

RWE Renewables UK Dogger Bank  
South (West) Limited

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South (East) Limited

Dogger Bank South Offshore  
Wind Farms

Project Change Request 2 – Onshore Substation  
Zone

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The Figures included in Appendix A are submitted solely to illustrate the proposed change and are not intended to replace the equivalent plans currently submitted as part of the DCO application.

Appendix B – Project Change Request 2 – Onshore Substation Zone Targeted Non-Statutory Consultation Letter

Appendix C - Project Change Request 2 – Onshore Substation Zone Site Notice Letter and Locations Plan

Appendix D - Project Change Request 2 – Consultation Responses

## Glossary

Term	Definition
Aquifer	Geological strata that hold water.
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.
Concurrent Scenario	A potential construction scenario for the Projects where DBS East and DBS West are both constructed at the same time.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
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.
Environmental Statement (ES)	A document reporting the findings of the EIA and produced in accordance with the EIA Directive as transposed into UK law by the EIA Regulations.
Groundwater	Water stored below the ground in rocks or other geological strata.
Haul Road	The track along the Onshore Export Cable Corridor used by traffic to access different sections of the onshore export cable route for construction.
Impact	Used to describe a change resulting from an activity via the Projects, i.e. increased suspended sediments / increased noise.
In Isolation Scenario	A potential construction scenario for one Project which includes either the DBS East or DBS West array, associated offshore and onshore cabling and only the eastern Onshore Converter Station within the Onshore Substation Zone and only the northern route of the onward cable route to the proposed Birkhill Wood National Grid Substation.

Term	Definition
Intertidal	Area on a shore that lies between Mean High Water Springs (MHWS) and Mean Low Water Springs (MLWS).
Onshore Converter Stations	A compound containing electrical equipment required to transform HVDC and stabilise electricity generated by the Projects so that it can be connected to the electricity transmission network as HVAC. There will be one Onshore Converter Station for each Project.
Onshore Development Area	The Onshore Development Area for ES is the boundary within which all onshore infrastructure required for the Projects would be located including Landfall Zone, Onshore Export Cable Corridor, accesses, Temporary Construction Compounds and Onshore Converter Stations.
Onshore Substation Zone	Parcel of land within the Onshore Development Area where the Onshore Converter Station infrastructure (including the Haul Roads, Temporary Construction Compounds and associated cable routeing) would be located.
Order Limits	The limits within which the Projects may be carried.
Projects Design (or Rochdale) Envelope	A concept that ensures the EIA is based on assessing the realistic worst case scenario where flexibility or a range of options is sought as part of the consent application.
Receptor	A distinct part of the environment on which effects could occur and can be the subject of specific assessments. Examples of Receptors include species (or groups) of animals, plants, people (often categorised further such as 'residential' or those using areas for amenity or recreation), watercourses etc.
Sediment	Particulate matter derived from rock, minerals or bioclastic matter.
Sequential Scenario	A potential construction scenario for the Projects where DBS East and DBS West are constructed with a lag between the commencement of construction activities. Either Project could be built first.
Source Protection Zone II	Outer protection zone - defined by a 400-day travel time from a point below the water table. This zone has a minimum

Term	Definition
	radius of 250 or 500 metres around the abstraction source, depending on the size of the abstraction.
Temporary Construction Compound (TCC)	An area set aside to facilitate construction of the Projects. These will be located adjacent to the Onshore Export Cable Corridor and within the Onshore Substation Zone, with access to the highway.
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).
Project Change Request 1	The proposed changes to the DCO application for the Projects set out in <b>Project Change Request 1 - Offshore &amp; Intertidal Works</b> [document reference 10.49].
Project Change Request 2	The proposed changes to the DCO application for the Projects set out in <b>Project Change Request 2- Onshore Substation Zone</b> [document reference 10.53].

## Acronyms

Term	Definition
AQMA	Air Quality Management Area
BMV	Best and Most Versatile
DBS	Dogger Bank South
DCO	Development Consent Order
ES	Environmental Statement
ExA	Examining Authority
ILA	Important Landscape Area
LWS	Local Wildlife Site
MSA	Mineral Safeguarding Area
NRMM	Non-Road Mobile Machinery
NSR	Noise Sensitive Receptor
OCoCP	Outline Code of Construction Practice
PILs	Landowners or Persons with an Interest in Land
PRoW	Public Right of Way
SPZ	Source Protection Zone
SuD <sub>s</sub>	Sustainable Drainage Systems
SSSI	Sites of Special Scientific Interest
TCC	Temporary Construction Compounds
WER	Water Environment Regulations
WSI	Written Schemes of Investigation

# 1 Introduction

1. An application for a Development Consent Order (DCO) (“the DCO application”) was submitted to the Planning Inspectorate on 12<sup>th</sup> June 2024 for the Dogger Bank South East (“DBS East”) and Dogger Bank South West (“DBS West”) (together referred to as “the Projects”). The DCO application was accepted for Examination on 10<sup>th</sup> July 2024.
2. The Applicants for the Projects are RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited. The Applicants are themselves jointly owned by the RWE Group of companies (51% stake) and Masdar (49% stake).
3. Following the submission of the DCO application, the Applicants received a grid connection offer from National Grid on the 28<sup>th</sup> of June 2024. Further design iteration, to accommodate this grid connection offer, along with ongoing supply chain engagement has provided further certainty on the size of Onshore Converter Station(s) required. This has resulted in the Applicants deciding to seek a second change to their DCO application (“Project Change Request 2”), to reduce the Onshore Order Limits and footprint of the permanent infrastructure within the Onshore Substation Zone. The proposed change would be in line with previous stakeholder comments and subsequent engagement with Interested Parties undertaken in the pre-examination period. The acceptability of any change is to be determined by the Examining Authority (ExA).
4. The Applicants previously notified of a change request to various offshore and intertidal activities at the Pre-Examination Procedural Deadline within a **Change Notification Letter** [PDA-012] (“Project Change Request 1”) and highlighted that a further notification for change may be forthcoming for works at the Onshore Substation Zone within the **Response to the Rule 17 Letter** [AS-006], dated 14<sup>th</sup> October 2024. The proposed changes taken alone or together with Project Change Request 1 would not materially change the nature of the Projects.

5. A further **Notification of Intention to Submit a Change Request related to works in the Onshore Substation Zone (Project Change Request 2)** [AS-015] was issued on the 4<sup>th</sup> November 2024 notifying the ExA of the proposed change, and the reasoning behind the decision. The **Change Notification Letter** [AS-015] included a summary of the environmental topics and expected impacts to the assessment conclusions (if any) that have the potential to be affected by the proposed change, details of the proposed consultation and timetable for submission of any materials, and a proposed list of stakeholders for targeted consultation. It also explained that the change would result in reduction in the nature of the compulsory acquisition powers being sought for some of the land around the Onshore Substation Zone. The ExA provided a response in the **Rule 17 letter issued 7<sup>th</sup> November 2024** [PD-007] to confirm they agreed with the approach set out and provided additional comments on the stakeholders to be consulted, and DCO application documents to be revised if the change is accepted.
6. The purpose of this 'Project Change Request 2- Onshore Substation Zone' document is to provide details about the proposed change, the impact of the change on the Projects as submitted as part of the accepted DCO application and the non-statutory consultation undertaken on 'Project Change Request 2'. This includes assessing whether the proposed change would give rise to any new or different likely significant effects to those previously identified and considered in the Environmental Statement (ES) which accompanied the DCO application. The assessment carried out by the Applicants and reported in this document demonstrates that the environmental impacts of the proposed change, which is within the Project Design Envelope assessed for the Projects, have been appropriately considered to satisfy the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The proposed change does not alter the conclusions of the assessments as set out in the ES or result in any new or different likely significant effects, as detailed in section 3 of this document.
7. Section 3 should be read in conjunction with the ES submitted with the DCO application. Any mitigation and associated outline management plans recommended as part of the original ES would be strictly applied to all works associated with the proposed change where they are relevant.
8. A reduction in the footprint of the Onshore Converter Station(s), would also result in a reduction in the nature of the compulsory acquisition powers sought in the **Draft DCO** [AS-120]. This document, therefore, sets out any changes to compulsory acquisition powers in section 4. The proposed change does not require the inclusion of "additional land" as defined in the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 and so those Regulations are not engaged.

9. The offshore and intertidal change request, Project Change Request 1, has been consulted upon in parallel to this change request. Offshore stakeholders were identified for targeted consultation in the **Dogger Bank South Offshore Wind Farms Project – Notification of Intention to Submit a Change Request (Change Notification Letter)** [PDA-012] for Project Change Request 1 and were issued with the relevant consultation documents (with the addition of further consultees suggested by the ExA in their **Rule 17 Letter issued 7<sup>th</sup> November 2024** [PD-007]). There is very little overlap in the targeted consultees for the two changes and so, whilst the consultation period was aligned with Project Change Request 1, the consultation material was not issued to unaffected onshore stakeholders and similarly unaffected offshore stakeholders were not consulted on this document, Project Change Request 2.
10. The Applicants have consulted on Project Change Request 2 between the 15<sup>th</sup> November and 16<sup>th</sup> December 2024, when a precursor to this document was issued to all identified consultees for comment. Responses received in respect of the Proposed Change 2 have been reviewed and collated, as shown in section 5.

## 2 Description of the Proposed Change

### 2.1 Description of the Proposed Change

11. The proposed reduction in the footprint of the Onshore Converter Station(s) shown in Figure 1 (b) would result in a number of minor associated amendments within the Onshore Substation Zone as listed below:
  - Minor updates to the Indicative Landscape Plan at the Onshore Substation Zone as presented on Figures 2(a) and 2(b) (Appendix A);
  - Reduction in size and change of indicative location of Sustainable Drainage System (SuDs) requirements as presented on Figures 1(a) and 1(b) (Appendix A);
  - Removal of the Yorkshire Water diversion from the DCO application as presented on Figure 3 (Appendix A);
  - Reduction in the Onshore Order Limits at the Onshore Substation Zone as a result of the removal of the Yorkshire Water diversion as presented on Figure 3 (Appendix A);
  - Reduction in the nature of the compulsory acquisition powers sought over land due to the reduction in footprint of the Onshore Converter Station(s) as presented on Figures 4(a) and 4(b) (Appendix A) and discussed further in section 4; and
  - Minor revision to the alignment of the onward cable connection within the Onshore Substation Zone to reflect the revised Onshore Converter Station(s) footprint.
12. **Table 2-1** details how the proposed changes to parameters would differ from those assessed in the Applicants' DCO application.
13. The proposed change is shown in the following figures, located in Appendix A. Where a change is proposed to a Figure that was submitted as part of the DCO application, the original figure has also been included so that the change can easily be identified:
  - Figure 1 (a) – Indicative General Arrangement Drawings for the Onshore Converter Station(s) – Submitted with the DCO Application;
  - Figure 1 (b) – Indicative General Arrangement Drawings for the Onshore Converter Station(s) – Proposed Change;
  - Figure 2 (a) – Indicative Landscape Plan – Submitted with the DCO Application;
  - Figure 2 (b) – Indicative Landscape Plan – Proposed Change;
  - Figure 3 – Onshore Substation Zone – Details of Proposed Changes;
  - Figure 4 (a) – Land Plan (sheet 19/20)– Submitted with the DCO Application;
  - Figure 4 (b) – Land Plan (Sheet 19/20) – Proposed Change;

- Figure 5 (a) – Works Plan (Onshore Converter Station(s)) – Submitted with the DCO Application; and
  - Figure 5 (b) – Works Plan (Onshore Converter Station(s)) – Proposed Change.
14. It should be noted that the Figures included in Appendix A are submitted solely to illustrate the proposed change and are not intended to replace the equivalent plans submitted as part of the DCO Application.
15. The description of the Proposed Change is unchanged from the **Change Notification Letter** [AS-015].

Table 2-1 Description of the Proposed Changes Relative to the DCO Application

Onshore Substation Zone	DBS East or DBS West In Isolation		DBS East and DBS West Concurrently		DBS East and DBS West Sequentially	
	At application stage	For the Request for Change	At application stage	For the Request for Change	At application stage	For the Request for Change
Operational compounds for Onshore Converter Station(s) (m)	244 x 264 (HVDC Converter)	122 x 264 (HVDC Converter)	244 x 264 (HVDC Converter) plus 244 x 264 (HVDC Converter)	122 x 264 (HVDC Converter) plus 122 x 264 (HVDC Converter)	244 x 264 (HVDC Converter) plus 244 x 264 (HVDC Converter)	122 x 264 (HVDC Converter) plus 122 x 264 (HVDC Converter)
Area of Onshore Converter Station(s) (m <sup>2</sup> )	64,000 <sup>1</sup>	32,208	129,000	64,416	129,000	64,416
Total construction area (m <sup>2</sup> ) <sup>2</sup>	94,000	62,208	189,000	124,416	189,000	124,416

<sup>1</sup> The area of Onshore Converter Station(s) shown on the plans was ^64,416 m<sup>2</sup> (In Isolation Scenario) and 128,832m<sup>2</sup> (Concurrent and Sequential Scenarios) but these numbers was rounded to 64,000m<sup>2</sup> and 129,000m<sup>2</sup>, respectively in the ES text.

<sup>2</sup> This is the total area (m<sup>2</sup>) of the Onshore Converter Station(s) and the TCCs.

Onshore Substation Zone	DBS East or DBS West In Isolation		DBS East and DBS West Concurrently		DBS East and DBS West Sequentially	
	At application stage	For the Request for Change	At application stage	For the Request for Change	At application stage	For the Request for Change
Maximum Building height (m)	24 – No change		24 – No change		24 – No change	
Height of lightning masts (m)	27 – No change		27 - No change		27 – No change	
Total construction compound area (m <sup>2</sup> )	30,000	No change	60,000	No change	60,000	No change
Number of construction compounds	1 – No change		2 – No change		2 – No change	
Duration of works at the Onshore Substation Zone (years)	4 – No change		4 – No change		6 – No change	

Onshore Substation Zone	DBS East or DBS West In Isolation		DBS East and DBS West Concurrently		DBS East and DBS West Sequentially	
	At application stage	For the Request for Change	At application stage	For the Request for Change	At application stage	For the Request for Change
Operational duration (years) (approximate)	30 – No change		30 – No change		32 – No change	

## 2.2 Rationale for Proposed Change

16. Project Change Request 2 has been prepared after further design iteration to support tender activities following the receipt of a grid connection offer from National Grid after DCO submission, on 28<sup>th</sup> June 2024. Following this confirmation from National Grid and ongoing supply chain engagement the indicative design of the Onshore Converter Station(s) has been developed further to refine the worst case down from the 2000MW per Project solution assessed in the ES.
17. This design work has provided further certainty on the size of Onshore Converter Station(s) required and allows the Projects to reduce the footprint of the permanent infrastructure within the Onshore Substation Zone in line with previous stakeholder comments and to deliver other associated changes. This would reduce the footprint for the permanent Onshore Converter Station(s) whilst staying within the location utilised to set the Project Design Envelope for the ES at DCO submission. There would be no change to the maximum height of the buildings or the lightning masts, as set out in **Table 2-1**.
18. Although Project Change Request 2 is primarily driven by the grid connection offer, it also enables the Projects to avoid activities interfacing with the Yorkshire Water asset which traverses the Onshore Substation Zone, as shown on Figure 3 in Appendix A. As the potential Yorkshire Water diversion would no longer be required, land in the north-east of the Onshore Substation Zone, Works No. 28A/B (Utility Connection Works) on Sheet 18 of the **Works Plan (Onshore) (Revision 3)** [PDA-003], can be removed from the Onshore Order Limits as shown on Figure 3 (Appendix A).
19. The Applicants received a number of comments on the scale of the built form of the Onshore Converter Station(s) in a rural area, and concerns were raised regarding the permanent land-take from agriculture by the Projects. These include:
  - **Albanwise Ltd** [RR-002] raised an objection regarding the *“scale and configuration of land that is intended to be occupied by the designs included in the proposal”* including an objection to the *“impacts on business operations (both farming or non-farming)...based on the layout of the project that is proposed”*;
  - **Historic England** [RR-022] raised concerns regarding the impact of the Onshore Converter stations on the setting of Scheduled Monument of ‘Heavy Anti-aircraft gunsite, 350m west of Butt Farm’, NHLE 1019186. Historic England’s Relevant Representation [RR-022] stated that *“The extent, massing, scale of the proposed structure and its proximity to the Scheduled Monument represents a considerable concern for Historic England. We consider that the proposed Onshore Converter Station(s); represents ‘less than substantial harm’ to the significance of the site, but at the high end of this scale. However, this high degree of ‘harm’ needs to be addressed. This can be achieved by removing the intervention, reducing its impact, or finding ways to mitigate that harm”*;

- **Rowley Parish Council** [RR-048] stated in their Relevant Representation “This project will have a significant visual impact on Residents of Bentley and a detrimental effect on businesses in this location, farmers, campsites etc where the viability of the businesses will be in doubt”;
  - **JL White & Son and Butt Farm Caravan, Camping and Glamping Site** [RR-054] stated in their Relevant Representation “Post construction and during operation the Project plans suggest that at the nearest point the converter station will be around 120m from the caravan and camping site. The impact of the presence of the converter station after construction is likely to have a significant impact on the long term viability of the caravan and camping site due to the affect on the visual amenity of the area as well as the long term noise and light pollution caused”; and
  - **East Riding of Yorkshire Council** have raised concerns about the scale of the Onshore Converter Station(s) in post-submission discussions regarding the DCO application.
20. Overall, the Applicants consider that the proposed change is positive as it would reduce the scale of built form in the rural area and reduce permanent land-take from agriculture by the Projects, which are beneficial in addressing the above representations.

## 2.3 Development of the Proposed Design Change

21. Following the receipt of the grid connection offers described in section 2.1, an optimisation process was undertaken to consider how the proposed reduced Onshore Converter Station(s) footprint could be positioned within the Onshore Substation Zone. A decision was made to keep to the reduced footprint design located within the area of Works No. 25A and/or 26A/B, located on page 18 of the **Works Plans (Onshore) (Revision 3)** [PDA-003]. These areas were selected as they had already been identified as the optimal locations within the Onshore Substation Zone for permanent infrastructure. This would also ensure that the updated design remains within the Project Design Envelope originally assessed in the ES. The overarching objective of the optimisation process was to adhere to the principles of the Onshore Substation Zone layout as described in section 4.10.6 of **ES Chapter 4 Site Selection and Assessment of Alternatives** [AS-017], whilst also using the opportunity to micro-site the reduced Onshore Converter Station(s) footprint away from known constraints, optimise landscaping opportunities and reduce land-take, where possible.
22. The optimisation process considered factors including:
- **Engineering considerations:** Earthwork requirements, cut and fill balances, permanent land take (including access road), utility diversions, opportunity for Sustainable Drainage Systems (SuDs) design, impact on watercourses, impact on the Onshore Order Limits.

- **Environmental considerations:** Terrestrial ecology, landscape and visual, noise, air quality, traffic and transport, onshore archaeology and cultural heritage, flood risk and hydrology, tourism and recreation impacts.
  - **Land considerations:** Potential effects on landowners, land take associated with the changed layout, impact on utilities, potential compensation requirements.
23. Following the optimisation work, a decision was made to proceed with the reduced Onshore Converter Station(s) footprint being positioned on the western side of the DCO submission Onshore Converter Station footprint, entirely within Works No. 25A (**Works Plans (Onshore) (Revision 3)** [PDA-003]) because it delivered the following key benefits:
- Preferred option from an engineering perspective in terms of cut and fill balances, as it has the least excess spoil to be removed from site (and therefore associated traffic movements) compared to other options;
  - Allows an opportunity to move the SuDs drainage basin away from the Yorkshire Water Main, avoiding interaction with this asset completely;
  - Allows the greatest opportunity of all options to reduce the Onshore Order Limits, as the land included in the Onshore Order Limits for the Yorkshire Water Main diversion can be removed;
  - Preferred option from a landscape and visual impact perspective (allows greater opportunities to integrate mitigation planting into nearby woodlands to the north and west and provide more effective screening in the east);
  - Preferable from a flood risk and hydrology perspective (crosses a smaller area of surface water flood risk compared to the DCO design) with least diversion of existing ditches;
  - Furthest away from residential receptors, and therefore allows an opportunity to lessen construction disturbance (including noise and air quality impacts) in addition to operational noise impacts compared to options sited further to the east of the DCO Onshore Converter Station(s) footprint;
  - Furthest away from the ecologically designated site within the Onshore Substation Zone (Bentley Moor Wood Local Wildlife Site/Ancient Woodland) which lessens potential air quality impacts on sensitive ecological receptors during construction, compared to other options; and
  - Greater amount of land able to be returned to agriculture compared to the DCO application submission design.

## 2.4 Assumptions and Limitations

### 2.4.1 Use of the Projects' Site Surveys

24. The entire site of the proposed Project Change 2 was contained within the Onshore Order Limits assessed as part of the ES and was therefore subject to any environmental surveys undertaken to inform the production of the ES. As a result, no additional surveys are required to inform the proposed change and no updates are required to the baseline information.

### 2.4.2 Use of the Projects' Environmental Statement

25. The assessments, conclusions and methodology contained within the ES have been used as the basis of the assessments within this document. No updates to ES chapters relevant to Project Change Request 2 and detailed in section 3 have been made since submission of the DCO application at the time of writing (November 2024), as such the DCO application was used as the most up-to-date source of information. The Works and Land Plans (onshore) have been updated in the DCO pre-examination period. Where these documents are discussed the most recently submitted version has been referenced. For completeness, this document should be considered alongside the following documents:
- Onshore Works Plans (Revision 3) [PDA-003]; and
  - Land Plans (Onshore) [PDA-004].

### 3 Potential Environmental Impacts of the Proposed Change

26. Each sub-section below considers the onshore ES topics submitted in support of the DCO application. Each ES topic sets out whether the proposed change may lead to new or different likely significant environmental effects relative to those stated in the ES and what mitigation might be required to avoid, reduce or offset these impacts.
27. The proposed changes under this Project Change Request 2 are focused entirely within the Onshore Substation Zone, and thus do not affect any of the assessments outside the Onshore Substation Zone nor any of the assessments incorporated within the Offshore EIA topics **Chapters 8 – 17 of the ES** [APP-080 – APP-139].
28. The following topics have been screened in for further assessments in the sections below, as the proposed change has the potential to alter the outcomes of the ES when considering impacts in the Onshore Substation Zone:
  - Chapter 18 Terrestrial Ecology and Ornithology [AS-110];
  - Chapter 19 Geology and Land Quality [APP-158];
  - Chapter 20 Flood Risk and Hydrology [APP- 163];
  - Chapter 21 Land Use [AS-111];
  - Chapter 22 Onshore Archaeology and Cultural Heritage [AS- 092];
  - Chapter 23 Landscape and Visual Impact Assessment [APP-192];
  - Chapter 24 Traffic and Transport [APP-195];
  - Chapter 25 Noise [APP-201];
  - Chapter 26 Air Quality [APP-208]; and
  - Chapter 29 Tourism and Recreation [APP-219].
29. Due to the scale and nature of the proposed change, the following topics related to onshore works are unlikely to affect, or be affected by the proposed change, and it was therefore considered appropriate to screen out the following topics from the assessments in relation to the proposed change:
  - Chapter 27 Human Health [APP-214];
  - Chapter 28 Socio-economics [APP- 217]; and
  - Chapter 30 Climate Change [APP- 222].

