RWE Renewables UK Dogger Bank South (West) Limited

RWE Renewables UK Dogger Bank South (East) Limited

Dogger Bank South Offshore Wind Farms

Coastal Erosion Rate Technical Note

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Company:	**RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited**	Asset:	**Development**
Project:	**Dogger Bank South Offshore Wind Farms**	Sub Project/Package	**Consents**
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Rev No.	Date	Status/Reason for Issue	Author	Checked by	Approved by
01	December 2024	First Issue	RHDHV	RWE	RWE

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Glossary

Term	Definition
Erosion	Wearing away of the land or seabed by natural forces (e.g. wind, waves, currents, chemical weathering).
Intertidal	Area on a shore that lies between Mean High Water Springs (MHWS) and Mean Low Water Springs (MLWS).
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.
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

Acronym	Definition
DGPS	Differential Global Positioning System
ES	Environmental Statement
ERYC	East Riding of Yorkshire Council
Lidar	Light Detection and Ranging

1 Introduction

1. This technical note addresses **Natural England's Relevant Representations** [RR-039] and comments received from the **Environment Agency** in an email sent to the Applicants on 23rd August 2024 related to coastal change (beach elevation change, platform lowering, and cliff erosion) presented in **Chapter 8 Marine Physical Environment** [APP-080].

2 Natural England Responses

2. Natural England are concerned that:

- The beach elevation change data presented in **Chapter 8 Marine Physical Environment** [APP-080] from 2008 to 2015 is out of date and there is insufficient information regarding beach elevation change and shore platform lowering; and
- The use of the UKCP18 high emission scenario (RCP8.5) at the 50% confidence level is not consistent with the National Coastal Erosion Risk Mapping project (NCERM2) which uses the 70% and 95% confidence levels.

2.1 Beach Elevation and Platform Lowering Comments

3. The Natural England comment RR-039: B20 and RR-039: B36 reads:

Natural England notes that it is stated that "The drill, or other trenchless installation, bore would be of sufficient depth below the ground level to have no effect on coastal erosion. The TJBs (Transition Joint Bays) would be located beyond any areas at risk of natural coastal erosion across the anticipated operational life of the Projects". However, we note that East Riding of Yorkshire Council (ERYC) historical and recent cliff recession rates have been used to demonstrate rates of change at landfall. Therefore, we consider the beach elevation change data presented in the ES from 2008-2015 to be out of date.

Establishing historical and more recent trends in beach and shore platform elevation change is a key part of the baseline characterisation for the marine (coastal) physical environment. This will help inform understanding of how the coast (at landfall) may evolve naturally over the lifetime of the Projects, establish coastal morphology sensitivity to scheme impacts, and inform asset integrity and cable burial assessments.

Natural England is concerned that currently there is insufficient information regarding beach elevation change and shore platform down wearing to inform the assessment of potential construction- and operation-related impacts to coastal morphology at landfall.

2.2 Beach Elevation and Platform Lowering Response

4. The Applicants have received Lidar data for the beach at the landfall from East Riding of Yorkshire Council. Data has been made available from 2008, 2013, 2018 and 2024, which are compared here to assess beach/shore platform elevation change across the intertidal landfall area. The results are shown in **Plates 2-1** to **2-4**.

5. Comparison of the Lidar data between 2008 and 2013 shows that most of the intertidal area eroded or was relatively stable. Between 2013 and 2018, most of the intertidal area accreted with small areas of erosion. Over the most recent period 2018-2024, a degree of stability has been established at the landfall. Although there have been short-term changes in morphology, over the medium term (16 years), between 2008 and 2024 the elevation of the intertidal area at the landfall has been relatively unchanged (**Plate 2-4**). There is a linear strip of erosion at the top of the beach, which is likely related to removal of sediment from within the toe of the cliff.

6. The new information presented here is sufficient to demonstrate that the conclusions reached in Section 8.7.3.9 of **Chapter 8 Marine Physical Environment** [APP-080] are robust and the magnitude of impact of construction activities remains negligible with a minor adverse significance of effect.

7. With respect to operation, one of the main uncertainties is the depth to which the cables should be buried across the beach. At the landfall, beach sand overlies the shore platform. A linear extrapolation of the intertidal elevation (beach and platform) established through the Lidar comparisons would mean that over the lifetime of the Projects the average elevation would remain stable. However, the future evolution of the intertidal area is unlikely to be linear and will largely depend on the position of future water (sea) levels. Accelerated sea-level rise will tend to increase the potential for erosion if a constant sediment supply is assumed. Even with the potential for increased intertidal erosion, the cables will be buried at depths that are sufficient so that they will not be exposed over the Projects lifetime. Hence, from an operational perspective there will be no impacts on coastal erosion/processes during operation.

