Far Grange is no longer within 350m of the Onshore Development Area and does not require consideration as a receptor in the Air Quality Assessment.
<b>Section 42 Consultation Response - Natural England 11<sup>th</sup> September 2023</b>	
We note that the Planning Inspectorate has agreed to scope out the 'Offshore Air Quality' impacts as the effects are unlikely to be significant (26.1 (2)). However, we advise there is currently not enough information to rule of potential impacts from vessel emissions at port or on routes close to any relevant terrestrial ecological receptors.	We have excluded the assessment of onshore air quality effects resulting from offshore vessels associated with offshore construction, operation, and decommissioning.  For context, the Local Air Quality Management Technical Guidance (LAQM TG22) provides screening criteria for the requirement for detailed assessment of vessel emissions, as it is considered at this level that there is a potential for impacts on local air quality. These are as follows:
A total of 11,489 vessel return trips are anticipated during the construction phase, although the potential for	



Comment	Project Response
<p>significant air quality impacts to sensitive receptors have been scoped out due to distance. It is not considered to be enough information to screen out potential for significant air quality impacts to the Humber Estuary SAC/SPA/Ramsar/SSSI due to near shore construction phase vessel movements.</p>	<ul style="list-style-type: none"> <li>• More than 5,000 large ship movements per year, with relevant exposure within 250m of the berths and main areas of manoeuvring</li> <li>• More than 15,000 large ship movements per year, with relevant exposure within 1km of the berths and main areas of manoeuvring</li> </ul>
<p>The EIA and HRA should assess potential air quality impacts to the Humber Estuary SAC/SPA/Ramsar/SSSI from vessel emissions.</p>	<p>In a worst case scenario, the maximum number of vessel return trips generated during the construction of the Projects (7,512) would be spread over the minimum five-year offshore construction period. Therefore, the mean average maximum number of vessel return trips required per year for construction (1,502) and operation (473) are well below the screening criteria included in LAQM TG22 (Defra, 2022). This number of vessel return trips generated would amount to an average of just over four vessels per day during construction and just over one vessel per day during operation.</p>
<p>A maximum of 474 vessel movements may be required per year during operational phase, although the potential for significant air quality impacts to sensitive receptors has been scoped out due to distance. It is not considered to be enough information to screen out potential for significant air quality impacts to the Humber Estuary SAC/SPA/Ramsar/SSSI due to near shore operational phase vessel movements.</p>	

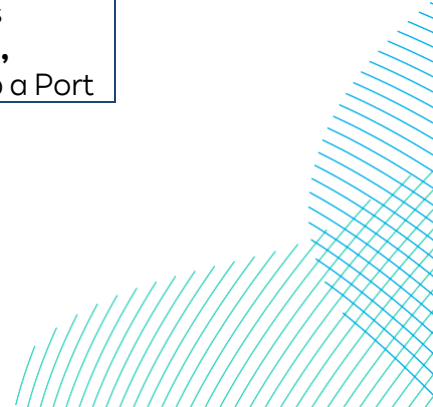


Comment	Project Response
	<p>Notwithstanding this, not all vessel movements generated during the construction and operation of the Projects would complete the same route (i.e., transit in/out along the Humber Estuary) nor would all vessels be in close proximity to sensitive habitats. Therefore, the number of vessels with the potential to impact on any one terrestrial ecological site would be significantly lower than the total number of vessels detailed above. For example, the landfall cable installation vessel will have a maximum of three return trips.</p> <p>The air quality impact from vessel emissions on designated ecological sites is therefore considered to be not significant. This includes the impact from vessel emissions on the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar and SSSI.</p> <p>The Inspectorate agreed with this approach, as stated in the Scoping Opinion (the Planning Inspectorate, 2022) that this matter may be scoped out of the ES on the basis that the main source of emissions would be exhaust emissions from vessels, and due to the nature and location of the offshore components of the Proposed Development associated vessel movements would only generate a small increase in emissions in all phases, which is unlikely to result in significant effects to land based human and ecological receptors.</p>