30. If Project Change Request 2 is accepted by the ExA, the Applicants propose to submit the revised DCO application documents listed in Appendix A, Schedule of application documents and plans to be resubmitted upon acceptance of Change Request(s) of 10.48 Cover Letter, only. This list of documents was proposed in the **Notification of Intention to Submit a Change Request related to works in the Onshore Substation Zone** [AS-015], issued to the ExA on the 4<sup>th</sup> November 2024 and has been supplemented with the additional documents proposed by the ExA in their **Rule 17 letter issued 7<sup>th</sup> November 2024** [PD-007].

### 3.1 Terrestrial Ecology and Ornithology

31. The site of the proposed change to reduce the footprint of the Onshore Converter Station(s) is mainly cropland (agricultural) with a number of native hedgerows. Bentley Moor Wood ancient woodland and Local Wildlife Site (LWS), as well as another unnamed ancient woodland area are also wholly within the Onshore Substation Zone. A number of trees within the Onshore Substation Zone are considered to have bat roost potential. Breeding and overwintering birds are also present.
32. The key elements of the proposed change relevant to Terrestrial Ecology and Ornithology are:
- Reduction of the footprint of the Onshore Converter Station(s);
  - Updates to the Indicative Landscape Plan; and
  - Reduction in Onshore Order Limits.
33. The main implications of the proposed change would be to:
- Decrease the total area of permanent habitat loss;
  - Reduce potential impacts associated with changes to air quality; and
  - Reduce potential disturbance to species.
34. Construction impacts that have the potential to be affected by the proposed change are:
- Impact 2: Disturbance to Non-Statutory Designated Nature Conservation Sites – Bentley Moor Wood ancient woodland and LWS;
  - Impact 3: Permanent and Temporary Loss / Fragmentation of Habitats; and
  - Impacts 4-12. Impact on protected and notable species. The reduction of the Onshore Order Limits is likely to result in less disturbance to species than reported in the ES as the area of habitats affected is reduced.

35. In the ES, the magnitude of impact for Impact 2 is based on the distance of the construction site to Bentley Moor Woods LWS. Whilst impacts arising from construction vehicle movements on the road network would not significantly reduce, as detailed in section 3.7, the reduced footprint of the Onshore Converter Station(s) would result in a distance greater than 200m between the Onshore Converter Station(s) and the LWS resulting in a potential reduced impact from construction activities. However, the magnitude of impact would remain high and the significance of effect would remain moderate adverse due to effects relating to Nitrogen deposition. It should also be noted that as reported in the ES, background levels of nitrogen deposition are already in exceedance at Bentley Moor Wood LWS, due to regular baseline traffic movements at locations where the air quality assessment was undertaken.
36. The reduction in the footprint of the Onshore Converter Station(s) and Onshore Order Limits would result in less habitats, mainly agricultural land, being permanently lost by the Projects. However, the magnitude of impact as reported in the ES is negligible and significance of effect is minor adverse. This would therefore be unchanged for Impact 3 as a result of the proposed change.
37. Impacts 4-12 would also benefit from the reduced footprint, which are likely to result in less disturbance to species than reported in the ES as the area of habitats affected decreases. The extent of the proposed change is not anticipated to alter the magnitude of impact or overall significance of effect for any one species e.g. bats, compared to that reported in the ES which ranges from minor to moderate adverse depending on the impact.
38. The operation and maintenance impacts that have the potential to be affected by the proposed change are:
- Impact 15: Disturbance to Habitats and Species from Maintenance Activities;
  - Impact 16: Disturbance to Species from Artificial Lighting;
  - Impact 17: Permanent habitat loss; and
  - Impact 18: The Effect of Permanent Habitat Loss on Species.
39. The magnitude of Impact 15 would be unchanged from the ES however a reduction in the Onshore Order Limits would result in less habitat area disturbed as part of maintenance operations associated with the Projects and is therefore a beneficial change. The overall significance of effect would remain minor adverse as reported in the ES.
40. Impact 16, disturbance to species from artificial lighting, would remain as outlined in the ES, there would be no requirement for continuous lighting and therefore disturbance impacts on species are not predicted as a result of the change. The magnitude of impact and overall significance of effect, minor adverse, remains unchanged from the ES.

41. Impact 17, permanent habitat loss, would be impacted by the proposed change. The total reduction in the Onshore Order Limits is approximately 6ha. This is predominantly made up of cropland. The magnitude of impact within the ES for Impact 17 was negligible as most habitats to be permanently lost are cropland, of low sensitivity and ecological interest and new native species rich hedgerow and new areas of woodland would be planted in the Onshore Substation Zone. This would be unchanged from the ES as a result of the proposed change. While the total area of permanent habitat loss within the Onshore Substation Zone would be reduced by approximately 6ha as a result of the reduced footprint on the Onshore Converter Station(s), the implementation of landscape planting in the Onshore Substation Zone (Appendix A, Figure 2b) is consistent with the approach outlined in the ES assessment. Overall, the magnitude of impact and significance of effect would remain minor adverse, as reported in the ES.
42. Impact 18, the effect of permanent habitat loss on species, has the potential to be impacted by the proposed change. The reduction in the total permanent habitat loss associated with the Onshore Substation Zone as a result of the change in the Onshore Order Limits and reduced footprint of the Onshore Converter Station(s) would reduce the permanent habitat loss of cropland primarily. The scale of the change however, when considered across the extent of the Onshore Development Area, would not alter the magnitude of the impact, which would remain low. With the implementation of **the Outline Ecological Management Plan [AS-114]** and **Outline Landscape Management Plan [AS-096]**, the significance of effect would be unchanged from the ES as minor adverse.
43. Mitigation measures for all impacts that have the potential to be affected by the proposed change remain the same as outlined in the ES.
44. Whilst the proposed changes would be beneficial to reducing overall habitat loss and subsequent potential impacts to habitats and species during both construction and operation, it is expected that there would be no change in relation to the baseline environment or the sensitivity and magnitude of impact on the identified receptors discussed within the ES.
45. As a result, **no new or different** Terrestrial Ecology and Ornithology related likely significant effects are anticipated as a result of the proposed change.

## 3.2 Geology and Land Quality

46. The site of the proposed change to reduce the footprint of the Onshore Converter Station(s) and associated drainage infrastructure is located within a Source Protection Zone (SPZ) 2 and underlain by Head Deposits and the Flamborough Chalk Formation. Unnamed streams and ditches associated with agriculture are located within the Onshore Substation Zone and there are no surface water abstractions. There is 2ha of Mineral Safeguarding Area (MSA) located within the Onshore Substation Zone, which represents approximately 0.002% of the total MSA within the East Riding of Yorkshire Council boundary. The critical human health receptors would be those involved with construction activities, adjacent offsite residents including Butt Farm, nearby workers (e.g. agricultural workers) and visitors, and users of the Public Rights of Way (PRoW), Walkington Footpath No.4 which crosses the permanent access road. The Onshore Substation Zone is also located entirely within grade 3b agricultural land, which is not considered to be Best and Most Versatile (BMV) grade. The main implications of the proposed change would be:
- A decrease in footprint which would mean a decrease in area over which foundations (including piles) may be required; and
  - A decrease in the total area of mineral sterilisation.
47. Construction impacts discussed within the ES which have the potential to be affected by the proposed change are:
- Impact 1: Exposure of workforce, landowners, land users and neighbouring land users to contaminated soils and groundwater and associated health impacts. In the ES, magnitude of impact is based on the likelihood that a plausible contaminant linkage is present and how these would impact the identified receptors. The presence of contaminant linkages is localised and a reduction in the footprint of the Onshore Converter Station(s) does not result in any new or different likely significant effects as a result of the risk or the baseline environment.
  - Impact 2: Direct impacts on groundwater quality and groundwater resources. In the ES, magnitude of impact is based on how earthworks, foundations and crossings would interact with underlying aquifers and SPZs potentially causing a degradation in its quality. The likelihood of an interaction is marginally reduced by a reduction in the footprint of the Onshore Converter Station(s) because less soil would be excavated and the foundations would be over a smaller area. This does not result in any new or different likely significant effects as a result of the risk or the baseline environment.
  - Impact 3: Impacts on surface water quality and the ecological habitats they support from contamination. In the ES magnitude of impact is based on how mobilised contamination may lead to a reduction in surface water quality and impact on the ecological habitats that they support. As discussed in Impact 1 the

presence of contaminant linkages is localised and a reduction in the footprint of the convertor station(s) does not result in any new or different likely significant effects as a result of the risk or the baseline environment.

- Impact 4: Sterilisation of Future Mineral Resources. The Onshore Convertor Station(s) have the potential to temporarily sterilise mineral resources during construction works. A reduction in the footprint of the Onshore Convertor Station(s) would reduce the area sterilised, however this would not change how the receptor is assessed.
- Impact 7: Impacts on agricultural land. In the ES magnitude of impact is based on how existing contamination may be mobilised and lead to a reduction in quality of the agricultural land. As discussed in Impact 1 the presence of contaminant linkages is localised and a reduction in the footprint of the Onshore Convertor Station(s) does not result in any new or different likely significant effects as a result of the risk or the baseline environment.

48. The operational and maintenance impacts that have the potential to be affected by the proposed change are:

- Impact 8: Exposure of workforce, landowners, land users and neighbouring land users to contaminated soils and groundwater and associated health impacts. In the ES, magnitude of impact is based on the likelihood that a plausible contaminant linkage is present and how these would impact the identified receptors. The presence of contaminant linkages is localised and a reduction in the footprint of the Onshore Convertor Station(s) does not result in any new or different likely significant effects as a result of the risk or the baseline environment.
- Impact 9: Impact on controlled waters (groundwaters and surface waters). In the ES, magnitude of impact is based on how maintenance works would interact with underlying aquifers and SPZs potentially causing a degradation in its quality. While maintenance works would still be required during the operational phase, it would be over a smaller area as a result of the proposed change.
- Impact 10: Sterilisation of Future Mineral Resources. The Onshore Convertor Station(s) have the potential to permanently sterilise mineral resources during the operational phase (32 years). A reduction in the footprint of the Onshore Convertor Station(s) would reduce the area sterilised, however this reduction would not be significant enough to change the outcome of the assessment.
- Impact 11: Built environment. During the operational phase there is the potential that the Onshore Convertor Station(s) could undergo a degradation of concrete due to chemical attack and/or ground gas accumulation. The proposed change would reduce the area of the onshore Convert Station(s) foundations, below ground.

49. Although the proposed change to the Onshore Substation Zone would result in a reduction in the area required for the construction and operational phases of the Projects by approximately 6ha (all scenarios), there is no change in relation to the baseline environment. With the implementation of embedded mitigation measures and additional mitigation as outlined in the ES, the magnitude of impact would remain negligible or low on a medium or high sensitivity receptor including Butt Farm, therefore the significance of effect would remain minor adverse for the impacts summarised in section 3.2.
50. As a result, **no new or different** Geology and Land Quality related likely significant effects are anticipated as a result of the proposed change.

### 3.3 Flood Risk and Hydrology

51. The site of the proposed change to reduce the footprint of the Onshore Converter Station(s) and associated drainage infrastructure is located in two surface water catchments and overlies one groundwater catchment. These are:
- High Hunsley to Woodmansey Area;
  - Beverley and Barmston Drain; and
  - Hull and East Riding Chalk.
52. The main implications of the proposed change would be to:
- Reduce the impact on existing ordinary watercourses located in the Onshore Substation Zone.
  - Reduce the total construction area within each catchment, which would lead to:
    - A reduction in exposed ground capable of increasing sediment supply to watercourses.
    - A reduction in the area over which accidental spills and leaks of contaminants could occur.
    - A reduction in potential changes to land use which could alter surface and groundwater flows and flood risk.
  - Reduce the total impermeable area in each catchment and associated runoff.
53. Construction impacts that have the potential to be affected by the proposed change are:
- Impact 1: Direct disturbance of surface water bodies. In the ES, magnitude of impact is based on the number of trenched crossings in each surface water catchment. The number of trenched crossings or channels that would be infilled within the Onshore Converter Station(s) footprint would be reduced from 16 to 12 in Beverley and Barmston Drain's catchment. For all construction scenarios magnitude of impact would remain medium and significance of effect would remain minor adverse, as reported in the ES. There would be no change in the

- number of trenched crossings in the High Hunsley to Woodmansey Area catchment;
- Impact 2: Increased sediment supply;
  - Impact 3: Accidental release of contaminants to surface and groundwaters; and
  - Impact 4: Changes to surface and groundwater flows and flood risk.
54. In the ES, magnitude of impact for Impacts 2, 3 and 4 is based on the area of the Onshore Development Area in each surface water catchment (and groundwater catchment for Impacts 3 and 4). For the Concurrent and Sequential Scenarios, the total construction area would be reduced by 64,584m<sup>2</sup> (0.065 km<sup>2</sup>); for the In Isolation Scenario the figure would be 31,792m<sup>2</sup> (0.032 km<sup>2</sup>). Only a small area of the proposed change would be situated in the High Hunsley to Woodmansey Area catchment (approximately 0.01 km<sup>2</sup>); the majority (approximately 0.055 km<sup>2</sup>) would be in Beverley and Barmston Drain's catchment. These changes, compared to the ES, are very small, and magnitude of impact would remain negligible in both surface water catchments and the underlying groundwater catchment, as reported in the ES. Significance of effect would remain as reported in the ES – negligible in the two surface water catchments and minor adverse in the groundwater catchment (due to high sensitivity).
55. The operation and maintenance impacts that have the potential to be affected by the proposed change are:
- Impact 1: Accidental release of contaminants to surface and groundwaters; and
  - Impact 2: Changes to surface and groundwater flows and flood risk.
56. For operation and maintenance activities, magnitude of impact in the ES is based on the area of installed infrastructure (above ground or buried) in each catchment, as a proxy to indicate the extent of required maintenance activities for the different scenarios. In the ES, magnitude of impact was assessed as negligible in the two surface water catchments and groundwater catchment that would be affected by the proposed change. Magnitude of impact would therefore remain negligible in all catchments, and significance of effect would remain negligible in the surface water catchments and minor adverse in the groundwater catchment (due to sensitivity).
57. Mitigation measures for all impacts that have the potential to be affected by the proposed change remain the same as outlined in the ES.
58. As a result, **no new or different** Flood Risk and Hydrology related likely significant effects are anticipated as a result of the proposed change.

### 3.3.1 Water Environment Regulations (WER)

59. The site of the proposed change to reduce the footprint of the Onshore Converter Station(s) and associated drainage infrastructure, is located in two river water body catchments and overlies one groundwater body catchment. These are:
- High Hunsley to Woodmansey Area (GB104026066820);
  - Beverley and Barmston Drain (GB104026067211); and
  - Hull and East Riding Chalk (GB40401G700700).
60. As described in section 3.3 Flood Risk and Hydrology, the proposed change would have a very limited impact on flood risk and hydrology receptors.
61. The three stages of the **WER Compliance Assessment [AS-074]** would not be affected by the proposed change: This means that:
- No new water bodies would be screened in or out at Stage 1 Screening;
  - The results of Stage 2 Scoping would remain as reported in the ES; and
  - The results of Stage 3 Detailed Compliance Assessment would remain as reported in the ES.
62. The overall conclusion presented in the ES would remain the same and **the Projects are considered to be compliant with WER requirements**.

### 3.3.2 Flood Risk Assessment

63. The proposed changes to the Onshore Substation Zone have been considered in the context of the flood risk as assessed within **Appendix 20-4 Flood Risk Assessment [APP-168]**. The main elements of the proposed changes that may affect the conclusions in relation to flood risk are:
- Reduction in the footprint of the Onshore Converter Station(s);
  - Amendments to the proposed location of the surface water drainage (i.e. SuDS) features; and
  - Reduction of the Onshore Order Limits within the north-east of the Onshore Substation Zone.
64. The Onshore Substation Zone is located in Flood Zone 1, and this is unchanged as a result of the proposed changes. Therefore, the conclusions related to the location of the Onshore Converter Station(s) and its suitability within Flood Zone 1 remain unchanged.
65. By limiting the footprint of the Onshore Converter Station(s) to the western area there is likely to be a reduced impact on the existing ordinary watercourses located in the Onshore Substation Zone. This is specifically relevant to the ordinary watercourse immediately to the east of the Onshore Converter Station(s) which would no longer require realignment.

66. Furthermore, the reduction in the built footprint would lead to a reduction in the overall creation of an impermeable area, which would have the potential to alter surface water flows and flood risk. As such, this is likely to reduce the requirement in relation to the storage volume to be provided by the SuDS features.
67. As a result, **no new or different** flood risk related impacts are anticipated as a result of the proposed change. The overall conclusions within **Appendix 20-4 Flood Risk Assessment** [APP-168] remain the same i.e. the Projects remain compliant with National Planning Policy Framework and the supporting Planning Practise Guidance.

### 3.4 Land Use

68. The site of the proposed change to reduce the footprint of the Onshore Converter Station(s) and associated drainage infrastructure is located within agricultural land classified as 3b and is not BMV land, as mentioned in section 3.2. There is one PRoW (Walkington Footpath No.4), which crosses the permanent access and several utilities that traverse the site including the Yorkshire Water Asset and two high pressure gas pipelines. The site is partially occupied by Countryside Stewardship Schemes but, there are no Environmental Stewardship Schemes located within the Onshore Substation Zone. The LWS Bentley Moor Wood is also located within Onshore Substation Zone.
69. The proposed changes would result in the reduction of land required on both a temporary and permanent basis. The footprint of the Onshore Converter Station(s), associated SuDS basin and landscaping, within the Onshore Substation Zone, would represent permanent land take for the duration of the operational phase. For the Projects In Isolation, this total permanent land take would be reduced by approximately 32,000m<sup>2</sup> (3.2ha), whereas for the Concurrent and Sequential Scenarios the reduction would be approximately 64,500<sup>2</sup> (6.5ha).
70. The proposed change to the Onshore Order Limits also affects the Land Use assessment as reported in the ES. The Onshore Substation Zone would be reduced from 0.75km<sup>2</sup> (75ha) to 0.69km<sup>2</sup> (69ha), a total reduction of 60,000m<sup>2</sup> (6ha). The reduction in the area of the Onshore Substation Zone primarily affects the total area of land to be returned to agriculture as reported in the ES. This is summarised in regard to Impact 2 below.
71. The proposed changes also remove the need for the diversion of the Yorkshire Water assets as presented on Figure 3 (Appendix A) which entirely reduces temporary disturbance during construction in this area.
72. These proposed changes have the potential to affect the following impacts as assessed in the ES.

73. Construction impacts that have the potential to be affected by the proposed change are:
- Impact 1: Agricultural drainage;
  - Impact 2: Temporary loss of agricultural land;
  - Impact 3: Soil degradation and loss of soil to erosion; and
  - Impact 5: Disruption to existing utilities.
74. During the construction phase, the magnitude of impact associated with the temporary loss of agricultural land, disruption to agricultural drainage, soil degradation and erosion and disruption to utilities remain unchanged as a result of the proposed changes. However, it should be noted that the magnitudes recorded within the ES were negligible following the implementation of embedded and additional mitigation measures. As such, there would be no change in the significance of effect for each of the identified receptors due to the reduction of the size of the Onshore Substation Zone.
75. The operational and maintenance impacts that have the potential to be affected by the proposed change are:
- Impact 2: Permanent loss of land for agriculture.
76. In the ES approximately 44%, 33ha of the total Onshore Substation Zone area of 75ha was to be returned to agriculture, following reinstatement.
77. With the proposed change, which for Concurrent or Sequential Scenario would reduce the permanent land take associated with the Onshore Converter Stations by 6.4ha, as well as the overall reduction in Onshore Order Limits of 6ha, the total area of the Onshore Substation Zone would be revised to 69ha, of which 37ha would be returned to agriculture, approximately 47% of the total area of the Onshore Substation Zone.
78. Overall, a greater proportion of the total area of the Onshore Substation Zone would be returned to agriculture as a result of the proposed change when compared with the DCO application which is beneficial. However, the total permanent land take as a result of the Onshore Converter Station(s), associated landscaping and drainage, would result in a 42ha permanent land take, which still exceeds the 20ha threshold for a high magnitude of impact on a medium sensitivity receptor, which would result in a major adverse significance of effect. No additional mitigation measures are available to reduce the magnitude of impact in relation to the permanent loss of agricultural land. This conclusion in the ES therefore, still remains relevant despite the reduction of land take associated with the Onshore Substation Zone.
79. As a result, **no new or different** Land Use related likely significant effects are anticipated as a result of the proposed change Land Use.

### 3.5 Onshore Archaeology and Cultural Heritage

80. The key elements of the proposed change relevant to Onshore Archaeology and Cultural Heritage comprise the reduction of the footprint of the Onshore Converter Station(s) and associated minor changes to the SuDs locations and reduction of the Onshore Order Limits within the north-east of the Onshore Substation Zone.
81. There are no Scheduled Monuments or Listed Buildings within the site of the proposed change, and it is not located within a Conservation Area or Registered Park and Garden. The closest designated heritage asset is the Scheduled Monument: *Heavy Anti-aircraft gunsite, 350m west of Butt Farm* (NHLE 1019186) approximately 115m north of the Onshore Substation Zone at its closest point.
82. The most relevant non-designated heritage assets to the proposed change are the historical limits and associated infrastructure for the Heavy Anti-aircraft gunsite (MHU15288), a possible moated site south of Butt Farm (MHU15124), and Ridge and furrow cultivation marks (APS\_026) identified in the **Assessment of Airborne and Satellite Remote Sensing Data and Map Regression Analysis for Archaeology** [APP-176], submitted in support of the ES.
83. Within the area of the proposed change which is to be removed from the Onshore Order Limits, there is only one geophysical anomaly of possible/probable archaeological origin detected during the geophysical survey, as described in the **Geophysical Assessment Report** [APP-180 to APP-188], this was a circular anomaly (818A). This was later confirmed as not of archaeological origin during the Phase 1 trial trenching undertaken across the Onshore Substation Zone, as described in the **Interim Archaeological Evaluation Report** [APP-189]. Further results from the Phase 1 and 2 trial trenching evaluation within the footprint of the Onshore Converter Station(s) identified a single pit and ephemeral remains of a possible undated enclosure ditch, as described in the **Interim Archaeological Evaluation Report** [APP-189], **Archaeological Trial Trenching Phase 1** [PDA-025 to PD-027] and **Archaeological Trial Trenching Phase 2 (Interim) Section 17** [PDA-030]. The remaining features identified in the archaeological trial trenching related to post-medieval field boundaries or drainage features and ridge and furrow cultivation.
84. Construction impacts that have the potential to be affected by the proposed change are:
- Impact 2 Direct physical impact on (permanent change to) non-designated heritage assets (including buried archaeological remains, historic earthworks and structures); and
  - Impacts 4 Indirect physical impact on (permanent change to) non-designated heritage assets.