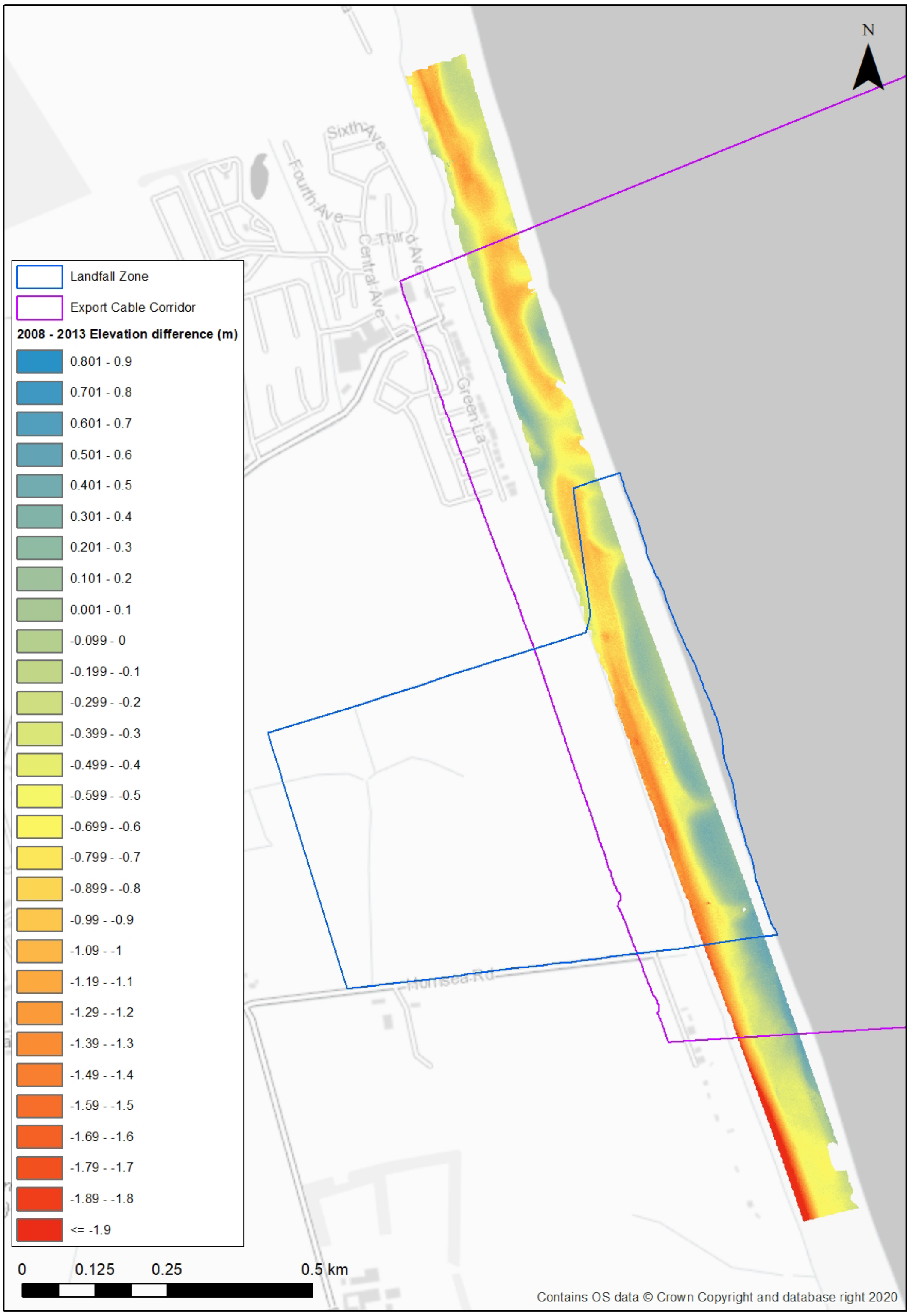

Plate 2-1 Elevation difference between the 2008 and 2013 Lidar surveys across the intertidal area of the landfall

