



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Dogger Bank South Offshore Wind Farm

Appendix B3 to the Natural England Deadline 3 Submission
Natural England's comments and updated advice on Marine Physical Environment

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 B3 – Natural England’s Advice on Marine Physical Environment at Deadline 3

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 Physical Environment:

- [REP2-036] 8.18 Disposal Site Characterisation Report (Revision 2) (Tracked)
- [REP2-040] 8.20 Cable Statement (Revision 3) (Tracked)

Our detailed comments on documents submitted by the Applicant in relation to Marine Physical Environment as listed above are provided in Tables 1 and 2 below.

Table 1 - Natural England's Advice On: [REP2-036] 8.18 Disposal Site Characterisation Report (Revision 2) (Tracked)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	General	Natural England notes that there is no differentiation between sandwave levelling and sediment disposal inside and outside of designated sites.	Natural England's Deadline 2 Appendix C2.1 advice remains unchanged
2	Section 8.1.3.3	It is stated that within the arrays, seabed level could be increased by up to 0.5m where multiple cable corridors merge, but in practice the cable layout will be designed to avoid this.	Natural England require clarity on where this has been secured. [R&I, B46.1]
3	Section 8.1.4	Natural England welcomes the proposal of a subtidal exit pit. Whilst we agree with the Applicant that this has the potential to reduce the risk of sediment transport being disrupted, further evidence is required to demonstrate whether project mitigation is sufficient.	Natural England advises that further evidence is presented on the reduction in sediment transport disruption.

Table 2 - Natural England's Advice On: [REP2-040] 8.20 Cable Statement (Revision 3) (Tracked)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Appendix B Section 5.2.3.1, Para 1	It is stated that " <i>Mobile bedforms are present in the ECC corridors, although rates of mobility are not yet confirmed.</i> " It is also stated that sediment mobility studies are ongoing. The recommendation of the Export Cable Route (ECR) Preliminary CBRA (Appendix B to [REP2-040]) is that the <u>results of</u>	To address this evidence gap, Natural England advises that a seabed mobility study and more detailed and accurate assessment of bedform migration rates and directions should be carried out. This will increase confidence when defining the optimal depth of lowering/cable burial depth

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
		<u>these sediment mobility studies should be considered alongside the present CBRA and further repeat bathymetry surveys</u> <i>"to calculate the total installation depth of lowering required to adequately protect the cable for its full design life."</i> Natural England agrees with this recommendation, but highlights the current level of uncertainty regarding seabed mobility and bedform migration rates and directions across the export cable corridor route options.	and help reduce the risk of cable exposures over the lifetime of the installed assets. [R&I, B29]
2	Appendix B Section 5.2.3.1	It is recommended that if active mobile features are found to be present after repeat bathymetry surveys, that a stable seabed level assessment should be undertaken. Natural England agrees with this recommendation.	We advise that this stable seabed level, or vertical reference level and depth of lowering, should be identified pre-construction. Unless accurate and sufficient data already exist, we advise that pre-construction surveys should be carried out in areas with mobile bedforms, across a corridor wide enough to identify areas with deeper troughs that have the potential to affect the asset over its lifetime is surveyed. This is important for increasing understanding of the seabed mobility in the targeted area, cable protection requirements and options. [R&I, B29]
3	Appendix B Table 27	Table 27 states that the estimated maximum dredge volumes for ECR options B and C, based on the 2022 bathymetry, are 227,886m ³ and 297,391m ³ respectively. However, it is unclear how these values relate to the Maximum Design scenario (MDS) parameters presented in either ES Chapter 8 [APP-080] or the Project Change Request 1 [AS-141].	We would welcome the Applicant's clarification on the MDS dredge volume values for the ECR. [R&I, B50]

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
4	Appendix B Section 6.6	<p>It is stated that <i>"The burial classes from the BAS have changed following re-calculation of the CBRA results accounting for the additional geotechnical data and resultant updated ground model from Fugro...this change mainly consists of a shift into a greater percentage of both routes (by cable distance) being allocated as class B or C."</i></p> <p>This shift, according to our understanding, is that there is now a higher percentage of export cable route length where reduced and variable or poor burial conditions are expected, than previously assessed. This is because more geohazards have since been identified. Clarification is needed on whether this increases the potential requirement for external cable protection along the ECR or changes the MDS presented in Table 4-2 of Project Change Request 1 [AS-141].</p>	<p>Clarification is needed on whether the results of the ECR Preliminary CBRA alter the MDS for ECR cable protection. We advise that further discussion is also needed on the implications for cable protection within the 10m depth contour. [R&I, B49]</p>
5	Appendix B; Section 7	<p>Several key cable burial risks have been identified across the site (ECR) including areas of sub-cropping or outcropping bedrock in the nearshore, high-strength clays, shallow waters over Dogger Bank, and large mobile features. However, it is not clear where these key risk areas occur along the cable route options.</p>	<p>We advise that it would be useful if the Applicant could provide a map identifying the cable sections where these key risks exist, along with an overlay of sensitive receptors and designated areas of seabed. [R&I, B49]</p>