



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Dogger Bank South Offshore Wind Farm

Appendix L to the Natural England Deadline 3 Submission
Natural England's comments and updated advice on Change Request 1

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 L – Natural England’s Advice on Change Request 1 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, Marine Physical Processes, Marine Mammals and Fish and Shellfish:

- [AS-141] 10.49 Project Change Request 1 – Offshore and Intertidal Works
- [AS-142] 10.50 Appendix A: Fish and Shellfish Environmental Assessment Update (Revision 1)
- [AS-143] 10.51 Appendix B: Marine Mammal Environmental Statement Update (Revision 1)
- [AS-144] 10.52 Appendix C: Marine Mammal Report to Inform Appropriate Assessment (RIAA) Habitats Regulations Assessment (HRA) Update
- [AS-131] 3.1 Draft Development Consent Order (Revision 04) (Tracked)
- [AS-133] 3.2 Explanatory Memorandum (Revision 4) (Tracked)
- [AS-134] 3.4 Schedule of Changes to Draft DCO (Revision 4)
- [AS-136] 7.8.8.3 Environmental Statement Appendix 8-3 – Marine Physical Processes Modelling Technical Report (Revision 2) (Tracked)
- [REP2-018] 7.8.8.3 Environmental Statement Appendix 8-3 – Marine Physical Processes Modelling Technical Report (Revision 3) (Tracked)
- [AS-138] 7.11.11.3 Environmental Statement Appendix 11-3: Underwater Noise Modelling Report (Revision 2) (Tracked)
- [AS-140] 7.11.11.4 Environmental Statement Appendix 11-4: Interim Population Consequence of Disturbance (iPCoD) Modelling (Revision 2) (Tracked)

1. Proposed Changes in Projects’ Parameters

The Applicant has submitted a Change Request to revise the following aspects of the Project envelope:

- Change 1: Removal of Gravity Based Structure (GBS) foundations.
- Change 2: Removal of Electrical Switching Platform (ESP) from the Projects’ Design Envelope.
- Change 3: Reduction in number of offshore platforms in the Projects’ Design Envelope, from eight to three within the Array Areas, including reductions in associated seabed preparation and scour protection.
- Change 4: Reduction of cabling within the Array Areas, plus associated seabed preparation and cable protection; and
- Change 5: Removal of the short trenchless crossing at landfall

Natural England welcome these changes, as they will result in a reduction in impacts across several thematic areas. Our detailed comments on the associated documents submitted by the Applicant are provided in Table 1.

2. Updates to application documents

Natural England notes the Applicant restates their view that the “*original ES chapters and RIAA represent point in time documents of the Projects’ design as of June 2024*” and that no updates to ES chapters are therefore required. Natural England maintains our advice provided in [REP1-063] that all changes/updates accepted in additional submissions should be reflected in updated ES chapters and assessments to be submitted within Examination timeframes. We acknowledge and welcome that the Applicant has updated outline Plans to reflect the changes detailed in the Change Request (e.g. Scour Protection Plan, MMMP), however we do not consider that other application documents such as the ES Chapters and Project Description should be treated differently and without such updates there is a risk further in-combination assessments will not use the most up to date Maximum Design Scenarios and Worse Case Scenarios. .

Table 1 - Natural England's Detailed Advice

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
	General	Natural England welcome the changes to the Project's design envelope, as they will result in a reduction in impacts across several thematic areas. However, do not alter our previous advice where concerns have been raised regarding EIA conclusions or sensitivities/magnitudes or assessment methodologies.	To note.
Benthic and Intertidal Ecology Document used: [AS-141] 10.49 Project Change Request 1 – Offshore and Intertidal Works			
1	Table 4-3, Impact 1 (temporary physical disturbance)	It is not clear from the information provided whether rock protection will be required at the exit pits and whether this has been accounted for in the Maximum Design Scenario (MDS).	<p>Natural England advises that necessary updates should be made to confirm that cable protection will not be used within nearshore areas including in the vicinity of HDD exit pits.</p> <p>Any additional areas of temporary and/or permanent <u>subtidal</u> habitat loss resulting from the construction and/or operation of the exit pits should be applied to the MDS. [R&I, C2]</p>
2	Table 4-3, Impact 5 (permanent habitat loss)	Impacts from cable protection have been reduced but not removed.	We welcome the reduction in the MDS for lasting habitat loss within Dogger Bank SAC as a result of reduced requirements for cable protection. However, Natural England's previous advice remains unchanged, and we still do not agree that an AEol on Annex I sandbanks within the Dogger Bank SAC can be excluded alone or in-combination owing to the lasting direct and indirect impacts as a result of the placement of cable protection.