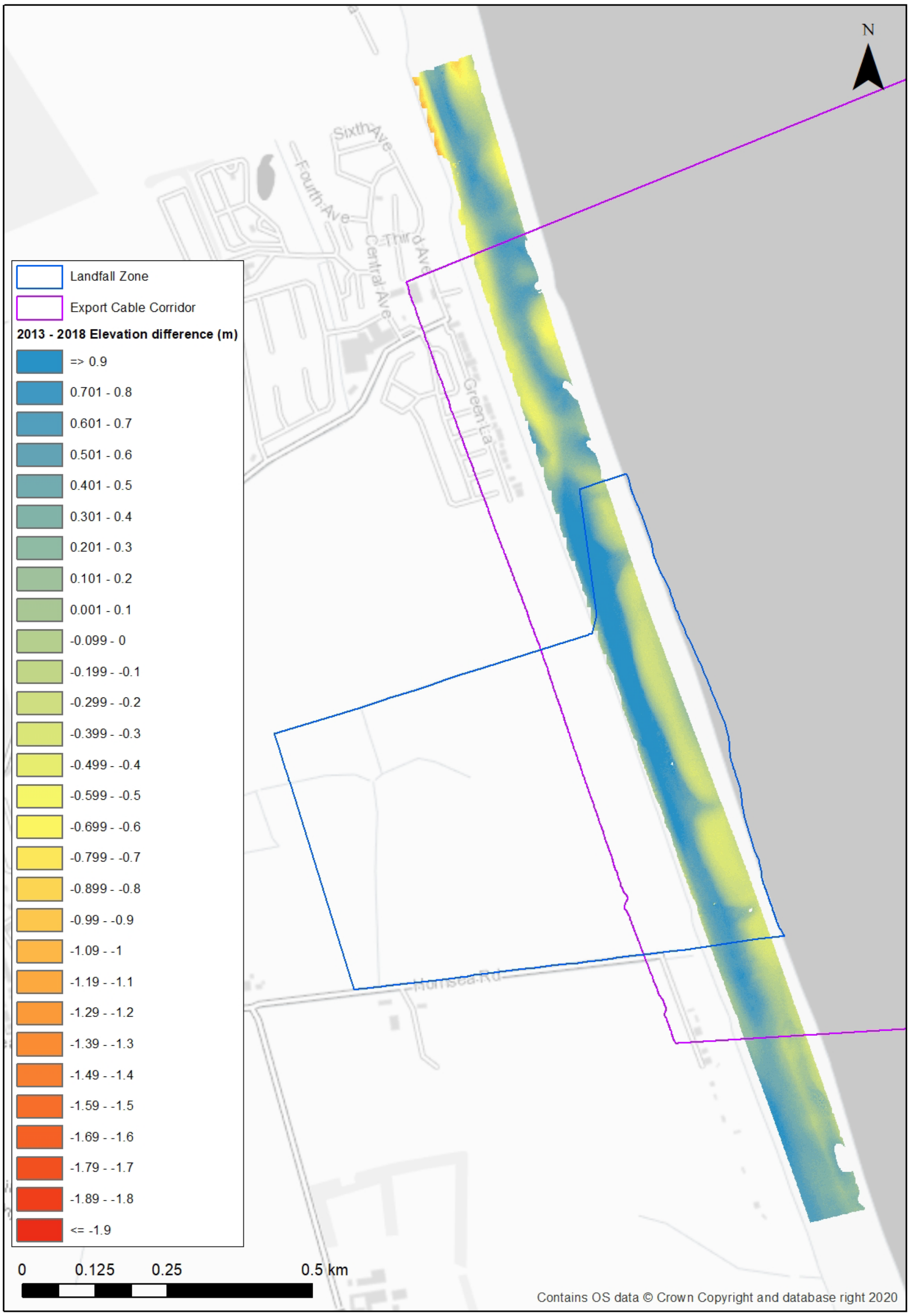

Plate 2-2 Elevation difference between the 2013 and 2018 Lidar surveys across the intertidal area of the landfall

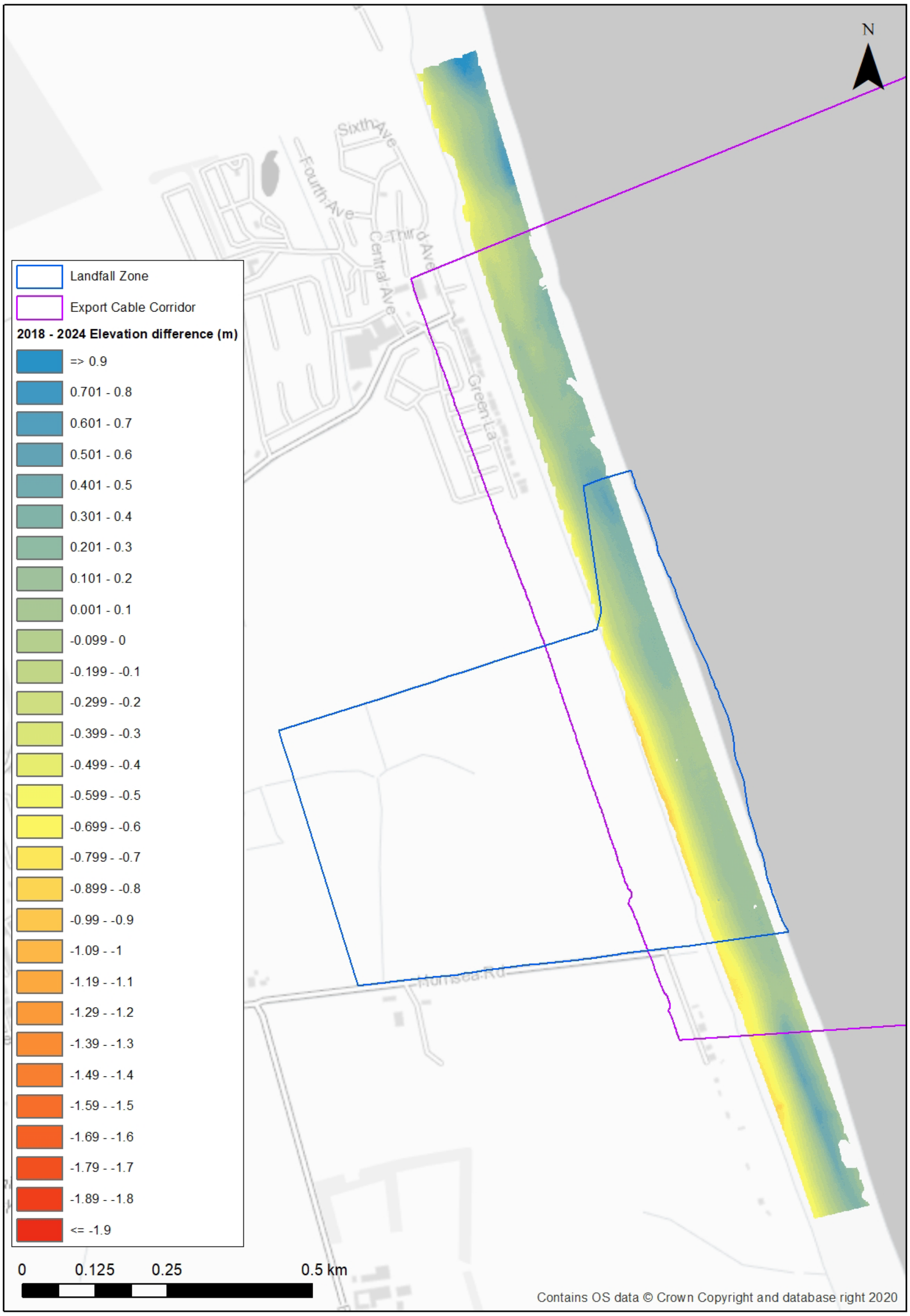

Plate 2-3 Elevation difference between the 2018 and 2024 Lidar surveys across the intertidal area of the landfall