85. As the proposed change comprises a reduction in the overall footprint of the Onshore Converter Station(s) and Onshore Order Limits to the north-east of the Onshore Substation Zone, the proposed changes are not anticipated to affect any additional assets or cause any different impacts and associated impacts to that assessed in the ES (Impacts 2 & 4), with regard to surviving sub-surface archaeological remains. Given the reduced area of disturbance it is expected there may be a slightly lesser impact relative to the original design assessed in the ES, although the overall significance of impacts are expected to remain the same.
86. As reported in **Chapter 22 Onshore Archaeology and Cultural Heritage** [AS-092], the above physical impacts to below ground archaeological remains would be mitigated prior and during construction of the Projects through both survey-specific pre-construction Written Schemes of Investigation (WSIs) and associated investigations, followed by subsequent pre-construction archaeological mitigation excavations (where identified to be required), as well as a Construction Stage Archaeological WSI, all of which will accord with the **Outline Onshore Written Scheme of Investigation** [APP-239].
87. Operational impacts that have the potential to be affected by the proposed change are:
- Impact 7 Permanent change to the setting of designated heritage assets which could affect their heritage significance.
88. The reduction in the Onshore Converter Station(s) footprint would reduce the overall massing and consequently reduce the visual intrusion of the Onshore Converter Station(s) in views south from the *Heavy Anti-aircraft gunsite, 350m west of Butt Farm* (NHLE 1019186). However, due to the proximity of the Onshore Converter Station(s) at its closest point remaining the same as the ES, the assessed magnitude of impact reported on in the ES related to operational impacts on setting (Impact 7) would remain unchanged.
89. At the detailed design stage, the Onshore Converter Station(s) would be designed to reduce the overall height and massing of associated structures and other elements as far as possible. Landscape proposals would include measures for the enhancement of the landscape during the operational phase of the Onshore Converter Station(s). This would include landscape screening of the Onshore Converter Station(s) such as hedgerow and woodland planting. Once matured, this would help to integrate the Onshore Converter Station(s) into the existing landscape of arable fields and boundary trees/hedgerows. The aforementioned planting would be secured through the approval of a detailed Landscape Management Plan post-consent. Screening along the northern and southern boundaries of the Onshore Substation Zone would likely reduce the magnitude of impact (shown in **Figure 23-6** [PDA-010]).
90. Mitigation measures for all impacts that have the potential to be affected by the proposed change remain the same as outlined in the ES.

91. As a result, **no new or different** Onshore Archaeology and Cultural Heritage related likely significant effects are anticipated as a result of the proposed change.

### 3.6 Landscape and Visual Impact

92. The key elements of the proposed change relevant to Landscape and Visual Impact comprise the reduction of the footprint of the Onshore Converter Station(s) and associated minor changes to the Indicative Landscape Plan, as shown in Figure 2b (Appendix A).
93. The main implications of the proposed change would be to:
- Reduce the area of direct physical impact on the landscape of the Onshore Substation Zone; and
  - Reduce the extent of permanent infrastructure that would be visible to receptors in the study area.
94. The construction impacts that have the potential to be affected by the proposed change are:
- Impact 3: Landscape Effects of Onshore Converter Station(s) During Construction – Subarea 5; and
  - Impact 6: Potential Effects on Visual Amenity During Construction. Visual Effects of Onshore Converter Stations – Subarea 5 (Onshore Substation Zone).
95. As reported in the ES, Impact 3 considers the construction of the Onshore Converter Station(s) which would lead to disturbance and activity across the area within the Onshore Substation Zone, including temporary access tracks across fields and a number of Temporary Construction Compounds (TCCs) with associated fencing, storage bunds, equipment, lighting, signage and other temporary features. The total construction area as a result of the proposed change would be reduced however the construction duration would remain as reported in the ES, up to six years. The change in the footprint of the Onshore Converter Station(s) would not alter the magnitude of impact as reported in the ES as the construction works would still be of a large scale and medium geographical extent. The magnitude of impact would therefore remain medium. The significance of effect, as reported in the ES, with the implementation of embedded mitigation in the form of the **Outline Landscape Management Plan** [AS-096] to ensure landscaping is reinstated results in a minor adverse significance of effect. This is unchanged from the ES.
96. Impact 6 considers the magnitude of impact of the construction of the Onshore Converter Station(s) in the Onshore Substation Zone in respect to visual amenity effects and the resulting significance of effect at a number of different viewpoints:
- Viewpoint 1: Butt Farm - The magnitude of impact on viewpoint 1, Butt Farm, is considered to be medium. The proposed change does not greatly alter the construction works though the revised footprint would result in a greater

separation distance from the construction works associated with the Onshore Converter Station(s) and from Butt Farm. The method, duration and timing of the construction works are unchanged from the ES. As such the significance of effect is unchanged from the ES and considered to be minor adverse with the implementation of the **Outline Landscape Management Plan [AS-096]** as embedded mitigation.

- Viewpoint 2, Copleflat Lane, Bentley - a high magnitude of impact as a result of a large scale visual impact in a small geographical extent. The construction of the Onshore Converter Station(s) would occupy a smaller horizontal extent of the view and would be located further from the viewpoint. The residual effect of construction would remain minor adverse, which is deemed to be not significant, as reported in the ES.
- Viewpoint 3: Beverley 20 near Broadgate – the proposed change would not alter the level of effect reported in the ES and would remain unchanged as a high magnitude of impact and overall minor adverse significance of effect.
- Viewpoint 4: Oriel Close, off Broadgate – The Onshore Converter Station(s) would occupy a smaller horizontal extent of the view and would appear better screened by existing woodland compared to the DCO layout. However, this beneficial screening is variable along this Close. As such is it considered that the magnitude of impact would remain low and overall significance of effect negligible, as reported in the ES.

97. The operation and maintenance impacts that have the potential to be affected by the proposed change are:

- Impact 1: Potential Effects on Landscape Character During Operation;
- Impact 2: Potential Effects on the Yorkshire Wolds Important Landscape Area (ILA); and
- Impact 3: Potential Effects on Visual Amenity During Operation.

98. The consolidation of both Onshore Converter Station(s) into a smaller footprint would reduce the overall area of the landscape of agricultural fields which would be physically affected by development, and subsequently would reduce physical effects on landscape character (Impact 1 as reported in the ES). Despite the reduction in the footprint, it is considered that the significance of effect reported in the ES would remain unchanged. The magnitude of impact would remain high within approximately 0.5km of the footprint of the Onshore Converter Station(s) and the overall significance of effect would remain moderate adverse, with the implementation of the embedded mitigation of the **Outline Landscape Management Plan [AS-096]** and is unchanged from the ES.

99. The smaller footprint would reduce the extent of physical effects on the Yorkshire Wolds ILA (Impact 2 as reported in the ES). Despite the reduction in the footprint, the Onshore Converter Station(s) would remain a prominent feature within the Yorkshire Wolds ILA. The level of effect reported in the ES would remain unchanged. The magnitude is therefore considered to be high within approximately 1km of the footprints of the Onshore Converter Station(s), reducing to medium then low with greater distance. As reported in the ES, the significance of effect would be moderate adverse with the implementation of the embedded mitigation of the **Outline Landscape Management Plan [AS-096]** and is unchanged from the ES.
100. The smaller footprint of the Onshore Converter Station(s) would reduce the overall massing and consequently reduce the visual intrusion of the Onshore Converter Station(s) in views experienced from Viewpoints 1 – Viewpoint 8 (Impact 3 as reported in the ES). A high-level summary of expected changes to views is provided below:
- Viewpoint 1: Butt Farm – There would be less visibility of the Onshore Converter Station(s). However, due to the proximity of the Onshore Converter Station(s) the level of effect reported on in the ES would remain unchanged, moderate (significant).
  - Viewpoint 2: Copleflat Lane, Bentley – The Onshore Converter Station(s) would occupy a smaller horizontal extent of the view and would be located further from the viewpoint. However, the Onshore Converter Station(s) would remain a prominent feature in views, and it is considered that the level of effect reported on in the ES would remain unchanged, moderate (significant).
  - Viewpoint 3: Beverley 20 near Broadgate – The Onshore Converter Station(s) would occupy a smaller horizontal extent of the view. However, the Onshore Converter Station(s) would remain a prominent feature in views, and it is considered that the level of effect reported on in the ES would remain unchanged, moderate (significant).
  - Viewpoint 4: Oriel Close, off Broadgate – The Onshore Converter Station(s) would occupy a smaller horizontal extent of the view and would appear better screened by existing woodland compared to the DCO layout. It is expected that the level of effect reported on in the ES would remain minor (not significant) at this viewpoint once the landscape plan as shown in Figure 2 (b) is matured.
  - Viewpoint 8: Beverley Minster – The Onshore Converter Station(s) would occupy a smaller horizontal extent of the view, however given the intervening distance, it is expected that the level of effect reported on in the ES would remain unchanged, minor (not significant).
  - Views from Viewpoints 5 (Walkington), 6 (footpath, Risby) and 7 (Woodmansey) would remain unchanged with effects remaining in alignment with those reported in the ES, Negligible (Not Significant).

101. The smaller footprint of the Onshore Converter Station(s) provides more flexibility in developing the proposed landscaping around the Onshore Converter Station(s). An updated Indicative Landscape Plan (Figure 2b) was produced to reflect the reduced Onshore Converter Station(s) footprint. Changes in the updated plan include providing a more continuous belt of woodland along the eastern boundary, enhancement of existing watercourse vegetation within the Site, and additional woodland planting to the east of the Onshore Converter Station(s) which would provide a layering effect in views from the south-east. Woodland planting along the eastern extents of the southern and northern boundaries has been reduced slightly given there would no longer be a Onshore Converter Station located further east within the Site. As a result, **no new or different** Landscape and Visual related likely significant effects are anticipated as a result of the proposed change.

### 3.7 Traffic and Transport

102. The traffic and transport impacts assessed within **Chapter 24 Traffic and Transport** [APP-195] include:
- Impact 1: Severance;
  - Impact 2: Amenity;
  - Impact 3: Road Safety;
  - Impact 4: Driver Delay (Capacity);
  - Impact 5: Driver Delay (Highway Geometry); and
  - Impact 6: Driver Delay (Road Closures).
103. The assessment of traffic and transport impacts within **Chapter 24 Traffic and Transport** [APP-195] was informed by reviewing the forecast change in traffic flows relative to the baseline traffic conditions. The traffic and transport baseline traffic conditions would remain unchanged under the proposed changes from those assessed within the ES.
104. The **Appendix 24-2 Transport Assessment** [AS-019] submitted with the DCO application includes details of a proposed new priority access junction from the A1079 (notated AC-SB4) that would provide access for the Projects construction and operational traffic to the Onshore Converter Station(s) via a new private access road. The proposed changes would not alter the access strategy and consequently the assignment of the Project's traffic to the traffic and transport study area (and impacted receptors) would not be affected.
105. The **Chapter 24 Traffic and Transport** [APP-195] identified that with the application of mitigation measures (as required) the residual effects associated with the Project's construction and operational phase traffic would not be significant in EIA terms for all impacts.

106. Forecast construction and operational traffic flows contained within the **Chapter 24 Traffic and Transport** [APP-195] were derived by construction consultants Wardell Armstrong and the Applicants' engineering team, by applying their experience of delivering similar offshore wind farm projects. The construction consultants and the Applicants' engineering team have advised that the proposed reduction in the footprint of the Onshore Converter Station(s) would result in:
- An overall reduction in the total number of vehicle movements during the construction phase, however, the peak daily vehicle movements would not be notably different (as a consequence of revised delivery programming); and
  - No change to the operation and maintenance strategy, e.g. the Onshore Converter Station(s) would remain unmanned and there would be no change in the duration or quantum of periodic maintenance activities.
107. It should also be noted that no changes are proposed to the **Outline Construction Traffic Management Plan** [AS-020] which includes targets, measures and monitoring processes to ensure that the construction traffic parameters (e.g., traffic numbers and routes) assessed within the **Chapter 24 Traffic and Transport** [APP-195] are managed and not exceeded (as secured in Requirement 14 of the **Draft DCO** [AS-120]).
108. As a result, **no new or different** traffic and transport related likely significant effects are anticipated as a result of the proposed change.

### 3.8 Noise

109. The key element of the proposed change relevant to Noise is the reduction of the footprint of the Onshore Converter Station(s), which would increase the distance between the Onshore Converter Station(s) and some noise sensitive receptors (NSRs) considered within **Chapter 25 Noise** [APP-201]. This proposed change has the potential to affect the following assessment impacts reported in the **Chapter 25 Noise** [APP-201]:
- Impact 3: On-site Construction Noise at Onshore Converter Station(s); and
  - Impact 6 Operation of Onshore Converter Station(s).

110. Impact 3 considers the construction activities at the Onshore Substation Zone which have the potential to result in noise impacts at NSRs. As reported in the ES, the worst case noise levels from Onshore Converter Station(s) activities are predicted to cause a negligible impact during daytime and a low impact during Saturday afternoon. The receptors worst-affected by the Onshore Converter Station(s) construction activities are of medium sensitivity, therefore the effect would be minor adverse (not significant) for the Onshore Converter Station(s) construction activities under all scenarios. The proposed change would not change the ES assessment as the construction activities would be broadly aligned with the ES and there is no change to the location of the NSRs. No additional mitigation measures are required however best practice measures would be followed at all construction sites and works would follow the **Outline Code of Construction Practice (OCoCP)** [AS-094] and is unchanged from the ES.
111. The reduction of footprint would locate the construction activities further from the nearest NSRs. With the implementation of best practicable means to minimise noise, as outlined in the OCoCP, it is considered that the impacts and effects identified in Impact 3 would be consistent with those reported in the ES and unchanged.
112. Potential effects during operation, Impact 6, considers the operation of the Onshore Converter Station(s) and the potential noise impacts on the nearest NSRs.
113. The ES assessment concluded that during night-time (23.00 – 07.00) operational impacts due to Onshore Converter Station(s) noise are predicted to be no greater than negligible for residential receptors, which are medium sensitivity. This represents minor adverse (not significant) effects at medium sensitivity receptors. No additional mitigation measures were therefore proposed. No effects were predicted during daytime hours (07.00 – 23.00).
114. The reduction of footprint would locate the operational infrastructure further from the nearest NSRs. It is considered that the impacts and effects identified for Impact 6 would be consistent with those reported in the ES and unchanged.
115. Notwithstanding the above, operational noise limits detailed in Requirement 21 of the **Draft DCO** [AS-120] would still be complied with by the Projects to prevent significant effects on receptors during operation.
116. Mitigation measures for all impacts that have the potential to be affected by the proposed change remain the same as outlined in the ES.
117. As a result, **no new or different** noise related likely significant effects are anticipated as a result of the proposed change.

### 3.9 Air Quality

118. The key elements of the proposed change relevant to Air Quality is the reduction of the footprint of the Onshore Converter Station(s). The reduction in the footprint of the Onshore Converter Station(s) would increase the distance between the Onshore Converter Station(s) and the nearby designated ecological site of Bentley Moor Wood (Ancient Woodland), which lies within the boundary of the Onshore Substation Zone. The proposed change would also increase the distance between the Onshore Converter Station(s) to some of the nearby human receptors.
119. There are no Air Quality Management Areas (AQMAs) within 500m of the proposed change. The closest AQMA, Hull AQMA No.1(A), is 10km to the south-east of the site. Background pollutant concentrations of nitrogen dioxide (NO<sub>2</sub>), and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) at the site of the proposed change and across the study area are considered in Table 26-28 and Table 26-30 of **Chapter 26 Air Quality** [APP-208] and are 'well below' (i.e. less than 75% of), and therefore meet, the relevant UK Air Quality Objectives. This is to be expected in areas that are largely in a rural setting.
120. Background pollutant concentrations of nitrogen oxides (NO<sub>x</sub>), ammonia (NH<sub>3</sub>) and background nitrogen and acid deposition rates at Bentley Moor Wood Ancient Woodland, which lies approximately 280m east of the proposed change, are presented in Table 26-29 of **Chapter 26 Air Quality** [APP-208]. Whilst background NO<sub>x</sub> concentrations and acid deposition rates are within their respective Critical Level and Critical Load, background NH<sub>3</sub> concentrations and nitrogen deposition rates are not. The baseline remains unchanged from that identified and assessed within the ES.
121. Construction impacts that have the potential to be affected by the proposed change are:
- Impact 1: Construction dust and fine particulate matter: Potential impacts in relation to construction dust soiling, human health and ecological risk remain the same. With the implementation of the mitigation measures described in **Chapter 26 Air Quality** [APP-208] and the **OCoCP** [AS-094], the effect of construction dust risk would be not significant;
  - Impact 2: NRMM emissions: Potential impacts of the proposed change in relation to Non-Road Mobile Machinery (NRMM) remain the same as those assessed in **Chapter 26 Air Quality** [APP-208]. With the implementation of the embedded mitigation measures described in Table 26-3 of **Chapter 26 Air Quality** [APP-208], the effect of NRMM emissions on local air quality would be not significant; and
  - Impact 3: Construction road vehicle exhaust emissions: The proposed change is not anticipated to result in a difference in construction traffic volumes. Therefore, the potential impacts in relation to road traffic emissions on human and ecological receptors remain the same as those assessed in **Chapter 26 Air Quality** [APP-208].

122. Mitigation measures for all impacts that have the potential to be affected by the proposed change remain the same as outlined in the ES.
123. As a result, **no new or different** air quality related likely significant related effects are anticipated as a result of the proposed change.

### 3.10 Tourism and Recreation

124. The proposed change has the potential to impact the outcomes of the assessment of the tourism economy of the Onshore Study Area and tourism assets in the proximity of the Onshore Substation Zone as recorded in **Chapter 29 Tourism and Recreation** [APP-219].
125. The impacts associated with tourism and recreation are the results of reactions, by tourists and the tourism economy to other environmental impacts such as visual impacts. As such, the tourism and recreation assessment is based on identifying significant effects in other assessments and then considering the implications for tourism and recreational assets.
126. The following topics, which have been screened in for further assessments as the proposed change has the potential to alter the outcomes of the ES, would determine the implications for tourism and recreational assets:
- Chapter 21 Land Use [AS-111];
  - Chapter 23 Landscape and Visual Impact Assessment [APP-192];
  - Chapter 24 Traffic and Transport [APP-195];
  - Chapter 25 Noise [APP-201]; and
  - Chapter 26 Air Quality [APP-208].
127. As demonstrated in sections 3.1 to 3.9, no new or different impacts are anticipated to any of the above topics as a result of the proposed change. As a result, **no new or different** Tourism and Recreation related likely significant effects are anticipated as a result of the proposed change.

## 4 Land Rights

128. The reduction in area required for the Onshore Converter Station(s) would create enough space to move the SuDs basin westward and avoid the potential diversion of a Yorkshire Water asset that traverses the Onshore Substation Zone in proximity to the Bentley Moor Wood Ancient Woodland, as shown on Figure 3. As the potential Yorkshire Water diversion would no longer be required, land in the north-east of the Onshore Substation Zone, Works No. 28A/B (Utility Connection Works) on Sheet 18 of the **Works Plan (Onshore) (Revision 3)** [PDA-003], could be removed from the Onshore Order Limits. This would mean the removal of part of existing plot numbers 18-027 and 18-032 from the **Book of Reference** [AS-043] Figure 3 shows the area proposed to be removed from the Onshore Order Limits.
129. The reduction in the space required for the Onshore Converter Station(s) also enables a reduction in the area of permanent land use within the Onshore Substation Zone. This would enable the Projects to reduce the nature of the compulsory acquisition powers being sought in the **Draft DCO** [AS-120] for some of the area around the Onshore Converter Station(s), which is in line with previous stakeholder feedback and representations received from **Albanwise Ltd** [RR-002], as set out in section 2.1. Further details of the changes are included in **Table 4-1** and should be read in conjunction with Land Plan Figures 4(a) 4(b) and the Works Plan Figures 5(a) and 5(b), in Appendix A.

**Table 4-1 Description of the Proposed Changes in Compulsory Acquisition Powers being Sought Relative to the DCO Application**

Existing Plot Number	Existing Acquisition Type	Current Works	New Plot Number	New Acquisition Type	New Works
18-010	Freehold Acquisition	Works No. 14A/B Onshore Cable Corridor Works No. 22A/B Permanent Access Road Zone Works No. 24A/B Substation Permanent Infrastructure Zone Works No. 26A/B Eastern Converter Station Footprint	18-010	Freehold Acquisition	Works No. 14A/B Onshore Cable Corridor Works No. 22A/B Permanent Access Road Zone Works No. 24A/B Substation Permanent Infrastructure Zone Works No. 27A/B, Permanent Landscaping

Existing Plot Number	Existing Acquisition Type	Current Works	New Plot Number	New Acquisition Type	New Works
		<p>Works No. 27A/B, Permanent Landscaping</p> <p>Works No. 29A/B, Permanent Landscaping</p> <p>Works No. 31A/B Onshore Cable Corridor to National Grid Connection</p>			<p>Works No. 29A/B, Permanent Landscaping</p> <p>Works No. 31A/B Onshore Cable Corridor to National Grid Connection</p>
18-010	Freehold Acquisition	<p>Works No. 22A/B Permanent Access Road Zone</p> <p>Works No. 24A/B Substation Permanent Infrastructure Zone</p> <p>Works No. 26A/B Eastern Convertor Station Footprint</p> <p>Works No. 27A/B, Permanent Landscaping</p> <p>Works No. 29A/B, Permanent Landscaping</p> <p>Works No. 31A/B Onshore Cable Corridor to National Grid Connection</p>	18-010A	Acquisition of Rights	<p>Works No. 30A/B Haul Road</p> <p>Works No. 31A/B, Onshore Cable Corridor to National Grid Connection</p>
18-014	Freehold Acquisition	<p>Works No. 24A/B Substation Permanent Infrastructure Zone</p>	18-014	Freehold Acquisition	<p>Works No. 24A/B Substation Permanent Infrastructure Zone</p>

Existing Plot Number	Existing Acquisition Type	Current Works	New Plot Number	New Acquisition Type	New Works
		Works No. 25A/B Eastern Convertor Station Footprint Works No. 26A/B Eastern Convertor Station Footprint			Works No. 25A/B Eastern Convertor Station Footprint Works No. 26A/B Eastern Convertor Station Footprint
18-014	Freehold Acquisition	Works No. 24A/B Substation Permanent Infrastructure Zone Works No. 25A/B Eastern Convertor Station Footprint Works No. 26A/B Eastern Convertor Station Footprint	18-014A	Acquisition of Rights	Works No. 30A/B Haul Road Works No. 31A/B, Onshore Cable Corridor to National Grid Connection
18-015	Freehold Acquisition	Works No. 24A/B Substation Permanent Infrastructure Zone Works No. 26A/B Eastern Convertor Station Footprint Works No. 27A/B, Permanent Landscaping Works No. 28A/B Utility Connection Works	18-015	Acquisition of Rights	Works No. 30A/B Haul Road
18-015	Freehold Acquisition	Works No. 24A/B Substation Permanent Infrastructure Zone Works No. 26A/B Eastern Convertor Station Footprint	18-015A	Freehold Acquisition	Works No. 24A/B Substation Permanent Infrastructure Zone Works No. 27A/B, Permanent Landscaping

Existing Plot Number	Existing Acquisition Type	Current Works	New Plot Number	New Acquisition Type	New Works
		Works No. 27A/B, Permanent Landscaping  Works No. 28A/B Utility Connection Works			Works No. 29A/B, Permanent Landscaping
18-021	Freehold Acquisition	Works No. 27A/B, Permanent Landscaping  Works No. 28A/B Utility Connection Works	18-021	Acquisition of Rights	Works No. 30A/B Haul Road
18-021	Freehold Acquisition	Works No. 27A/B, Permanent Landscaping  Works No. 28A/B Utility Connection Works	18-021a	Freehold Acquisition	Works No. 27A/B, Permanent Landscaping
18-022	Freehold Acquisition	Works No. 27A/B, Permanent Landscaping  Works No. 30A/B Haul Road	18-022	Freehold Acquisition	Works No. 27A/B, Permanent Landscaping
18-022	Freehold Acquisition	Works No. 27A/B, Permanent Landscaping  Works No. 30A/B Haul Road	18-022A	Acquisition of Rights	Works No. 30A/B Haul Road
18-025	Freehold Acquisition	Works No. 27A/B, Permanent Landscaping  Works No. 28A/B Utility Connection Works	18-025	Freehold Acquisition	Works No. 27A/B, Permanent Landscaping

Existing Plot Number	Existing Acquisition Type	Current Works	New Plot Number	New Acquisition Type	New Works
18-025	Freehold Acquisition	Works No. 27A/B, Permanent Landscaping  Works No. 28A/B Utility Connection Works	18-025A	Acquisition of Rights	Works No. 30A/B Haul Road
18-027	Acquisition of Rights	Works No. 18A/B, Temporary Haul Road  Works No. 28A/B Utility Connection Works No. 31A/B, Onshore Cable Corridor to National Grid Connection	18-027	Acquisition of Rights	Works No. 31A/B, Onshore Cable Corridor to National Grid Connection
18-027	Acquisition of Rights	Works No. 18A/B, Temporary Haul Road  Works No. 28A/B Utility Connection Works No. 31A/B, Onshore Cable Corridor to National Grid Connection	18-027a	Temporary Possession	Works No. 18A/B Temporary Haul Road

130. The changes in land use would enable 47% of the Onshore Substation Zone area to be returned to agriculture post construction. This would enable agricultural tenants to retain land within their remaining tenancies and reduces the potential impacts of the Projects on the operation of these businesses.
131. The change would also remove the requirement for the potential Yorkshire Water diversion meaning the Projects would no longer require permanent land rights and temporary construction rights over land in the north-east of the Onshore Substation Zone. This would remove 10% of land from the order in the Onshore Substation Zone.

