THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

Dogger Bank South Offshore Wind Farm

Appendix F4 to the Natural England Deadline 4 Submission
Natural England's comments and updated 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

25th April 2025

Appendix F4 – Natural England's Advice on Marine Mammals 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 Mammals:

- [REP3-031] 13.6 Marine Mammal Technical note - Significance of Effect for disturbance from piling and cumulative underwater noise
- [REP3-013] Appendix 11-6 UXO Clearance Information and Assessment (Revision 3) (Tracked)

A summary of Natural England's key concerns in relation to Marine Mammals is set out below.

1. General Concerns

Natural England have reviewed the Unexploded Ordnance Clearance Information and Assessment [REP3-013] submitted by the Applicant at Deadline 3, however there are no updates in this document that currently change our previously provided advice.

Natural England maintains that the Applicant should be committing to using noise reduction technology at this early stage and needs to provide an updated impact assessment to reflect the predicted sound reduction. This will allow any reduction to impact ranges to be calculated and presented before the end of Examination.

2. Marine Mammal Technical note - Significance of Effect for disturbance from piling and cumulative underwater noise

2.1. iPCoD Population Modelling

Natural England provided advice to the Applicant on iPCoD population modelling and significance levels at Deadline 3 [REP3-058]. As outlined in this advice, Natural England does not agree that significance should be defined as 1% annual decline over 6 years and instead the definition of a significant impact should be more conservative.

Natural England considers the decline predicted by iPCoD (Appendix B Marine Mammal Environmental Statement Update [AS-143]) in year 2032 for harbour porpoise (98.72%), bottlenose dolphin (97.98%) and minke whale (98.34%), which all experience more than 1% decline, as potentially showing a significant impact and therefore warranting further investigation. Although some threats to marine mammals can be included in the model parameters, the model cannot account for all impacts that will also have population level effects (such as bycatch, prey availability and shipping) and therefore the determination of significant also needs to account for these other impacts.

Natural England advises that the Applicant presents results from the iPCoD modelling using a more conservative definition of significant impacts.

2.2 Harbour Porpoise

Natural England is concerned by the significance level of ‘major adverse’ for harbour porpoise, presented in the Effective Deterrent Range (EDR)/Dose Response/Temporary Threshold Shift (TTS) column of Table 1-3. There is limited understanding of how disturbance leads to health, reproduction and consequently population level impacts in marine mammals. Although iPCoD is the best available tool to predict these impacts, there are still limitations to this model, and therefore conclusions of significance cannot be based solely on iPCoD outcomes.

To reduce the significant impact to harbour porpoise, Natural England advises that the Applicant should commit to using noise reducing technology and provide updated documents to show how implementing this will alter estimated impact ranges and significance conclusions.

2.3 Grey Seals

Natural England is concerned by the significance level of ‘moderate adverse’ for grey seals, calculated by the dose response method. There is limited understanding of how disturbance leads to health, reproduction and consequently population level impacts in marine mammals; although iPCoD is the best available tool to predict these impacts, there are still limitations to this model, and therefore conclusions of significance cannot be based solely on iPCoD outcomes. The results of the dose response method still need to be taken into consideration, especially when resulting in a significant impact.

To reduce the significant impact to grey seals, we advise the Applicant commits to using noise reducing technology and provide updated documents to show how implementing this will alter estimated impact ranges and significance conclusions.