



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Dogger Bank South Offshore Wind Farm

Appendix C2.1 to the Natural England Deadline 2 Submission
Natural England's comments and updated advice on Benthic and Intertidal Ecology

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 C2.1 – Natural England’s Advice on Benthic and Intertidal Ecology at Deadline 2

Overview

In formulating these comments, the following documents submitted by the Applicant have been considered in relation to the impacts of Dogger Bank South (East and West) Offshore Wind Farm (DBS OWF) on Benthic and Intertidal Ecology:

- [AS-025] 10.36 Review of evidence on recovery of sandbank habitat following habitat damage (Revision 01)
- [AS-028] 8.24 Outline Offshore Operations and Maintenance Plan (Revision 02) (tracked)
- [AS-048] 10.30 Response to Natural England's Relevant Representations (Revision 01)
- [AS-081] 8.27 Outline Scour Protection Plan (Revision 2) (tracked)
- [AS-104] 10.38 Benthic Ecology Technical Note
- [AS-156] 11.6 The Applicant’s Responses to January 2025 Hearing Action Points (Revision 2) (Tracked)

A summary of Natural England’s key concerns in relation to Benthic and Intertidal Ecology is set out below in sections 1 – 8. Our detailed comments on documents submitted by the Applicant as listed above are provided in Tables 1-3.

1. Ecological halo effects

Natural England’s Risk & Issues Log Deadline 2, point C8

- 1.1 Natural England acknowledges that during pre-application discussions with the Applicant we had not used the specific terminology of an ‘ecological halo effect’, with this terminology introduced in our Relevant Representation submission. However, we highlight that whilst the terminology had not been used, the impact pathway it describes is not new or unknown. Colonisation of hard structures and/or utilisation of the presence of infrastructure in the water column, can lead to localised changes in biological communities, which combined with changes to physical processes resulting from the presence of the infrastructure, can alter the characteristic composition of the benthic habitat and/or biological community in the surrounding area, creating a halo of changed habitat and ecology.
- 1.2 We note the Applicant’s assertion that this has not previously been raised during the Evidence Plan Process or with respect to other offshore wind farms (OWF). However, the Applicant’s EIA scoping screened in ‘Colonisation of introduced substrate’, which Natural England assumed would relate to an assessment of the impacts of colonisation on the surrounding habitat. We also consider that it falls under the screened in impact pathways of ‘Physical change to another habitat type’ and ‘Introduction of Invasive and Non-Native Species’ (which can include both species non-native to a protected habitat and those non-native to UK waters). We also highlight that DBS is the only Round 4 project to have array

areas wholly within a Special Area of Conservation (SAC) designated for benthic habitat. Further, monitoring the effect of colonisation of OWF infrastructure on the characteristic community of the Dogger Bank SAC is a key component of the Benthic Monitoring Plans for the Dogger Bank A, B, C and Sofia OWFs.

- 1.3 We also note the Applicant's highlighting of the uncertainties of the scale or likelihood of this impact. Natural England agrees that there is uncertainty, but due to the Project's location within the Dogger Bank SAC (of which the characteristic community is a protected feature) and the potential for impacts to be exacerbated as a result of the network of interlinking cables between the arrays, we consider this uncertainty is why it should be robustly assessed and monitored. We therefore maintain our advice that a robust assessment is needed of the potential worst-case area of impact on benthic communities within Dogger Bank SAC sandbank feature, including more detailed assessment of the likely nature and scale of that impact, as a result of changes to physical and biological processes following the placement of structures and cable/scour protection on the seabed.
- 1.4 Once assessments have been updated, monitoring should be secured via the In-Principal Monitoring Plan to determine whether the residual impacts are as predicted. We refer the Applicant to the MMO's (2014¹) Review of environmental data associated with post-consent monitoring of licence conditions of offshore wind farms, which discusses both evidence and monitoring approaches for this impact.

