

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

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# **Dogger Bank South Offshore Wind Farms**

**Environmental Statement**

**Volume 7**

**Appendix 30-1 Climate Change Consultation Responses**

**June 2024**

**Application Reference: 7.30.30.1**

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| Project:                       | <b>Dogger Bank South Offshore Wind Farms</b>   | Sub Project/Package:         | <b>Consents</b>            |
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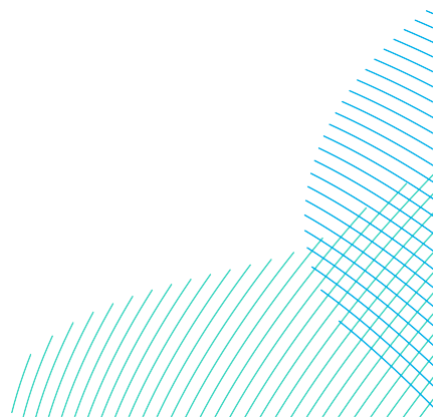
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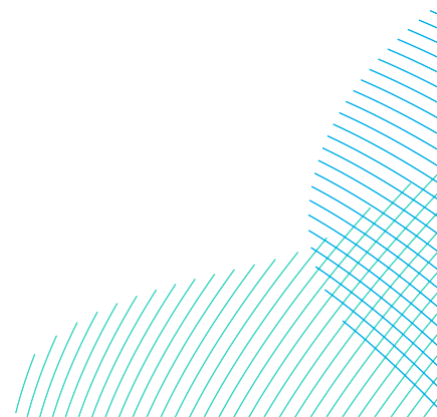
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## Glossary

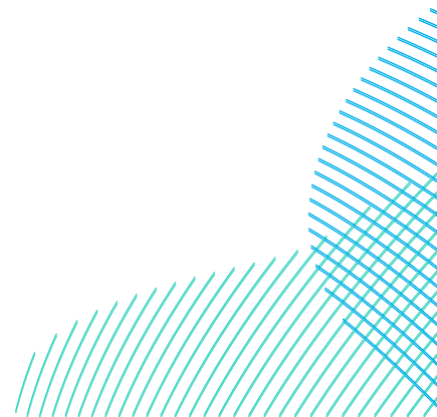
| Term  | Definition  |
|---|---|
| Array cables                                | Offshore cables which link the wind turbines to the Offshore Converter Platform(s).   |
| Baseline                                    | The existing conditions as represented by the latest available survey and other data which is used as a benchmark for making comparisons to assess the impact of the Projects.  |
| Coastal/tidal flooding                      | When high tide events overtop the shoreline to cause flooding to land behind.   |
| Cumulative Effects                          | The combined effect of the Projects in combination with the effects of a number of different (defined cumulative) schemes, on the same single receptor / resource.  |
| Cumulative Effects Assessment               | The assessment of the combined effect of the Projects in combination with the effects of a number of different (defined cumulative) schemes, on the same single receptor/resource.  |
| Dogger Bank South (DBS) Offshore Wind Farms | The collective name for the two Projects, DBS East and DBS West.  |
| 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. |
| Landfall                                    | The point on the coastline at which the Offshore Export Cables are brought onshore, connecting to the Onshore Export Cables at the Transition Joint Bay (TJB) above mean high water.  |
| Planning Inspectorate (PINS)                | The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects (NSIPs).   |

| Term            | Definition   |
|-----------------|--|
| Scoping opinion | The report adopted by the Planning Inspectorate on behalf of the Secretary of State.   |
| Scoping report  | The report that was produced in order to request a Scoping Opinion from the Secretary of State.  |
| Sea level       | Generally, refers to 'still water level' (excluding wave influences) averaged over a period of time such that periodic changes in level (e.g. due to the tides) are averaged out.  |
| Sea level rise  | The general term given to the upward trend in mean sea level resulting from a combination of local or regional geological movements and global climate change.   |
| Surge           | Changes in water level as a result of meteorological forcing (wind, high or low barometric pressure) causing a difference between the recorded water level and the astronomical tide predicted using harmonic analysis.                                      |
| 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   |
|-------|--|
| CCRA  | Climate Change Resilience Assessment               |
| DESNZ | Department for Energy Security and Net Zero        |
| DUKES | Digest of UK Energy Statistics                     |
| ES    | Environmental Statement                            |
| GHG   | Greenhouse Gas                                     |
| IEMA  | Institute of Environmental Management & Assessment |
| NPPF  | National Planning Policy Framework                 |
| PEIR  | Preliminary Environmental Information Report       |



## 30.1 Consultation Responses

### 30.1.1 Introduction

1. This appendix covers those statutory consultation responses that have been received as a response to the Scoping Report (2022) and the Preliminary Environmental Information Report (PEIR) (2023).
2. Response from stakeholders and regard given by the Applicants have been captured in **Table 30-1-1**.

