



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

Dogger Bank South Offshore Wind Farm

**Appendix C3 to the Natural England Deadline 3 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

19<sup>th</sup> March 2025

## **Appendix C3 – Natural England’s Advice on Benthic and Intertidal Ecology at Deadline 3**

### 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:

- [REP2-036] 8.18 Disposal Site Characterisation Report (Revision 2) (Tracked)
- [REP2-040] 8.20 Cable Statement (Revision 3) (Tracked)
- [REP2-052] 8.27 Outline Scour Protection Plan (Revision 3) (Tracked)
- [REP2-013] 6.2.3 Appendix 3 – Project Level Dogger Bank Compensation Plan (Revision 2) (Tracked)
- [REP2-026] 8.6 Commitments Register (Revision 2) (Tracked)

### **1. Change Request 1**

Natural England welcomes that the values for the worst-case scenarios and/or Maximum Design Parameters (MDP) have been updated in the above documents in line with Change Request 1. These changes are welcome and reduce the worst-case parameters / impacts originally assessed in Chapter 9 Benthic Ecology [APP-085]. However, the reductions do not result in any changes to the outcomes of the original assessments.

Please see Appendix B3 of our Deadline 3 submission for further comments on 8.20 Cable Statement [REP2-040] and 8.18 Disposal Site Characterisation Report [REP2-036]. Please note that in all documents there should be differentiation between infrastructure, activities and impacts inside and outside of benthic designated sites.

### **2. 8.20 Outline Scour Protection Plan [REP2-052]**

Natural England notes that text has been added to Section 1.2 indicating that if plastic-based materials are used as part of scour protection (e.g. frond lines or mats), the impacts on the marine environment will be considered in the final Scour Protection Plan (SCP). We highlight that as the final SCP will be provided post-consent, if the impacts of plastic-based scour protection have not been included and/or fully assessed as part of the Application Environmental Statement/RIAA, a further assessment will be required at that time. And depending on the outcome may require an additional HRA assessment to inform Condition Discharge.

### **3. 6.2.3 Project Level Dogger Bank Compensation Plan [REP2-103]**

### 3.1 Written Ministerial Statement (DESNZ, 2025)

Natural England agrees with the revisions made by the Applicant with respect to the interim guidance in the Written Ministerial Statement published by DESNZ in January 2025. As noted in our Deadline 2 response [REP2-071], Defra are now leading on the designation and/or extension of an MPA for the delivery of strategic benthic compensation.

### 3.2 Quantification of impacts

Whilst the impact values in [REP2-103] have been revised in line with the Change Request reductions, we note that outstanding concerns remain regarding the quantification of benthic impacts. We welcome that the Compensation Plan provides values calculated for habitat loss and physical damage, however these do not consider aspects such as ecological halo effects. Natural England advises that if agreement cannot be reached on the impacts that should be included in habitat loss estimates (e.g. abrasion/ disturbance and ecological halo effect), then as with ornithology compensation, impact values should be provided in line with both the Applicant's and SNCB's advised approach to the assessment. This will provide the Examiner's and Secretary of State with a fuller understanding of the potential scale of compensation that will be required to be delivered.

### 3.3 Removal of project level compensation

Natural England welcomes the Applicant's proposed progression of strategic benthic compensation in the form of Marine Protected Area designation and/or extension and therefore has no nature conservation concerns with the removal of project level compensation i.e., fisheries management measures and seagrass restoration.

## **4. 8.6 Commitments Register [REP2-026]**

Natural England notes that commitment ref. CO96 of [REP2-026] has been updated with "*habitat with suitability for sandeel, and / or surficial deposits of glacial till*" to be included when determining presence of potential Annex I / UK BAP Priority Habitats during preconstruction surveys and for consideration to avoid though micro-siting should this habitat be identified. Whilst we welcome this, the figures presented by the Applicant in [APP-050] (6.1.2 RIAA HRA - Appendix B – Sandeel Habitat Potential in the Dogger Bank SAC and Southern North Sea SAC - Volume 6) indicate that the Project Development area is considered to have a medium to high habitat potential for sandeel. It is therefore unclear how much mitigation this will deliver. We continue to advise that efforts to avoid the use of external cable protection to reduce impacts to sensitive benthic features would be most effective.