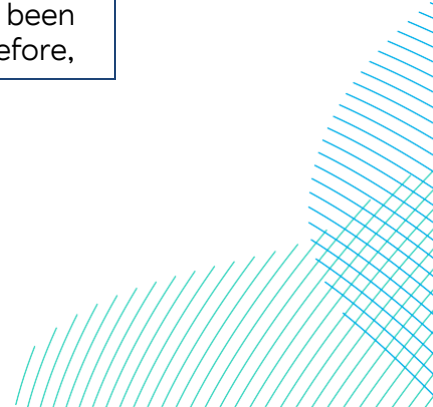




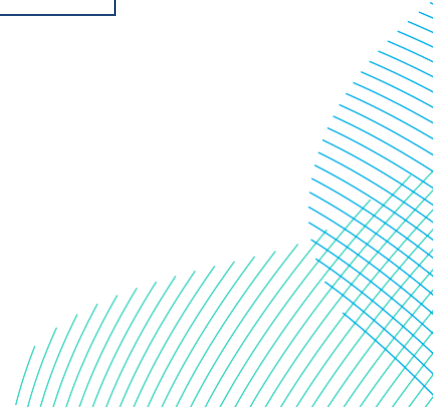
Comment	Project Response
<p>Provide confirmation of the number of operational vehicle movements associated with staff travel to and from ports for vessel movements and if this number scopes in or out of requiring additional air quality assessment.</p>	<p>Operational vehicle movements associated with the onshore operation of the Projects would be limited to routine maintenance, estimated at an average of one visit per week.</p>
<p>There is no consideration of operational traffic impacts contribution in-combination with other plans or projects. Cumulative impacts with other developments could potentially result in significant impacts on nature conservation sites due to emissions to air.</p>	<p>The preferred base port (or ports) for the offshore construction, operation and decommissioning of the Projects are not known and any decision would not be expected until post-consent. Such facilities would be existing or would be provided or brought into operation by means of one or more planning applications or as port operations with permitted development rights. It has therefore been agreed with National Highways, Hull City Council and East Riding of Yorkshire Council to scope out of the assessment the onshore impacts of traffic and transport associated with offshore construction, operation and decommissioning activities.</p> <p>As such, the number of vehicle movements generated during operation has not been considered, and comparison to screening criteria is therefore not possible. However, it is considered operational vehicle movements would be well below the screening criteria.</p> <p>To ensure proper assessment and mitigation of potential effects related to the operational phases of the Projects (including cumulative effects), the <b>draft DCO (Volume 3, application ref: 3.1)</b> includes a Requirement to develop a Port</p>



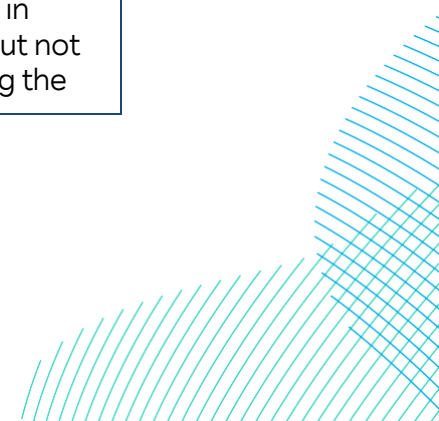
Comment	Project Response
	<p>Traffic Management Plan (PTMP) once the final base port location is determined.</p> <p>This approach has been accepted by the Planning Inspectorate for other recently consented offshore wind farm projects, e.g., Norfolk Vanguard and Boreas, East Anglia Two, East Anglia One North and Hornsea Three.</p>
<p>We note there is a lack of information provided on the use of NRMM and back-up generators. We advise there is currently not enough information to rule out air quality impacts to designated sites and ancient woodland, in close proximity to the onshore development area.</p>	<p>Defra technical guidance (Defra, 2022) states that emissions from NRMM used on construction sites are unlikely to have a significant impact on local air quality where relevant control and management measures are employed. However, intensive construction activities, for example Horizontal Directional Drilling (HDD) works, may temporarily increase pollutant concentrations in the vicinity of receptors. Trenchless crossing techniques (such as HDD) may be used in selected locations for crossing existing infrastructure/natural features and this may require 24-hour working. This 24-hour working is likely to last less than one month at most locations. The Environmental Statement <b>Volume 7 Chapter 5 Project Description (application ref: 7.5)</b> will provide further detail on the programme and construction timelines.</p> <p>Embedded mitigation measures specific to NRMM have been included in the design of DBS Offshore Wind Farm. Therefore,</p>
<p>There is not enough information regarding location of NRMM or duration of activities. to enable the risk of habitat impacts to be screened out.</p>	
<p>Additionally, no minimum NRMM standard is currently defined. A minimum NRMM standard is useful as this will establish the emission limit value associated with the plant to inform the assessment of impacts and mitigate the effects of emissions.</p>	