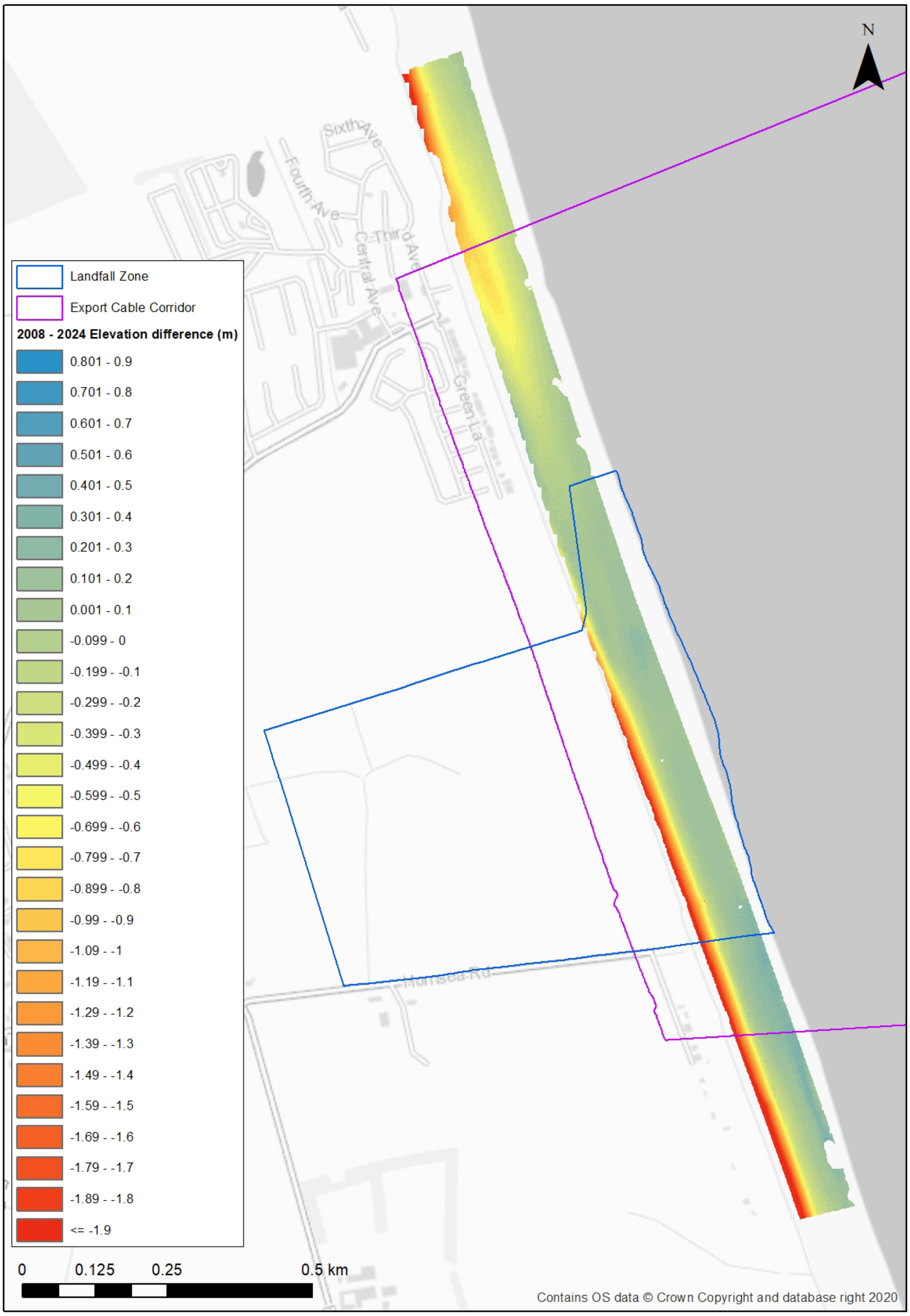

Plate 2-4 Elevation difference between the 2008 and 2024 Lidar surveys across the intertidal area of the landfall

2.3 Coastal Erosion and UKCP18 Emissions Scenarios Comments

8. The Natural England comment RR-039: B23 reads:

Natural England notes that data on coastal erosion was obtained from East Riding of Yorkshire Council to provide an historic understanding of coastal change. Predictions of coastal erosion were made using the UKCP18 high emission scenario (RCP8.5) at the 50% confidence level. However, we advise that the revised National Coastal Erosion Risk Mapping project (NCERM2; https://www.data.gov.uk/dataset/4b723013-b676-4202-aab5-a2bc449c72fb/national-coastal-erosion-risk-management-ncerm), which uses the 70th and 95% confidence level to predict worst case erosion rates should be used.

2.4 Coastal Erosion and UKCP18 Emissions Scenarios Response

9. The Applicants have received up-to-date coastal erosion data (up to May 2024) from ERYC. Further, after a review of **Chapter 8 Marine Physical Environment** [APP-080], the predicted erosion rates data provided in Table 8-20 of that chapter using the UKCP18 high emission scenario (RCP8.5) at the 50% confidence level are incorrect. They are revised in **Table 2-3** using the May 2024 coastal erosion data, the UKCP18 medium emission scenario (RCP4.5) at the 50% confidence level (most likely best estimate scenario).

10. The erosion rates at profiles 24 to 31 up to May 2024 are shown in **Table 2-1** spanning the record between 1852 and 2003 (historic erosion rates) and the record between 2003 and 2024 (recent erosion rates). The distinction between historic and recent erosion rates is made as they have been determined using different techniques. The recent erosion rates are considered more accurate as they are measured using Differential Global Positioning System (DGPS). It should be noted the values presented in **Table 2-1** differ from those presented in Table 8-18 of **Chapter 8 Marine Physical Environment** [APP-080] in response to the Environment Agencies comments (see section 3.6 for further details).