2. Receptor value

Natural England's Risk & Issues Log Deadline 2, point C9

- 2.1 Natural England maintains the advice provided in our Relevant Representation [RR-039] that an appropriate value should be attributed to biotopes/habitats which contribute to Annex I features, and subsequently more appropriately used to inform the magnitude of impacts. We note the Applicant's methods state in section 9.4.2.1.2 of ES Chapter 9 Benthic and Intertidal Ecology [APP 085] that "*The value will be considered, where relevant, as a modifier for the sensitivity assigned to the receptor, based on expert judgement*", Table 9-9 outlines the definition of 'High' value as "*Habitats (and species) protected under international law (e.g. Annex I habitats within an SAC boundary)*" and Table 9-10 defines 'High' magnitude as "*Fundamental, permanent / irreversible changes, over the majority of the receptor, and / or considerable alteration to medium or high value receptors*". We therefore consider that by the Applicant's own methods, habitats contributing to Annex 1 features should be assigned a 'high' value.

3. Sediment deposition and disposal

Natural England's Risk & Issues Log Deadline 2, point B17, B44, B45, C21, C33, C34

¹ MMO (2014). Review of post-consent offshore wind farm monitoring data associated with licence conditions. A report produced for the Marine Management Organisation, pp 194. MMO Project No: 1031. ISBN: 978-1-909452-24-4.

- 3.1 Natural England advised in our Relevant Representation [RR-039] that within benthic MPAs, any sediment deposition from sandwave levelling/seabed clearance should be located within areas of similar sediment type, as close to and upstream of the original sandwave, and be deposited using a fall pipe (should a suction hopper dredger be used).
- 3.2 The Applicant states [AS-048] that due to the variety of the sediments present, it would be difficult to dispose of material in areas of the same type. Therefore, Natural England continues to query the necessity for sandwave levelling for this project as this has not been required for Dogger Bank A, B, C and Sofia (previously Dogger Bank Crekye Beck A&B and Dogger Bank Teesside A&B). If after further consideration the Applicant determines it is required, we request they provide further justification/reasoning on why sand from sandwave levelling cannot be deposited in areas of sand in the near vicinity to the levelling activity. It is unclear if it is because of the tool that the Applicant is proposing to undertake sandwave levelling with, and how sediment would be deposited as a result. We further query this because the site characterisation surveys show similar habitats throughout the site. In addition, sandwaves by their very nature form the mobile parts of sandbanks so tend to be finer sediment types which are found throughout the SAC. Natural England highlights that developers on other projects (not within Dogger Bank SAC) have chosen to remove the mobile layer of the sandbanks, i.e. the sand waves, to ensure that cables can be laid in the stable part of the sandbank. This reduces the likelihood of cable exposure and the need for external cable protection and ensures that sediment is retained within the designated site, thus making sandwave levelling a mitigation measure to avoid permanent habitat change/loss. If this is not a sandwave levelling tool issue, Natural England queries if the Applicant is proposing a structural change to the actual sandbank, rather than sandwave levelling. If this is the case then we advise that this has different environmental implications including (but not exclusively) longer recovery times, which would need to be assessed.
- 3.3 Natural England advises, if the Applicant is unable to apply the mitigation required, then (Option 1) they will need to provide a WCS and associated assessment of "physical change to another sediment type" within the ES and RIAA. Alternatively, (Option 2) the Applicant should consider committing to mitigating the 'physical change' impacts by using a control flow excavator (or similar tool) for sand wave levelling, which would side cast the sediment, thus avoiding the need for a separate action to deposit the sediment and maintaining sediment within similar sediment type.
- 3.4 If Option 1 is taken forward and it is found that deposition would result in habitat loss/change then we advise that it is likely that the only alternative option available (Option 3) to avoid habitat change/loss would be to dispose of sediment outside of the designated SAC, which would in itself result in a permanent loss of Annex I feature from the designated site. Having already advised against Option 3 due to the conservation objectives of the site being hindered, we would welcome further consideration by the Applicant of securing mitigation measures to avoid permanent habitat loss/change from sandwave levelling.
- 3.5 Natural England notes in [AS-156] 'The Applicants' Responses to January 2025 Action Points (Revision 2) (Tracked)' that the preferred method of dredging in seabed preparation is by using a Trailing Suction Hopper Dredger (TSHD) with the technique of bottom