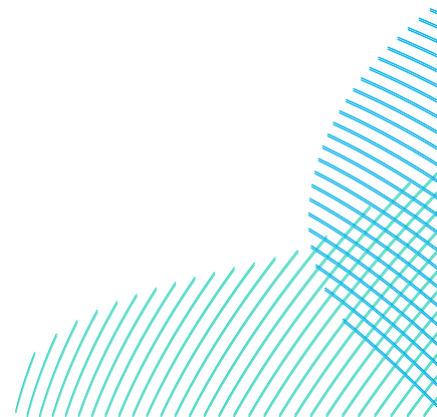
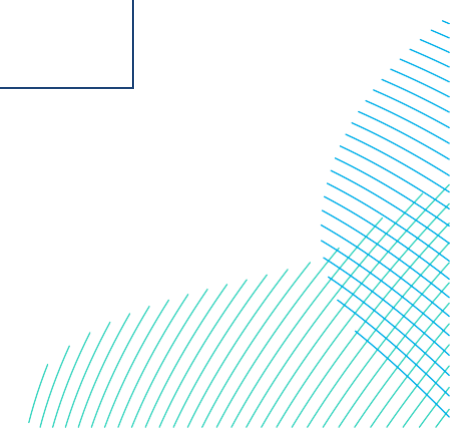


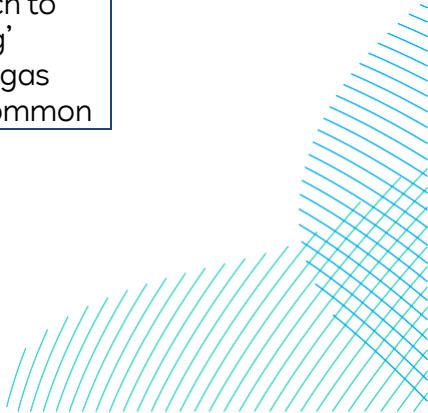
Table 30-1-1 Consultation Responses Related to **Volume 7, Chapter 30 Climate Change (application ref: 7.30)**

| Comment   | Project Response   |
|---|--|
| <b>Scoping Opinion dated 02/09/2022 in relation to Climate Change</b>   |  |
| <p><b>(5.3.1) Cumulative impacts - emissions</b></p> <p>Paragraph 1026 outlines the global approach to assessment of Greenhouse Gas (GHG) emissions, seeking to scope out an assessment with other projects. in line with IEMA guidance. The Inspectorate is in agreement with this approach provided that overall emissions are considered.</p> <p>It is noted from Paragraph 1030 that cumulative effects related to climate resilience of the Proposed Development is to be assessed in each relevant ES chapter (e.g., flood risk and hydrology).</p> | <p>Planning Inspectorate’s agreement with this approach has been noted. The GHG assessment has considered emissions from all phases of the Projects, including construction, operation, and decommissioning. Therefore, a cumulative assessment of GHG emission for the Projects has not been carried out.</p> |
| <p><b>(5.3.2) Vulnerability of infrastructure to climate change (construction and decommissioning)</b></p> <p>The Scoping Report seeks to scope this matter out on the basis that the construction phase is anticipated to take place within the next 10 years and so effects are considered unlikely.</p>  | <p>The construction and decommissioning phases of the Projects have been considered as part of the Climate Change Resilience Assessment (CCRA), which and is detailed within section 30.6.2 of <b>Volume 7, Chapter 30 Climate Change (application ref: 7.30)</b>.</p>   |