132. The Applicants consider amendments to a number of plans and documents, associated with a reduction in compulsory acquisition powers would be required, should the proposed change be accepted by the ExA into examination, as detailed in Appendix A, Schedule of application documents and plans to be resubmitted upon acceptance of Change Request(s) of **Change Request Application** letter (document reference:10.48).

## 5 Consultation

### 5.1 Purpose of Consultation

133. Two consultations were carried out simultaneously, one for Project Change Request 1 which related to offshore and intertidal changes and one for **Project Change Request 2 – Onshore Substation Zone** [document reference 10.53]. Details of Project Change Request 1 can be found in **Project Change Request 1 – Offshore and Intertidal Works** [document reference 10.49].
134. The Project Change Request 2 non-statutory consultation, the results of which are presented in this section of the document, sought to obtain feedback on the changes outlined in sections 1 to 4 of this Project Change Request.

### 5.2 Consultation Approach

135. The approach to the consultation was a targeted non-statutory consultation. The consultation is classified as non-statutory under the Planning Act 2008 as it falls outside of the statutory consultation processes for Nationally Significant Infrastructure Projects.
136. Although the consultation was non-statutory, the consultation period met statutory guidance as it ran for more than 30 days. The ExA were in agreement with the proposed 30-day consultation period as outlined in the **Rule 17** letter issued 7<sup>th</sup> November 2024 [PD-007] and did not conclude significant changes to the consultation process and scope outlined within this document.
137. The targeted approach to the consultation was adopted to ensure that the relevant stakeholders and landowners or Persons with an Interest in Land (PILs) were informed about the changes, allowing for the changes to be considered and feedback to be provided.
138. The period of the non-statutory consultation ran from 15<sup>th</sup> November – 16<sup>th</sup> December 2024.

### 5.3 Scope of Consultation

139. The scope of the consultation is outlined in the details provided within section 5 of this document. Further details regarding the scope of the consultation can be found in Appendix B – Project Change Request 2 – Onshore Substation Zone Targeted Non-Statutory Consultation Letter.

## 5.4 Consultation Method/Delivery

140. Letters were issued via email to stakeholders on the 15<sup>th</sup> November 2024 as outlined in **Table 5-1**. Letters and plans were delivered by hand to 11 PILs as highlighted in **Table 5-1**.
141. In addition to contacting Stakeholders directly, site notices were placed along the route of the Onshore Cable Corridor, as requested by the ExA in the **Rule 17 letter** issued 7<sup>th</sup> November 2024 [PD-007]. This included locations near to the Substation Zone, as shown in the map provided in Appendix C Project Change Request 2 – Onshore Substation Zone Site Notice Letter and Locations Plan.
142. A copy of the site notice provided can also be found in Appendix C.
143. Further details regarding the details of the consultation were made available on the DBS Website ([DBS Offshore Wind](#)).

## 5.5 Consultation Audience/Stakeholder and PILs Consultees

144. The approach to identifying stakeholders was carefully considered based on the relevant areas of change as outlined in this document in sections 1 to 4. Key onshore stakeholders were identified if they have been consulted throughout the development of the DCO application and have engaged with the Applicants previously. Land interests, statutory undertakers and other stakeholders which have the potential to be affected by the project changes were also identified.
145. Stakeholders included Local Authorities, Parish Councils and PILs, Statutory Undertakers, Prescribed and Non-prescribed consultees including all stakeholders with an interest in the scope of the changes outlined, as detailed in **Table 5-1**. The stakeholders and PILs identified were agreed with the ExA in the ExAs response to the Applicants **Change Notification Letter** [AS-015] in the **Rule 17 letter** issued 7<sup>th</sup> November 2024 [PD-007]. Additional consultees were requested to be consulted by the ExA and these have been included in **Table 5-1**.
146. Where consultees were identified as having an interest in both Project Change Request 1 and Project Change Request 2, they were consulted on both and issued all of the relevant information via a single email or letter.
147. **Table 5-1** outlines the stakeholders consulted, their category and contact method used by the Applicants

**Table 5-1 Stakeholders Consulted on Project Change Request 2 – Onshore Substation Zone**

Stakeholder	Stakeholder Category	Contact Method
Albanwise Ltd	Land Interest	Letter Emailed
Beverley and North Holderness Internal Drainage Board	Prescribed Consultee	Letter Emailed
Beverley Town Council	Host Parish Council	Letter Emailed
Bishop Burton College	Land Interest	Hand Delivered
East Riding of Yorkshire Council	Host Local Authority	Letter Emailed
East Riding of Yorkshire and Kingston Upon Hull Joint Access Forum	Non-prescribed Consultee	Letter Emailed
Forestry Commission Yorkshire and Northeast	Prescribed Consultee	Letter Emailed
Health and Safety Executive	Prescribed Consultee	Letter Emailed
Historic England	Prescribed Consultee	Letter Emailed
Hull City Council	Neighbouring Local Authority	Letter Emailed
Humber Archaeological Partnership	Non-prescribed Consultee	Letter Emailed
Humberside Fire and Rescue	Prescribed Consultee	Letter Emailed
Humberside Police and Crime Commissioner	Prescribed Consultee	Letter Emailed
INEOS	Statutory Undertaker	Letter Emailed
Robert Elvidge	Land Interest	Hand Delivered
Oliver White	Land Interest	Hand Delivered
Andrew Woodmansey	Land Interest	Hand Delivered
Stuart Yeo	Land Interest	Hand Delivered
Dawn Bache	Land Interest	Hand Delivered
John and Ruth Tunnicliffe	Land Interest	Hand Delivered
Elizabeth and Graham Lilley	Land Interest	Hand Delivered

Stakeholder	Stakeholder Category	Contact Method
Audrey Dawson and Stephen Michael Knaggs	Land Interest	Hand Delivered
Sam and Adelle Brewitt	Land Interest	Hand Delivered
Lincolnshire Wildlife Trust	Non-prescribed Consultee	Letter Emailed
Ministry of Defence	Prescribed Consultee	Letter Emailed
National Gas Transmission PLC	Statutory Undertaker	Letter Emailed
National Grid PLC	Statutory Undertaker	Letter Emailed
National Grid Electricity System Operator Limited	Statutory Undertaker	Letter Emailed
National Grid Electricity Transmission PLC	Statutory Undertaker	Letter Emailed
National Grid Interconnector Holdings Limited	Statutory Undertaker	Letter Emailed
National Highways	Prescribed Consultee	Letter Emailed
Natural England (Offshore Wind Farms)	Prescribed Consultee	Letter Emailed
Natural England	Prescribed Consultee	Letter Emailed
NHS England	Prescribed Consultee	Letter Emailed
Northern Gas Networks Limited	Statutory Undertaker	Letter Emailed
Northern Powergrid Limited	Statutory Undertaker	Letter Emailed
OFGEM	Non-prescribed Consultee	Letter Emailed
Rowley Parish Council	Host Parish Council	Letter Emailed
The Coal Authority	Prescribed Consultee	Letter Emailed
The Environment Agency	Prescribed Consultee	Letter Emailed
The Wildlife Trusts	Non-prescribed Consultee	Letter Emailed
The Woodland Trust	Non-prescribed Consultee	Letter Emailed

Stakeholder	Stakeholder Category	Contact Method
United Kingdom Health Security Agency	Prescribed Consultee	Letter Emailed
Walkington Parish Council	Host Parish Council	Letter Emailed
Yorkshire Water Services	Statutory Undertaker	Letter Emailed
Yorkshire Wildlife Trust	Non-prescribed Consultee	Letter Emailed

## 5.6 Consultation Responses and Applicants Regard

148. A total of seven consultation responses were received during the consultation period. **Table 5-2** below details the comments received and the Applicants' regard. A copy of these consultation responses are available in Appendix D.

**Table 5-2 Consultation Responses Received through the Non-Statutory Consultation |Process and the Applicants' Responses on Project Change Request 2 – Onshore Substation Zone**

Stakeholder	Response Date	Comment	Response
National Highways	28/11/2024	Thank you consulting National Highways on the 'Project Change Request 2: Onshore Substation Zone', having reviewed the description of the proposed change and the summary of the predicted environmental effects of the change to the Applicants' Environmental Statement [AS-015], the changes to the application does not alter the previous conclusion from the ES, that traffic movements will be managed through a CTMP.	The Applicants acknowledge this comment.
The Coal Authority	20/11/2024	<p>Thank you for your notification of 15<sup>th</sup> November 2024 seeking the views of the Coal Authority on the above.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority's defined Development Low Risk Area. On this basis we have no specific comments to make.</p> <p>However, in the interest of public safety, it is requested that the Coal Authority's Standing Advice note is drawn to the l's attention, where relevant.</p>	The Applicants acknowledge this comment.
Natural England	09/12/2024	<p>Thank you for your consultation on the above dated 14<sup>th</sup> November 2024, which was received on 15<sup>th</sup> November 2024.</p> <p>This advice is being provided as part of Natural England's Discretionary Advice Service. RWE Renewables UK Dogger Bank South (East) Limited; RWE Renewables UK Dogger Bank South (West) Limited has asked Natural England to provide advice upon:</p> <p>Project Change Request 2: Onshore Substation Zone</p> <p>This advice is provided in accordance with the Quotation and Agreement dated 3<sup>rd</sup> February 2022.</p> <p>The following advice is based upon the information within:</p> <p>Project Change Request 2: Onshore</p> <p>8. Project Change Request 2: Onshore Substation Zone (Appendix A – Figures, Appendix B - List of DCO Application Documents to be Updated), Nov 2024, C2.1, Rev 01</p> <p>Natural England have reviewed the changes and are satisfied that there should be no material impact on aspects relevant to our remit.</p>	The Applicants acknowledge this comment.

Stakeholder	Response Date	Comment	Response
INEOS	29/11/2024	<p>Many thanks for your e-mail/letter regarding the project change request.</p> <p>INEOS UK SNS Limited is the operator and co-owner of the Cavendish field, which is located in UKCS Block 43/19a, ceased production in 2018 and is currently being decommissioned. Dana Petroleum (E&amp;P) Limited is the other co-owner.</p>	<p>The Applicants acknowledge this comment.</p>
Dr Stephen R. Mounce	10/12/2024	<p>I am responding to the above consultation as a potentially Interested Party and providing some feedback on the proposed changes/ current version of the proposal. I am a local resident of Beverley who is particularly interested in the impacts of the overland cable route on Burton Bushes/ Beverley Westwood (a unique site and very popular nature amenity area for the public), both as a community area, as a unique habitat and in terms of archaeological interest.</p> <p>As a general comment, I was rather shocked to hear that only 4-6 members of the public responded to the consultation (one of which was myself) - I felt that information provided about the scheme and its impacts was rather under the radar. Since the project change requests are quite major (such as changing an Onshore Substation Zone), the public should have further chance to comment going forward.</p> <p>This new version of the proposal seems to be improved in that (provided the map at <a href="https://interactivemap.doggerbanksouth.co.uk/">https://interactivemap.doggerbanksouth.co.uk/</a> is correct) the proposed overland corridor is now given around a 100m gap whilst circling around Burton Bushes and the Westwood. This is better than some earlier maps which had this corridor right next to the Westwood which was completely inappropriate. In fact this is referred to in the November newsletter (having not being addressed previously nor still in the archaeology section) "Avoids the designated landscape at Westwood Common;" and under ecology p5 "Potential impact on Beverley Westwood and Burton Bushes Sites of Special Scientific Interest (SSSI)":</p> <ul style="list-style-type: none"> <li>• The cable route avoids both Beverley Westwood and Burton Bushes SSSI.</li> <li>• Temporary construction compounds have been selected that are further away from Burton Bushes SSSI to minimise impact.</li> <li>• We have committed to Horizontal Directional Drill under woodland areas to leave them undisturbed and in situ.</li> <li>• Comment: Can RWE confirm there is no drilling under Burton Bushes? This does not seem to be on the map and should not be allowed.</li> </ul> <p>Whilst the adjustments described in the first two points are welcome, I still contend that the corridor and construction sites and buildings are too close to wildlife habitats/ archaeological SSIs to me (e.g. Burton Bushes) and general peaceful amenity areas on the Westwood. There appears to be quite a lot of construction of 'temporary construction compounds' near to or next to various parts of the Westwood. The York road will be significantly disrupted.</p> <p>I spoke to Richard, a transport consultant/ contractor at the 2023 consultation event who gave me a lot of detailed information about the practicalities, timings, HGV, transport disruption, buildings, lengths per section. He explained the overland corridor is split into 15 sections overall, with each section requiring about 12 months of constructions, digging works, HGVs etc. One of these sections (16a) runs down the back length of the Westwood (including alongside Burton Bushes) and is forecast to last for</p>	<p>The Applicants acknowledge this comment.</p> <p>The consultation approach, scope and methods are set out in sections 5.1 to 5.4 of this document, and reflects the proposed approach set out in the Applicants' <b>Intention to Submit a Change Request re Onshore Substation Zone (Change Request 2)</b> (AS-015). The Examining Authority confirmed their agreement of this targeted consultation approach in their Rule 17 letter issued 7<sup>th</sup> November 2024 [PD-007], subject to the addition of a number of stakeholders to the circulation list. The Applicants have carried out their consultation as per the agreed approach with the Examining Authority and consider that it is adequate and satisfactory.</p> <p>As detailed in <b>Chapter 18 Terrestrial Ecology and Ornithology</b> [AS-109] Burton Bushes and Beverley Parks Local Nature Reserve are statutory designated sites, located on <b>Figure 18-3</b> [APP-141]. With the reduction of the Onshore Development Area since the PEIR, Burton Bushes SSSI and Beverley Parks LNR are no longer adjacent to the Onshore Development Area. Burton Bushes SSSI is now approximately 0.12km away, Beverley Westwood Local Wildlife Sites (Newbald Rd and Waxcaps), shown on <b>Figure 18-4</b> [APP-141] have also been avoided.</p> <p>The Applicants can confirm that there will be no trenchless crossing (e.g. Horizontal Directional Drilling) beneath the Beverley Westwood LWS / Burton Bushes SSSI.</p> <p>There is the potential for disturbance caused by works associated with the Onshore Export Cable Corridor on the Beverley Westwood LWS/Burton Bushes SSSI due to activities which generate fugitive emissions (i.e. dust and emissions from an increase in construction traffic and road access), noise disturbance from increased traffic, and trenchless crossing such as Horizontal Directional Drilling (HDD). However, this would be controlled through <b>Outline Code of Construction Practice</b> [AS-094] and <b>Outline Construction Traffic Management Plan</b> [AS-20], and the effects are not considered significant.</p> <p>Whilst the Onshore Development Area now avoids any impacts to the Beverley Westwood, as described above, the site does fall within the Study Area for the Onshore Archaeology and Cultural Heritage assessment. <b>Chapter 22 Onshore Archaeology and Cultural Heritage</b> (AS-092) considers any potential impacts to archaeological sites at the Beverley Westwood, including temporary</p>

Stakeholder	Response Date	Comment	Response
		<p>months 15 to 26 of the project (likely earliest 2027 if the plan goes ahead and of course dependent on the National Grid Creyke Beck proposal).</p> <p>Therefore, likely there could be large scale construction activities, major transport disruption, noise pollution, wildlife/ ecology impacts, amenity impacts, possible knock on archaeological damage for Beverley Westwood for a period of up to 12 months as the plans stand. Incredibly, in section 3.3.3. of the PEIR in point 178 for potential impacts on tourism and users of recreational routes the "effects were assessed as negligible. no mitigation measures are proposed". Human health aspects were similarly glossed over in points 168 and 169.</p> <p>I would like to highlight the following (particularly as the PEIR ignored important information about Burton Bushes and didn't mention it or the Westwood once - very cursory and sub standard):</p> <ul style="list-style-type: none"> <li>Burton Bushes is a unique habitat of 25 acres of ancient woodland (pre 1500s), is designated as a Site of Special Scientific Interest including for Quercus robur - Pteridium aquilinum - Rubus fruticosus woodland (Broadleaved, mixed and Yew).</li> </ul> <p>SSSI designation:  <a href="https://designatedsites.naturalengland.org.uk/SiteList.aspx?siteName=Burton%20bushes&amp;countyCode=&amp;responsiblePerson=&amp;DesignationType=All">https://designatedsites.naturalengland.org.uk/SiteList.aspx?siteName=Burton%20bushes&amp;countyCode=&amp;responsiblePerson=&amp;DesignationType=All</a></p> <p>Map:  <a href="https://magic.defra.gov.uk/MagicMap.aspx?startTopic=Designations&amp;activelayer=sssiIndex&amp;query=HYPERLINK%3D%271002049%27">https://magic.defra.gov.uk/MagicMap.aspx?startTopic=Designations&amp;activelayer=sssiIndex&amp;query=HYPERLINK%3D%271002049%27</a></p> <ul style="list-style-type: none"> <li>The woodland trust has identified over 40 unique ancient trees in this wood:  <a href="https://ati.woodlandtrust.org.uk/treesearch/?v=2161204&amp;ml=map&amp;z=17&amp;nwLat=53.84295110571505&amp;nwLng=0.47212924667010103&amp;seLat=53.838494534874606&amp;seLng=-0.4567762822688559">https://ati.woodlandtrust.org.uk/treesearch/?v=2161204&amp;ml=map&amp;z=17&amp;nwLat=53.84295110571505&amp;nwLng=0.47212924667010103&amp;seLat=53.838494534874606&amp;seLng=-0.4567762822688559</a></li> </ul> <ul style="list-style-type: none"> <li>It is also a haven for birds, with over 63 varieties including greater spotted woodpecker, tawny owl, chiffchaffs and blackcaps.</li> <li>Burton Bushes is also a site of archaeological significance (Earthworks on the floor of Burton Bushes indicate probable agricultural enclosures, probably from the Romano-British period (c. AD 50-390)) - as is the Westwood in general (three Bronze Age Barrows). The neighbouring field to Burton Bushes i.e. containing the corridor could potentially contain similar areas of interest.</li> </ul> <p>English heritage Survey from 2004:  <a href="https://historicengland.org.uk/research/results/reports/6453/WestwoodCommonBeverley_anArchaeologicalSurvey_SurveyReport">https://historicengland.org.uk/research/results/reports/6453/WestwoodCommonBeverley_anArchaeologicalSurvey_SurveyReport</a></p> <p>Whilst I understand the need for these energy infrastructure projects I therefore make representation that this plan has made a poor decision on the onshore export cable corridor route and has not sufficiently thought through and investigated impacts (particularly around ecology, archaeology and heritage) on Beverley Westwood and Burton Bushes with the present corridor. It should be moved even further away from Burton Bushes and the Westwood to protect habitats and mitigate the other issues highlighted.</p>	<p>changes to the setting of heritage assets on the Beverley Westwood, and concludes that no significant residual impacts are anticipated.</p> <p>An assessment of the Projects impact on human health is provided in <b>Chapter 27 Human Health</b> [APP-214] of the Environmental Statement (ES).</p> <p>The assessment draws upon relevant public health information and also considers the residual impacts from other Environmental Statement Chapters (e.g. noise, air quality, tourism and recreation, landscape and visual, etc). Potential health impacts associated with the Projects (e.g. construction related noise, air quality impacts) are found to be not significant following the implementation of mitigation outlined in <b>Outline Code of Construction Practice</b> [AS-094].</p> <p>The Applicants note the additional detail regarding the Burton Bushes SSSI.</p> <p>A full assessment of potential impacts on this receptor is presented in <b>Chapter 18 Terrestrial Ecology and Ornithology</b> [AS-109]</p> <p>The Applicants have followed a comprehensive, iterative site selection process to develop the most appropriate Onshore Export Cable Corridor, as set out in <b>Chapter 4 Site Selection and Assessment of Alternatives</b> [AS-017].</p> <p>Following project design refinement since PEIR, the Burton Bushes SSSI and Beverley Parks LNR are no longer adjacent to the Onshore Development Area. Burton Bushes SSSI is now approximately 0.12km away, and Beverley Westwood Local Wildlife Sites also avoided.</p>

Stakeholder	Response Date	Comment	Response
		No AI was utilised in the production of this submission.	
East Riding of Yorkshire Council	16/12/2024	<p>Further to the proposed changes outlined in Project Change 1 East Riding of Yorkshire Council would offer the following comments in relation to the landscape and visual impacts of the proposed converter station changes:</p> <ol style="list-style-type: none"> <li>1. The initial assessment in the Project Change Request 2, at 3.6. 99, that there would be "no new or different Landscape and Visual related likely significant effects are anticipated as a result of the proposed change", is noted. We concur with this general view.</li> <li>2. The reduction in size, and change of indicative location, of Sustainable Drainage System (SuDS) requirements are noted. The revised plans currently indicate no change in approach; the scheme still appears to adopt a 'pipe to pond' approach, with a single large 'Area for SuDS' indicated on the Landscape Plan, although it was noted in our meeting on 21.11.24 that it was stated this would now be a landscape led approach. We trust that the revised Outline Drainage Strategy, and thereafter the detailed design, will incorporate a 'landscape-led' approach to SuDS.</li> <li>3. The consideration of construction phase effects is noted. We look forward to seeing these demonstrated in relevant photomontages.</li> <li>4. Despite the new belt of planting close to the east boundary of the new footprint, there is some loss of planting to the north-eastern edge of the former boundary. This should be reviewed carefully to ensure no loss of landscape/visual mitigation as a result of the change.</li> <li>5. We note at 3.6. 93 "the construction duration would remain as reported in the ES, up to 6 years." Exploring opportunities to reduce the construction period, with regard to the more compact building footprint, has potential to reduce Landscape and Visual effects.</li> <li>6. We look forward to the more detailed assessment and evidence in the revised LVIA.</li> </ol> <p>We have no further comments to make on the proposed changes.</p>	<ol style="list-style-type: none"> <li>1. The Applicants acknowledge this comment.</li> <li>2. The Applicants acknowledge this comment. The <b>Outline Drainage Strategy (Revision 2)</b> [AS-098] was updated and re-submitted to the ExA in the pre-examination phase on 28th November. The updates included confirmation that the drainage design would adopt a landscape led approach. As described in the Applicants' cover letter (10.48) Appendix A, an updated Outline Drainage Strategy, reflecting the changes described within this document, will be submitted to the Examination upon acceptance of the Change Request.</li> <li>3. The Applicants do not propose to update the <b>Environmental Statement Chapter 23 – Landscape and Visual Impact Assessment - Figure 23-1 to Figure 23-15 (Revision 2)</b> [PDA-010], with temporary construction works, only the permanent structures to be located within the Onshore Substation Zone. Details of the potential impact of the proposed change on landscape and visual receptors during construction are included in section 3.6 of this document.</li> <li>4. The reduction in the footprint of the Onshore Converter Stations has resulted in the infrastructure being located in the west of the Substation Zone. Since there is no above-ground infrastructure in the east the screening has been reduced in response. The intention has been to increase the amount of land available to be returned to the landowner as farmland, while maintaining sufficient visual screening for key receptors.</li> </ol> <p>The mitigation strategy is to create layers of planting that overlap in views and combine to provide effective screening. Using blocks and strips of native planting will tie into the local landscape character, and the existing woodlands around the Substation Zone. New planting and existing woodlands will combine to reduce the intrusion of the converter station.</p> <p>To the north-east, planting is constrained by the cable corridor, where underground cables will be installed. These will pass under the Ancient Woodland at Bentley Moor Wood, which will be retained and protected throughout the works. This will provide key screening in this direction. Planting of substantive woodland will not be possible over the cable easements, though some planting in this area may prove to be feasible subject to detailed design.</p>