deposition to discharge the sediments *“usually done in close proximity to the area from which the sediment was obtained”* and can be done in a *“controlled way over a distance, rather than discharging in one go in a concentrated fashion”*. Which is the opposite required to deliver Natural England advice to both ensure the sediment remains within the system and to enable sandbank recovery. We also note that the response states that use of a fall pipe to dispose of sediment after dredging is not practicable as they are not equipped on a TSHD and that fall pipes are typically used to deliver rock to the seabed during cable / scour protection installation. However, Natural England notes that for Five Estuaries and Outer Dowsing (and other offshore consented OWFs) there is a commitment to use a downpipe to ensure that sediment can be deposited in a target location upstream of the sediment and within similar sediment type. Therefore, there is an expectation that this is a deliverable for all projects.

- 3.6 Therefore, where sandwave levelling is unavoidable, we reiterate our previous advice that dredged material should be placed at a location that enables it to remain within the sediment system (unless this leads to impacts on another feature). We also continue to advise monitoring to support predictions and conclusions of sandwave recovery.

4. Sandbank Recovery

Natural England’s Risk and Issues Log Deadline 2, points C11, C16, C23,

- 4.1 Having reviewed the Applicant’s additional submission [AS-025] 10.36 Review of evidence on recovery of sandbank habitat following habitat damage, we are not sufficiently persuaded by the Applicant’s arguments to revise our advice provided within our relevant and written representation [RR-039]. Therefore, we confirm that Natural England’s advice in relation to the potential for an AEoI on Dogger Bank SAC resulting from disturbance/damage to Annex I Sandbanks from cable installation remains unchanged to that provided within our relevant/Written representation [RR-039]. In addition, we do not believe that the evidence provided allows for Plan Level HRA conclusions (as signed off by the Secretary of State) to be ‘superseded’ by the project level assessment as proposed by the Applicant at [AS-025] Paragraph 39 Page 17.
- 4.2 Equally we maintain that recovery of the Dogger Bank SAC is likely to be 10-25 years. Please see the evidence provided in the 2019 Article 17 reporting: [UK Offshore information for H1110 - Sandbanks which are slightly covered by sea water all the time as part of the Fourth Report by the United Kingdom under Article 17 of the EU Habitats Directive](https://jncc.gov.uk/jncc-assets/Art17/H1110-OFF-Habitats-Directive-Art17-2019.pdf) <https://jncc.gov.uk/jncc-assets/Art17/H1110-OFF-Habitats-Directive-Art17-2019.pdf>
- 4.3 Further evidence will be available when the Favourable Condition Status for Annex I Sandbanks is published which is likely to be later this year.

