

# **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 27-1 Human Health Consultation Responses**

**June 2024**

**Application Reference: 7.27.27.1**

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

**Revision: 01**

**Unrestricted**



|                                |  |                              |                            |
|--------------------------------|--|------------------------------|----------------------------|
| Company:                       | <b>RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited</b> | Asset:                       | <b>Development</b>         |
| Project:                       | <b>Dogger Bank South Offshore Wind Farms</b>   | Sub Project/Package:         | <b>Consents</b>            |
| Document Title or Description: | Appendix 27-1 Human Health Consultation Responses  |                              |                            |
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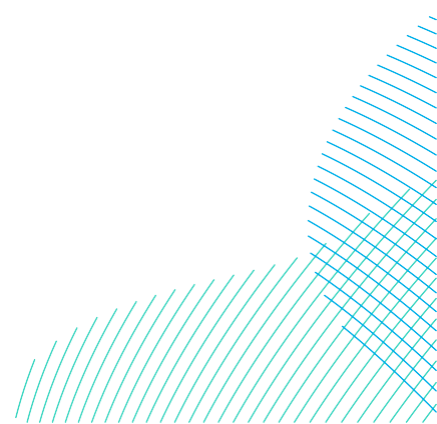
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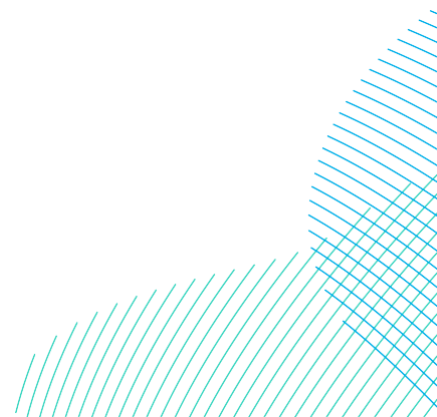
## Glossary

| Term            | Definition  |
|-----------------|---|
| Baseline        | The existing conditions as represented by the latest available survey and other data which is used as a benchmark for making comparisons to assess the impact of the Projects.  |
| Effect          | Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the value, or sensitivity, of the receptor or resource in accordance with defined significance criteria.   |
| Impact          | Used to describe a change resulting from an activity via the Projects, i.e. increased suspended sediments / increased noise.  |
| Landfall        | The point on the coastline at which the Offshore Export Cables are brought onshore, connecting to the onshore cables at the Transition Joint Bay (TJB) above mean high water.   |
| Landfall Zone   | The generic term applied to the entire landfall area between Mean Low Water Spring (MLWS) and the Transition Joint Bays (TJBs) inclusive of all construction works, including the landfall compounds, Onshore Export Cable Corridor and intertidal working area including the Offshore Export Cables. |
| Scoping opinion | The report adopted by the Planning Inspectorate on behalf of the Secretary of State.  |
| Scoping report  | The report that was produced in order to request a Scoping Opinion from the Secretary of State  |
| The Applicants  | The Applicants for the Projects are RWE Renewables UK Dogger Bank South (East) Limited and RWE Renewables UK Dogger Bank South (West) Limited. The Applicants are themselves jointly owned by the RWE Group of companies (51% stake) and Masdar (49% stake).  |
| The Projects    | DBS East and DBS West (collectively referred to as the Dogger Bank South Offshore Wind Farms).  |



## Acronyms

| Term  | Definition                                    |
|-------|---|
| ETG   | Expert Topic Group                            |
| ES    | Environmental Statement                       |
| OHID  | Office for Health Improvement and Disparities |
| PEIR  | Preliminary Environmental Information Report  |
| PRoW  | Public Rights of Way                          |
| UKHSA | United Kingdom Health Security Agency         |