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Marine Physical Environment Document used: [AS-141] 10.49 Project Change Request 1 – Offshore and Intertidal Works [AS-136] 7.8.8.3 Environmental Statement Appendix 8-3 – Marine Physical Processes Modelling Technical Report (Revision 2) (Tracked) [REP2-018] 7.8.8.3 Environmental Statement Appendix 8-3 – Marine Physical Processes Modelling Technical Report (Revision 3) (Tracked)			
3	AS-141 General	The Applicant previously stated that Withow Gap SSSI had been retained in the assessment for consideration of any potential indirect effects. It is not clear whether potential impacts to Withow Gap SSSI have been considered following the changes made to the project design envelope through the Change Request, and if indirect effects are still possible with the removal of the intertidal exit pits. [R&I, B42]	Natural England advises the Applicant to clarify the status of Withow Gap SSSI following the Change Request.
4	AS-141 Table 4-2	For the Operational impact “Cable Repairs and Reburial”, the Applicant has provided the WCS volume of sediment displaced during O&M activities in the Array Areas and Offshore Export Cable Corridor. However, the WCS impact has not been provided with respect to any affected Marine Protected Areas (MPA).	Natural England advise that the WCS impacts are provided for any affected MPAs. [R&I, B5]
5	AS-136/ REP2-018 General	Natural England welcomes that revised marine processes modelling has been provided to reflect the project parameters as applied for. We note that the modelling has also been updated to reflect both array layout options (equal distribution of turbines and	To note.

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		platforms (Option 1); turbines and platforms condensed into a corner (Option 2)). As per our previous advice, Natural England considers Option 1 to be a more appropriate and realistic worst-case scenario for use in the assessment. [R&I, B11]	
6	AS-136/ REP2-018 Annex B	Natural England welcomes the updated modelling carried out by the Applicant. However, the wave roses in Plate 8-3 of [APP-080] show the predominant wave directions are north and northwest with a secondary component from the south and southwest in DBS E, and north and to lesser extent northwest with a secondary component from the south in DBS W. However, the wave model assessment in Annex B has been run for waves approaching from the north and east only and not the south and/or southwest, which would be useful in terms of understanding cumulative effects with other nearby OWFs. Further consideration needs to be given to potential associated changes to morphological processes and the SAC over the lifetime of the Project. This is important because long-term changes to the wave energy could affect not only the finer-scale topography and sediment composition/distribution, but also the characteristic communities, thus hindering the conservation objectives.	As advised previously in our Relevant Representation [RR-039], we wish to see the wave modelling include waves approaching from a south and/or southwest direction. This would inform the project alone and cumulative impact assessment. [R&I, B13, B18]
7	AS-136/ REP2-018	The contour plots in Annex C show distinct "shadow areas" of decreased or increased current speeds and	We continue to advise that the Applicant needs to consider impacts to Dogger Bank sandbank due to changes in the

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	Annex C	bed shear stress that extend from the arrays due to the presence of the DBS E and W arrays. Although it is stated that this could " <i>manifest as northwest movement of sandbanks and spatially varied seabed mobility within the Array Areas...</i> ", there is insufficient consideration of the potential lifetime implications for seabed mobility and morphology.	wave, hydrodynamic and sediment transport regimes [R&I, B19].
Fish and Shellfish			
Document used: [AS-142] 10.5 Appendix A – Fish and Shellfish Environmental Statement Update			
8	Section 1 Point 2	The Project has been updated to remove the electrical switching platform (ESP) in the export cable corridor (ECC).	Natural England welcomes the Applicant's request to remove the ESP, particularly for impacts to herring. And has no further comment at this time.
9	Section 2 Point 10	The Applicant has updated the ES assessment to include inter-platform cables which were previously omitted in error.	Natural England advises the Applicant to assess the additional cables for possible heat impacts to sandeel, as only EMF impacts have been reassessed.
10	3.1.4.1	<p>The Applicant continues to assess underwater noise impacts from piling on Atlantic herring and sandeel as 'minor adverse'.</p> <p>Natural England continues to disagree with the statements that underwater noise and vibration impacts would have 'minor adverse effects', particularly for sandeel (fish without swim bladder) and Atlantic herring (fish with swim bladder), which are important prey species for designated predators.</p> <p>In addition, Natural England also disagrees that 'no additional mitigation measures are required'</p>	Natural England advice continues to align with MMO's Deadline 2 response [REP2-061], that a full seasonal restriction for Atlantic herring is required, and that noise abatement systems and vibration reduction should be explored.

