



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Dogger Bank South Offshore Wind Farm

Appendix C4 to the Natural England Deadline 4 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

25th April 2025

Appendix C4 – Natural England’s Advice on Benthic and Intertidal Ecology at Deadline 4

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:

- [REP3-032] 13.7 Bed Mobility and Thermal Environment (Revision 1)
- [REP3-026] 10.38 Benthic Ecology Technical Note (Revision 2) (Tracked)
- [REP3-027] 13.2 The Applicants’ Response to ExQ1 (Revision 1)
- [REP3-028] 13.3 The Applicant’s Responses to Deadline 2 Documents (Revision 1)

Our detailed comments on documents submitted by the Applicant in relation to Benthic and Intertidal Ecology as listed above are provided in Tables 1 - 3 below.

Table 1 - Natural England's Advice On: [REP3-022] Review of Evidence on Recovery of Sandbank Habitat following Habitat Damage (Rev02)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Table A-1	Natural England welcomes the additional information which has been provided in relation to the likely recoverability of benthic receptors within the red line boundary. However, the pathways of effect which have been considered do not address impacts from the creation of depressions from UXO clearance or jack-up operations in areas of coarse or mixed sediments. As we have previously advised, these areas will need to be considered as permanent habitat change/loss unless it can be otherwise evidenced that they will backfill with similar sediment types. We also highlight that evidence from similar sediment types at Triton Knoll and Lincs OWFs are demonstrating that jack-up vessel leg depressions can remain 2-10 years after installation.	Natural England advises that assessed impacts from the creation of depressions from UXO clearance or jack-up operations in areas of coarse or mixed sediments require updating and considered as permanent habitat change/loss (rather than temporary disturbance/damage) unless it can be otherwise evidenced that they will backfill with similar sediment types.

Table 2 - Natural England's Advice On: [REP3-028] 13.3 The Applicant's Responses to Deadline 2 Documents (Revision 1)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	REP2-065: 1.2	<u>Halo effects</u> Whilst the Applicant considers it unlikely that changes to sediment characteristics beyond the footprint of infrastructure would be of sufficient scale	Natural England advises that insufficient evidence has been provided to address our concerns set out in our Relevant Representations and Appendix C2.1 of our Deadline 2 submission [REP2-065].

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
		to lead to a loss of Annex 1 feature, the evidence suggests that it is a possibility that cannot be ruled out and should therefore be factored into the predicted impacts. Further, the Applicant's response focusses on organic material and sediment type, and does not consider changes to the characteristic benthic communities resulting from the placement of infrastructure. We highlight that the Applicant acknowledges it is likely that there will be a " <i>change from one Annex 1 sandbank biotope to another Annex 1 sandbank biotope</i> " but that they don't consider this would represent a loss of Annex 1 habitat. However, the Supplementary Advice on the Conservation Objectives for Dogger Bank SAC ¹ for the Conservation Objective (CO) 'Biological Structure: Characteristic communities' states that " <i>Characteristic communities are ones associated with established biological communities (biotopes) that form the feature</i> ", and therefore a change in biotope would represent the CO being taken further away from its restore objective.	Natural England welcome the Applicant's suggestion to add specific reference to monitoring for this impact pathway to the In Principle Monitoring Plan (IPMP).
2	REP2-065:7.1	<u>Decommissioning of cable/scour protection</u> The Applicant maintains their position that the use of removable cable and scour protection measures will be considered during the detailed design stages of the Projects post-consent, and that under	Natural England reiterates our previous advice [RR-039; B68, C59] [REP2-065] whereby a commitment to remove all on and above seabed infrastructure associated with the development within benthic designated sites (excluding cable crossings) at the time of decommissioning should be secured in the DCO. We do not agree that such

¹ [Supplementary Advice on Conservation Objectives for Dogger Bank Special Area of Conservation: JNCC, December 2022](#)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
		Requirement 7 of the Draft DCO [REP3-005] it is stated that the Project's offshore works must not commence until a written decommissioning programme has been submitted to the SoS for approval. Furthermore, the Applicant also maintains their position that strategic compensation to be applied is likely to exceed the actual footprint of impact caused by the Projects and that it is likely that the compensation will be secured on a permanent basis, beyond the life of the Projects, thus compensating for any enduring effects of protection should any be left in situ.	<p>commitments be left to post consent and consider it unlikely that technology and/or understanding will change significantly between now and the development of post-consent Cable, Scour Protection and Decommissioning Plans, which must be provided pre-construction.</p> <p>We also reiterate our previous advice [REP2-065] that the Defra guidance for marine compensatory measures is clear that the mitigation hierarchy must be applied to avoid and reduce impacts as much as possible, even if compensation measures are being implemented.</p> <p>Natural England also highlights that OSPAR decision 98/31 confirms that the preference is for decommissioning of all surface infrastructure.</p> <p>[R&I B7, B24, C27]</p>
3	REP2-065: 8.1	<p><u>Drill arisings</u></p> <p>The Applicant has stated that drill arisings would be located adjacent to turbine foundations and within the scour protection footprint so would be captured within the existing habitat loss estimates. However, it is unclear to Natural England how this would be achieved in practice. Further, if the arisings were to be covered over with scour protection then we agree that the footprint would be captured in the existing habitat loss estimates, however this would also assume that the protection is rock which would preclude all other forms of required mitigation</p>	<p>Natural England requests the Applicant provide further clarification on how it would be ensured that drill arisings would be deposited in such close proximity to turbines and the implications for the scour protection used.</p> <p>Natural England welcome the Applicant's suggestion to add specific reference to monitoring for this impact pathway to the In Principle Monitoring Plan (IPMP).</p>

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
		regarding using removable scour/cable protection, which is less likely to be rock.	

Table 3 - Natural England's Advice On: [REP3-027] 13.2 The Applicant's Responses to Examiner's Questions (Revision 1)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	BE.1.12	Natural England welcome the additional detail provided by the Applicant on benthic monitoring.	We advise that the IPMP is updated with the additional proposals.