## 25.1 Consultation Responses

### 25.1.1 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 27-1-1**.

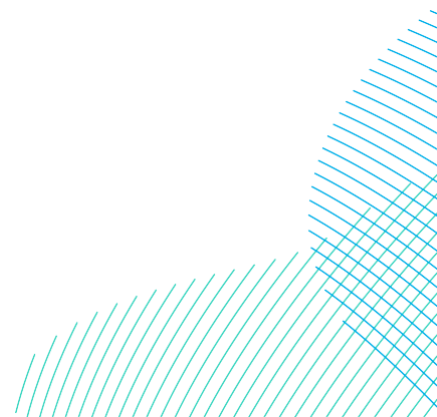
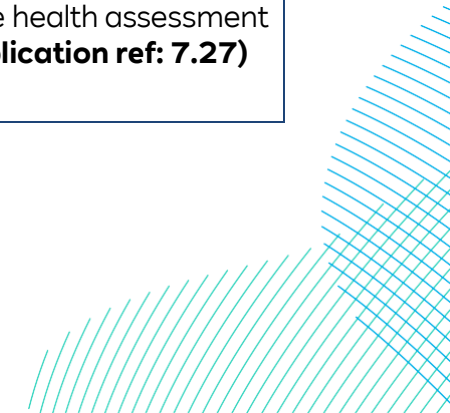
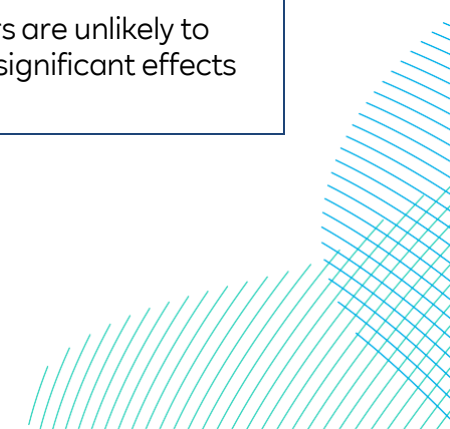


Table 27-1-1 Consultation Responses Related to **Volume 7, Chapter 27 Human Health (application ref: 7.27)**

| Comment  | Project Response  |
|--|---|
| <b>The Planning Inspectorate Scoping Opinion 02/09/2022</b>  |   |
| <p>In relation to Air quality, airborne noise, and seascape, landscape, and visual impact offshore] The Inspectorate refers to the advice given elsewhere in this Scoping Opinion on these matters but agrees that effects on human health arising from them can be scoped out of the ES.</p>  | <p>Agreed. This is consistent with the scope of the health assessment in <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> section 27.6.</p>   |
| <p>Paragraph 967 states that soil contamination is only considered to pose a potentially significant health risk to the public where it is associated with water contamination, (and as such) soil contamination in itself is scoped out. No evidence is provided within the Scoping Report for this statement.</p> <p>The chapters should provide this information, or an assessment of likely significant effects on human health from soil contamination.</p> | <p>Assessment of soil contamination is covered in <b>Volume 7, Chapter 19 Geology and Land Quality (application ref: 7.19)</b>. <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b>, section 27.7.1.5 also discusses spoil contamination to confirm that relevant pollution pathways relate to air quality and water, which are respectively assessed in sections 27.6.1.3 and 27.6.1.4. These assessment sections confirm there would not be significant population health effects.</p> |
| <p>Interference with access to open space is discussed in the Scoping Report in relation to construction impacts but not discussed for operation. Impacts during operation to open space</p>   | <p>Agreed. This is consistent with the scope of the health assessment in <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> section 27.6.</p>   |

