



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Dogger Bank South Offshore Wind Farm

Appendix B2 to the Natural England Deadline 2 Submission
Natural England's comments and updated advice on Marine Physical Environment

For:

The construction and operation of the Dogger Bank South (East and West) Offshore Wind Farm located approximately 100-122km off the Northeast Coast in the Southern North Sea.

Planning Inspectorate Reference EN010125

14th February 2025

Appendix B2 – Natural England’s Advice on Marine Physical Environment at Deadline 2

In formulating these comments, the following document submitted by the Applicant have been considered in relation to the impacts of Dogger Bank South (East and West) Offshore Wind Farm (DBS) on Marine Physical Environment:

- [AS-048] 10.30 Response to Natural England's Relevant Representations (Revision 01)
- [AS-110] 7.18 ES Chapter 18 – Terrestrial Ecology and Ornithology (Revision 3) (Tracked)
- [AS-156] The Applicants’ Responses to January 2025 Hearing Action Points (Revision 2) (Tracked)

1. Emergency intertidal access

Natural England’s Risk and Issues Log Deadline 2, Point B14

The Applicant has updated [AS-110] (Chapter 18 - Terrestrial Ecology and Ornithology (Revision 3)) with an assessment of the potential impact of temporary loss/fragmentation of habitat to the priority habitat of maritime cliff and slope from the emergency intertidal access, with mitigation measures such as preconstruction surveys, use of protective matting, and monitoring included. We welcome this, however we note in paragraph 252 it is stated that the temporary emergency access design will be finalised when the contractor is appointed. Natural England advise that clarity is needed on the aspects that are not currently finalised to determine if this can be resolved. We consider that a full outline contingency plan should be included at the point of consent (N.B. this does not have to be a standalone document).

2. Nearshore cable protection

Natural England’s Risk and Issues Log Deadline 2, Point B23

Natural England have previously advised [RR-039] that we cannot rule out an adverse effect on integrity for the Humber Estuary SAC due to the current condition allowing 10% of the cumulative export cable length to be protected from 350m seaward of MLWS to the 10m depth contour.

Whilst we welcome the Applicant's commitment to the separate bundling of pairs of the export cables outlined in the updated Cable Statement [AS-079], we note that it has not been secured in the DCO and updated cable protection estimates and assessments have not been provided.

We also note the Applicant’s response [AS-048] which states that for navigational safety, cable protection within the 10m depth contour would be limited to a height of no greater than 50cm and as such rock placement would not be used in this area with alternative solutions to be considered such as mattresses. However, this is also not a commitment that has been secured and no evidence has been provided to demonstrate that 50cm will not disrupt longshore sediment transport towards the Humber Estuary SAC and Spurn Point. We therefore advise

that further evidence is provided, or that the original commitments advised in our Relevant Representation are secured.

3. Changes to bedload sediment transport and seabed morphology

Natural England's Risk and Issues Log Deadline 2, Point B29

Natural England previously advised [RR-039] that there is insufficient information to support the assessment of changes to bedload sediment transport and seabed morphology due to the presence of cable protection measures on Dogger Bank. We advised seabed mobility assessment should be carried out to inform the cable burial assessment and, thus, the requirement for cable protection measures.

The Applicant has clarified in [AS-156] 'The Applicants' Responses to January 2025 Hearing Action Points (Revision 2) (Tracked)' that the Cable Burial Risk Assessment (CBRA) and cable routing studies will include seabed mobility assessment, but that final versions of these documents are unlikely to be submitted during the Examination process. Natural England do not expect final versions of these documents to be submitted within Examination timeframes, but we advise that endeavours are made to provide updated outline versions including a more detailed assessment on bedform migration rates and directions, thickness of the mobile sediment layer and distribution, scour potential, and a refinement of the sediment transport model (including consideration of predicted wave height changes and increased storminess).