5. Zone of Influence

Natural England’s Risk & Issues Log Deadline 2, point C24

- 5.1 We welcome the Applicant's clarification that the 8km Zone of Influence (Zol) is incorrect. The Applicant has stated in their response [AS-048] that the correct Zol is 14km and this has been used in Chapter 8 Marine Physical Environment [APP-080] and Chapter 9 Benthic and Intertidal Ecology [APP-085], which does provide some reassurance. However, it is unclear how this correct Zol value of 14km relates to the values presented in Tables 8-3-17 and 8-3-18 and in Annex D Results of Dispersion Model Assessment Runs of [AS-136] 7.8.8.3 Environmental Statement Appendix 8-3 – Marine Physical Processes Modelling Technical Report (Rev 2) (Tracked).
- 5.2 The zone of potential influence identified in [APP-080] (7.8 Environmental Statement Chapter 8 – Marine Physical Environment) is 14km. However, the Applicant has stated in their response [AS-048] and paragraph 173 of [APP-080] that the maximum extent of the plume during peak tidal currents reaches 18km from the cable corridor to the east of Flamborough Head. Furthermore, the Applicant has added [AS-048] that *"at such distances the sediment concentration would be below 1mg/l and thus indistinguishable from the existing background levels of sediment in the water column."* Natural England requires further clarification from the Applicant whether, based on this comment above, 18km should be used as the zone of greatest influence for sediment plumes (or at least for the nearshore).
- 5.3 Natural England notes that the Applicant states in [AS-048] that the change in Zol would not alter the assessment outcomes presented in RIAA HRA Part 2 of 4 [APP-046], or the designated sites screened in for assessment given the distances of those sites from the Projects. We advise that the Applicant should justify this conclusion by providing a list or table showing the designated sites screened in for assessment within the RIAA alongside the incorrect and correct Zol values to enable us to better understand the implications of the changes to the Zol to the assessment.
- 5.4 We also highlight that it remains unclear where sediments will be deposited and to what depth. We advise that smothering and siltation should be assessed against the MarESA benchmarks, and unless the spatial sediment deposition relative to these benchmarks has been predicted, then assessments of smothering on benthic receptors within the Zol cannot be considered robust.

6. Cable / scour protection replacement

Natural England's Risk & Issues Log Deadline 2, point A0, A7, A15, A21, C4, C5

- 6.1 We note in the Applicant's response [AS-048] that *"it is intended that no new marine licences will be sought for any additional or replenishment protection required during the operational phase in areas that were protected as part of construction, unless such protection would exceed the maximum amounts authorised by the DMLs. The Applicants are of the opinion that a distinction should not be drawn in protection maintenance licencing terms between areas within or beyond any Marine Protected Areas as long as any future protection levels fall below the worst case scenario levels assessed within the Environmental Statement (ES) and the Report to Inform Appropriate Assessment (RIAA). The impacts of this protection will be compensated for as part of the Dogger Bank (DBS) South benthic Special Area of Conservation (SAC) compensation proposals".*

6.2 Furthermore, the Applicant considers that *“If additional cable protection for maintenance purposes was required beyond the maximum limits authorised by the DMLs then a separate marine licence or licences would be required”*.

6.3 Natural England do not agree with this and continue to advise as previously. With regard to deployment end date, the Applicant’s response is that they envisage *“that these applications would cover 10 year periods post-construction”*. Natural England draws the ExA and Applicant’s attention to our Deadline 2 Appendix C2.2 ‘Natural England’s advice on cable protection assessment for offshore windfarms and inclusion in marine licenses’.

7. Decommissioning cable/scour protection

Natural England’s Risk & Issues Log Deadline 2, point B7, C27

7.1 Natural England notes the Applicant’s response [AS-048] that they do not consider that they can commit to decommissioning cable/scour protection at this time as technology and/or our understanding of the impacts may change. Further, they do not consider it necessary as the loss of habitat will be compensated for. Natural England disagrees with both aspects of this stance.

7.2 Natural England acknowledges that technologies and understanding might change by the time the Project reaches decommissioning. However, we do not consider this to be sufficient reason for not committing to decommissioning. We highlight that advances in technology and engineering methods could allow for complete removal of offshore windfarm infrastructure in the future. It is our view that this is a more likely outcome than rock protection in a SAC designated for its sedimentary habitat being found to be beneficial. We advise that the removal of all on and above seabed infrastructure should be committed to in an outline decommissioning plan and secured in the DCO. We reiterate our Relevant Representation advice [RR-039; B68, C59] that consideration should be given to comments made in relation to minimising environmental impacts as much as possible through the choice of scour prevention/cable protection. Every effort should be made to avoid using those that are least likely to be recovered at the time of decommissioning. We refer the Applicant to Natural England’s Scour and Cable Protection Decommissioning Study:

<https://publications.naturalengland.org.uk/publication/5938793965420544>.