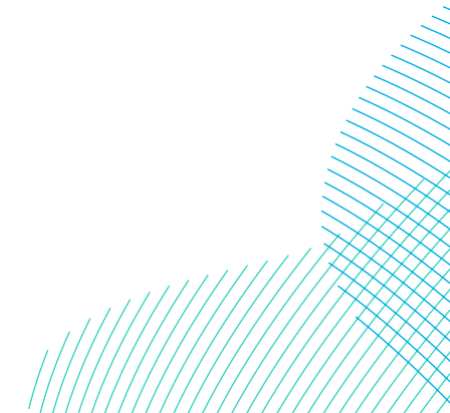


| Comment   | Project Response   |
|---|--|
| <p>and transport routes including public rights of way (PRoW) and cycle routes are denoted as scoped out for in <b>Table 4-3</b>.</p> <p>The Inspectorate is content that significant effects on human health, other than those of safety discussed elsewhere, are unlikely to arise from impacts to transport.</p> <p>The Inspectorate accepts that any short-term disruption to open space, PRoW, cycle paths and bridleways etc will have occurred during construction and no additional impacts would be anticipated during operation.</p> <p>The ES should detail how PRoW and open space areas will be reinstated following construction and how these works are to be secured.</p> | <p>Details of PRoW and open space reinstatement are addressed in <b>Appendix C Outline Public Rights of Way (PRoW) Management Plan (Volume 8, application ref: 8.9)</b>. Impacts to PRoW are assessed in <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>.</p> <p>PRoW and Open Space reinstatements will be secured through the <b>Outline Code of Construction Practise (OCoCP) (Volume 8, application ref: 8.9)</b> submitted with the DCO application.</p> |
| <p>The Scoping Report does not provide any information about operational air quality impacts in the text or reasoning behind scoping it out in this section.</p> <p>As advised above, 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. In the absence of a detailed</p>   | <p>This issue is addressed in <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b>.</p> <p><b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> aligns with <b>Volume 7, Chapter 26 Air Quality (application ref: 7.26)</b>.</p> <p>Due to their occasional use, backup generators are unlikely to result in levels of air pollution that would have significant effects for population health.</p>   |

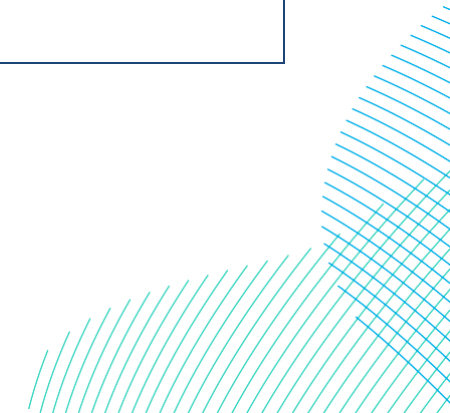




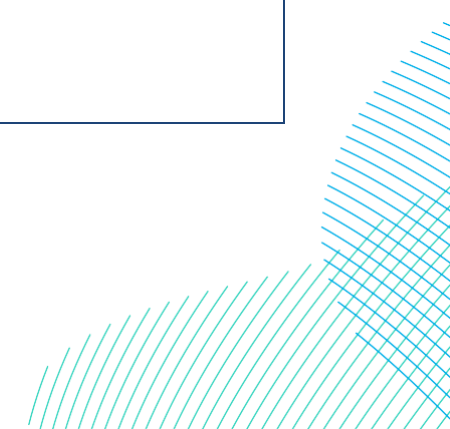
| Comment   | Project Response   |
|---|--|
| <p>project description which allows this impact pathway to be removed, the Inspectorate cannot agree to scope this matter out. The ES should provide an assessment the likely significant effects on air quality during the operational phase.</p>  |  |
| <p>The Inspectorate agrees that these matters* are either beyond the scope of EIA or given the nature of the proposals and the reasoning provided in the Scoping Report unlikely to give rise to significant environmental effects and can be scoped out of the ES.</p> <p>*Housing availability; disruption to built environment and community infrastructure; community safety risks; changes in community identity; climate change effects on health during construction and decommissioning; EMF risks (public concern and understanding is scoped in for onshore operation); health and social care demand; and wider societal benefits during construction.</p> | <p>Agreed. This is consistent with the scope of the health assessment in <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b>, section 27.6.</p> |



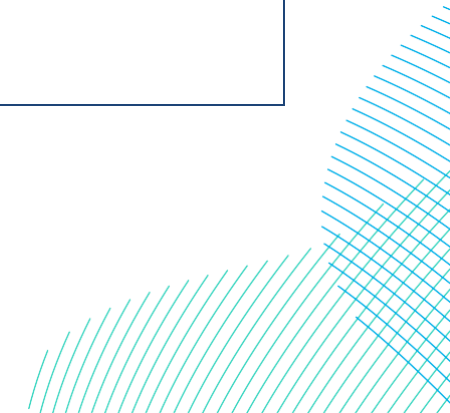
| Comment  | Project Response   |
|--|--|
| <p><b>Scoping Response - United Kingdom Health Security Agency (UKHSA) and Office for Health Improvement and Disparities (OHID) 23/08/2022</b></p>   |  |
| <p>UKHSA is satisfied that the health baseline approach is reasonable and that likely impacts and populations at risk are considered for further assessment.</p> <p>UKHSA is satisfied that the proposed approach uses good practice and has identified appropriate data sources and health standards.</p> <p>UKHSA is satisfied likely impacts and populations at risk are considered and that appropriate issues have been scoped in for further assessment in subsequent stages of the submission.</p> <p>UKHSA is satisfied that appropriate determinants of health and population groups have been identified and scoped into future assessments.</p> <p>UKHSA is satisfied with the proposed approach.</p> <p>We note that EMF impacts have been scoped out of the assessment based on compliance with extant guidance and regulations. UKHSA is satisfied with this approach.</p> | <p>Agree that the scope and methods for the health assessment are appropriate. This is consistent with the scope of the health assessment in <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b>, section 27.4 on methods and section 27.6 on assessment.</p> |