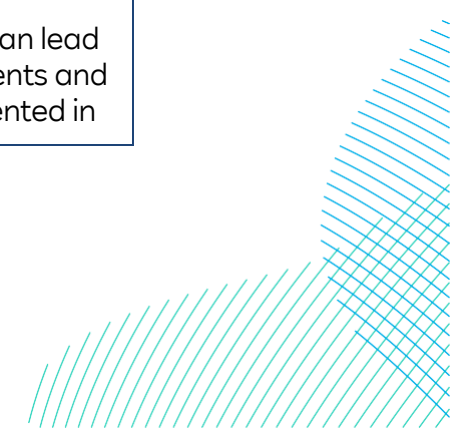




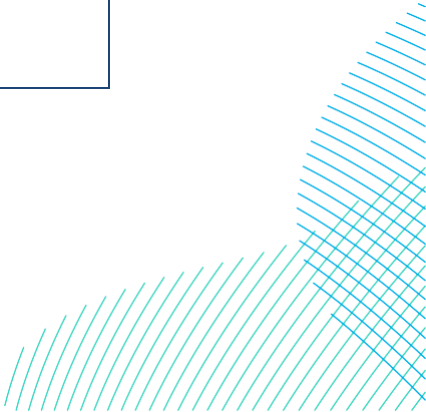
| Comment   | Project Response   |
|---|--|
| <p>The Inspectorate does not understand this rationale given that evidence exists that infrastructure in the UK is already being affected by the effects of climate change.</p> <p>There is an absence of detailed information in the Scoping Report about the sensitivity and risks associated of the receiving environment, and the phasing and timescales of construction. In the absence of this information the Inspectorate cannot agree to scope this matter out of the ES.</p> <p>The ES should provide an assessment of the vulnerability of infrastructure to climate change during construction and decommissioning, where likely significant effects could occur.</p> |  |
| <p><b>(5.3.3) Characterisation of existing emissions and baseline</b></p> <p>Paragraph 1014 indicates that the emissions within the East Riding of Yorkshire are likely to be dominated by industrial and commercial sources, however, does not reference any other sources such as transport emissions. The Inspectorate considers that any baseline information</p>   | <p>Section 30.6.1 of <b>Volume 7, Chapter 30 Climate Change (application ref: 7.30)</b> presents the GHG assessment undertaken as part of ES. As the study area includes the UK grid network and not within the East Riding of Yorkshire, there is a wider focus rather than considering emissions within regional administrative boundary. The approach to determining the baseline environment (or ‘Do Nothing’ scenario) considers the generation of electricity from gas and its resulting GHG emissions, as this is the most common</p> |



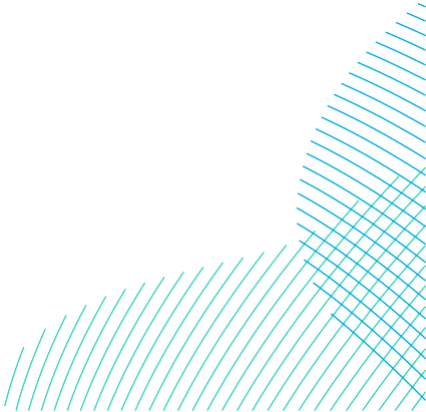
| Comment   | Project Response  |
|---|---|
| <p>should consider all sources of emissions where data is available.</p> <p>The general and brief characterisation of the climate of the east coast of England in Paragraphs 1018-1019 is noted. The ES should contain a detailed characterisation of the receiving environment in so far as it is relevant to the assessment of significant environmental effects, with cross references to related aspect chapters (e.g., the proposed assessment of flood risk) where appropriate.</p> | <p>form of fossil fuel production in the UK, as detailed in section 30.5. GHG's released from electricity generated by gas generation sources instead of the Projects (over the design life) is derived using the DESNZ 2023 Digest of UK Energy Statistics (DUKES) (DESNZ, 2023d). Therefore, the baseline emissions considered in the GHG assessment are not the regional industrial, commercial and transport emissions but the emissions resulting from the generation of electricity from gas instead of electricity generated by the Projects.</p> <p>The CCRA presented in section 30.6.2 of <b>Volume 7, Chapter 30 Climate Change (application ref: 7.30)</b> considered the environmental effects of climate related risk including flooding and was informed by informed presented in relevant chapters such as <b>Volume 7, Chapter 20 Flood Risk and Hydrology (application ref: 7.20)</b> which outlines the potential sources of flood risk.</p> |
| <p><b>(5.3.4) Project vulnerability to climate change</b></p> <p>Paragraph 1029 identifies the potential for the increase in coastal erosion to affect project infrastructure. The ES should detail how the design of the scheme has considered this in relation to location of infrastructure and protective measures, in particular in relation to the identified area of</p>   | <p>See <b>Volume 7, Chapter 8 Marine Physical Process (application ref: 7.8)</b> for details on coastal erosion with consideration for the Projects. The vulnerability and resilience of the Projects to climate hazards which can lead to coastal erosion, including sea level rise, storm events and storm surges are considered within the CCRA, presented in</p>  |