Table 2-1 Average historic cliff erosion at the landfall for each of the ERYC coastal profiles

Profile	Location	Historic erosion rate (1852 to 2003) (m/year)	Recent erosion rate (2003 to 2024) (m/year)
24	Between defences opposite Southfield Lane, Ulrome	1.48	1.44
25	North end of Green Lane, Skipsea	1.48	1.77

Profile	Location	Historic erosion rate (1852 to 2003) (m/year)	Recent erosion rate (2003 to 2024) (m/year)
26	South of Green Lane, Skipsea	1.53	1.38
27	Opposite Skipsea village	1.22	1.57
28	Opposite bungalows to south of Skipsea	1.17	1.84
29	To south of Withow Gap, Skipsea	0.96	1.90
30	Within golf course to north of Skirlington	0.99	1.30
31	North end of Skirlington campsite	1.07	1.03

11. A historic sea-level rise of 1.73mm/year is used (unchanged from the analysis presented in **Chapter 8 Marine Physical Environment** [APP-080]). Predicted changes in future relative sea-level using UKCP18 RCP4.5 50% confidence level are shown in **Table 2-2** and **Plate 2-5**.

Table 2-2 Changes in relative sea level under the 50th percentile medium emissions scenario using a 2024 baseline

Year	Medium emissions 50th percentile (m)	
	Relative sea-level (m)	Average rate of relative sea-level rise (mm/year)
2024	0.0	0.0
2034 (10 years)	0.047	4.70
2044 (20 years)	0.099	4.97
2054 (30 years)	0.155	5.16
2074 (50 years)	0.271	5.42

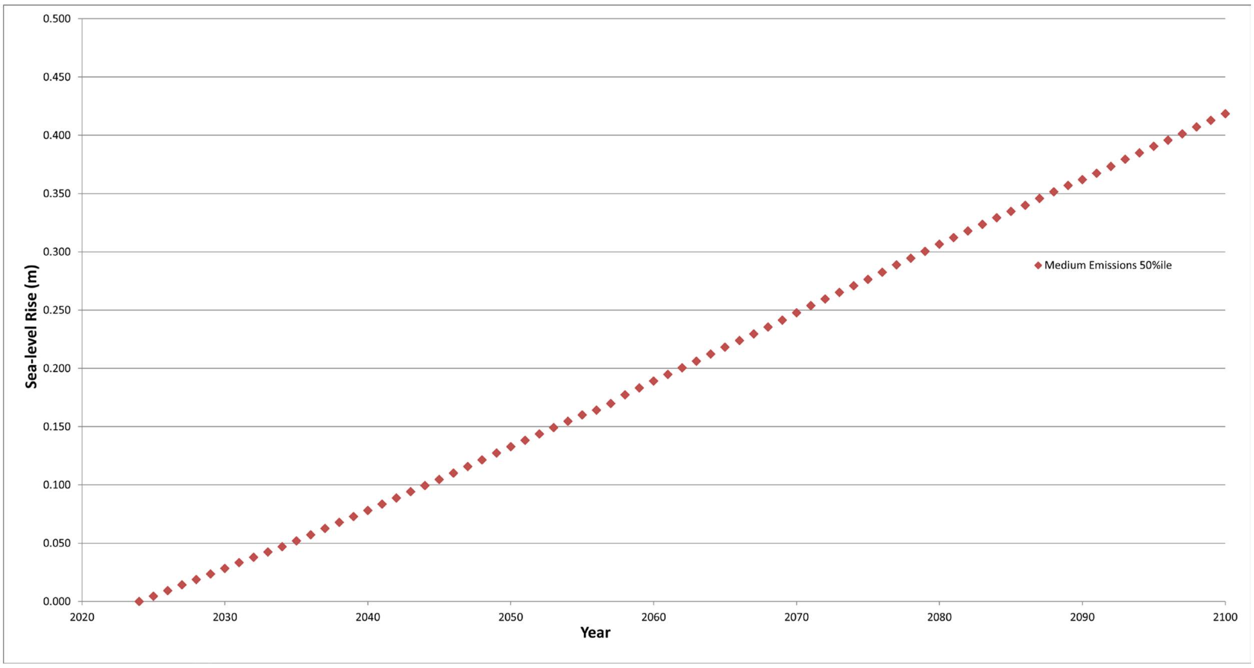

Plate 2-5 Changes in relative sea level under the 50th percentile medium emissions scenario using a 2024 baseline

12. NCERM splits the English coast into frontages defined as lengths of coast with consistent characteristics based on the cliff behaviour and the type of defence. It provides a dataset showing erosion extents and rates for a No Active Intervention Policy Scenario at Skipsea for three periods using the 5th, 50th and 95th percentile confidence levels:

- Short Term (0 to 20 years;
- Medium Term (20 to 50 years); and
- Long Term (50 to 100 years).

13. The initial NCERM (1) uses outdated methods to estimate future erosion rates and the percentile confidence levels were not based on probability. Also, NCERM1 is primarily for national use, and only for local use in the absence of better local knowledge. Because of these potential flaws, NCERM1 is currently being superseded by NCERM2, which is adopting a different and more robust approach, which is validated locally.

14. The results of NCERM2 are not publicly available yet, and so cannot be presented here as has been requested by Natural England. Should NCERM2 be made available (estimated to be in 2025) whilst the DBS DCO Examination is ongoing the Applicants will be happy to present erosion predictions around the proposed the landfall as requested.

15. In the absence of the availability of NCERM2 the Applicants suggest that the forecasts of coastal erosion presented represent a pragmatic and reasoned forecast.

16. To predict future coastal erosion rates, the forward projection equation of Leatherman (1990) is used (unchanged from the analysis presented in **Chapter 8 Marine Physical Environment**): **Equation 1: $R_P = R_H . (S_P/1.73)$** where:

- R_P = predicted erosion rate (m/year);
- R_H = historic erosion rate (m/year); and
- S_P = predicted relative sea-level rise (mm/year).