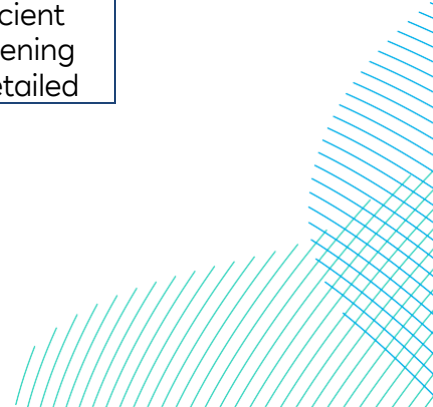
Comment	Project Response
<p>Provide further information on NRMM locations, duration of operations and minimum standard of NRMM and assess for potential air quality impacts to designated sites and ancient woodland in proximity to the onshore development area.</p>	<p>although the assessment considers emissions from all NRMM plant, the focus of the assessment is on trenchless crossing techniques (e.g. HDD) as this is considered to have the largest emissions generation potential.</p> <p>The exact location that NRMM will be operational within the Onshore Development Area is unknown. However, generators to power trenchless crossings will be confined to temporary construction compounds (TCC), and not the entire Onshore Development Area. The qualitative assessment of NRMM emissions provided in section 26.6.1.2 considers worst-case locations to ensure a robust assessment, i.e., assuming all NRMM and trenchless crossing generators are located at the closest edge of the proposed TCC. Additionally, there are no designated ecological sites within 200m of a TCC.</p>
<p>Horizontal Directional Drilling (HDD) compounds are currently only identified east and southeast of Skipsea. It is important to understand where all HDD compounds are proposed as this is where NRMM with emissions to air will be located.</p>	<p>Further refinement of the Projects' Onshore Development Area and additional NRMM and trenchless crossing information have been considered in section 26.6.1.2. This includes the anticipated duration of trenchless crossings and the number and type of NRMM anticipated to be required during construction. Therefore, it is considered the assessment is sufficient and robust.</p>
<p>Provide further information on NRMM locations and clarification on whether there is potential for emissions associated with NRMM associated with HDD to occur outside of HDD compounds.</p>	<p>Further refinement of the Projects' Onshore Development Area and additional NRMM and trenchless crossing information have been considered in section 26.6.1.2. This includes the anticipated duration of trenchless crossings and the number and type of NRMM anticipated to be required during construction. Therefore, it is considered the assessment is sufficient and robust.</p>



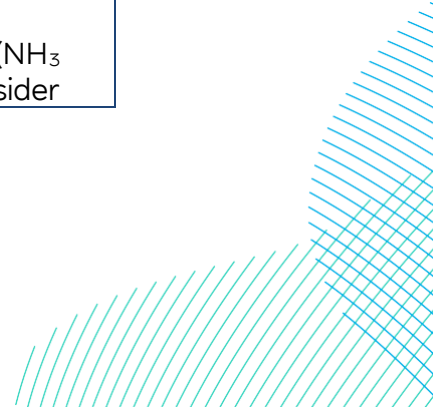
Comment	Project Response
<p>The concentrations reported for S33 and S34 do not match those reported in the East Riding of Yorkshire’s 2020 annual status report.</p>	<p>Noted. The error in reporting does not impact on the model verification in PEIR.</p>
<p>Provide clarification as to whether this affects the model verification and consequently the modelled results.</p>	<p>The monitoring data carried out by East Riding District Council has been updated since the PEIR, including description of the monitoring results. This is reported in section 26.5.</p> <p>In addition, the base year for the purpose of model verification in the ES has been updated to 2022; whereas in the PEIR a base year 2019 was used. Therefore, model verification has been updated since PEIR, as detailed in section 26.4.3.3.</p>
<p>The consultation response table within the air quality assessment chapter indicates that the assessment has not accounted for potential emissions associated with back-up generators. The response notes that the number and capacity of generators is not yet known, however emissions are unlikely to be significant due to the expected minimal operational times and that if generators are greater than 1MWth. This plant will be regulated under the Medium Combustion Plant Directive regulations and will be permitted by the Environment Agency. Nevertheless, there is the potential that a significant generator capacity may be required during the operational phase.</p>	<p>Details of the number and capacity of back-up generators are not yet known; however, any local air quality impact is very unlikely to be significant. Given their purpose, such plant operate very infrequently, although need to be regularly tested, but typically this is for a short time, on a periodic basis, such as weekly or monthly. Generators which have a thermal input rating greater than 1MWth will require an operational Environmental Permit. Emergency standby generators which are tested &lt;50 hours/year are exempt from the ‘Specified Generator’ requirements, but they are still classed as ‘Medium Combustion Plants’. The new units would be considered in aggregate capacity, according to the rated thermal input not electrical output. Depending on various factors including the</p>



