

BEVERLEY & NORTH HOLDERNESS INTERNAL DRAINAGE BOARD

(A Member of the York Consortium of Drainage Boards)

Wednesday 19 March 2025

Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sir/Madam,

RE: Application by RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited for an Order granting Development Consent for the Dogger Bank South Offshore Wind Farms
Response to the Examining Authority's Written Questions and requests for further information - Issued on 28 February 2025

The Board is responding to each of the questions asked of us:

DCO .1.3 - Boards Consent determination

The Board believe 28 days would be a reasonable amount of time to determine a consent application. This is on the basis of all the required relevant details information and fees are provided and the project does not submit an unreasonable significant amount of applications all at the same time.

If this was to occur the Board would require an extended period of time for information to be provided and prioritising the consents required.

DCO.1.10 - Article 16(8) Drafting

8a We believe this relates to a public sewer or drain under the Water Industry Act. These assets tend to be owned by the Utility Provider. It does not include an IDB asset maintained by a Board under the Land Drainage Act as these are usually owned by others.

Despite this, the Board's understanding is that it is agreed that our approval/consent will be obtained for *any* watercourse which falls within our district.

8b We are uncertain why ***other expressions***, excluded watercourse and why it does not have the same meaning as per the Water Resources Act 1991 and Land Drainage Act 1991 which are the same.

HF.1.7 - Cumulative effects assessment in ES Chapter 20 (revision 2)

The Board is not directly promoting any capital schemes which could impact on the project work. The Board however during the construction period and certainly during the project life span will be carrying out watercourse maintenance work. This can consist of annual vegetation control such as weed spraying mechanical weed cutting and flailing (usually once or twice annually) and more occasionally silt removal, bank reprofiling and repair following bank slips (usually timer piling). The above requiring heavy equipment access within the Boards maintenance access strips usually 9 m either side of the watercourse banks.



William Symons Clerk to the Board

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HF.1.12 - oCoCP content and quality

- If level of detail is sufficient to frame the necessary mitigation of the potential effects during construction and operation of the projects

The Board believes that the level of detail for its purpose to frame the necessary mitigation of the potential effects during construction and operation of the projects.

It being noted the onshore converter station is not located in the Beverley and North Holderness Drainage District. The Board being satisfied that any runoff from this location will be constrained to a greenfield runoff rate if the flows with attenuation to a capacity as required by the Lead Local Flood Authority.

The drainage of access roads hard standings and bridges in the Boards drainage District in the wider project will be subject to more detailed design and consent in the future. (as per clause 188 and 189). The Board requiring further details of any flows diverted away from construction sites in its drainage District.

The Board in its drainage seeks ordinary watercourses crossings, unless otherwise agreed, to be conducted by trenchless techniques. We have previously noted:

Submission ID: 33933 The Board notes the changes to the draft Development Consent Order – Revision 5 – submitted at Deadline 1 – January 2025. In respect Part 4 of Schedule 15 – “Protective Provisions”, the Board accept the changes to the definition of ‘specified work’ strictly on the basis that the addition of the word ‘including’ does not preclude any other works in this definition. It remains, however, the Beverley and North Holderness IDB position is that we seek trenchless crossings unless otherwise agreed with the Board. I have checked earlier correspondence and this is consistent with the requests of Mr J Church, the Boards previous Engineer. I accept that Mr J Church highlighted concerns on actually carrying out the works open cut which the applicant has proposed mitigation - the significant concern beyond the installation is disturbing established banks creating a potential weakness zone for slipping when the banks are reinstated. The Boards maintenance practice following a slip is driving long usually spiked timber piles to withhold supporting backing boards. The work being designed to regain the bank stability. This operation clearly would not be desirable or appropriate in these locations with the cables and protection installed. The Board wants the above noting formally now but appreciate this will be dealt with directly by the applicant in due course.

In all watercourse crossings the Board requires a minimum of 2m below the channel bed what ever technique of installation is used not just trenchless techniques

In relation to 202 consideration of culvert installation the land is very flat with limited gradient so the loss of channel flood storage capacity is important in addition to flow conveyance. Thus mitigation on lost channel storage capacity as required.

In 206 we are uncertain the context of this clause in relation to temporary dams and how it relates to the export cables depth in the channel bed. In relation to open cut cable installation, although we do not wish to see it progressed because of the longer term problems, the Board would require at least a 2m cable depth below the channel bed.



- If there is reasonable certainty of the quality and content of the future detailed CoCP (revision 3) would be appropriate

At this stage a number of issues in relation to certainty of the quality and content is linked to the detail design which is not yet available at this stage of the project

- If measures listed for temporary culverts in section 6.3.2.6 of the oCoCP (revision 3) would be appropriate for permanent culverts, as suggested in paragraph 205 of the same document.

In relation to 204 it needs to be clear and agreed the ownership and future responsibility to maintain and update for any new or updated culverts and bridges in the Boards Drainage District. These structures will not be taken on by the Board and it is our preference they are removed at the end of the construction period unless the ownership and future responsibility is confirmed.

In relation to 205 invert levels and culvert sizes within the Boards Drainage District will need to be agreed and consented by the Board.

Outline Drainage Strategy (Revision 3) February 2025

It being noted the onshore converter station is not located in the Board's district. The details of the outline drainage strategy for the work within the Boards Drainage District is very limited and appears to require future agreement of the Board.

The Board would, however, like to be clear that we generally only apply our greenfield run-off rate of 1.4 litres per second per hectare (unless there is an existing positive connection already). We will, on this occasion, apply a minimum discharge rate of 1 litres per second.

HF.1.15 oCoCP Accommodating drainage features constructed within the order limits associated with the export cable corridor

The Board believes this is the developer's responsibility to establish.

Yours faithfully,

Bill Symons

Bill Symons
Clerk to the Board

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