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11	3.1.4.3	The Applicant has reassessed monopiling impacts for DBS East and West in isolation but only discusses pin piling when reassessing DBS East and DBS West together.	Natural England require further clarification as to why pin piling is referred to throughout this section with no information provided on monopiling, when assessing the impacts of DBS West and East together. We advise that the impacts of both pin-piling and monopiling should be assessed.
12	3.2.2	The Applicant refers to percentages of habitat loss in reference to the Fish Study area but previously provided percentages of Dogger Bank SAC and Banks herring and sandeel nursery and spawning grounds, which are ecologically more meaningful. To further assess this impact, percentages provided in reference to the Dogger Bank SAC area, Banks herring nursery and spawning grounds and sandeel nursery and spawning grounds would be beneficial.	Natural England requests the Applicant provides percentages for habitat loss in relation to the fish assessment in line with that presented in 6.1.2 Appendix B - Sandeel Habitat Potential in the Dogger Bank SAC and Southern North Sea SAC [APP-050].
13		The Applicant continues to assess permanent habitat loss as 'minor adverse' for both sandeel and Atlantic herring, through the ES.	Natural England maintains the position that there is a significant impact particularly to sandeel spawning and nursery habitat from permanent habitat loss. ICES advice for sandeel in divisions 4.b–c, sandeel Area 1r (ICES 2025) states that 'any activity leading to the degradation of sandeel habitat should be avoided.' Whilst this is likely unavoidable in the case of the Projects, sufficient assessment should be provided and mitigation applied to minimise impacts as much as possible. Furthermore, we have highlighted issues in relation to habitat loss and impacts to benthic habitats which reduce/remove their ability to support benthic communities which are integral to

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			maintaining populations of Annex I and II designated site features [R&I C10].
14		Natural England continues to disagree that habituation is applicable to noise sources impacting fish from the Projects. Seismic air guns, whilst impulsive are a different noise source both in frequency and duration and therefore no direct assumption can be made that fish will be habituated to high ambient noise resulting in a reduced response to piling.	It is not currently clear if the Applicant has removed habituation from the updated assessment. We continue to advise the Applicant to provide more appropriate supporting evidence for habituation, if it is retained.
Marine Mammals Document used: [AS-144] 10.52 Appendix C Marine Mammal RIAA Update; [AS-140] 7.11.11.4 Appendix 11-4 iPCoD Modelling (Revision 2) (Tracked)			
15	7.11.11.4	In order to fully understand the impacts concluded by the iPCoD modelling, Natural England requests the Applicant provides additional information.	Please see the rows below for further information to be provided as needed.
16	7.11.11.4	Provide the mean, median and confidence intervals for the impacted and unimpacted populations for all scenarios.	
17	7.11.11.4	Natural England does not support the Applicants method of using a 1% annual decline over 6 years to conclude significance. This method is not conservative as other threats which also impact populations, such as bycatch, prey availability, shipping, are not included in the model, and therefore, the population reduction caused by	Natural England advises the Applicant uses a model which considers the population reduction caused by other impacts as well as offshore wind.

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		offshore wind projects needs to account for other threats that could also cause a decline at a population level.	
18	7.11.11.4	If iPCoD modelling results show any decline in population size, this could indicate a significant impact and therefore should be assessed in more detail.	Natural England advise that conclusions of significant impacts should be an evaluation of iPCoD along with other tools such as, EDR and dose response.
19	10.52 - 4.3; 7.11.11.4	There is limited understanding of how disturbance leads to health, reproduction and consequential population level impacts in marine mammals. Although iPCoD is the best available tool to predict these impacts, there are still limitations to this model.	As advised in our Relevant Representations, Natural England advise that conclusions should not solely be based on the model results, but instead should be an evaluation of iPCoD along with Environmental Disturbance Radius (EDR) and dose response.
20	10.52 – 6.2.2; 7.11.11.4	The results of the in-combination assessment are currently only presented by the Applicant in the format of iPCoD results.	Natural England advise that the results of the in-combination assessment should be presented as the numbers of individuals and the proportion of the SAC impacted, not just the iPCoD results.
21	10.52 – 7	The RIAA does not currently show the assessment for the spatial and temporal area of the SNS SAC disturbed on a daily and seasonal basis to indicate how close the thresholds are to being breached.	Natural England advise that this table of results is clearly presented in the updated RIAA.
22	10.52 - 4.3	The proportion of grey seals from the Humber estuary SAC disturbed by this project in-combination with other projects remains high (up to 14.4%), as is the proportion of grey seals from the Berwickshire and North Northumberland Coast SAC disturbed by	Natural England continue to advise that to reduce the disturbance to these SACs, commitments should be made to noise reducing technology.

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		this project alone (up to 6.8%), and therefore, Natural England cannot rule out AEoI on these SACs at this time.	
Offshore Ornithology			
23		The current Change Request 1 documents do not include an updated Offshore Ornithology assessment, due to the Applicant stating that there will be no impact from the changes. However, we consider the changes to the location of the planned exit pits could change the likelihood of impacts to Red Throated Diver in the Greater Wash SPA.	Natural England requests clarification on how the move from intertidal to subtidal exit pits alters vessel and construction activity within/in the vicinity of Greater Wash SPA, and how this will impact Red Throated Diver populations.