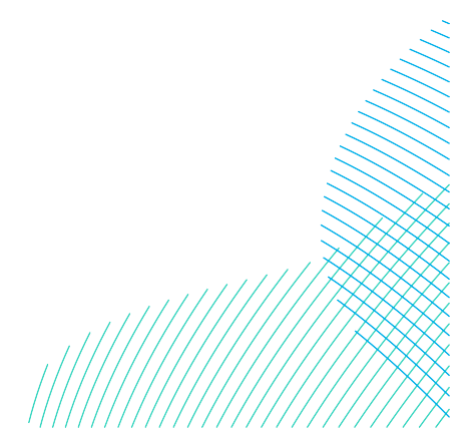
| Comment   | Project Response  |
|---|---|
| <p>rapid erosion at the Holderness Coast (and the potential impacts on the cable landfall point and onshore substations / cable route).</p> <p>Where this assessment identifies design changes to be required, these should also be assessed in the relevant aspect chapter.</p>  | <p>section 30.6.2 of <b>Volume 7, Chapter 30 Climate Change (application ref: 7.30)</b>.</p>  |
| <p><b>(5.3.5) Approach to assessment</b></p> <p>The Inspectorate notes the references in the Scoping report to professional guidance (i.e., ‘Assessing Greenhouse Gas Emissions and Evaluating their Significance’ (Institute of Environmental Management and Assessment, IEMA 2022)) and the assessment being ‘informed’ by ‘Environmental Impact Assessment Guide to: Climate Change Resilience &amp; Adaptation (IEMA 2020). The ES should set out the methodologies used to explain any departure from the proposed approach where professional judgement has been applied, as this is presented in limited detail within the Scoping Report. Outputs from other assessments should be clearly explained where these have been applied.</p> | <p>The GHG assessment has been carried out in accordance with the IEMA guidance (IEMA, 2022), and the assessment methodology is provided in section 30.4.3 and <b>Volume 7, Appendix 30-2 Greenhouse Gas Assessment Methodology (application ref: 7.30.30.2)</b>.</p> |



| Comment   | Project Response   |
|---|--|
| <p><b>Scoping Response - Environment Agency 23/08/2022</b></p>  |  |
| <p>The Environment Agency will be interested to see further details relating to how the project can minimise its emissions. There may be opportunity to work together on shared ambitions. Please contact us to discuss this in more detail. The National Flood and Coastal Erosion Risk Management Strategy (<a href="https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2">https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2</a>) sets out the Environment agency’s vision and objectives.</p> | <p>This chapter presents the climate change and GHG assessment for the Projects, including embodied emissions in materials, and the release of GHGs from marine vessels, road vehicles, helicopters and onshore construction plant and equipment. Further details of measures to reduce the release of GHGs associated with the Projects through design are provided in section 30.3.3 of <b>Volume 7, Chapter 30 Climate Change (application ref: 7.30)</b>.</p> <p>The Environment Agency’s position of setting itself a goal to become a net zero organisation by 2030, whilst being more resilient to flooding and coastal change, as outlined in the National Flood Coastal Erosion Risk Management Strategy is acknowledged.</p> |



| Comment  | Project Response  |
|--|---|
| <p><b>Scoping Response - Natural England 23/08/2022</b></p>  |   |
| <p>The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.</p> | <p>See <b>Volume 7, Chapter 18 Terrestrial Ecology and Ornithology Appendix 18-10 Biodiversity Net Gain Strategy (application ref: 7.18)</b> for details of the Biodiversity Net Gain strategy.</p> |



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