



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

Dogger Bank South Offshore Wind Farm

**Appendix F3 to the Natural England Deadline 3 Submission
Natural England's comments and advice on Marine Mammals**

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 F3 – Natural England’s Advice on Marine Mammals

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) on Marine Mammals.

- [AS-048] 10.30 - Response to Natural England's Relevant Representations (Revision 01)
- [REP2-050] 8.26 Draft In Principle Site Integrity Plan (Revision 3) (Tracked)
- [REP2-048] 8.25 Outline Marine Mammal Mitigation Protocol (Revision 3) (Tracked)

1.1 Outline Marine Mammal Mitigation Protocol

Piling at night / reduced visibility

Natural England’s Risk & Issues Log Deadline 3, point F10

Natural England can only agree to piling during reduced visibility / darkness if the Applicant can demonstrate that the Passive Acoustic Monitoring (PAM) equipment can cover the whole Mitigation Area (MA). We highlight that the most frequently used PAM technologies for marine mammal mitigation struggle to detect harbour porpoise beyond a distance of 300 m. The Applicant will need to show evidence that their proposed PAM equipment will cover the whole MA for all marine mammals and that they have considered animals that vocalise infrequently such as baleen whales and seals.

Noise Abatement Systems

Natural England advise that the Applicant should fully commit to using noise reducing technology, such as Noise Abatement Systems, at this stage in the application.

Natural England does not consider that a commitment to employ best endeavours constitutes a commitment to use NAS and that it does not go far enough to provide confidence and certainty that a project will implement either primary or secondary NAS for their projects and therefore noise reduction at source may not be achieved. Consequently, Natural England strongly advises that all Applicants should commit to the use of NAS as mitigation to ensure the satisfactory alternatives test for EPS licensing can be passed and significant noise reductions can be achieved to help avoid adverse effects on integrity of designated sites, particularly from cumulative and in-combination impacts with other plans and projects.

If a commitment to the use of NAS can be made pre-consent, Natural England would welcome the use of Best Endeavours by Applicants to secure the most appropriate noise abatement system or noise mitigation technology they can between consent and construction. Natural

England would welcome the opportunity to engage with the Applicant in this regard post-consent.

1.2 Draft In Principal Site Integrity Plan

Natural England acknowledges that the Project alone is not breaching the Southern North Sea (SNS) SAC disturbance thresholds; however, there are several projects contributing to the exceedance, including this Project, which is contributing a significant proportion. To reduce the disturbance in the SNS SAC, there is an expectation that each contributing project will take responsibility for their project's noise reduction, for example by committing to NAS, in line with the mitigation hierarchy.