Stakeholder	Response Date	Comment	Response
			<p>The existing mature hedgerow and trees west of Bentley Moor Wood will be retained and, where necessary, enhanced and infilled as part of the landscape scheme. Proposed woodland planting up to 30m deep along this northern boundary, combined with the existing mature hedgerow, is considered to provide adequate screening of the Onshore Converter Stations in close range views from Butt Farm. This is the key location of sensitive visual receptors to the north-east of the site. Views experienced by dwellings alongside the A164 will be effectively screened by the existing Bentley Moor Wood.</p> <p>Other receptors to the north-east include properties along Victoria Road to the south of Morrisons, and houses on Wingfield Way further to the north. Victoria Road, some 675m from the Onshore Converter Stations, is relatively low-lying and benefits from existing mature trees and hedgerows within gardens and boundaries, around Jock's Lodge, and alongside the A1079. Houses on Wingfield Way, around 800m from the Onshore Converter Stations, have more elevated views. From this location, the Onshore Converter Stations would be seen behind woodland along the A1079 and around the Butt Farm access bridge, and beyond the proposed screening on the northern site boundary.</p> <p>There are not considered to be any sensitive visual receptors that would be adversely affected as a result of the reduction in proposed planting to the north-east of the converter station. The proposed landscape planting shown in the Indicative Landscape Plan accompanying the Change Request 2, located in Appendix A of this document is considered to provide an appropriate level of mitigation of the revised proposals.</p> <p>5. Regarding the reduction in the size of the Onshore Substation Zone and Onshore Converter Station area, the reduction in scale of the works at the Onshore Substation Zone, would not have a significant impact on the overall indicative project construction program proposed in <b>Chapter 5 – Project Description</b> [APP-071]. The construction period is dependent on the onshore and offshore construction. Supply and delivery of key components to site is not accelerated by the reduced footprint, and is subject to manufacturing, transport, and supply chain constraints. Some elements of work cannot be completed until these items are installed and hence precludes a compressed program. In addition, only once the offshore elements are complete can the construction works at the Onshore Substation Zone be fully commissioned and finalised. The final phase of the works is the reinstatement, and removal of all the temporary facilities once sufficient commissioning is completed. This is anticipated to take up to 6 years in a sequential construction scenario, as detailed in section 5.8 and Table 5-33 of <b>Chapter 5 – Project Description</b> [APP-071].</p>

Stakeholder	Response Date	Comment	Response
			<p>This would therefore not change the landscape and visual effects as reported in <b>Chapter 23 – Landscape and Visual Impact Assessment</b> of the ES [APP-192].</p> <p>6. The <b>Environmental Statement Chapter 23 – Landscape and Visual Impact Assessment - Figure 23-1 to Figure 23-15 (Revision 2)</b> [PDA-010] will be updated with the proposed design changes, upon acceptance of the Project Change Request 2, if agreed by the ExA.</p>
Historic England	13/12/2024	<p>Thank you for your notification of 15th November, 2024, concerning two Project Change Requests, the first in relation to Offshore and Intertidal Works and the second in relation to the Onshore Substation Zone.</p> <p>We have considered the notification and your supporting information (PDA-012 for Offshore and AS-015 for Onshore) and have the following comments and observations:</p> <p>2) Onshore:</p> <p>We note and welcome the reduction in the size of the footprint of the proposed Onshore Converter Station (OCS). We agree that the proposed reduction in scale of the OCS will lead to a reduced potential for effects on buried archaeology and a reduced visual impact when seen from the World War II anti-aircraft gun site at Butt Farm (NHLE 1019186). However, we consider that the harm to the significance of the designated site will remain at 'major adverse', and not 'minor adverse'.</p> <p>The reduction in the scale of the OCS should allow for a reconsideration of the landscaping scheme around the OCS, permitting greater flexibility and nuance and a departure from 'screening' approaches.</p> <p>An improved approach to the landscaping might include more naturalistic or estate-style planting and/or the introduction of horizontal banding as used to great effect by Sylvia Crowe and Brenda Colvin in the 1950s and 1960s to reduce the visual impact of coal fired and nuclear power stations.</p> <p>Such interventions could help reduce the level of harm to significance.</p>	<p>As set out in the Environmental Statement <b>Appendix 22-5 - Onshore Infrastructure Settings Assessment</b> [APP-178), the proposed planting has been designed to provide screening of the proposed Onshore Converter Stations in views southwards from the Butt Farm Heavy Anti-Aircraft (HAA) gun site (Scheduled Monument 1019186). While these southwards views do not comprise the most important contributing elements in its setting, the visible presence of the Onshore Converter Stations was assessed to be a potentially detracting element in the setting of the monument. To address this potential effect, the existing hedgerow planting to the northern edge of the Onshore Substation Zone would be strengthened with trees. While the larger buildings would remain visible, this planting would 'screen and break up visibility of low-level elements of the development such as switch gear and the proposed access road which are nearest to the heritage asset, leaving the more architecturally coherent larger structures visible above the intervening planting. This would reduce the impact of the visual intrusion of the Onshore Converter Stations by increasing the perceptual separation of the asset from the development' (section 77, APP-178). In effect, the aim is to minimise the sense of visual intrusion of the low level infrastructure, along with vehicles, switchgear, signage, fencing and other equipment outside the Onshore Converter Stations, and thereby increase the perceived separation of the heritage asset from the development, rather than screen visibility entirely.</p> <p>The screening planting has also been designed to respond to and be visually congruous with the historic landscape character of the area, which is characterised by blocks of mixed and deciduous woodland, with hedgerows containing mature trees. This screening would be effective in longer views towards the HAA gun site from the north, and would address HE's stated concern for the effect of kinetic views of the site, effectively screening lower level elements of the proposed development in all views towards the HAA gunsite.</p> <p>It is not considered that a banded design could achieve meaningful screening without a significantly increased land take of the site northwards, which would increase any loss of archaeological remains of the wider HAA battery site, and increase the perceived proximity of the proposed development to the asset. Increased land take would be required to allow for relatively natural slopes,</p>

Stakeholder	Response Date	Comment	Response
			<p>rather than a narrow, engineered bund. Introduction of bunding would result in the loss of the existing mature hedgerow between the HAA site and the Onshore Converter Stations. Planting on raised bunds tends to be less successful due to the raised soil drying out. As such, even if planted with trees, this approach would provide less effective screening than the proposed planting. The effectiveness of any screening would likewise be reduced in longer views towards the HAA gun site, and would not respond to the existing rural historic landscape character. As a result, a design based on a large-scale bund is considered likely to result in a higher magnitude of adverse effect and is not considered an appropriate response to the need to address change in setting of the scheduled HAA gun site.</p> <p>Similarly, the suggested estate-style planting, would not accord well with the existing historic landscape character and would not provide as effective screening. Estate style planting would rely on groups and layers of trees, rather than a single block, which is also unlikely to be feasible within the narrow strip available for screen planting in the Substation Zone.</p>

## 5.7 Summary of PIL Consultations

149. Whilst no formal consultation responses were received from PILs, a number of meetings were held in November and December 2024 with the Landowner and four Tenants of the land directly impacted to discuss the Project Change Request 2. Feedback at each of those meetings was generally positive towards the change as it reduces the amount of land needing to be surrendered from agricultural tenancies.

## 5.8 Summary of Consultation

150. A total of seven consultation responses were received following conclusion of the non-statutory consultation period held between the 15<sup>th</sup> November and 16<sup>th</sup> December 2024. Following the conclusion of the non-statutory consultation period, the Applicants reviewed each comment and provided individual responses to each (detailed in section 5.6). In summary, stakeholders broadly welcomed the proposed changes to the Onshore Development Area. This was also supported by the discussions held with key PILs during the consultation period. No amendments or changes were made to Project Change Request 2 as a result of the consultation.

## 6 Conclusions

151. The proposed change represents a reduction in the Onshore Order Limits, whilst staying within the maximum design parameters utilised to set the Project Design Envelope for the ES at DCO submission, as outlined in **Table 4-1**. The reduced permanent Onshore Converter Station(s) footprint would also be entirely located within Works No. 25A, located on page 18 of the **Works Plans (Onshore) (Revision 3)** [PDA-003]. This was assessed within the ES as the location for the construction and operation of the DBS East Project Onshore Converter Station(s). It should be noted there is no proposed change to the maximum infrastructure height.
152. The proposed changes under this Project Change Request 2 are focused entirely within the Onshore Substation Zone, and thus do not affect any of the assessments incorporated within the Offshore EIA topic **Chapters 8 – 17** [APP-080 – APP-139] of the ES. The proposed changes would reduce the scale of built form during operation onshore and move the works further from some onshore receptors than the distances assessed in the ES, as set out in section 3. The proposed change also addresses stakeholder concerns about the size of the Onshore Converter Station(s) and impacts on local farming businesses raised in relevant representations or through further discussion post submission of the DCO as detailed in section 2.2.
153. Overall, the proposed change is broadly positive and would result in a reduction in environmental impacts compared to those presented in the **ES** [APP-064 – APP-225] at the point of submission, for certain topics. However, as detailed in section 3, these positive impacts are not considered significant enough to result in any new or different likely significant environmental effects. Furthermore, all works associated with the proposed change would be undertaken in strict accordance with the environmental and construction management measures outlined within the wider DCO application, as secured by the Projects' **Draft DCO** [AS-120].
154. This document therefore demonstrates that the proposed change would not lead to the requirement for any additional mitigation measures or result in any new or different likely significant environmental effects to those previously assessed and reported within the ES.
155. The Applicants can confirm that the proposed changes, should they be accepted, would not impact the Consents and Licences required for the Projects, which remain unchanged from those described in Table 2-1 'Onshore Consents' of **Other Consents and Licences** [APP-228] submitted alongside the DCO Application. As these licences are all required post-DCO consent, they would not have any impact on the Examination Timetable.

## 7 Next Steps

156. Should the proposed changes detailed in this document be accepted by the ExA, the Applicants propose to update a number of documents previously submitted to the ExA during the examination process. This will be in order to reflect the changes to the Onshore Substation Zone resulting from this change request, any relevant Written Representations and questions from the ExA. Further details on which documents would be updated, as well as those which would not change, can be found in Appendix A 'Schedule of Application Documents for Change Requests 1 and 2' of the **Change Request Applications** letter [document reference 10.48] submitted to the ExA alongside Project Change Request 1 and Project Change Request 2.

## Appendix A – Figures

- LEGEND**
- ONSHORE ORDER LIMITS
  - ONSHORE EXPORT CABLE CORRIDOR
  - ONSHORE EXPORT CABLE CORRIDOR TEMPORARY CONSTRUCTION COMPOUND
  - ONSHORE CONVERTER STATION TEMPORARY CONSTRUCTION COMPOUND
  - ONWARD 400KV CONNECTION TO NATIONAL GRID
  - INDICATIVE EARTHWORKS EXTENTS
  - INDICATIVE SURFACE WATER DETENTION BASIN (SUDS)
  - OFF ROUTE HAUL ROAD
  - PROPOSED ACCESS WORKING AREA
  - INDICATIVE PERMANENT ACCESS ROAD
  - INDICATIVE SUBSTATION ACCESS ROAD WORKING AREA
  - INDICATIVE ROADSIDE FILTER TRENCHES
  - INDICATIVE CUT OFF DRAIN / DITCH
  - INDICATIVE PLATFORM SURFACE WATER DRAINAGE
  - EXISTING WATERCOURSE / DITCH
  - EXISTING UNDERGROUND UTILITY

- NOTES**
1. DO NOT SCALE FROM THIS DRAWING.
  2. DRAWING IS NOT FOR CONSTRUCTION.
  3. DRAWING IS INDICATIVE ONLY AND FEATURES SHOWN MAY VARY FROM FINAL DESIGN. ACTUAL DESIGN TO BE CONFIRMED AT DETAILED DESIGN STAGE. CONSTRUCTION TO BE COMPLETED IN ACCORDANCE WITH RELEVANT STANDARDS DEFINED IN DETAILED DESIGN.
  4. HVDC RBP CONVERTOR STATION ELECTRICAL LAYOUT PRESENTED PROVIDED BY MOTT MACDONALD AND IS INDICATIVE ONLY.

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REV	DATE	REASON FOR ISSUE	BY	CHK	APP
01	12/11/2024	SIMPLIFIED FOR CHANGE REQUEST	ZF	PM	AH



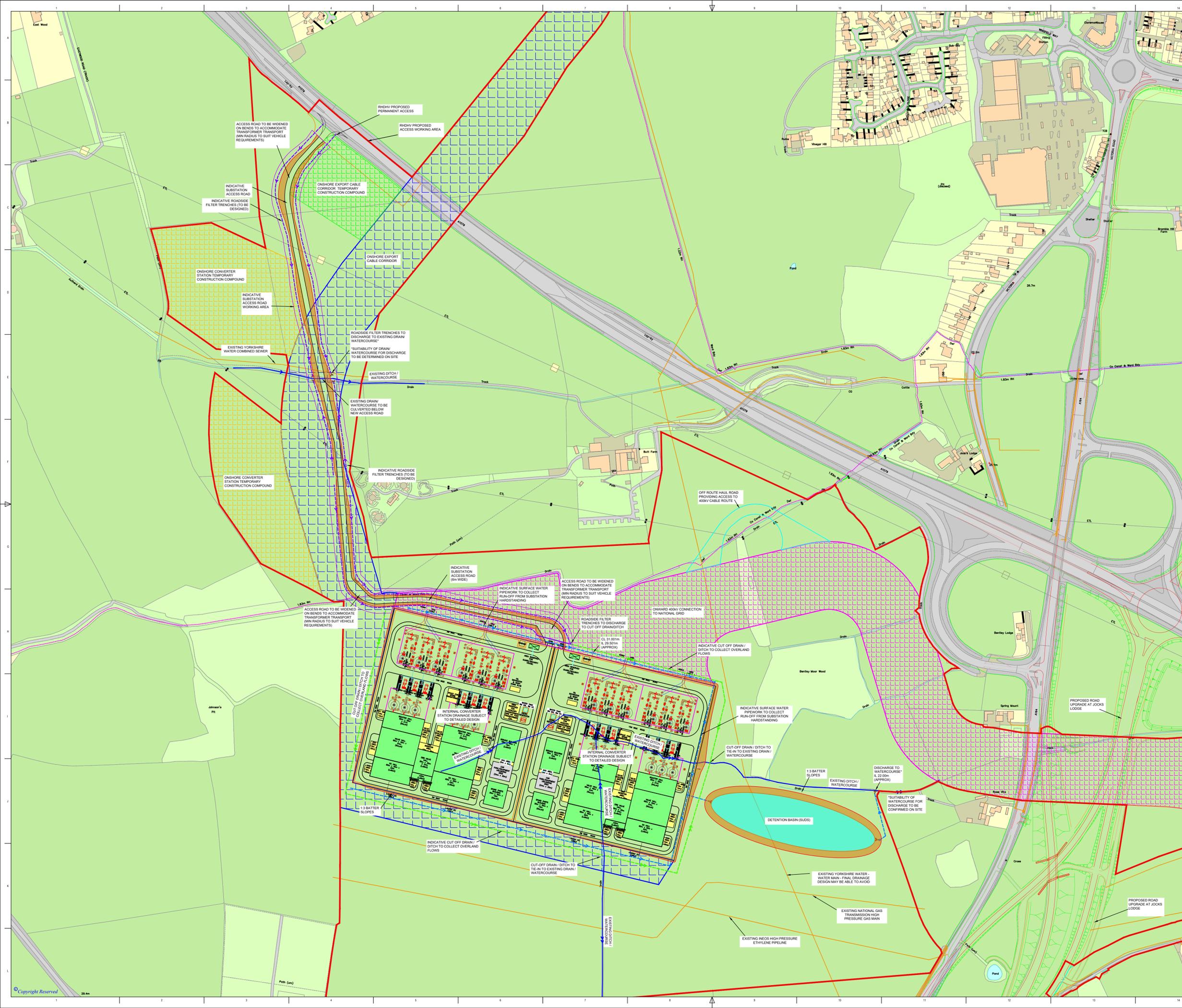
**PROJECT TITLE**  
**DOGGER BANK SOUTH (EAST AND WEST) OFFSHORE WIND FARMS**

**DRAWING TITLE**  
**FIGURE 1 (a) - INDICATIVE GENERAL ARRANGEMENT DRAWINGS FOR THE ONSHORE CONVERTER STATION(S) - SUBMITTED WITH THE DCO APPLICATION**

**DRAWING STATUS**  
**FINAL**

SHEET SIZE	DESIGNED	DRAWN	CHECKED	APPROVED
A1	PM	ZF	PM	AH
SHEET SCALE	DATE	DATE	DATE	DATE
NTS	12.11.2024	12.11.2024	12.11.2024	12.11.2024

WA DRAWING NUMBER	REVISION	
ED13554-GE-1130	01	
DBS DOCUMENT NUMBER	REVISION	
DBS-WAR-V2-XX-M2-C-0065-A	01	
RWE ECODOC NUMBER	SHEET No	REVISION
005457624-01	001 OF 001	01



- LEGEND**
- ONSHORE ORDER LIMITS
  - ONSHORE EXPORT CABLE CORRIDOR
  - ONSHORE EXPORT CABLE CORRIDOR TEMPORARY CONSTRUCTION COMPOUND
  - ONSHORE CONVERTER STATION TEMPORARY CONSTRUCTION COMPOUND
  - ONWARD 400KV CONNECTION TO NATIONAL GRID
  - INDICATIVE EARTHWORKS EXTENTS
  - INDICATIVE SURFACE WATER DETENTION BASIN (SUDS)
  - OFF ROUTE HAUL ROAD
  - PROPOSED ACCESS WORKING AREA
  - INDICATIVE PERMANENT ACCESS ROAD
  - INDICATIVE SUBSTATION ACCESS ROAD WORKING AREA
  - INDICATIVE ROADSIDE FILTER TRENCHES
  - INDICATIVE CUT OFF DRAIN / DITCH
  - INDICATIVE PLATFORM SURFACE WATER DRAINAGE
  - EXISTING WATERCOURSE / DITCH
  - EXISTING UNDERGROUND UTILITY

- NOTES**
1. DO NOT SCALE FROM THIS DRAWING.
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  4. HVDC RBP CONVERTOR STATION ELECTRICAL LAYOUT PRESENTED PROVIDED BY MOTT MACDONALD AND IS INDICATIVE ONLY.

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REV	DATE	REASON FOR ISSUE	BY	CHK	APP
02	12/11/2024	UPDATE TITLE FOR CHANGE REQUEST	ZF	PM	AH
01	08/11/2024	FINAL FOR DCO	ZF	PM	AH



**PROJECT TITLE**  
**DOGGER BANK SOUTH (EAST AND WEST) OFFSHORE WIND FARMS**

**DRAWING TITLE**  
**FIGURE 1 (b) - INDICATIVE GENERAL ARRANGEMENT DRAWINGS FOR THE ONSHORE CONVERTER STATION(S) - PROPOSED CHANGE**

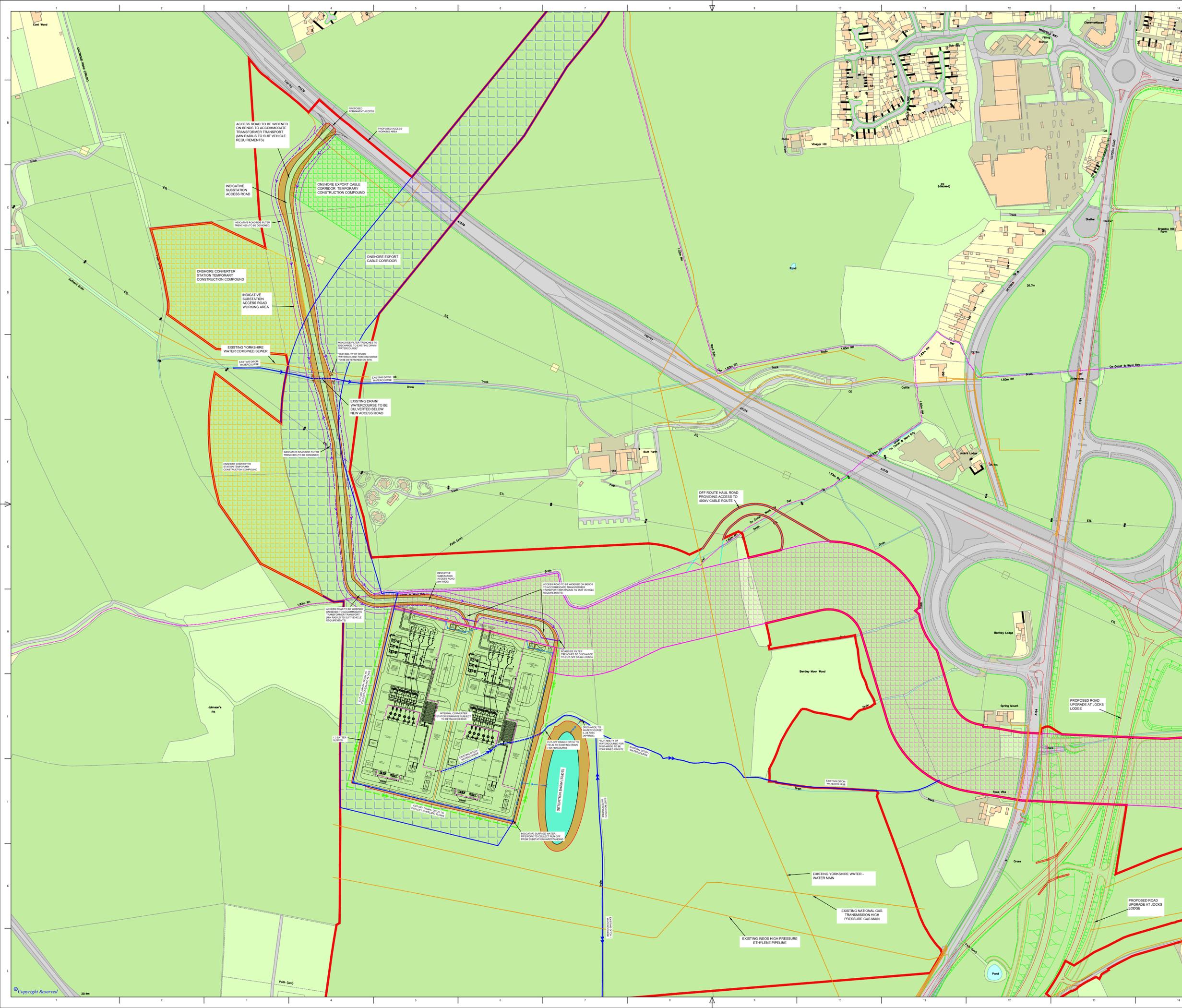
**DRAWING STATUS**  
**FINAL**

SHEET SIZE	DESIGNED	DRAWN	CHECKED	APPROVED
A1	PM	ZF	PM	AH
SHEET SCALE	DATE	DATE	DATE	DATE
NTS	08.11.2024	12.11.2024	12.11.2024	12.11.2024