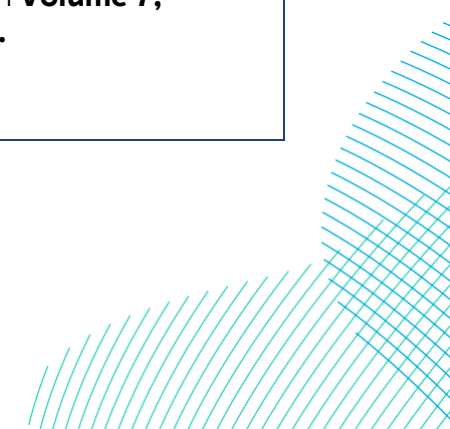
| Comment   | Project Response   |
|---|--|
| <p>Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.</p> | <p><b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b>, section 27.6.1.3 considers the non-threshold effects of air quality.</p>  |
| <p><b>Scoping Response - Hull City Council 23/08/2022</b></p>   |  |
| <p>The extent of the defined onshore study area remains in relative proximity to the city of Kingston-upon-Hull, with a population of c.260, 000. There is potential for both positive and negative impacts to affect sensitive receptors within the adjacent Hull City Council administrative area, during the construction phase, particularly as a consequence of noise, vibration, and air quality associated with vehicular traffic movements, climate change mitigation and energy provision outputs during operation, and employment and training opportunities during both.</p>   | <p>The city of Hull is included as appropriate within the study area, see <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> section 27.3.2 and the assessment section 27.6.</p> |



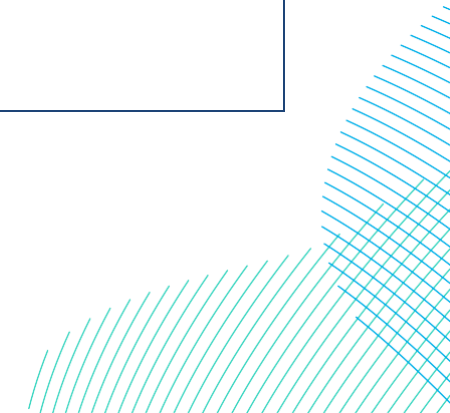
| Comment  | Project Response   |
|--|--|
| <p><b>Section 42 Consultation – Haven Leisure Limited July 2023</b></p>  |  |
| <p>The Preliminary Environmental Information Report (‘PEIR’) does not take into account the extant permission for the location of static caravans within the current ‘Pitch and Putt’. For example, the assessment of noise impact during the construction period includes the Pitch and Putt within a zone of likely construction noise impact from works a Zone 9 but does not identify the area as a specified noise receptor and it has not been assessed.</p> | <p>The Landfall Zone site selection process as outlined in <b>Volume 7, Chapter 4 Site Selection and Alternatives (application ref: 7.4)</b> has resulted in a landfall location further from these receptors, avoiding the potential for a significant adverse population health effect in relation to these receptors.</p> <p>Relevant receptors are discussed as appropriate in the assessments of <b>Volume 7, Chapter 25 Noise (application ref: 7.25); Volume 7, Chapter 26 Air Quality (application ref: 7.26);</b> and <b>Volume 7, Chapter 29 Tourism and Recreation (application ref: 7.29)</b>.</p> |
| <p>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.</p>   |  |
| <p>The overall sensitivity of occupiers of Far Grange to impacts associated with the DBS must reflect the overall nature of occupancy at the site. In particular, as owner occupiers, visits to the site are typically longer and therefore those staying would experience impacts over longer periods (particularly during the construction period). Those staying at the site as part of their</p>   |  |



