THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

Dogger Bank South Offshore Wind Farm

Appendix E3 to the Natural England Deadline 3 Submission
Natural England's comments and advice on Fish and Shellfish.

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

19th March 2025

Appendix E3 – Natural England's advice of Fish and Shellfish

In formulating these comments, the following documents submitted by the Applicant have been considered in relation to Fish and Shellfish:

- [AS-105] 10.41 Heat Mapping Report Atlantic Herring and Sandeel
- [REP2-061] Marine Management Organisation Deadline 2 Submission
- [AS-142] 10.5 Appendix A – Fish and Shellfish Environmental Statement Update
- [PD-015] EN010125-001289-ExQ1 - Dogger Bank South 28 February 2025
- [REP1-051] EN010125-001166-11.6 The Applicants' Responses to January 2025 Action Points.

1.1. 10.41 Heat Mapping Report

Natural England welcomes the review and update of the heat maps for Atlantic herring and sandeel provided in [AS-105]. We note only one year of Vessel Monitoring System (VMS) data (2020) has been incorporated, and request justification for this is provided as it will only provide a snapshot of fishing activity. We defer to Cefas regarding the detailed assessment of the methodology used by the Applicant.

Reducing Herring spawning seasonal restriction

Regarding the Applicant's use of Eastern Greenlink 2 (EGL2) as justification to reduce the herring spawning seasonal restriction for cable installation, Natural England support concerns raised by the MMO at Deadline 2 [REP2-061] that cumulative impacts for numerous upcoming developments should be taken into consideration along the ECC route. Further, the EGL2 proposal concerned only cable installation works and therefore cannot automatically be applied to the impacts of DBS, which also includes underwater noise impacts, as well as seabed preparation works and cable installation activities. Natural England defer to Cefas for further comment on the appropriate period of a seasonal restriction to be applied for herring. However, we maintain that a number of environmental factors could cause herring to spawn at different times within the season and that Atlantic Herring populations could experience significant impacts from underwater noise from piling activities and UXO clearance during the spawning period.

1.2 Worst-case location for the assessment of underwater noise impacts on herring

Natural England agree that underwater noise has been assessed across a larger geographical spread given the Applicant's assessment of the bathymetry and likely includes a greater area of medium spawning potential habitat for herring. We note that the Applicant has responded

to the January 2025 Action Points [REP1-051] with reference to the updated heat maps and to the Temporary Threshold Shift (186 dB re 1 μPa^2s SELcum) underwater noise threshold (Popper *et al*., 2014).

However, we are still unclear on if using the Southwest corner with the 135 dB re 1 μPa^2s SELss threshold (Hawkins *et al.,* 2014) will overlap more with the very high potential spawning areas, particularly around Kilometre Point 30 (Figure 2-1 [AS-105]). Concerns could only be addressed by reassessment of underwater noise models. In both scenarios, Natural England maintain that underwater noise impacts from piling will have population level effects due to possible disturbance to spawning herring if noise exceeds the behavioural threshold (135 dB re 1 μPa^2s SELss) across their spawning potential habitats. We therefore maintain the position that a seasonal restriction is needed in order to reduce population level impacts on the Banks Herring population (see 1.1).