7.3 Whilst we acknowledge that a conclusion of Adverse Effect on Integrity on Dogger Bank SAC has already been confirmed in the Plan Level HRA and that compensation will be provided for the habitat loss from cable and scour protection, the Defra guidance for marine compensatory measures is clear that the mitigation hierarchy must be applied to avoid and reduce impacts as much as possible, even if compensation measures are being implemented ([Best practice guidance for developing compensatory measures in relation to Marine Protected Areas](#)) (2021). This is further supported by [090224 OWEIP Consultation on updated policies to inform guidance for MPA assessments .pdf](#), which includes a step wise approach to avoiding, reducing and minimising impacts and the scale of compensation required.

7.4 In addition, we highlight the Secretary of State decisions for Hornsea 3, Norfolk Vanguard and Norfolk Boreas, which require cable protection to be decommissioned even though compensation is being provided, because the associated designated sites are in unfavourable condition and have a restore objective.

8. Drill arisings

Natural England's Risk & Issues Log Deadline 2, point C25

8.1 We maintain our previous advice that the placement of drill arisings adjacent to turbines may result in further habitat loss/change unless the Applicant can commit to placing drill arisings in areas of similar habitat / particle size, as was committed to by Dogger Bank A, B, C and Sofia. We do not consider that the Applicant's comparison to Hornsea 4 is appropriate. The Hornsea 4 array area is considerably more inshore than DBS so will likely be subject to greater wave action, it also is not within an SAC formed of underlying glacial clay/till sediments which might not dissipate if brought to the surface.

8.2 Further, evidence from LID and Lincs OWFs shows that the arisings are still present 14 years later, and may have facilitated a change in benthic communities. We therefore disagree that even within dynamic sandbank systems, which Dogger Bank is not, it can be assumed that drill arisings will be winnowed away. We advise that if drill arisings cannot be deposited in a similar habitat, they should be considered a permanent loss of habitat at the disposal location within the assessment. We also advise that a commitment to monitoring the dissipation of drill disposal mounds should be secured, as was done on the original Dogger Bank projects.

Table 1 - Natural England's Advice On: [AS-081] 8.27 Outline Scour Protection Plan and [AS-028] 8.24 Outline Offshore Operations and maintenance plan

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	<p>[AS-081] 1.3 and 1.4</p> <p>[AS-028] Table 2.3 updates</p>	<p>Natural England notes that this document is intended to lay out the key principles of foundation protection both immediately post-construction and throughout the operational life of the Project. We note that the Applicant is predicting secondary scour but maintaining that the Maximum Design Scenario (MDS) of 768,736m² scour protection footprint is still accurate.</p> <p>Whilst we note that the Applicant proposes monitoring of scour protection measures and subsequent secondary scour, detail on how secondary scour will be addressed and whether this is included within the MDS has not been stated and is not clear. Application documents such as the Project Description [APP-071] only address replenishment of cable protection, not that around turbine structures.</p> <p>Of particular concern is the Applicant's claims that replenishment would occupy the same footprint as the original rock protection. However, if rock protection became dispersed or lost integrity, Natural England consider it unlikely that the footprint of habitat loss and/or impacts to the structure and/or function of the Annex I feature will not increase.</p>	<p>Natural England advises that detail on all scenarios in which rock replenishment/additional scour protection may be required is provided in order to determine whether the MDS for rock protection replenishment is realistic. In addition, this information is required to determine on how aligned the proposals are with Natural England's advice on cable protection provided at Appendix C2.2 to Deadline 2.</p>

		Therefore, we advise it remains unclear how the MDS for further cable and/or structure (i.e. turbine) scour protection during the operational phase has been determined and whether the MDS is accurate.	
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Table 2 - Natural England's Advice On: [AS-104] 10.38 Benthic Ecology Technical Note