| Comment   | Project Response  |
|---|---|
| <p>holiday would have an expectation of peace, quiet and as a means to enhance their overall wellbeing; this would be likely to be disrupted during the construction period.</p>  |   |
| <p>Further to the above matters, the assessment of effects on tourism and recreation during the construction period and reported in the PEIR concludes a minor adverse and not significant impact. No specific reference to Far Grange (and all its operations) as a receptor is apparent within the PEIR. This needs to be re-examined. Haven Leisure would like to offer its assistance to provide accurate information on the nature of operations at Far Grange and ways in which impacts could potentially be mitigated for those staying at the site.</p> |   |
| <p><b>Section 42 Consultation - East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum July 2023</b></p>  |   |
| <p>There is a need for specific details about PRow (Public Right of Way) diversions where the cable corridor intersects PRowS. Currently, there are no details. The JLAF asks that temporary diversion routes be defined by the Applicant after consulting the East Riding of Yorkshire Council’s Countyside Access Team. Permissions will need to be sought from landowners. The same procedure should be adopted where permanent PRow diversions</p>  | <p>An Outline Public Rights of Way Management Plan (see <b>Appendix C (Volume 8, application ref: 8.9)</b>) is submitted with the DCO application. Impacts on PRowS are assessed in <b>Volume 7, Chapter 21 Land Use (application ref: 7.21)</b>.</p> |



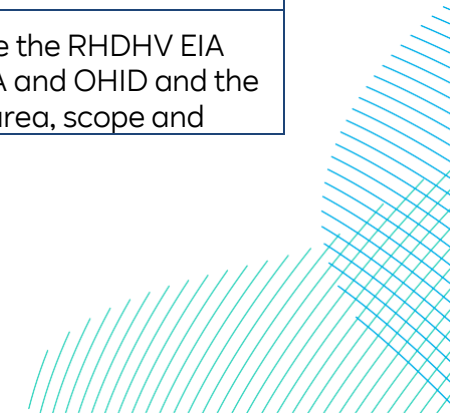
| Comment   | Project Response  |
|---|---|
| <p>are proposed except that, in these cases, the Applicant is asked to liaise with the Definitive Map Team of East Riding of Yorkshire Council. The Definitive Map Team will consult the JLAF for its collective opinion in order to avoid unintended complications along the proposed diversion route. In each and all cases, JLAF asks that diversions be in place before temporary or permanent closure is affected.</p>   | <p>The Projects have clarified that there would be short term temporary closures with short diversions – lasting up to two months for the majority of crossings.</p> <p>Following completion of works, the footpaths will be restored to their original condition (or improved) before reopening to the public.</p> <p>The Outline Public Rights of Way Management Plan (see <b>Appendix C (Volume 8, application ref: 8.9)</b>) outlines the health and safety requirements associated with the interactions of PRow during construction, as well as the PRow management methodologies that will be implemented.</p> <p>PRow diversions and reinstatements will be secured through the <b>Outline Code of Construction Practice (OCoCP) (Volume 8, application ref: 8.9)</b> submitted with the DCO application.</p> |
| <p>Temporary closure of each PRow where diversion cannot be implemented should be limited in time in order to minimise, as much as possible, the interruption of public rights of access and the physical and mental public health benefits that accrue to countryside access. The Applicant is asked to liaise with the East Riding of Yorkshire Council’s Countyside Access Team regarding temporary closure of PRows.</p>  |   |
| <p>The JLAF asks that the Applicant gives an outline schedule of the way the installation will proceed. It wishes to be assured that the work will progress on a ‘rolling’ geographical basis i.e. that work shifts progressively along the proposed corridor in defined lengths and that there is no intention to divert or close all affected PRows from landfall to the converter stations proximal to the Creyke Beck sub-station for the duration of the installation.</p> |   |