17. The predicted future erosion rates at each profile (based on the 50th percentile medium emissions scenario) combining the historic cliff erosion rates with the best estimate of future sea-level rise are shown in **Table 2-3**. It should be noted that these figures present an update to the figures presented in Table 8-20 of **Chapter 8 Marine Physical Environment** [APP-080]. These figures were not used to inform the assessment in that chapter and were shown to indicate a potential future baseline of trends of cliff erosion. As such, the updated figures presented below do not affect the original assessment conclusions reached in **Chapter 8 Marine Physical Environment** [APP-080].

Table 2-3 Projected cliff erosion rates at the landfall profiles based on the 50th percentile medium emissions scenario

Erosion Profile Details		Erosion rate (m/year)				
		Historic	Future			
Profile	Location	2003 to 2023	10 years	20 years	30 years	50 years
24	Between defences opposite Southfield Lane, Ulrome	1.44	3.90	4.13	4.29	4.50
25	North end of Green Lane, Skipsea	1.77	4.82	5.10	5.29	5.56
26	South of Green Lane, Skipsea	1.38	3.74	3.96	4.11	4.32
27	Opposite Skipsea village	1.57	4.27	4.51	4.68	4.92
28	Opposite bungalows to south of Skipsea	1.84	5.00	5.29	5.49	5.77
29	To south of Withow Gap, Skipsea	1.90	5.17	5.46	5.67	5.96
30	Within golf course to north of Skirlington	1.30	3.54	3.74	3.88	4.08
31	North end of Skirlington campsite	1.03	2.80	2.96	3.08	3.23

18. Predictions of future coastal erosion using the UKCP18 medium emission scenario (RCP4.5) at a 50% confidence level suggest the maximum cliff retreat distance at the landfall will be 52m over the next 10 years, 109m over the next 20 years, 170m over the next 30 years and 298m over the next 50 years.

3 Environment Agency Responses

19. The Environment Agency comments (issued by email to the Applicants on 23rd August 2024) relate specifically to the coastal erosion analysis presented in **Chapter 8 Marine Physical Environment** [APP-080] (see **Appendix A –Environment Agency's Marine Physical Environment Queries** for a copy of the EA's original request for further information). A summary of their comments is presented below:

- Has the Leatherman equation used in the prediction of cliff erosion rates been validated elsewhere?
- Are there any other places/methods which show a five-fold increase in erosion rate within 10 years?
- Why is the historic erosion rate (1852-1989) higher than the most recent rate (1989-2023)?
- In Table 8-20 why is the 20-year rate lower than the 10-year rate for all locations?

3.1 Leatherman Equation Comment

20. The Environment Agency comment reads:

- *(The EA) would like some more information on the coastal erosion rates they are planning on using Leatherman equation - has this been validated in any other part of the world or a coast similar to the Holderness? Are there any other places/methods which show a five-fold increase in erosion rate within 10 years?*

3.2 Leatherman Equation Response

21. The estimation of the future shoreline along Holderness is complex, due to the stochastic nature of cliff erosion, which is apparent from irregular cliff lines and the observation data that records losses up to 10m within a single year. The most widely used models to forecast cliff-top erosion are empirical and use historical trend analysis from a knowledge of historic cliff erosion rates (Leatherman, 1990; Bray and Hooke, 1997; Lee and Clark, 2002; Lee 2012, 2014; Gorokhovich and Leiserowiz, 2012; Castedo *et al.*, 2015, 2017). Two methods of historical trend analysis have typically been adopted to predict future cliff erosion:

- Direct extrapolation of historic trends into the future without incorporating potential increases due to higher rates of relative sea-level rise (Lee and Clarke, 2002); and
- Forward projection including potential increases to account for higher rates of relative sea-level rise (Leatherman, 1990).

22. Other methods to predict cliff erosion include systems-based models such as the Soft Cliff and Platform Erosion (SCAPE) model (Walkden and Hall, 2005) and Coastal Modelling Environment (CoastalME) model (Payo *et al*., 2018). These systems-based models have not been used, and the forward projection method is preferred, for the following reasons:

- Projection uses a constant (historic erosion) in the method adding a degree of certainty that is not inherent in systems-based models. The systems-based models, whilst considering material strength, and wave and tidal characteristics, do not include historic data in their calculations. Past activity is a better indicator of how a coast will respond to future relative sea-level rise, subaerial forcing and wave action compared to systems-based models.
- Systems-based models are limited by the assignment of a single material strength to a cliff that may have different strengths. Also, they only consider influencing marine processes and do not take account of subaerial drivers of cliff recession, which contribute to mass movement.
- The projection equation is simple and has few uncertain elements, whereas systems-based modelling is more complex with a range of elements that introduce more uncertainty.

23. Although there are limitations and uncertainties with all the possible methods that could be used to estimate future cliff recession rates, the Leatherman method was chosen in this case because the uncertainties inherent in the projection method are smaller than those associated with the other methods. Also, it has been used by Lee (2012, 2014) on similar coasts in the UK.

3.3 Erosion Rate Comments

24. The Environment Agency comments read:

- *Are there any other places/methods which show a five-fold increase in erosion rate within 10 years?*; and
- *In Table 8-20 why is the 20-year rate lower than the 10-year rate for all locations?*

3.4 Erosion Rate Response

25. After a review of **Chapter 8 Marine Physical Environment** [APP-080], the predicted erosion rates data provided in Table 8-20 using the UKCP18 high emission scenario (RCP8.5) at the 50% confidence level are incorrect. They are revised here using May 2024 coastal erosion data (provided by ERYC), the UKCP18 medium emission scenario (RCP4.5) at the 50% confidence level (most likely best estimate scenario). The methodology and results are presented in section 1.1.4 of this document. Erosion rates using the results of NCERM2 will be provided once they become publicly available.