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	5.1.3.1.1 para 66.	<p>Natural England considers that the Applicant has still not sufficiently characterised benthic receptors within Flamborough Head SAC. All benthic receptors within the Zol, particularly those within designated sites, need to be sufficiently characterised to enable a robust, evidenced assessment to be undertaken and presented. In the absence of characterisation of benthic receptors at a suitable resolution, the WCS needs to be presented (e.g. most sensitive biotope within the broadscale habitat used as a basis for assessments) to consider the sensitivity or recoverability of the benthic receptors to the identified pressure pathways.</p> <p>Natural England advises that the application of the MarESA sensitivity assessment requires the key elements of the feature (in terms of life history, and ecology of the key and characterizing species) to be defined in order that the feature's resistance to a defined intensity of pressure (the pressure benchmark) can be assessed. In order for the</p>	<p>Natural England believes that this is readily resolvable and advises that to provide the necessary transparency in their assessments and assessment conclusions, the Applicant should state which specific habitats/biotopes were used to determine feature sensitivity according to MarESA.</p> <p>We also advise that the Applicant considers the nature of the secondary impacts (i.e. including frequency and duration) against the MarESA benchmark, and in cases where the benchmark is exceeded (i.e. where pressures are not single discrete events) a transparent justification of assessment conclusions is required. Without this information Natural England is unable to provide advice with certainty on the likelihood of the conservation objectives of the Flamborough Head SAC being hindered.</p>

		<p>MarESA sensitivity assessment to be applied, it is therefore necessary to identify the features present within the Zol to biotope level.</p> <p>Natural England notes that the Applicant's Technical Note has still not done this (or transparently supplemented with a WCS), and as such, it is not clear how the sensitivity of SAC features to the relevant pressure benchmark(s) has been derived.</p> <p>Natural England also advises that the MarESA pressure benchmarks relate to single discrete events (i.e. single discrete deposition event), and that benthic receptors are likely to respond differently where pressures are repeated. We note that the Applicant has also not considered this within their assessments of secondary impacts within Marine Protected Areas.</p>	
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Table 3 - Natural England's Advice On: [AS-025] 10.36 Review of evidence on recovery of sandbank habitat following habitat damage

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	General	<p>Natural England welcomes the further information provided by the Applicant to support their assessment conclusions in respect of loss of benthic habitat as a result of UXO clearance and/or jack-up operations. However, the evidence provided does not satisfy the requirements to evidence that depressions will fill with a similar sediment character.</p>	<p>We continue to advise that depressions caused by UXO and/or jack-up operations in areas of coarse or mixed sediments may need to be considered as permanent habitat change/loss unless it can be otherwise evidenced that they will backfill with similar sediment types.</p> <p>We continue to advise that recovery is unlikely within the irreplaceable NERC Section 41 habitats which have been</p>

		<p>Natural England notes the Applicant's reference to MarESA in assessing likely sensitivity and recoverability of given habitats to abrasion. However, we highlight that the MarESA sensitivity and recoverability evidence does not consider the changes in topography or the long term secondary effects of those changes (i.e. infilling with finer sediments than present at baseline) which are of main concern. We note that the review of evidence presented from Dogger Bank B refers solely to recovery of the seabed topography/surface profile, not the long term/permanent changes in sediment character within the footprint of UXO clearance and/or jack-up operations.</p>	<p>identified within the red line boundary (i.e. Piddocks with a sparse associated fauna in sublittoral very soft chalk or clay).</p>
2	Section 2.3.3 and Appendix 1	<p>Natural England advises it is not clear when determining recoverability of biotopes, how resistance or sensitivity was accounted for in the assessment. There is also missing context around specific species within these biotopes which have longer lifespans, and recruitment can take longer than 2 years.</p> <p>For example, in the resilience assessment of MC5212 <i>Abra prismatica</i>, <i>Bathyporeia elegans</i> and polychaetes in circalittoral fine sand, it states that <i>"Recovery of the seabed from severe physical disturbances that alter sediment character may also take up to 10 years or longer (Le Bot et al., 2010), although extraction of gravel may result in more permanent changes and this will delay recovery"</i>.</p>	<p>Natural England advises that further context should be added to the Section 2.3.2 text and the Table in Appendix 1 to include the approach taken to summarise the MarESA assessment of the 6 biotopes as the term recovery is used which differs to the three parameters in MarESA.</p> <p>Caveats on the recovery timelines should be included as MarESA states that the resilience and ability to recover is a combination of environmental conditions, frequency of disturbance and intensity of the disturbance, therefore the recovery assessment should include this as a caveat to the recovery timeframes presented. This section does not provide all relevant information related to the recovery of biotopes present in the area, therefore, there could be misinterpretation of the MarESA outputs based on the recovery timelines in this report. This section should note that recovery is only possible after the activity has finished, therefore actual recovery, from placement of infrastructure</p>