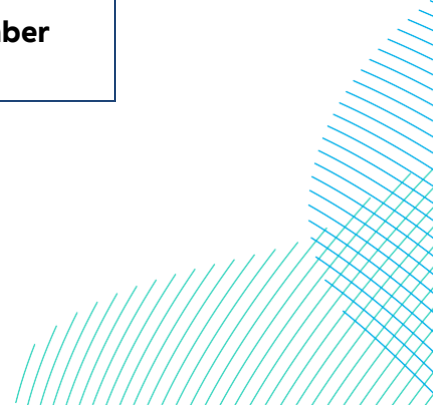
Comment	Project Response
<p>Provide further information on the location, number, capacity, and operational hours of proposed back-up generators and assess for potential air quality impacts to designated sites and ancient woodland in proximity to the onshore development area.</p>	<p>location, a Standard Rules Permit may be available. The Applicants will apply for and have in place the requisite Permit(s), which if required would consider any potential impacts upon ecological sites, for its back-up power provision at the appropriate time.</p>
<p>We note Table 26-20 shows potential air quality impacts to Burton Bushes SSSI and ancient woodland from road traffic emissions has been scoped out of further assessment.</p>	<p>The requirement for further assessment of road traffic emissions on Burton Bushes SSSI and ancient woodland was completed by screening the in-combination traffic flows against the JNCC distance-based screening thresholds (further detail is provided in section 26.4.3.3). At PEIR stage, the traffic generated by the Projects in addition to other plans and projects (including general traffic growth) along the road link adjacent to Burton Bushes SSSI and ancient woodland did not exceed the screening criteria at the distance the ecological site is located from the road, as road traffic pollutant concentrations decrease rapidly with distance back from the road's edge, and therefore did not require detailed assessment.</p> <p>For the ES, the revised in-combination traffic flows have been considered in the assessment. In-combination traffic flows on the road link adjacent to the Burton Bushes SSSI and ancient woodland do not exceed the JNCC distance-based screening thresholds equating to a 1% increase in CLe or CL, as detailed</p>
<p>Burton Bushes SSSI and ancient woodland should be included in the detailed assessment pending resolution of the above comment (E13) and assessed in-combination with other plans or projects.</p>	



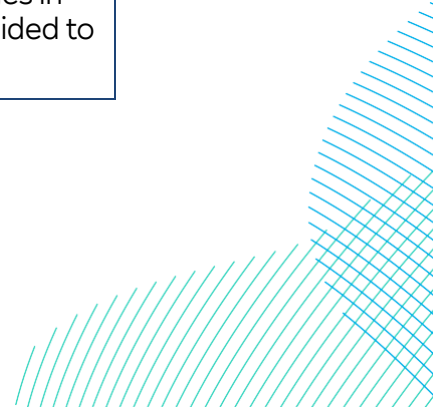
Comment	Project Response
	<p>in section 26.4.3.3.7. Therefore, impacts on this site are considered to be insignificant, in accordance with JNCC (Chapman &amp; Kite, 2021a; 2021b) guidance.</p>
<p>The current traffic modelling is based on and ‘average fleet mix’. It is possible that the construction fleet mix may not represent an average fleet due to the high levels of construction vehicles.</p>	<p>The suitability of the Joint Nature Conservation Committee (JNCC) Reports methodology (2021a; 2021b) for assessing the impact of the Projects on ecological receptors has been considered in a technical memo (Reference: PC2340-RHD-ON-ZZ-TN-Z-0043) issued to Natural England on 4 April 2024. This memo summarised and concluded that (1) more stringent AADT screening criteria (including the consideration of pollutant Critical Level and Load specific screening criteria) are applied than compared to the Natural England screening criteria and therefore a greater number of affected roads and ecological sites within 200m of these roads are screened in for further assessment, (2) the data provided in the JNCC Reports methodology and used in the assessment are based on a combination of monitored measurements and verified detailed modelling which “<i>can be considered more certain than many modelling-based results</i>” and is “<i>expected to provide robust and representative, albeit indicative, information which will often be better than a detailed model if that model has not been verified against measurements</i>” (Chapman &amp; Kite, 2021b), (3) no change from the 2019 (NO<sub>x</sub>) and 2015 (NH<sub>3</sub> and N-Dep) monitored concentrations is applied to consider</p>
<p>Provide further information on the predicted construction fleet mix and review the appropriateness of using Chapman &amp; Kite (2021) JNCC guidance.</p>	