3.5 Historic v Recent Erosion Rates Comment

26. The Environment Agency comment reads:

- *Why is the historic erosion rate (1852-1989) higher than the most recent rate (1989-2023) - is it a variation in how the rate is calculated using maps v surveying? It would be expected that the historic rate, when there was less carbon in the atmosphere and a more stable sea level, to be lower than the last 25 years or so, when the sea level rise and associated issues would be more pronounced. Any errors in measurement should be removed if possible before using erroneous data to calculate future recession rate*; and
- *If they combine the most recent and historic rates whole rate as they are proposing, they will need to provide more information on how representative it is. By averaging the rate over the whole time the rate it is higher than the most recent rate, which is good in terms of conservativism in the approach but we will need assurances that it is representative of how the coast is changing in the environment - especially as the historic rates has the longest period of time and so the rate will be weighted to take that more into account*.

3.6 Historic v Recent Erosion Rates Response

27. For the reasons stated, cliff erosion rates would typically be higher in more recent times. The 'recent' average erosion rate detailed in Table 8-18 of **Chapter 8 Marine Physical Environment** [APP-080] utilised a date range between 1989 and 2023, which potentially trended the average erosion lower due to average erosion rates pre-2003 being historically lower than rates post-2003. As such, in

28. **Table** 2-1 the original date ranges for the 'historic' and 'recent' average erosion rates have been amended to better reflect the changes in recent erosion rates from the historic values and provide a more representative value for recent average erosion rates.

29. Using the recently provided May 2024 data from ERYC, average erosion rates between 2003 and 2024 are generally higher than those between 1852 and 2003 (profiles 25, 27, 28, 29, and 30, representing 63% of the profiles,

30. **Table** 2-1). The historic and recent rates are similar along two profiles (24 and 31). Only one profile (26) shows a significant reduction in average erosion rate. Hence, most of the cliff at the landfall is eroding faster now (last 20 years) than it did for the 150-year period prior to 2003.

4 Summary

31. The beach elevation change data presented in **Chapter 8 Marine Physical Environment** [APP-080] has been updated in this note to include data from 2008, 2013, 2018 and 2024. The time series has been compared to assess beach/shore platform elevation change across the intertidal landfall area. The results show:

- Between 2008 and 2013 shows that most of the intertidal area eroded or was relatively stable.
- Between 2013 and 2018, most of the intertidal area accreted with small areas of erosion.
- Between 2018 and 2024, most of the intertidal area was stable.
- Overall, between 2008 and 2024 the elevation of the intertidal area at the landfall has been relatively unchanged.

32. The new information presented here does not affect the conclusions reached in **Chapter 8 Marine Physical Environment** [APP-080] on the impacts and effects of construction and operation at the landfall.

33. The prediction of future cliff erosion presented in **Chapter 8 Marine Physical Environment** [APP-080] has been updated here. These predictions will be further updated using the results of NCERM2 when they are made publicly available, assuming that they become available during the course of the DBS DCO Examination.

34. In this note using historic cliff erosion data up to May 2024, the UKCP18 medium emission scenario (RCP4.5) at the 50% confidence level results show that the landfall cliff will erode 52m over the next 10 years, 109m over the next 20 years, 170m over the next 30 years and 298m over the next 50 years. This represents a reduction to the values presented in the original version of **Chapter 8 Marine Physical Environment** [APP-080], which noted a potential maximum cliff retreat distance at the possible landfall location of 56m over the next 10 years, 110m over the next 20 years, 175m over the next 30 years and 322m over the next 50 years.

5 References

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Appendix A – Environment Agency's Marine Physical Environment Queries

Outlook

FW: URGENT Dogger Bank South Offshore Wind Farm- further info requested

From: Wallace, Neil [redacted]@environment-agency.gov.uk>
Sent: Friday, August 23, 2024 3:16 PM
To: Dogger Bank South <dbs@rwe.com>
Cc: Wilcock, Matthew [redacted]@environment-agency.gov.uk>; Burns, Oli [redacted]@environment-agency.gov.uk>; Booth, Lily [redacted]@environment-agency.gov.uk>; Sustainable Places, Yorkshire <sp-yorkshire@environment-agency.gov.uk>
Subject: [EXT] URGENT Dogger Bank South Offshore Wind Farm- further info requested
Importance: High

Hello,

I'm contacting you on behalf of other Env Agency colleagues who are presently on leave. I've been forwarded the below email and now seeking your URGENT assistance to gain further information/ clarification ahead of an approaching deadline for written representations.

Would someone be able to assist in replying to me with the requested details between where highlighted?

Apologies if this information has already been requested/ obtained – I'm not involved in this scheme.

Thanks.

Neil Wallace

Planning Specialist - Sustainable Places (Yorkshire)
Email: sp-yorkshire@environment-agency.gov.uk
Environment Agency | Lateral, 8 City Walk, Leeds, LS11 9AT

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I have gone through the Marine Physical Environment chapter, and I have some concerns about the recession rate and the calculation of the increased rate with sea level rise in this submission and the other ongoing Dogger Bank scheme – which is why Lizzie and James are copied in.

I would like some more information on the coastal erosion rates they are planning on using Leatherman equation - has this been validated in any other part of the world or a coast similar to the Holderness? Are there any other places/methods which show a five-fold increase in erosion rate within 10 years?