| Comment  | Project Response |
|--|------------------|
| <p>The Applicant, and/or subsequent owners of the cables, should be required to adopt medium-term responsibility for restoration of surface settlement where PRoWs cross ground that has been disturbed. Given the easily-poached, heavy-clay soils of Holderness and typical dilated and consolidated soil bulk densities, soil settlement is eventually likely to be around 15 - 25 cm (6 - 10 inches). This will attract pools of water and plasticise the soil, resulting, de facto, in cul-de-sac PRoWs because of unfavourable ground conditions, particularly in winter, thereby severely reducing usage and the public health benefits of countryside access. JLAF suggests a watch-period of at least seven years to allow time for soil settlement. With regard to this matter, the cable owner would best deal with the ERYC Countryside Access Team which, ordinarily, would receive reports of access issues from members of the public and/or be aware of such issues through the field experience of its own officers. These reports and observations could be evaluated and passed directly to the company for action. When ground restoration works take place, permissions will have to be sought beforehand and restoration carried out to standards set by ERYC's Countryside Access Team.</p> |                  |
| <p><b>ETG Meeting 19/12/23</b></p>   |                  |
| <p>On the 19th of December 2023, a meeting with the Human Health ETG was held on Microsoft teams. In attendance were the RHDHV EIA Project Manager, RPS Human Health Impact Lead, RWE Onshore Consent Manager, representatives of the UKHSA and OHID and</p>   |                  |

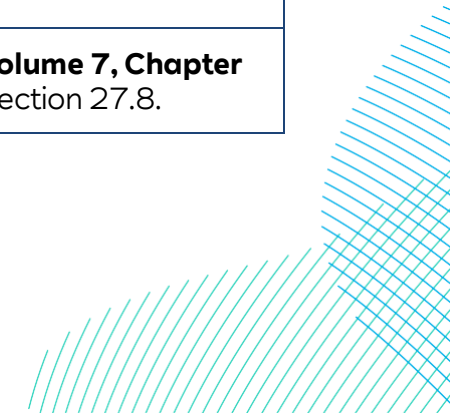


| Comment   | Project Response  |
|---|---|
| <p>the Deputy Director of Public Health (dDPH) for East Riding of Yorkshire Council. The meeting included development of agreement with regards to methods, study area, and scope of the ES health assessment as detailed below.</p>  |   |
| <p><b>Methods</b><br/>The UKHSA/OHID/dDPH agreed in principle with the assessment methodology as set out in the Human Health chapter of the PEIR which follows the guidance provided by IEMA (Pyper, Lamming, et al., 2022; Pyper, Waples, et al., 2022). It was noted that the assessment will consider the local health priorities and needs, as reflected in East Riding's joint health and wellbeing strategy 2023-2028 (East Riding Health and Wellbeing Board, 2023).</p> | <p>The agreed methodology is unchanged for the ES since PEIR and is set out in <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> section 27.4.</p>                             |
| <p><b>Study Area</b><br/>The UKHSA/OHID/dDPH agreed in principle with the study area as set out set out in the Human Health chapter of the PEIR.</p>  | <p>The agreed study area is unchanged for the ES since PEIR and is set out in <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> section 27.3.2.</p>                            |
| <p><b>ES scope</b><br/>The UKHSA/OHID/dDPH agreed in principle with the scope of the assessment as set out in the Human Health chapter of the PEIR.</p>   | <p>The agreed scope is unchanged for the ES since PEIR and is set out in <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> section 27.3.1 and the assessment section 27.6.</p> |
| <p><b>ETG Meeting 25/03/24</b></p>  |   |
| <p>On the 25th of May 2024, a meeting with the Human Health ETG was held on Microsoft teams. In attendance were the RHDHV EIA Project Manager, RPS Human Health Impact Lead, RWE Onshore Consent Manager, representatives of the UKHSA and OHID and the Deputy Director of Public Health (dDPH) for East Riding of Yorkshire Council. Having previously covered the study area, scope and</p>   |   |