WA DRAWING NUMBER ED13554-GE-1129	REVISION 02
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DBS DOCUMENT NUMBER DBS-WAR-V2-XX-M2-C-0064-B	REVISION 02
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RWE ECODEC NUMBER 005453454-02	SHEET No 001 OF 001	REVISION 02
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Legend:

- Onshore Substation Zone
- Existing utilities
- Area of underground cables
- Proposed meadow grassland
- Proposed woodland meadow
- Existing woodland to be retained
- Proposed native woodland
- Existing hedgerow to be retained
- Proposed native hedgerow
- Proposed native hedgerow with trees
- Proposed scrub
- Area for SUDs (indicative)
- Area to be returned to agriculture
- Access
- Area of earthworks to be re-seeded with grassland
- Public Right of Way
- Public Right of Way diversion

SUI	REV	DATE	DESCRIPTION	DRW	CHK	APR
S7	P08	25/10/2024	Suitable for Information	SH	EH	PM
S6	P07	06/03/2024	Suitable for Information	SH	EH	PM
S5	P07	27/02/2024	Suitable for Information	SH	EH	PM
S4	P06	22/11/2023	Suitable for Information	SH	EH	PM
S3	P02	22/03/2023	Suitable for Information	HS	TH	PM

Title:  
**Indicative Landscape Plan - Submitted with the DCO application**

Figure: 2a      Drawing No: PC2340\_LUC\_ON\_ZZ\_DR\_Z\_2a

Co-ordinate system: British National Grid      Page Size: A3      Scale: 1:6,000      DO NOT SCALE

Project: Dogger Bank South Offshore Wind Farms      Report: Dogger Bank South: Project Change Request 2



0      0.15      0.3 km

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Legend:

- Onshore Substation Zone
- Existing utilities
- Area of underground cables
- Proposed meadow grassland
- Proposed woodland meadow
- Existing woodland to be retained
- Proposed native woodland
- Existing hedgerow to be retained
- Proposed native hedgerow
- Proposed native hedgerow with trees
- Enhancement of existing watercourse vegetation
- Area for SUDs (indicative)
- Area to be returned to agriculture
- Maintained access through planting
- New access
- Area of earthworks to be re-seeded with grassland
- Public Right of Way
- Public Right of Way diversion

S7	P08	25/10/2024	Suitable for Information	SH	EH	PM
S6	P07	06/03/2024	Suitable for Information	SH	EH	PM
S5	P07	27/02/2024	Suitable for Information	SH	EH	PM
S4	P06	22/11/2023	Suitable for Information	SH	EH	PM
S3	P02	22/03/2023	Suitable for Information	HS	TH	PM
SUI	REV	DATE	DESCRIPTION	DRW	CHK	APR

Title:  
Indicative Landscape Plan – Proposed change

Figure: 2b      Drawing No: PC2340\_LUC\_ON\_ZZ\_DR\_Z\_2b

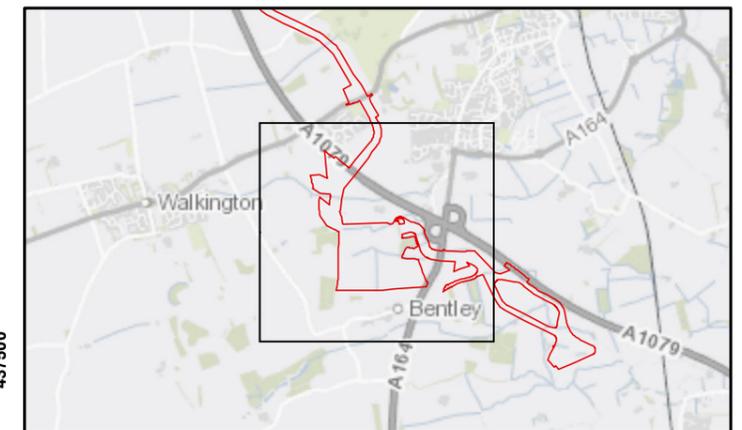
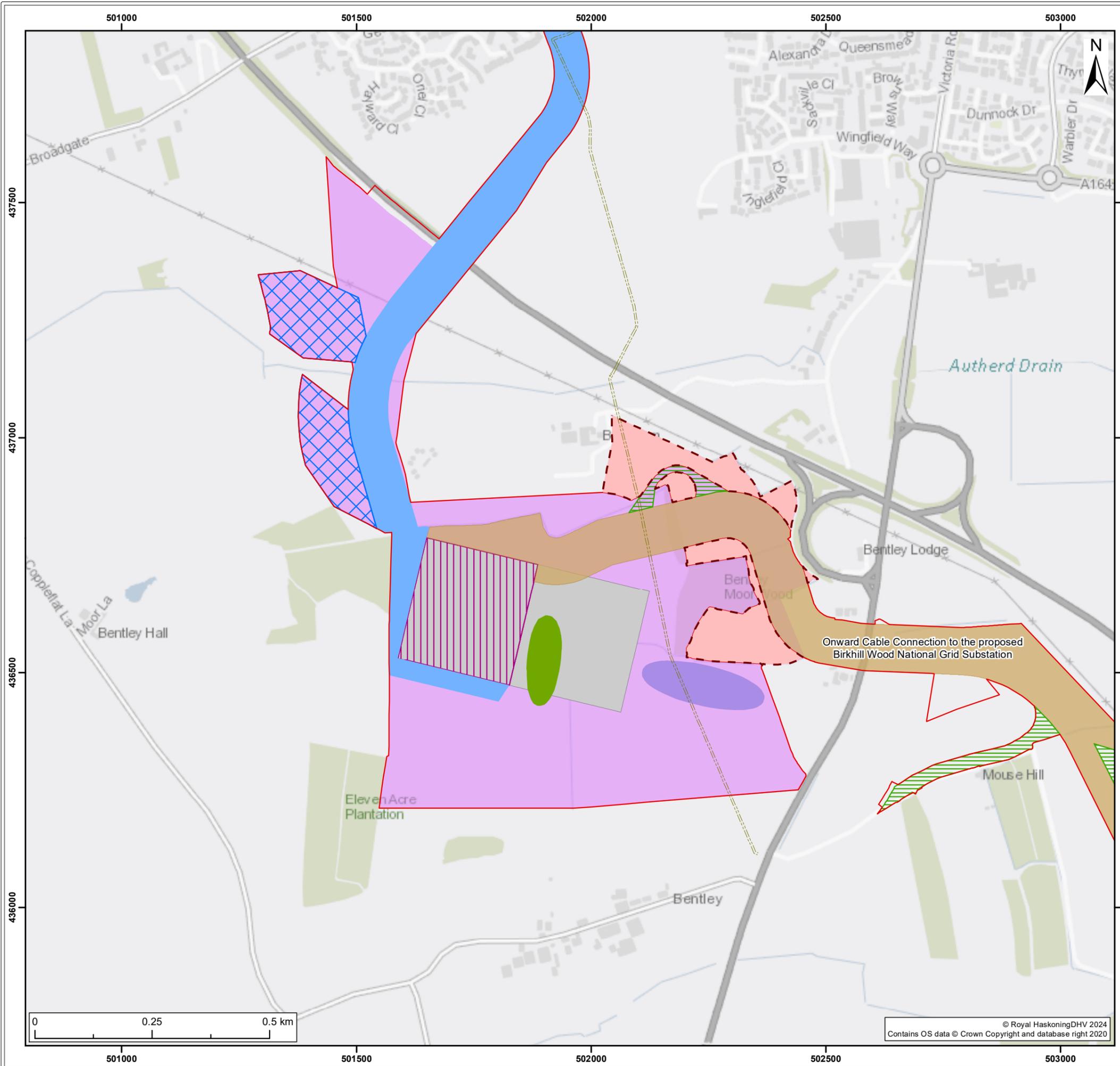
Co-ordinate system: British National Grid      Page Size: A3      Scale: 1:6,000      DO NOT SCALE

Project: Dogger Bank South Offshore Wind Farms      Report: Dogger Bank South: Project Change Request 2



0      0.15      0.3 km

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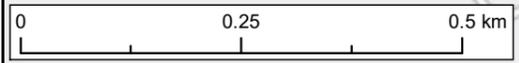


- Legend:
- Onshore Development Area
  - Onshore Substation Zone Temporary Construction Compounds
  - Onshore Substation Zone
  - Indicative 'Project Change Request 2' Onshore Converter Station(s) maximum footprint (both projects)
  - DCO Application Onshore Converter Station(s) maximum footprint (both projects)
  - Removed from the Onshore Development Area
  - Indicative Change Request 2 Area for SUDs
  - Indicative DCO Application Area for SUDs (removed)
  - Haul Road
  - Onshore Export Cable Corridor
  - Onward Cable Connection to the proposed Birkhill Wood National Grid Substation
  - Existing Yorkshire Water – Water Main

SUI	REV	DATE	DESCRIPTION	DRW	CHK	APR
S4	P04	14/11/2024	Suitable for stage approval	SM	ND	RH
S4	P03	12/11/2024	Suitable for stage approval	SM	ND	RH
S3	P02	07/11/2024	Suitable for review & comment	SM	ND	RH
S2	P01	31/10/2024	Suitable for information	SM	ND	RH

Title:  
**Onshore Substation Zone - Details of Proposed Changes**

Figure: 3	Drawing No: PC2340-RHD-ON-ZZ-DR-Z-0908	
Co-ordinate system: British National Grid	Page Size: A3	Scale: 1:8,000
Project: Dogger Bank South Offshore Wind Farms	Report: Project Change Request 2 – Onshore Substation Zone	



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- Key:**
- Order Limits
  - Freehold Acquisition
  - Acquisition of Rights
  - Temporary Possession

**Notes:**

Coordinate System: British National Grid  
Projection: Transverse Mercator  
Datum: OSGB 1936

**Interest:**  
N/A

**Location:**  
Bentley, Rowley, Beverley, East Yorkshire,  
HU17 8RG

**Coords:** 501935, 436905

**Scheme Name:**  
Dogger Bank South Offshore Wind Farm

**Drawing Name:**  
Figure 4 (a) – Land Plan (sheet 19/20) –  
Submitted with the DCO application

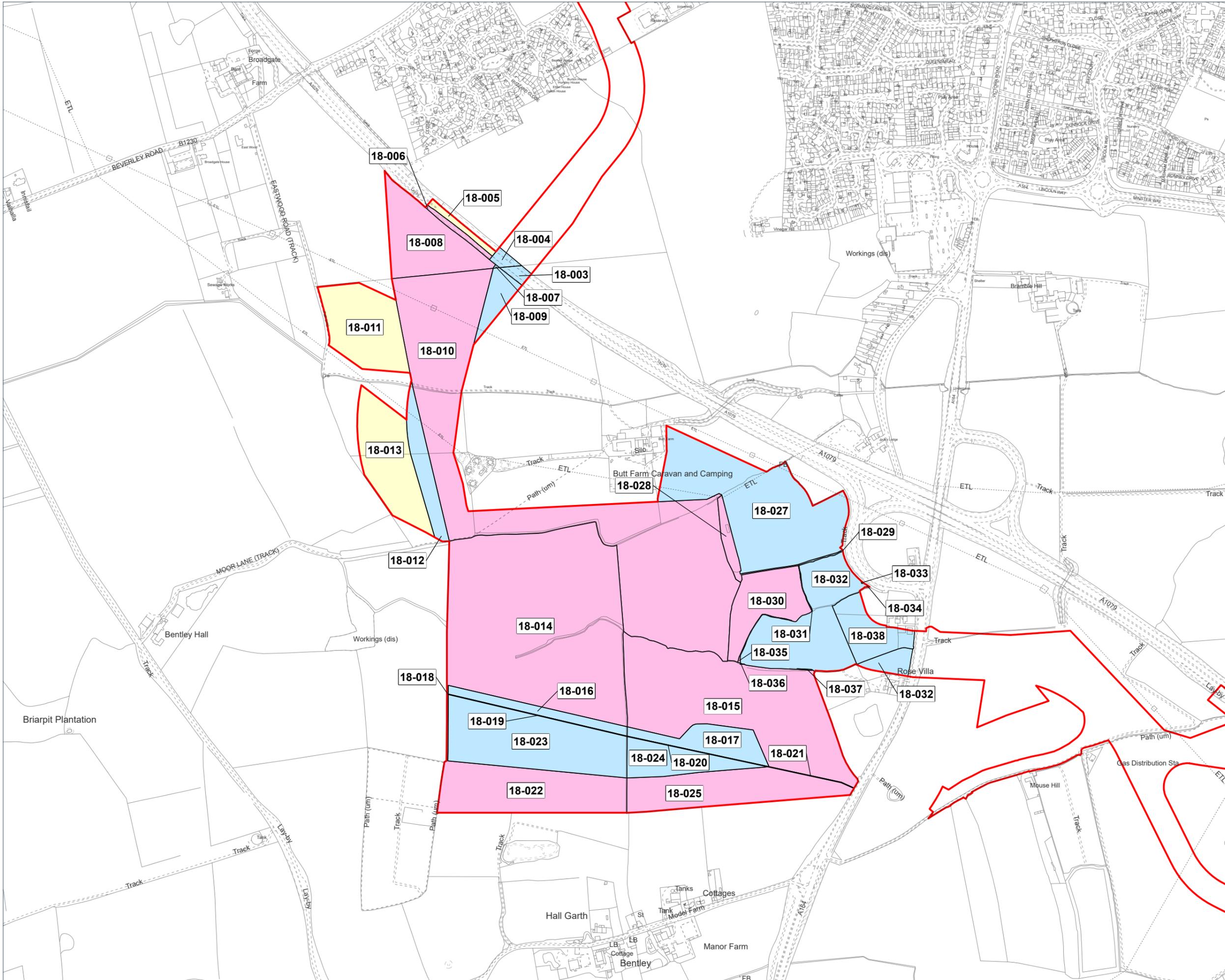
**Drawing No:** 22000026\_PLN\_INFO\_6602.1

Rev	Date	Description
-	14.11.2024	First Issue

**Drawn:** PA  
**Approved:** GH  
**Sheet No:** 1 of 1  
**Sheet Size:** A3



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Drawing Location: C:\Users\Paulo.Alexandre\Documents\Dogger Bank South Offshore Wind Farm 22000026 - Geomatics\01 DM Plans\2024\1101\_22000026\_PLN\_INFO\_6602.1.aprx

- Key:**
- Order Limits
  - Freehold Acquisition
  - Acquisition of Rights
  - Temporary Possession

**Notes:**

Coordinate System: British National Grid  
Projection: Transverse Mercator  
Datum: OSGB 1936

**Interest:**  
N/A

**Location:**  
Bentley, Rowley, Beverley, East Yorkshire, HU17 8RG

**Coords:** 501935, 436905

**Scheme Name:**  
Dogger Bank South Offshore Wind Farm

**Drawing Name:**  
Figure 4 (b) – Land Plan (Sheet 19/20) – Proposed change

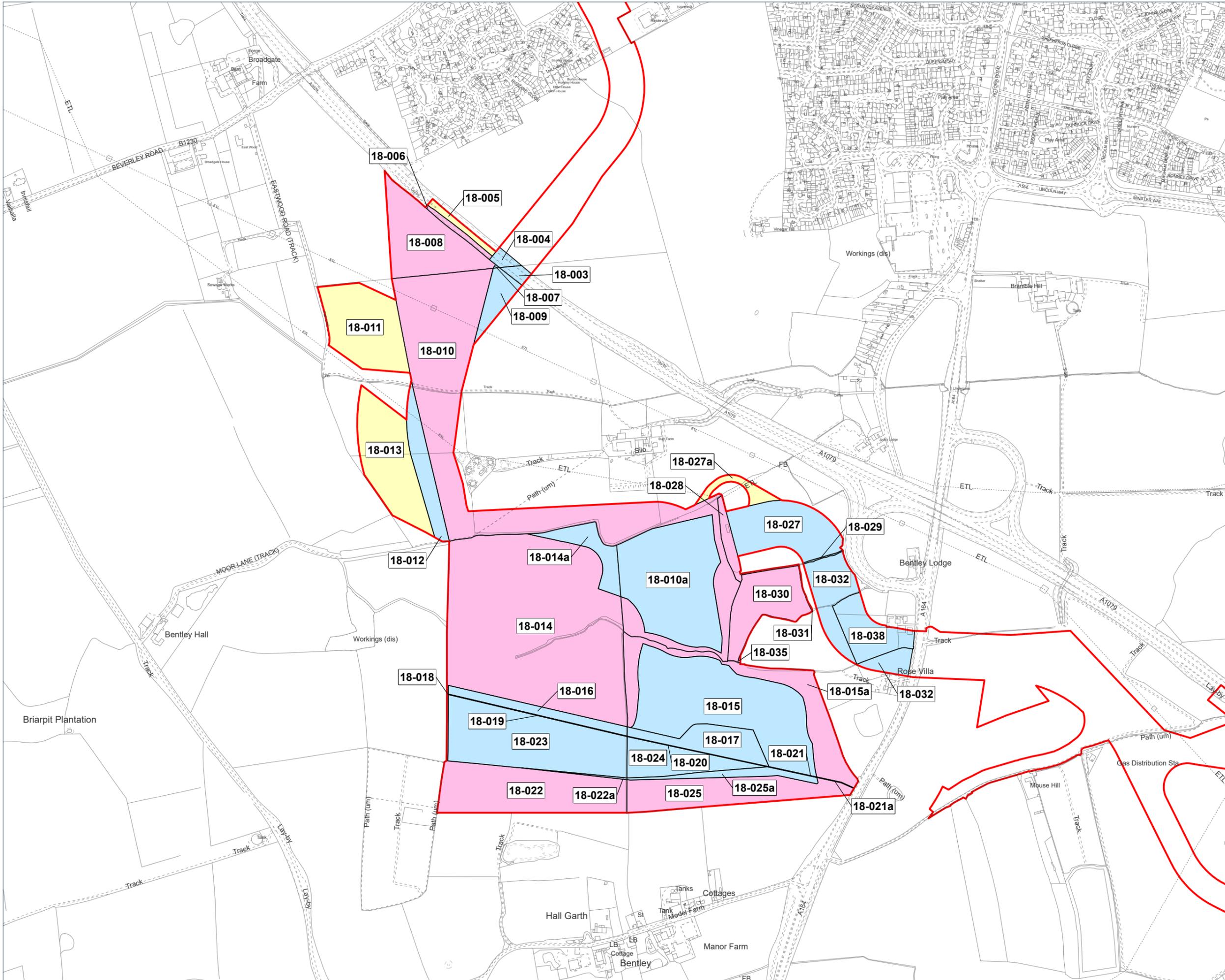
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Rev	Date	Description
-	14.11.2024	First Issue

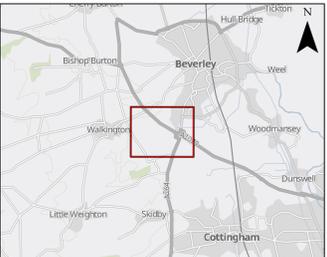
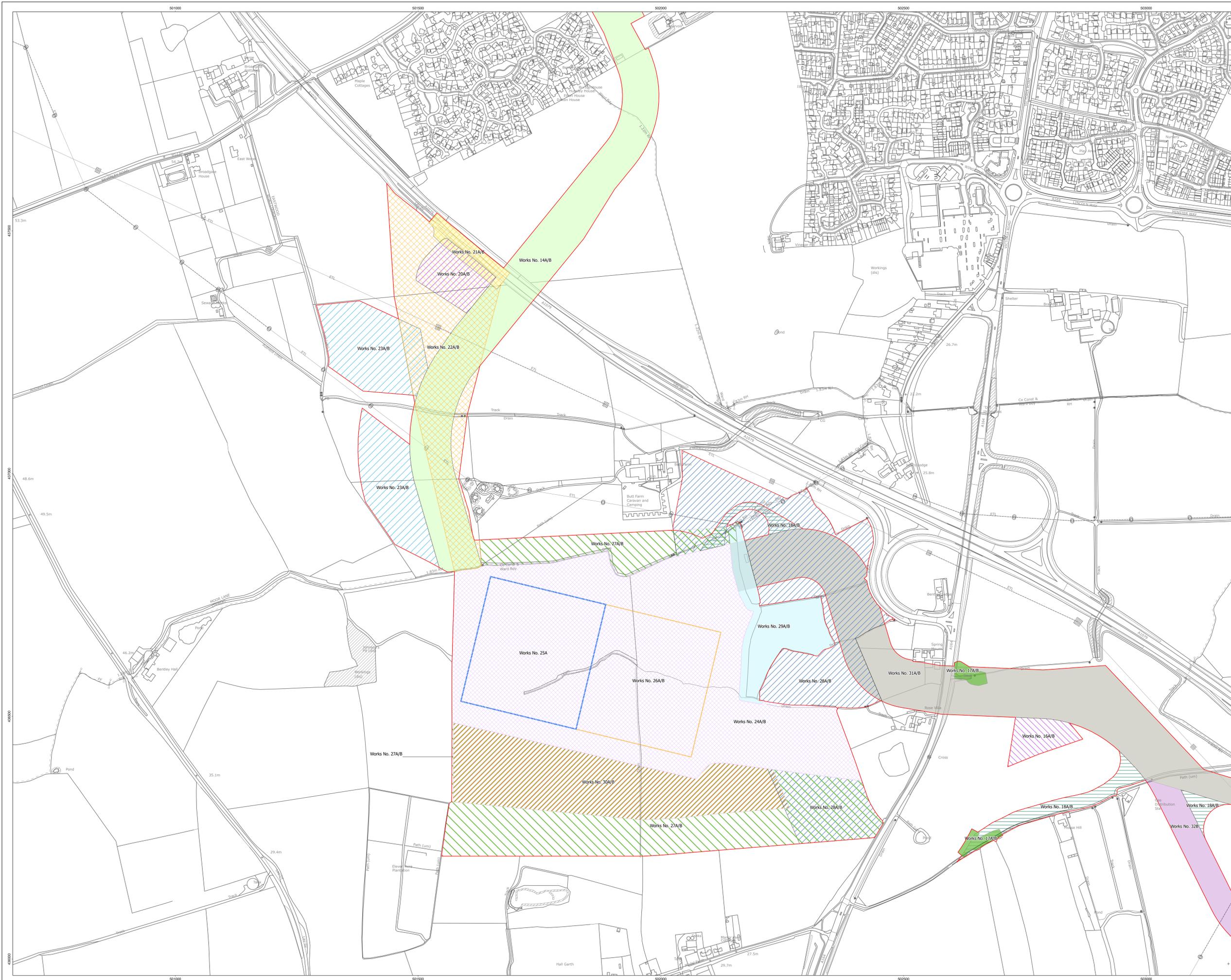
**Drawn:** PA  
**Approved:** GH  
**Sheet No:** 1 of 1  
**Sheet Size:** A3