Comment	Project Response
	<p>any changes in ambient pollutant levels with the successful introduction of tighter emission standards for petrol cars and diesel vehicles over the last decade, and (4) the assessment is undertaken in-combination with other Projects and Plans (including traffic growth), therefore, despite Project-generated traffic containing a high proportion of construction traffic, this is reduced overall when combined with the total in-combination traffic flows. Furthermore, as discussed in section 26.4.3.3.7.4, the majority of in-combination AADT considered in the assessment comprises traffic other than Project-generated traffic. Given the conservative and robust nature of the JNCC Reports' approach, it is considered this outweighs any concerns regarding the average fleet mix used to calculate the in-combination impact of traffic emissions on designated ecological sites.</p> <p>A meeting was held with Natural England on 2 May 2024 to discuss the Section 42 responses received from Natural England on the PEIR, including the suitability of the JNCC Reports methodology, and how the air quality assessment of potential impacts on ecological receptors has progressed since PEIR to ES.</p>
<p><b>Hull City Council and East Riding of Yorkshire Council Onshore Noise and Air Quality - ETG Meeting 27<sup>th</sup> November 2023</b></p>	

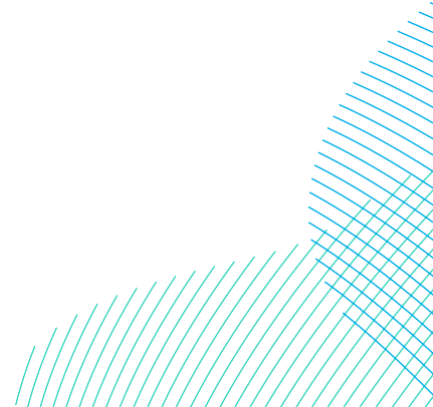


Comment	Project Response
Scoping out of the Operational Impacts from the assessment	Operational impacts have been scoped out, in alignment with stakeholders' agreement as part of the EPP (Environmental Impact Assessment) via the Dogger Bank South Traffic and Access, Onshore Noise, and Air Quality Expert ETG (Expert Technical Group) workshops in November 2023. Therefore, these elements have been scoped out of the assessment.
The list of potential impacts and Air Quality assessment methodology for ES	Both the EHOs from HCC and EYRC concurred with the list of impacts and the assessment approach. The Hull EHO raised an inquiry regarding the consideration of Hull SPD 3 guidance, to which it was clarified that SPD was used, aligning with the request in the Scoping Opinion and subsequent email consultation with the council.
Cumulative impact of other projects been considered at ES	EHO from HCC inquired about the consideration of the cumulative impact of other projects. It was clarified that a full cumulative assessment will be incorporated into the ES.
Air Quality Assessment at ES	The HCC EHO sought information on whether the assessment of potential key junctions had been conducted. An agreement was reached with Hull City Council that junction assessments would not be considered at the ES stage due to challenges in obtaining baseline data for Castle Street, and it was decided to defer these assessments to the post-consent stage.





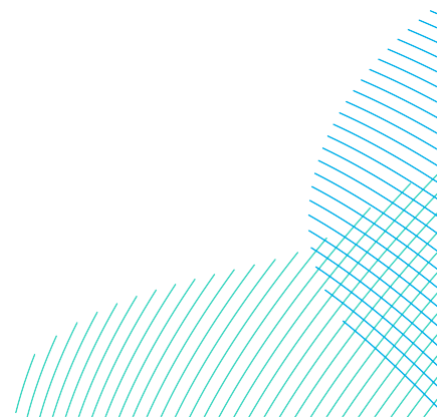
Comment	Project Response
	It was collectively agreed that the assessment methodology established during the PEIR stage could be applied for the ES, with the incorporation of new construction dust guidance being the only adjustment.
Model verification	Furthermore, Hull City Council requested the determination of verification factors for PM <sub>10</sub> and PM <sub>2.5</sub> . Section 26.4.3.3.5.6 details the derivation of the PM adjustment factor used in the assessment, in accordance with the guidance in LAQM TG (22) (Defra, 2022b).



## References

IMO (1973) International Convention for the Prevention of Pollution from Ships (MARPOL).

RWE (2022). Environmental Impact Assessment Scoping Report: Dogger Bank South Offshore Wind Farms.



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