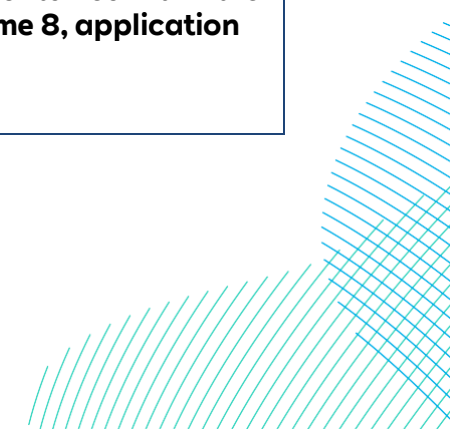




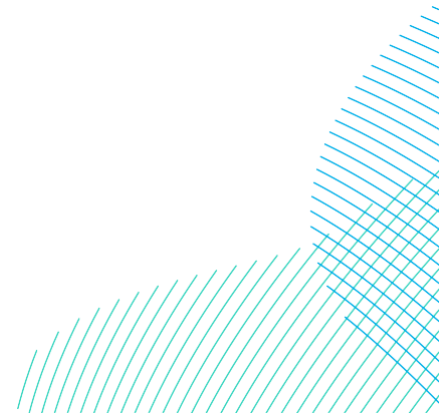
| Comment   | Project Response  |
|---|---|
| <p>methodology for the ES health assessment in the ETG of 19/12/23, the following aspects of <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> were reported.</p>  |   |
| <p><b>ES Findings: Embedded Mitigation</b><br/>Offshore and Onshore Embedded Mitigation measures taken into account in the Human health assessment were described. No issues or concerns were raised by stakeholders.</p>   | <p>Embedded mitigation measures are described in detail in <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> in section 27.3.4.</p>                                      |
| <p><b>ES Findings: Construction and Decommissioning</b><br/>Residual effects for construction and decommissioning effects were compared with those described at PEIR stage and resulted in no changes, ranging from Minor adverse (not significant) to Minor beneficial (not significant). No issues or concerns were raised by stakeholders.</p> | <p>Construction and decommissioning effects are described in detail in <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> in sections 27.6.1 and 27.6.3 respectively.</p> |
| <p><b>ES Findings: Operation</b><br/>Residual effects for the operational phase were compared with those described at PEIR stage and resulted in no changes, ranging from negligible to Minor adverse (not significant) to Moderate beneficial (significant). No issues or concerns were raised by stakeholders.</p>                              | <p>Operational effects are described in detail in <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> in section 27.6.2.</p>   |
| <p><b>ES Findings: Cumulative Effects</b></p>   | <p>Cumulative effects are described in detail in <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> in section 27.8.</p>  |



| Comment   | Project Response  |
|---|---|
| <p>Residual Cumulative effects were summarised with reference to relevant determinands as appropriate to the effects generated by the cumulative scheme listed in the ETG presentation. The conclusions were as for those presented in individual topic assessment ES chapters (e.g. traffic, air quality and noise, and socioeconomic effects). No issues or concerns were raised by stakeholders.</p>   |   |
| <p><b>ES Findings: Interactions</b><br/>           Interactions with respect to different determinants (e.g. noise, upskilling, employment) were presented for construction and decommissioning, and operational phases, using a geographic scale of impact i.e. site specific, local, regional, national and International. The phase assessment and lifetime assessment results concluded ‘No change’ at any geographic level, No issues or concerns were raised by stakeholders.</p> | <p>Interactions are described in detail in <b>Volume 7, Chapter 27 Human Health (application ref: 7.27)</b> in section 27.10.</p>   |
| <p><b>Local Liaison Committee Meetings</b><br/>           Three meetings held in February 2024 at Skipsea, Leven and Beverley with Local Parish Councils and Applicants representatives were reported. Photomontages of the Projects at year 1 and 10 of operation and the Landscape Management Plan were presented at the committee meetings. No concerns were raised overall by attendees of the committee meetings. No comments or concerns were raised by stakeholders.</p>         | <p>Photomontages of the Projects are provided separately in the <b>Design and Access Statement (Volume 8, application ref: 8.8)</b>. The Landscape Management Plan would be developed further post -DCO consent on the basis of principles contained within the <b>Outline Landscape Management Plan (Volume 8, application ref: 8.11)</b>.</p> |



| Comment  | Project Response  |
|--|---|
| <p><b>Agreement Log/ Statement of Common Ground</b><br/>Stakeholders were asked to provide feedback on the Agreement Log as issued to them on 21/03/24 in advance of the ETG meeting. Stakeholders were made aware of its purpose to gain documented agreement with them on the scope, methodology and outputs of the Human Health assessment, and that it would ultimately inform a Statement of Common Ground (SoCG). UKHSA commented that they would liaise internally before formally responding on the Agreement Log and stated that they would formally respond to a SoCG by letter correspondence. No other comments or concerns were raised by stakeholders.</p> | <p>The Agreement Log will be updated following feedback requested from stakeholders. A SoCG will be compiled incorporating responses in the finalised Agreement Log and expected to be developed during the DCO examination period.</p> |



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