

Sent via email to: DoggerBankSouth@planninginspectorate.gov.uk

23 May 2025

To Whom it May Concern,

The Lincolnshire Wildlife Trust's response to the Examining Authorities second written questions (ExQ2) for the Dogger Bank South Offshore Wind Farms.

Lincolnshire Wildlife Trust (LWT) welcomes the opportunity to provide comment on the ExQ2 question BE.2.3 regarding the Report to Inform Appropriate Assessment (RIAA) Habitats Regulations Assessment (HRA) Part 2 of 4 - Annex 1 Offshore Habitats and Annex II Migratory Fish Revision 4. This response pertains to section 6.4.2.6.1 physical change (to another seabed / sediment type) of the Dogger Bank Special Area of Conservation (SAC).

It should be noted that the LWT supports the sustainable development of marine renewable energy generation as part of the UK's energy policy and ambition to deliver 50 GW of offshore wind by 2030 and to reach the legally binding net zero target by 2050. However, development should not be done at the expense of the environment, and LWT strongly advocates a 'right technology, right place' approach.

There are a few critical points regarding the above question that LWT would like to highlight as areas that will need further mitigation or reconsideration.

Over-Reliance on Rapid Recovery Claims and Population- Level Risk to Sandeel

The Applicant repeatedly references high and medium recoverability of benthic biotopes (MarESA criteria), implying that any disturbance will be short-lived and ecologically insignificant. However, this fails to fully consider:

- "Rapid recovery" of physical sediment structure should not be used as a proxy for ecological recovery.

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- The vulnerability of the impacted species – particularly sandeel, which, despite the potential for habitat recovery, may not exhibit equivalent ecological recovery due to their small, site-faithful populations.
- The cited recovery rates do not account for genetic diversity loss or recolonisation challenges faced by small, localised populations following disturbance which could lead to population bottlenecks or loss of resilience.
- Point 47 suggests that the Applicant is claiming that due to the removal of the previous pressures from sandeel fishing in the area, their lesser impacts are acceptable. The closure of the sandeel fishery was based on evidence that any disturbance hinders recovery of the feature and it is therefore not valid to suggest that their disturbance is acceptable simply because a more destructive activity (i.e., fishing) has ceased.

Misrepresentation of Affected Area and Habitat Compensation

- Volume 7, Chapter 10 claims the area affected is limited compared to the broader North Sea. This regional comparison is misleading and inappropriate for evaluating impacts on protected, site-faithful species within a designated conservation area.
- The claim that only 5.7% of medium-high potential habitat is impacted still represents a substantial spatial footprint within a protected area. Given sandeels' high site fidelity, the availability of habitat outside the project footprint is not a valid form of compensation.
- The claim that only 0.2% of the Dogger Bank SAC will be impacted does not reflect realistic ecological halo of impacts beyond the defined project area. In practice, seabed disturbance often extends beyond mapped infrastructure, and cumulative effects of cable installation, anchor scour, and remedial work can compound the effective footprint.
- The 0.2% figure is misleading: while proportionally small, it represents 25 km² of disturbance in a protected and ecologically important environment, which is a significant area.

Episodic Disturbance is Still Significant

- While the Applicant acknowledges the episodic and largely single-event nature of most disturbances, this does not mitigate the ecological consequences. Episodic does not equal negligible—especially when breeding and spawning cycles are disrupted.
- Importantly, Natural England has stated that any disturbance, regardless of scale or frequency, has the potential to hinder the recovery of the SAC sandbank habitat.

Inappropriate Comparison to Other Developments

- The reliance on precedents from Hornsea Project Three and other Round 3 developments ignores the fact that each site has distinct ecological characteristics and conservation importance.
- In particular, the Dogger Bank SAC differs substantially from the Hornsea site. It is a key upwelling area, supporting high primary productivity that underpins a rich and



complex food web. This makes it a critical nursery and feeding ground for numerous fish species, and of exceptional importance to seabirds and marine mammals.

- The site is designated for its sandbank habitat and associated species, and benefits from strong conservation protections under the Habitats Directive. Its role as a biodiversity hotspot makes it uniquely vulnerable to even small-scale disturbances.
- Consequently, the precautionary principle must be applied more stringently at Dogger Bank, especially when assessing impacts on conservation features of European importance. Comparisons to less sensitive or less designated areas such as Hornsea are not ecologically valid.

Conclusion: Potential for Adverse Effect on Integrity (AEol)

Given the:

- Proven sensitivity of the sandbank and its associated species (especially sandeels),
- Likely underestimation of spatial and ecological footprint,
- Disregard for population-scale impacts and site fidelity of sandeel,
- Over-reliance on sediment recovery as a proxy for full ecological recovery,

it is our view that the Applicant has not robustly demonstrated the absence of an Adverse Effect on Integrity (AEol) for the Dogger Bank SAC. The precautionary principle must be upheld, and further mitigation or reconsideration of project design may be required.

Yours sincerely,



Conservation Officer
Lincolnshire Wildlife Trust