		<p>The pressures list has missed 'Physical change (of the seabed type)' which is a significant pressure from installation of offshore wind. For example for biotope Nephtys cirrosa and Bathyporeia spp. in infralittoral sand - MarLIN - The Marine Life Information Network, the resistance to a permanent change to an artificial substrata is none, with low resilience and high sensitivity.</p> <p>Other pressures (i.e. abrasion/disturbance of the substrate on the surface of the seabed, and pressure and/or disturbance of the substrate below the surface of the seabed including abrasion) have also not been included in this assessment.</p>	<p>and hard substrata to the sandbank is between 62-70 years based on the evidence the Applicant has provided.</p> <p>Additionally, the Advice on Operations for Dogger Bank SAC published in 2022 states that the habitats in Dogger Bank SAC are all sensitive to the pressure of physical change to another seabed type, and physical change to another sediment type. Table A-1 should therefore also include 'Physical change (of the seabed type)'.</p>
3	Section 4 Paragraph 44	<p>Natural England disagree with the conclusion of no AEOL in relation to habitat disturbance/damage. Dogger Bank SAC is unique in the UK, provides a substantial proportion of sandbank to achieve sufficiency requirements and is in unfavourable condition. Any activity which occurs over a duration of 60 years then, based on the information in Table A-1 will take at least 2-10 years to recovery, can be considered to significantly impact the conservation objectives of the site and prevent this site from recovering.</p>	<p>Natural England advises that unless the Applicant position changes during Examination this risk and issue is unlikely to be resolved during examination.</p>
4	Section 5, Paragraph 46 & 47	<p>Natural England notes that the report does not mention any potential increased disturbance / impact from cumulative impacts during construction (or UXO clearance) or continued cumulative disturbance from the operational phase.</p>	<p>Natural England advises that cumulative impacts should be given further consideration by the Applicant.</p>

		There may be shorter recovery rates for specific biotopes known to be present within Dogger Bank SAC, but the full recovery of the whole site would be expected to be longer.	
5	Section 5, Paragraph 50	<p>Natural England notes that the report states that habitat damage in the Dogger Bank SAC is no different from that of the North Norfolk Sandbanks and Saturn Reef SAC, or the Haisborough, Hammond and Winterton SAC. We disagree with this statement, as while the impact footprints and impact types may be similar, Dogger Bank SAC is a relict sandbank and comparison to the recovery rates to mobile/dynamic sandbank system is not appropriate in this instance.</p> <p>While it has been evidenced that UXO craters have backfilled, this is not sufficient evidence to state that all aspects of habitat damage may be reversible.</p>	Natural England advises that we are currently at an impasse in relation to the issue. We believe that to resolve this issue evidence from cable installation within Dogger Bank SAC and subsequent recovery would need to be submitted. Until this is provided, we agree with the conclusion of the Plan Level HRA on habitat disturbance/damage from cable installation.