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Drawing Location: C:\Users\Paulo.Alexandre\Documents\Dogger Bank South Offshore Wind Farm 22000026 - Geomatics\01 DM Plans\2024\1101\_22000026\_PLN\_INFO\_6601.1.aprx



- KEY:**
- Onshore Order Limits
  - Works No. 14A/B, Onshore Cable Corridor
  - Works No. 16A/B, Satellite Temporary Construction Compound
  - Works No. 17A/B, Temporary Construction Vehicle Access from the Public Highway
  - Works No. 18A/B, Temporary Haul Road
  - Works No. 20A/B, Main Temporary Construction Compound
  - Works No. 21A/B, Permanent Access From Public Highway
  - Works No. 22A/B, Permanent Access and Associated Drainage Zone
  - Works No. 23A/B, Converter Station Temporary Construction Compound
  - Works No. 24A/B, Converter Station and Associated Drainage Zone
  - Works No. 25A, Western Converter Station Footprint
  - Works No. 26A/B, Eastern Converter Station Footprint
  - Works No. 27A/B, Permanent Landscaping
  - Works No. 28A/B, Utility Connection Works
  - Works No. 29A/B, Permanent Landscaping
  - Works No. 30A/B, Temporary Haul Road
  - Works No. 31A/B, Onshore Cable Corridor to National Grid Connection
  - Works No. 32B, Onshore Cable Corridor to National Grid Connection

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 Not to be used for Navigation

**PROJECT TITLE**  
**Dogger Bank South**

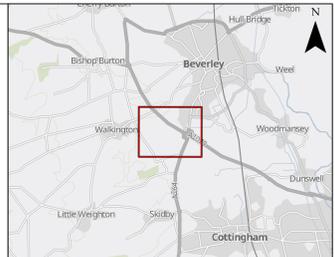
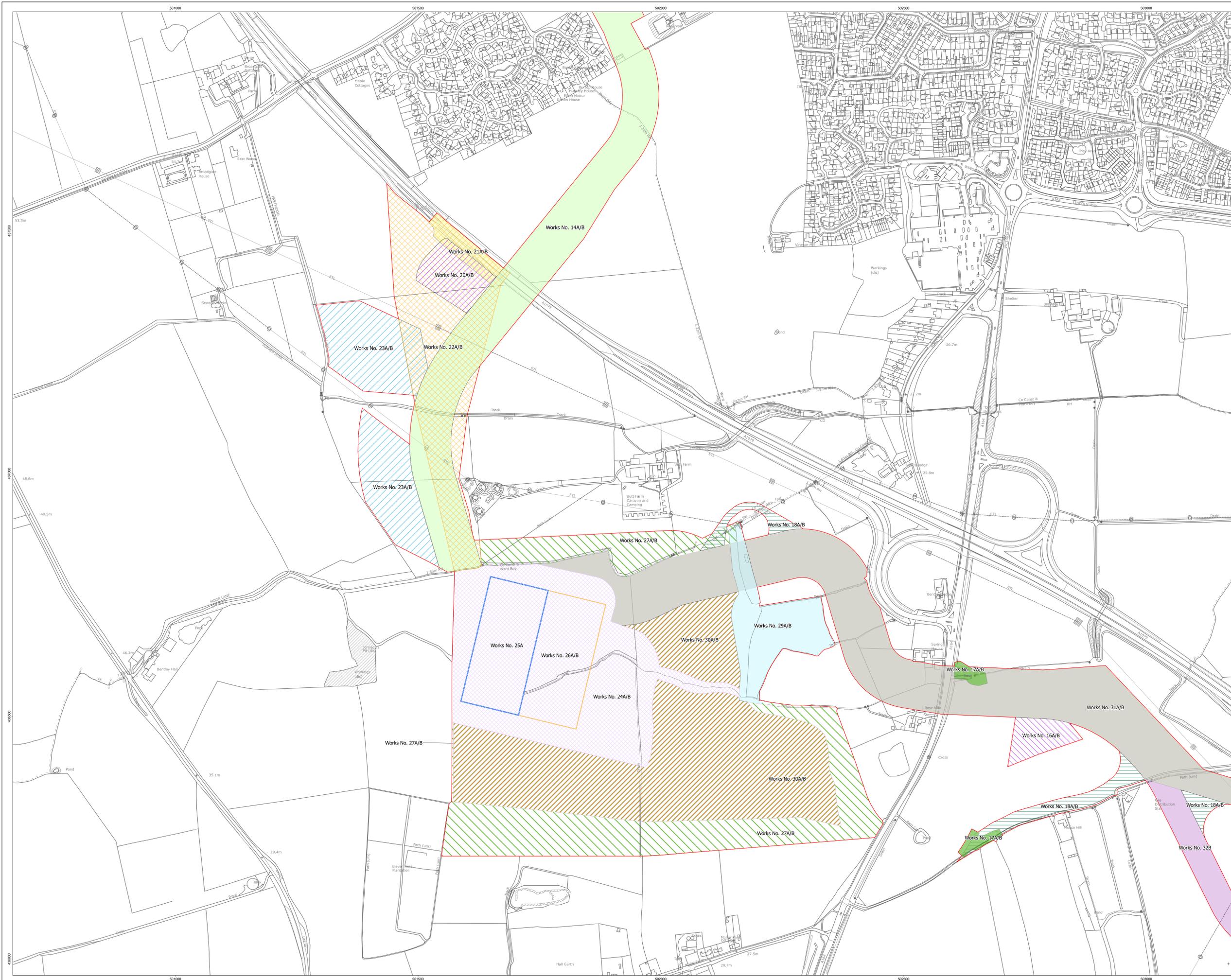
**DRAWING TITLE**  
**Figure 5 (a) – Works Plan (Onshore Converter Station(s)) – Submitted with the DCO application**

**DRAWING NUMBER:** ED13554-GE-1061 **PAGE NUMBER:** Page 1 of 1

VER	DATE	REMARKS	DRAW	CHECK	APRD
A	13/11/2024	Prepared for change request	BL	PM	AH

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**wardell armstrong** **DBS Offshore Wind**



- KEY:**
- Onshore Order Limits
  - Works No. 14A/B, Onshore Cable Corridor
  - Works No. 16A/B, Satellite Temporary Construction Compound
  - Works No. 17A/B, Temporary Construction Vehicle Access from the Public Highway
  - Works No. 18A/B, Temporary Haul Road
  - Works No. 20A/B, Main Temporary Construction Compound
  - Works No. 21A/B, Permanent Access From Public Highway
  - Works No. 22A/B, Permanent Access and Associated Drainage Zone
  - Works No. 23A/B, Converter Station Temporary Construction Compound
  - Works No. 24A/B, Converter Station and Associated Drainage Zone
  - Works No. 25A, Western Converter Station Footprint
  - Works No. 26A/B, Eastern Converter Station Footprint
  - Works No. 27A/B, Permanent Landscaping
  - Works No. 29A/B, Permanent Landscaping
  - Works No. 30A/B, Temporary Haul Road
  - Works No. 31A/B, Onshore Cable Corridor to National Grid Connection
  - Works No. 32B, Onshore Cable Corridor to National Grid Connection

**MAP NOTES / DATA SOURCES:**  
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**PROJECT TITLE**  
**Dogger Bank South**

**DRAWING TITLE**  
**Figure 5 (b) – Works Plan (Onshore Converter Station(s)) – Proposed Change**

**DRAWING NUMBER:** ED13554-GE-1062 **PAGE NUMBER:** Page 1 of 1

VER	DATE	REMARKS	DRAW	CHEK	APRD
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 0 0.01 0.02 0.04 0.06 Miles

**wardell armstrong** **DBS Offshore Wind**

# Appendix B – Project Change Request 2 – Onshore Substation Zone Targeted Non-Statutory Consultation Letter

Our ref.	005458223-01
Contact	Thomas Tremlett
Phone	[REDACTED]
Email	[REDACTED]@rwe.com

**14<sup>th</sup> November 2024**

Dear Stakeholder,

**Dogger Bank South Offshore Wind Farms**

**PINS Reference: EN010125**

**Project Change Request 2: Onshore Substation Zone - Targeted Non-Statutory Consultation  
15<sup>th</sup> November to the 16<sup>th</sup> December 2024**

RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank (East) (hereafter referred to as ‘the Applicants’) submitted a Development Consent Order (DCO) application to the Planning Inspectorate on 12<sup>th</sup> June 2024 for the Dogger Bank South East (“DBS East”) and Dogger Bank South West (“DBS West”) Offshore Wind Farms (together referred to as “the Projects”). The DCO application was accepted for Examination on 10<sup>th</sup> July 2024. A non-technical summary of the scope of the Projects at the point of submission into examination can be found in the [Environmental Statement Non-technical Summary](#) included with the DCO submission.

The Applicants have been engaging with stakeholders to seek to resolve concerns or comments prior to submission of the DCO application and within the DCO pre-examination period. This engagement has outlined clear stakeholder preference to reduce the size of the Onshore Converter Station(s) and minimise the impacts on existing receptors within and adjacent to the Onshore Substation Zone. A grid connection offer for each Project was received in June 2024 and subsequent engagement with the supply chain has provided enough information to enable the Applicants to seek to reduce the footprint of the Onshore Converter Station(s) in the Onshore Substation Zone in line with this stakeholder feedback. This reduction in footprint has resulted in the following minor amendments to the proposals within the Onshore Substation Zone included within the DCO application:

- Reduction in size and change of indicative location of Sustainable Drainage Systems (SuDs) requirements as presented on Figures 1(a) and 1(b) (Appendix A);
- Minor updates to the Indicative Landscape Management Plan at the Onshore Substation Zone as presented on Figures 2(a) and 2(b) (Appendix A);
- Removal of the Yorkshire Water diversion from the application as presented on Figure 3 (Appendix A);

- Reduction in the Onshore Order Limits at the Onshore Substation Zone as a result of the removal of the Yorkshire Water diversion as presented on Figure 3 (Appendix A);
- Reduction in the type of the compulsory acquisition powers sought over land due to the reduction in footprint of the Onshore Converter Station(s) as presented on Figures 4(a) and 4(b) (Appendix A) and discussed further in Section 4; and
- Minor revision to the alignment of the onward cable connection within the Onshore Substation Zone to reflect the revised Onshore Converter Station(s) footprint.

These amendments are being brought together in the form of the **‘Project Change Request 2: Onshore Substation Zone’**, which the Applicants intend to submit to the Examining Authority in January 2025.

Before the Applicants submit the Project Change Request to the Examining Authority for consideration, they are undertaking targeted non-statutory consultation for a period of 30 days with identified stakeholders in line with the relevant Planning Inspectorate [guidance](#). The Applicants notified the Examining Authority of their intention to submit Project Change Request 2 on the 4<sup>th</sup> November 2024 [\[AS-015\]](#). This notification provided a brief description of the proposed change, a summary of the predicted environmental effects of the change relative to the Applicants’ Environmental Statement, a summary of how consultation on the change would be undertaken and the Applicants’ consideration on how this could be accommodated within the Draft Examination Timetable. The Examining Authority responded on the 7<sup>th</sup> November 2024 [\[PD-007\]](#) with a list of additional stakeholders to consult on the Change Request, all of which are now being included in the consultation.

A single document, the **‘Project Change Request 2: Onshore Substation Zone’** is being provided for consultation. This document provides a description of the proposed change, relevant figures in Appendix A, an assessment of the environmental effects of the project change request relative to the assessments undertaken in the Applicants’ Environmental Statement and a description of the changes required to compulsory acquisition powers sought through the Draft DCO. Whilst the changes are considered broadly beneficial, the assessments do not alter the conclusions outlined in the Applicants’ Environmental Statement.

The Applicants are undertaking targeted non-statutory consultation on Project Change Request 2 from the **15<sup>th</sup> November 2024 to the 16<sup>th</sup> December 2024**. Full information and copies of the document can be found at <http://www.doggerbanksouth.co.uk>. The Applicants are also undertaking a consultation on ‘Change Request 1: Offshore and Intertidal Works’ in parallel to this consultation.

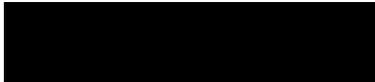
The Applicants welcome all feedback on the proposed design change and the associated assessment work undertaken to support these changes. The deadline for consultation feedback is **16<sup>th</sup> December at 23:59** by either of the options below:

- (1) by email to [dbs@rwe.com](mailto:dbs@rwe.com); or
- (2) by post to ‘Freepost DBSOWF’. No further postal address or stamp is required. Postal responses must be sent on or before this deadline.

The Applicants will consider all feedback received and will provide responses detailing how the feedback has been taken into account when the change request is submitted to the Examining Authority. The current intention is that the Request for Change will be submitted in January 2025.

Please don't hesitate to contact us at [dbs@rwe.com](mailto:dbs@rwe.com) or 0800 254 5459 should you have any queries related to this change request. The Project Team would be happy to accommodate a virtual meeting to explain the change should that be convenient within the consultation period.

Yours sincerely,



Thomas Tremlett  
Senior Consents Manager

DBS Offshore Wind Farms

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

Registered no. 13656240

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

Registered no. 13656525

**Registered office:**

Windmill Hill Business Park,  
Whitehill Way, Swindon,  
Wiltshire, England SN5 6PB

Registered in England  
and Wales.

## Appendix C – Project Change Request 2 – Onshore Substation Zone Site Notice Letter and Locations Plan





Site Plan: Scale: 1: 36112

Interest:	Rev	Date	Description
Interest	-	11.12.2024	First Issue
Location:	Please note: this map has been created and printed using an ESRI ArcGIS Enterprise Web Mapping Application.		
Location			
Coords:	-23337, 7165158		
Scheme Name:	Scheme Name		
Drawing Name:	Drawn:	XX	
Drawing Name	Sheet No:	1 of 1	
Drawing No:	Sheet Size:	A4	
Drawing Number			

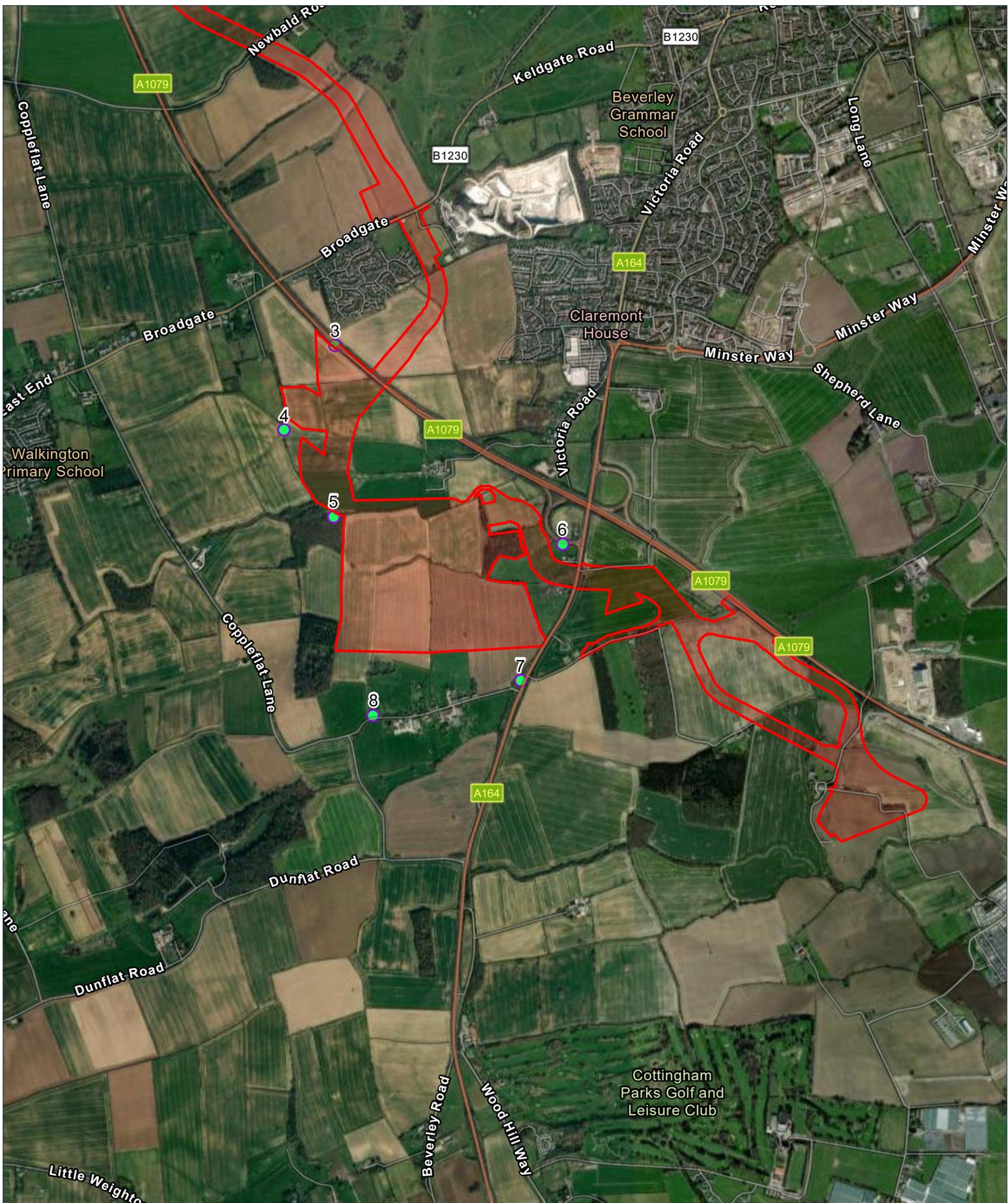
Key:	ES Red Line Boundary P08
	Targeted Consultation - Change Request Notices (13.11.2024)

Notes:	
Coordinate System:	WGS 1984 Web Mercator Auxiliary Sphere
Projection:	Mercator Auxiliary Sphere
Datum:	WGS 1984


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Document Path:



Site Plan: Scale: 1: 36112

Interest:	Rev	Date	Description
Interest	-	11.12.2024	First Issue

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Coords:	-49880, 7135022		
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Drawing Name:	Drawn:	XX	
Drawing Name	Sheet No:	1 of 1	
Drawing No:	Sheet Size:	A4	

Key:	Notes:
 ES Red Line Boundary P08	
 Targeted Consultation - Change Request Notices (13.11.2024)	


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# **NOTICE PUBLICISING CONSULTATION ON PROPOSED CHANGES TO A DEVELOPMENT CONSENT ORDER APPLICATION**

## **THE PLANNING ACT 2008**

### **DOGGER BANK SOUTH OFFSHORE WIND FARMS**

Notice is hereby given that RWE Renewables Dogger Bank South (West) Limited and RWE Renewables Dogger Bank South (East) Limited (the “Applicant”) of Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, United Kingdom, SN5 6PB is consulting on its proposals to make changes to its application for a Development Consent Order (DCO) for the Dogger Bank South Offshore Wind Farms (“the Application”) related to works in the Onshore Substation Zone. On 4 November 2024, the Applicants notified the Examining Authority appointed by the Secretary of State that it was proposing to make a formal request to change an element of the Application. The details of those changes are set out below. The Applicants are holding a targeted consultation on the proposed changes. This notice explains the changes and how you can take part in the consultation.

#### **Summary of the Projects**

The application for an order to grant development consent for construction, operation, maintenance and decommissioning of the Dogger Bank South East (“DBS East”) and Dogger Bank South West (“DBS West”) offshore wind farms, both located in the North Sea on the Dogger Bank (together referred to as “the Projects”) and the associated development to connect the proposed offshore wind farms to the national grid was accepted into examination by the Planning Inspectorate on the 12<sup>th</sup> July 2024. 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 routing to the proposed Birkhill Wood National Grid substation close to the existing Creyke Beck substation

#### **Summary of changes sought**

The proposed change includes a reduction in the footprint of the Onshore Converter Station(s), which would subsequently result in minor amendments to the outline landscaping proposals, a reduction in the Order Limits and a reduction in the nature of the compulsory acquisition powers sought in the draft DCO [APP-027]. No additional land outside of the Order Limits nor upgrade of the compulsory acquisition powers sought over the plots as shown on the Land Plans (Onshore) [PDA-004] is required for the proposed change. This change is being made following receipt of a grid connection offer for the Projects, relevant subsequent design work being undertaken and related ongoing supply chain engagement which provides the opportunity for the Projects to limit the scale and location of the Onshore Converter Station(s). This would reduce the footprint for the permanent Onshore Converter Station(s) whilst staying within the maximum design parameters for the ES at DCO submission. The proposed changes are broadly positive and do not have any material effect on the assessments and conclusions of the environmental assessments submitted with the Application and for some topics result in a reduction in environmental impacts.

#### **Further Information**

A consultation document outlining the changes and plans and maps showing the nature and location of the proposed changes can be viewed and downloaded on the Applicants’ website [www.doggerbanksouth.co.uk](http://www.doggerbanksouth.co.uk)

The documents will be available to view online until the close of the consultation at 23.59 on Monday 16 December 2024.

## **Respond to the consultation**

We are now seeking your views on the changes and are consulting on only these changes between **15 November** and **16 December 2024**.

Any responses in respect of the Projects should be sent:

(1) by email to **[dbs@rwe.com](mailto:dbs@rwe.com)**; or

(2) by post to **'Freepost DBSOWF'**. No further postal address or stamp is required.

The deadline for responses is **23:59 on Monday 16 December 2024**, postal responses must be sent on or before this deadline.

Your comments will be analysed by the Applicants and copies may be made available in due course to the Secretary of State, the Examining Authority and the Planning Inspectorate, and other relevant statutory authorities so that your comments can be considered as part of the DCO application process.

## **What happens after the consultation**

The Applicants will consider the consultation responses made and will have regard to them as it finalises its request to make changes to the Application. It will compile a consultation report, which sets out how it has undertaken its consultation and how regard has been had to the responses received. This will be submitted with the request to make changes to the Application. The examining authority will then decide whether to accept the request.

If you have any queries in relation to the consultation please telephone the Applicants on: 0800 254 5459 or [email:dbs@rwe.com](mailto:dbs@rwe.com).

## Appendix D – Project Change Request 2 – Consultation Responses

**From:** [REDACTED]  
**To:** [Dogger Bank South](#)  
**Subject:** [EXT] Dogger Bank South Offshore Wind Farms - Project Change Request 2: Onshore Substation Zone - Targeted Non-Statutory Consultation 15th November to the 16th December 2024  
**Date:** Dear Stakeholder, 28 November 2024 14:51:32

**[\*\* EXTERNAL SENDER \*\*]:**

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**[\*\* EXTERNER ABSENDER \*\*]:**

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Dear DBS project team,

Thankyou consulting National Highways on the '**Project Change Request 2: Onshore Substation Zone**', having reviewed the description of the proposed change and the summary of the predicted environmental effects of the change to the Applicants' Environmental Statement [AS-015], the changes to the application does not alter the previous conclusion from the ES, that traffic movements will be managed through a CTMP.