Why is the historic erosion rate (1852-1989) higher than the most recent rate (1989-2023) - is it a variation in how the rate is calculated using maps v surveying? I would expect the historic rate, when there was less carbon in the atmosphere and a more stable sea level, to be lower than the last 25 years or so, when the sea level rise and associated issues would be more pronounced. They need to make sure any errors in measurement are taken out if possible before using erroneous data to calculate future recession rate. If they combine the most recent and historic rates whole rate as they are proposing, they will need to provide more information on how representative it is. By averaging the rate over the whole time the rate it is higher than the most recent rate, which is good in terms of conservativism in the approach but we will need assurances that it is representative of how the coast is changing in the environment - especially as the historic rates has the longest period of time and so the rate will be weighted to take that more into account.

Please could you also ask why in Table 8-20 why is the 20 year rate lower than the 10 year rate for all locations?

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From: Wilcock, Matthew [redacted]@environment-agency.gov.uk>
Sent: Thursday, August 8, 2024 5:01 PM
To: Crook, Anthony [redacted]@environment-agency.gov.uk>; Piercy, David [redacted]@environment-agency.gov.uk>; NE Yorkshire Groundwater <NEYorkshireGroundwater@environment-agency.gov.uk>; Jennings, Richard [redacted]@environment-agency.gov.uk>; L&W Coast, Hull, Esk and Derwent <CHED1@environment-agency.gov.uk>; Yorkshire Waste <YorkshireWaste@environment-agency.gov.uk>; Nash, Chris [redacted]@environment-agency.gov.uk>; Foster, Amanda [redacted]@environment-agency.gov.uk>; Burns, Oli [redacted]@environment-agency.gov.uk>
Subject: ACTION REQUIRED by 30/08: Dogger Bank South Offshore Wind Farm Relevant Representations
Importance: High

Good afternoon all,

This is to make you aware of an important consultation we have received which we are required to review.

DPS Ref: RA/2024/147428/01
Cost Code: ENVPAC/1/YOR/00305 – Please record all time spent against this code

Project Description
Dogger Bank South Offshore Wind Farm

The RWE application for the Dogger Bank South (DBS) Offshore Wind Farm Project Development Consent Order has been submitted to and accepted by the Planning Inspectorate. The statutory consultation period has formally commenced and we need to review the proposals in so far as they relate to our remit.

Project Description
In summary, the Projects involve construction of two offshore wind farms known as Dogger Bank South East ("DBS East") and Dogger Bank South West ("DBS West"), both located in the North Sea on the Dogger Bank and the associated development to connect the proposed offshore wind farms to the national grid. The Projects would have a combined maximum number of 200 turbines. The offshore array areas for DBS West and DBS East are situated at a minimum of 100km and 122km from shore respectively. The proposed onshore works consist of installation of buried onshore export cables, from a landfall on the East Riding of Yorkshire coastline near Skipsea to (up to) two newly constructed onshore converter stations near the hamlet of Bentley, before onward onshore cable routeing to the proposed Birkhill Wood National Grid substation close to the existing Creyke Beck substation. Further information about the proposed Projects is available at www.doggerbanksouth.co.uk.

All of the consultation documents are on the Planning Inspectorate website Dogger Bank South DCO submission documents (planninginspectorate.gov.uk)

There are a lot of documents and a huge amount of information, so please see the **Application Guide** (attached), which lists all documents submitted to help you focus on the most relevant documents. Links to the documents can be found in the Examination Library (https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010125/EN010125-000619-Dogger%20Bank%20South%20-%20Examination%20Library.pdf)

I suggest that all consultees review the following documents:

- 1.1 Cover letter
- 1.4 Application Guide
- 2.1 Site Location Plan (Offshore)
- 2.2 Site Location Plan (Onshore)
- 3.1 Draft Development Consent Order - this is the drafted consent, it is subject to change as we go through the examination. Specific area of interest includes Schedule 2, part 1, which lists the conditions on the DCO, known as Requirements.
- 3.2 Explanatory memorandum
- 7.1 ES Introduction
- 7.4 Consideration of Alternatives
- 7.5 ES Project Description
- 7.6 EIA Methodology

In addition to these documents you should review the chapters of the Environmental Statement and any other documents that are relevant for you to consider. It is helpful if in your response you are clear about the documents you have reviewed and are referring to.

Please can you review these documents having regard to any comments you made during previous consultations on this project and identify any issues or impacts associated with the project that you feel have yet to be resolved or require further information / work before we can agree to the proposals?

Consultation Deadline
Please ensure that you / your team provide your comments either by email or on DPS (if you have access), under DPS reference RA/2024/147428/01. If you do not have access to DPS, please respond via return to this email. Your deadline to respond is **Friday 30th August**. Please try to stick to this. Our final response must be registered with PINS by midnight on 6th September – this is non-negotiable. Speak to me asap if you are struggling. At this stage in the process I would rather have a less detailed response but on time, than one which is late.

Please note this is a statutory consultation and following changes to legislation we now recover all costs for work on NSIPS, therefore please record all time against: **ENVPAC/1/YOR/00305**

If you have any questions, please contact me asap. Please be aware, I am on leave from 15th August until 3rd September. If you have any queries in this time please email our team inbox sp-yorkshire@environment-agency.gov.uk.

Many thanks

[redacted]
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External: [redacted]
Mobile: [redacted]

Working days: Monday to Thursday (Tuesday-Friday from September)

Pronouns: [redacted] (why is this here?)

Creating a better place for people and wildlife

RWE Renewables UK Dogger Bank
South (West) Limited

RWE Renewables UK Dogger Bank
South (East) Limited

Windmill Business Park
Whitehill Way
Swindon
Wiltshire, SN5 6PB