Many thanks

[REDACTED]

Web: [www.nationalhighways.co.uk](http://www.nationalhighways.co.uk)

*Please note I work Monday to Thursday*

**Please note upcoming leave 28<sup>th</sup> -31<sup>st</sup> October**

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**National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | [info@nationalhighways.co.uk](mailto:info@nationalhighways.co.uk)**

*Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ*

**From:** [REDACTED]@coal.gov.uk  
**To:** [Dogger Bank South](#)  
**Subject:** [EXT] EN010125 Dogger Bank South Offshore Wind Farms, DOGGER BANK WIND FARM, 210KM OFF THE YORKSHIRE COAST, AT THE CLOSEST POINT TO SHORE  
**Date:** 20 November 2024 07:20:13  
**Attachments:** [Coal Authority Response 20-11-2024 071843644.pdf](#)

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Dear [REDACTED]

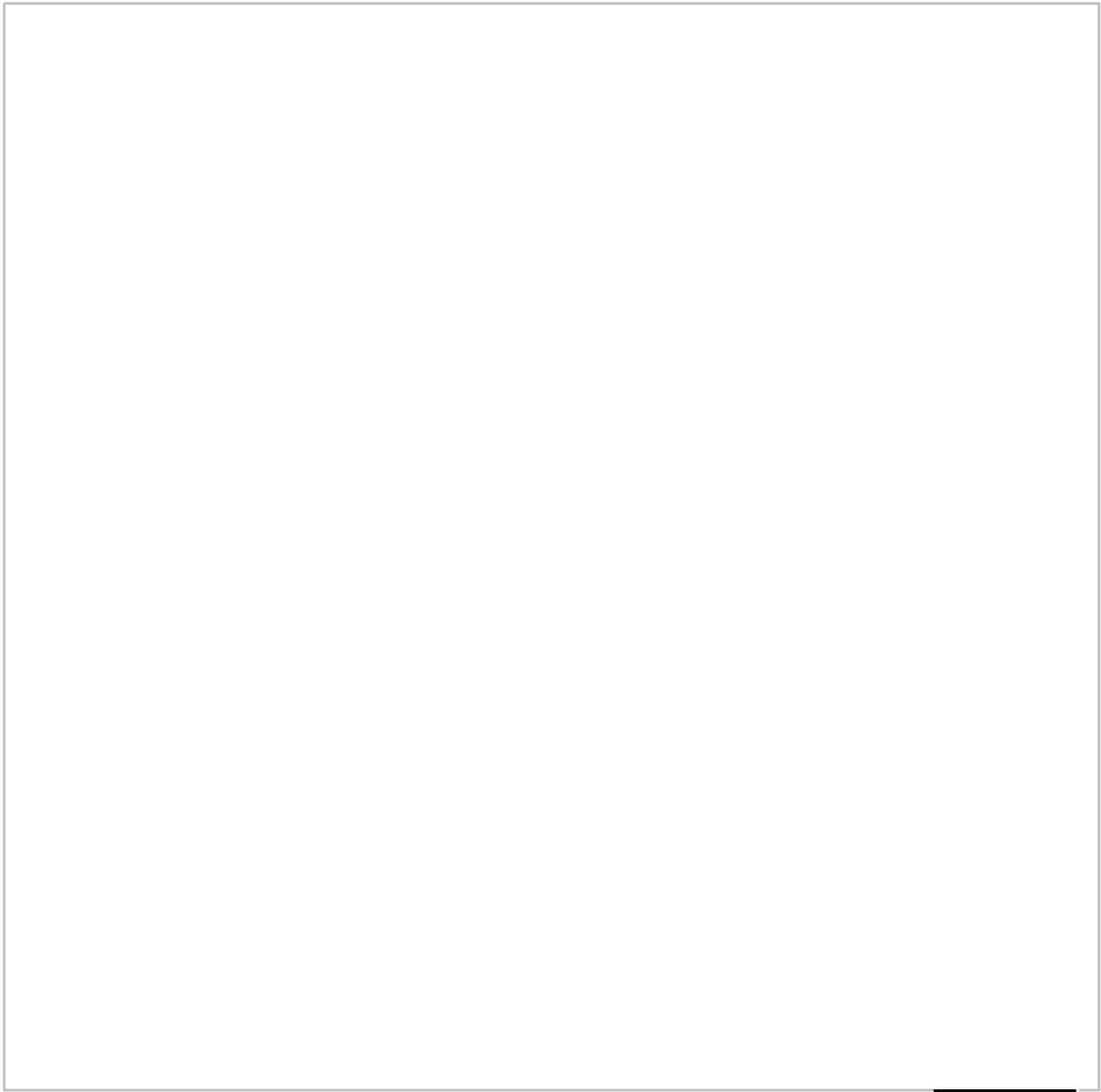
Following receipt of your consultation on 15 November 2024, please find attached our response.

If you would like to discuss this matter further, please contact the Planning team on the number below.

Regards

The Coal Authority Planning Team

<https://www.gov.uk/coalauthority>



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The Coal  
Authority

T: [REDACTED]  
E: [REDACTED]@coal.gov.uk  
W: [www.gov.uk/coalauthority](http://www.gov.uk/coalauthority)

**For the attention of:** [REDACTED]  
Nationally Significant Infrastructure Project

[By email: [dbs@rwe.com](mailto:dbs@rwe.com)]

20 November 2024

Dear [REDACTED]

**Re: EN010125 Dogger Bank South Offshore Wind Farms**

**Project Change Request 2: Onshore Substation Zone; DOGGER BANK WIND FARM, 210KM OFF THE YORKSHIRE COAST, AT THE CLOSEST POINT TO SHORE**

Thank you for your notification of 15 November 2024 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority's defined Development Low Risk Area. On this basis we have no specific comments to make.

However, in the interest of public safety, it is requested that the Coal Authority's Standing Advice note is drawn to the applicant's attention, where relevant.

Yours

**The Coal Authority Planning Team**

**From:** [REDACTED]  
**To:** [Dogger Bank South](#)  
**Cc:** [REDACTED]  
**Subject:** [EXT] Dogger Bank South OWF: response to Change Request consultation  
**Date:** 09 December 2024 15:00:41  
**Attachments:** [Picture \(Device Independent Bitmap\) 1.jpg](#)  
[EN010125 494247 DBS NE response to Change Request 1 and 2 FINAL.pdf](#)

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**Dogger Bank South Offshore Wind Farms PINS Reference: EN010125**

[Project Change Request 1: Offshore and Intertidal Works and Project Change Request 2: Onshore Substation Zone Non-Statutory Consultation](#)

Dear [REDACTED]

Thank you for the recent consultation request regarding the above mentioned change request (1&2) for DBS OWF. Please find attached Natural England's response. If you wish to discuss anything further, please feel free to get in touch.

Thanks and best wishes,

[REDACTED]  
Higher Officer  
Marine Sustainable Development  
Yorkshire and North Lincolnshire and East Midlands Area Team  
Natural England, [REDACTED]  
Tel: [REDACTED]  
[www](#)



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Date: 09 December 2024  
Our ref: DAS/494247  
Your ref: NA



Customer Services

**BY EMAIL ONLY**

Dear 

**Discretionary Advice Service (Charged Advice)**

UDS A009159

**Development proposal and location:** Dogger Bank South Offshore Wind Farms Change Request

Thank you for your consultation on the above dated 14 November 2024, which was received on 15 November 2024.

This advice is being provided as part of Natural England's Discretionary Advice Service. RWE Renewables UK Dogger Bank South (East) Limited; RWE Renewables UK Dogger Bank South (West) Limited has asked Natural England to provide advice upon:

- Project Change Request 1: Offshore and Intertidal Works
- Project Change Request 2: Onshore Substation Zone

This advice is provided in accordance with the Quotation and Agreement dated 3 February 2022.

The following advice is based upon the information within:

**Project Change Request 1: Changes to offshore and intertidal works**

1. Project Change Request 1: Environmental Assessment Update, Nov 2024, C1.1, Rev 01
2. Appendix A – Fish and Shellfish Ecology Environmental Statement Update, Nov 2024, C1.1.1, Rev 01
3. Appendix B – Marine Mammal Environmental Statement Update, Nov 2024, C1.1.2, Rev 01
4. Appendix C – Marine Mammal Report to Inform Appropriate Assessment Update, Nov 2024, C1.1.3, Rev 01
5. Appendix 8-3 – Marine Physical Process Modelling Technical Report, Nov 2024, 7.8.8.3, Rev 02 (Tracked)
6. Appendix 11-3 – Underwater Noise Modelling Report, Nov 2024, 7.11.11.3, Rev 02 (Tracked)
7. Appendix 11-4 – iPCoD Modelling, Nov 2024, 7.11.11.4, Rev 02 (Tracked)

**Project Change Request 2: Onshore**

8. Project Change Request 2: Onshore Substation Zone (Appendix A – Figures, Appendix B - List of DCO Application Documents to be Updated), Nov 2024, C2.1, Rev 01

## **Project Change Request 1: Changes to offshore and intertidal works**

Natural England welcomes the refinements to the Project Envelope and Maximum Design Parameters summarised in the documents above and agree that they will not result in a material change to the nature of the project. Our advice therefore remains as given in [PDB-011](#), that the changes are submitted and accepted into Examination with relevant chapters and assessments updated at the earliest opportunity. We note that we have not conducted a detailed review of the assessments at this stage, as the updates reflect the specific changes related to the request itself and further updates may be required to the environmental assessments to address other concerns raised in Relevant and Written Representations. We therefore defer our full comments to when the updates assessments are submitted into Examination.

## **Project Change Request 2: Onshore**

Natural England have reviewed the changes and are satisfied that there should be no material impact on aspects relevant to our remit.

For clarification of any points in this letter, please contact [REDACTED] at [REDACTED]@naturalengland.org.uk

The advice provided in this letter has been through Natural England's Quality Assurance process

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

Yours sincerely,

[REDACTED]  
Higher Officer  
Yorkshire and North Lincolnshire  
Telephone [REDACTED]

**From:** [REDACTED]  
**To:** [Dogger Bank South](#); [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** [EXT] RE: Dogger Bank South Offshore Wind Farms - Project Change Request Targeted Non-Statutory Consultation 15th November to the 16th December 2024  
**Date:** 29 November 2024 08:47:06  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

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Many thanks for your e-mail/letter regarding the project change request.

As indicated in our representations back in the summer by my colleague [REDACTED] given the intention is to construct these wind farms in an area which is proximate to our licence areas, we would urge the project to engage on agreeing appropriate co-location arrangements. Please can I suggest we set up an introductory call so that we can understand more about each other's plans/activities for these proximate areas with a view to avoiding any potential conflicts and exploring any potential synergies.

To recap, INEOS Energy's interests in the areas are as follows:

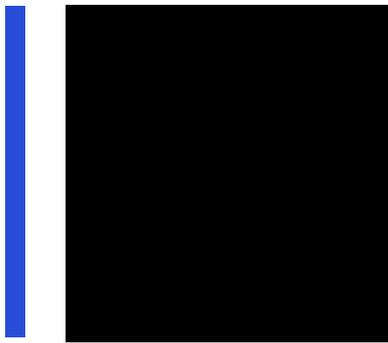
- INEOS UK SNS Limited is the licence administrator and co-licensee of 2 licences in respect of UKCS Blocks 43/12a, 43/13b, 43/12b, 43/13c, 43/14b, 43/17a, 43/18a and 43/19d awarded as part of the 33rd Offshore Licensing Round by the North Sea Transition Authority (details of which can be found on the NSTA's website under Tranche 3 awards). ONE-Dyas UK Limited is the other co-licensee.
- INEOS UK SNS Limited is the operator and co-owner of the Cavendish field, which is located in UKCS Block 43/19a, ceased production in 2018 and is currently being decommissioned. Dana Petroleum (E&P) Limited is the other co-owner.

I'll look forward to hearing from you.

Kind regards,

[REDACTED]

[REDACTED]  
Asset Manager



---

**From:** dba@rwe.com <dba@rwe.com>

**Sent:** 15 November 2024 11:37

**To:** dba@rwe.com; [redacted]@ineos.com; [redacted]  
[redacted]@ineos.com; [redacted]@ineos.com

**Subject:** RE: Dogger Bank South Offshore Wind Farms - Project Change Request Targeted Non-Statutory Consultation 15th November to the 16th December 2024

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If in doubt, throw it out.

Dear Stakeholder,

Please note that the website address listed in the email and letter included with the previous email is incorrect and should read [www.doggerbanksouth.co.uk](http://www.doggerbanksouth.co.uk), please find amended letter attached.

Kind regards,  
DBS Project Team

---

**From:** Dogger Bank South <[dba@rwe.com](mailto:dba@rwe.com)>

**Sent:** Friday, November 15, 2024 9:08 AM

**To:** [redacted]@ineos.com; [redacted]@ineos.com; [redacted]@ineos.com

**Subject:** Dogger Bank South Offshore Wind Farms - Project Change Request Targeted Non-Statutory Consultation 15th November to the 16th December 2024

Dear Stakeholder,

We are undertaking Targeted Non-statutory Consultations on two Project Change Requests (the first in relation to Offshore and Intertidal Works and the second in relation to the Onshore Substation Zone) from **15<sup>th</sup> November 2024 to 16<sup>th</sup> December 2024** following notifying the Examining Authority of a potential change to the accepted DCO Application for the Dogger Bank South Offshore Wind Farm Projects ('the Projects') on the 8<sup>th</sup> October and 4<sup>th</sup> November respectively. Further

information is provided in the letter attached.

As part of discussions with the Examining Authority, you were identified as a potentially Interested Party in these consultations and we are therefore seeking your feedback on the proposed changes and the environmental effects of these changes outlined within the consultation documentation provided at <http://www.doggerbanksouth.com>. Please provide any feedback by either emailing [dbs@rwe.com](mailto:dbs@rwe.com) or sending feedback via post to 'FREEPOST DBSOWF' by the **16<sup>th</sup> December 23:59**. We will provide a record of all feedback received and our consideration of this feedback when we submit these changes to the Examining Authority in January 2025.

Kind regards,  
DBS Project Team

  
**Stakeholder Manager**  
**DBS Offshore Wind**

tel:   
email  [rwe.com](mailto:dbs@rwe.com)  
website: [www.doggerbanksouth.co.uk](http://www.doggerbanksouth.co.uk)

Please note my working hours are 08 :30 - 17 :30 Monday to Thursday.



---

**From:** Dogger Bank South <dba@rwe.com>  
**Sent:** Thursday, December 12, 2024 9:48 AM  
**To:** [REDACTED]@rwe.com>  
**Subject:** FW: [EXT] Re: Dogger Bank South Offshore Wind Farms - Project Change Request Targeted Non-Statutory Consultation 15th November to the 16th December 2024

-NOT ENCRYPTED-

---

**From:** Dr Steve Mounce [REDACTED]  
**Sent:** Wednesday, December 11, 2024 10:54 AM  
**To:** Dogger Bank South <dba@rwe.com>  
**Subject:** [EXT] Re: Dogger Bank South Offshore Wind Farms - Project Change Request Targeted Non-Statutory Consultation 15th November to the 16th December 2024

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Please find attached for the consultation (sent in post).

Best Regards,

Dr. Steve mounce

On 15/11/2024 12:45, [dba@rwe.com](mailto:dba@rwe.com) wrote:

Dear Stakeholder,

Please note that the website address listed in the email and letter included with the previous email is incorrect and should read [www.doggerbanksouth.co.uk](http://www.doggerbanksouth.co.uk), please find amended letter attached.

Kind regards,  
DBS Project Team

---

**From:** Dogger Bank South <[dbs@rwe.com](mailto:dbs@rwe.com)>  
**Sent:** Friday, November 15, 2024 9:21 AM  
**To:** Dogger Bank South <[dbs@rwe.com](mailto:dbs@rwe.com)>  
**Subject:** Dogger Bank South Offshore Wind Farms - Project Change Request  
Targeted Non-Statutory Consultation 15th November to the 16th December 2024

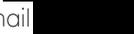
Dear Stakeholder,

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As part of discussions with the Examining Authority, you were identified as a potentially Interested Party in these consultations and we are therefore seeking your feedback on the proposed changes and the environmental effects of these changes outlined within the consultation documentation provided at <http://www.doggerbanksouth.com>. Please provide any feedback by either emailing [dbs@rwe.com](mailto:dbs@rwe.com) or sending feedback via post to 'FREEPOST DBSOWF' by the **16<sup>th</sup> December 23:59**. We will provide a record of all feedback received and our consideration of this feedback when we submit these changes to the Examining Authority in January 2025.

Kind regards,  
DBS Project Team

  
**Stakeholder Manager**  
**DBS Offshore Wind**

tel:   
email: @[rwe.com](mailto:dbs@rwe.com)  
website: [www.doggerbanksouth.co.uk](http://www.doggerbanksouth.co.uk)

Please note my working hours are 08 :30 – 17 :30 Monday to Thursday.

Dr. Stephen R. Mounce,

Email: [REDACTED]

10/12/2024

**Re: Dogger Bank South Project Targeted Non-statutory Consultation - response**

Dear RWE,

I am responding to the above consultation as a potentially Interested Party and providing some feedback on the proposed changes/ current version of the proposal. I am a local resident of Beverley who is particularly interested in the impacts of the overland cable route on Burton Bushes/ Beverley Westwood (a unique site and very popular nature amenity area for the public), both as a community area, as a unique habitat and in terms of archaeological interest.

As a general comment, I was rather shocked to hear that only 4-6 members of the public responded to the consultation (one of which was myself) - I felt that information provided about the scheme and its impacts was rather under the radar. Since the project change requests are quite major (such as changing an Onshore Substation Zone), the public should have further chance to comment going forward.

This new version of the proposal seems to be improved in that (provided the map at <https://interactivemap.doggerbanksouth.co.uk/> is correct) the proposed overland corridor is now given around a 100m gap whilst circling around Burton Bushes and the Westwood. This is better than some earlier maps which had this corridor right next to the Westwood which was completely inappropriate. In fact this is referred to in the November newsletter (having not being addressed previously nor still in the archaeology section) "*Avoids the designated landscape at Westwood Common;*" and under ecology p5 "*Potential impact on Beverley Westwood and Burton Bushes Sites of Special Scientific Interest (SSSI)*":

- *The cable route avoids both Beverley Westwood and Burton Bushes SSSI.*
- *Temporary construction compounds have been selected that are further away from Burton Bushes SSSI to minimise impact.*
- *We have committed to Horizontal Directional Drill under woodland areas to leave them undisturbed and in situ.*

Comment: Can RWE confirm there is no drilling under Burton Bushes? This does not seem to be on the map and should not be allowed.

Whilst the adjustments described in the first two points are welcome, I still contend that the corridor and construction sites and buildings are too close to wildlife habitats/ archaeological SSIs to me (e.g. Burton Bushes) and general peaceful amenity areas on the Westwood. There appears to be quite a lot of construction of 'temporary construction compounds' near to or next to various parts of the Westwood. The York road will be significantly disrupted.

I spoke to Richard, a transport consultant/ contractor at the 2023 consultation event who gave me a lot of detailed information about the practicalities, timings, HGV, transport disruption, buildings, lengths per section. He explained the overland corridor is split into 15 sections overall, with each section requiring about 12 months of constructions, digging works, HGVs etc. One of these sections (16a) runs down the back length of the Westwood (including alongside Burton Bushes) and is forecast to last for months 15 to 26 of the project (likely earliest 2027 if the plan goes ahead and of course dependent on the National Grid Creyke Beck proposal).

Therefore, likely there could be large scale construction activities, major transport disruption, noise pollution, wildlife/ ecology impacts, amenity impacts, possible knock on archaeological damage for Beverley Westwood for a period of up to 12 months as the plans stand. Incredibly, in section 3.3.3. of the PEIR in point 178 for potential impacts on tourism and users of recreational routes the "effects were assessed as negligible.. no mitigation measures are proposed". Human health aspects were similarly glossed over in points 168 and 169.

I would like to highlight the following (particularly as the PEIR ignored important information about Burton Bushes and didn't mention it or the Westwood once - very cursory and sub standard):

- Burton Bushes is a unique habitat of 25 acres of ancient woodland (pre 1500s), is designated as a Site of Special Scientific Interest including for *Quercus robur* - *Pteridium aquilinum* - *Rubus fruticosus* woodland (Broadleaved, mixed and Yew).

SSSI designation:

<https://designatedsites.naturalengland.org.uk/SiteList.aspx?siteName=Burton%20bushes&countyCode=&responsiblePerson=&DesignationType=All>

Map:

<https://magic.defra.gov.uk/MagicMap.aspx?startTopic=Designations&activelayer=sssiIndex&query=HYPERLINK%3D%271002049%27>

- The woodland trust has identified over 40 unique ancient trees in this wood:

<https://ati.woodlandtrust.org.uk/treesearch/?v=2161204&ml=map&z=17&nwLat=53.84295110571505&nwLng=0.47212924667010103&seLat=53.838494534874606&seLng=-0.4567762822688559>

- It is also a haven for birds, with over 63 varieties including greater spotted woodpecker, tawny owl, chiffchaffs and blackcaps.
- Burton Bushes is also a site of archaeological significance (Earthworks on the floor of Burton Bushes indicate probable agricultural enclosures, probably from the Romano-British period (c. AD 50-390)) - as is the Westwood in general (three Bronze Age Barrows). The neighbouring field to Burton Bushes i.e. containing the corridor could potentially contain similar areas of interest.

English heritage Survey from 2004:

[https://historicengland.org.uk/research/results/reports/6453/WestwoodCommonBeverley\\_anArchaeologicalSurvey\\_SurveyReport](https://historicengland.org.uk/research/results/reports/6453/WestwoodCommonBeverley_anArchaeologicalSurvey_SurveyReport)

Whilst I understand the need for these energy infrastructure projects I therefore make representation that this plan has made a poor decision on the onshore export cable corridor route and has not sufficiently thought through and investigated impacts (particularly around ecology, archaeology and heritage) on Beverley Westwood and Burton Bushes with the present corridor. It should be moved even further away from Burton Bushes and the Westwood to protect habitats and mitigate the other issues highlighted.

No AI was utilised in the production of this submission.

Best Regards,

Dr Stephen R. Mounce

**From:** [REDACTED]@eastriding.gov.uk>

**Sent:** Monday, December 16, 2024 4:31 PM

**To:** Dogger Bank South <dbs@rwe.com>

**Subject:** [EXT] Dogger Bank South project change 1 targeted consultation

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Good afternoon

Further to the proposed changes outlined in Project Change 1 East Riding of Yorkshire Council would offer the following comments in relation to the landscape and visual impacts of the proposed converter station changes:

1. The initial assessment in the Project Change Request 2, at 3.6. 99, that there would be *“no new or different Landscape and Visual related likely significant effects are anticipated as a result of the proposed change”*, is noted. We concur with this general view.
2. The reduction in size, and change of indicative location, of Sustainable Drainage System (SuDS) requirements are noted. The revised plans currently indicate no change in approach; the scheme still appears to adopt a ‘pipe to pond’ approach, with a single large ‘Area for SuDS’ indicated on the Landscape Plan, although it was noted in our meeting on 21.11.24 that it was stated this would now be a landscape led approach. We trust that the revised Outline Drainage Strategy, and thereafter the detailed design, will incorporate a ‘landscape-led’ approach to SuDS.
3. The consideration of construction phase effects is noted. We look forward to seeing these demonstrated in relevant photomontages.

4. Despite the new belt of planting close to the east boundary of the new footprint, there is some loss of planting to the north-eastern edge of the former boundary. This should be reviewed carefully to ensure no loss of landscape/visual mitigation as a result of the change.
5. We note at 3.6. 93 "the construction duration would remain as reported in the ES, up to 6 years." Exploring opportunities to reduce the construction period, with regard to the more compact building footprint, has potential to reduce Landscape and Visual effects.
6. We look forward to the more detailed assessment and evidence in the revised LVIA.

We have no further comments to make on the proposed changes.

Regards



Principal Planning Officer  
East Riding of Yorkshire Council

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South (East) Limited

Windmill Business Park  
Whitehill Way  
Swindon  
Wiltshire, SN5 6PB

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