THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

Dogger Bank South Offshore Wind Farm

Appendix F5 to the Natural England Deadline 5 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

23rd May 2025

Appendix F5 – Natural England's Advice on Marine Mammals at Deadline 5

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:

- [REP4-094] 14.9 Illustrative Underwater Noise Reduction Technical Note
- [REP4-055] 8.25 Outline Marine Mammal Mitigation Protocol (Revision 4)
- [REP4-053] 8.23 In Principle Monitoring Plan (Revision 3)
- [REP4-093] 14.8 Effects on Prey Species Technical Note
- [PD-021] The Examining Authority's Second Written Questions (ExQ2)

Our detailed comments on the documents submitted by the Applicant in relation to Marine Mammals as listed above, are provided below.

1. **Underwater noise impacts and mitigation**

Natural England welcomes the Applicant's submission of the Illustrative Underwater Noise Reduction Technical Note [REP-094]. We have provided comments below based on the information included within the technical note, however we request that the underwater noise modelling report which supports the note is also provided for review.

[REP4-094] demonstrates that if a 10 dB reduction in underwater noise (UWN) was achieved through primary or secondary mitigation, impacts to marine mammal species would be significantly reduced. The reductions presented would likely remove the significant impacts on marine mammal populations currently predicted and enable Adverse Effects on Integrity (AEoI) of the Humber Estuary SAC, Berwickshire and North Northumberland SAC and Southern North Sea SAC to be ruled out. They would also reduce the injury zones for minke whale and harbour porpoise to a level that could be fully mitigated with Acoustic Deterrent Devices. This is all welcome, however the Applicant also states that they *"will not be committing to any specific secondary noise reduction methods until the final design parameters, including all relevant primary measures, are finalised post consent*". Natural England accepts this and does not expect the Applicant to commit to specific secondary noise reduction methods. Instead, we suggest that the Applicant could commit to achieving a 10dB reduction in UWN during construction from levels predicted in the environmental assessment via primary and/or secondary mitigation, with the exact systems and/or technologies to be determined post-consent. **We consider a commitment of this nature to be essential, as unsecured mitigation that may or may not be applied cannot be considered in impact**

assessments. We must therefore base our conclusions on the assessment as it currently stands, whereby our position remains that AEoI cannot be ruled out for grey seals in the Humber Estuary SAC for the project in-combination with other plans and projects, for grey seals in Berwickshire and North Northumberland Coast (BNNC) SAC for the project alone, and harbour porpoise in Southern North Sea SAC in-combination with other plans and projects.

As impacts cannot be ruled out at this time, particularly for the Project alone and injury zones, it is not in doubt that additional mitigation will be needed post-consent. Further, as the Applicant considers that a (minimum) 10dB reduction is both achievable and necessary to reduce impacts, we do not consider that it is unreasonable to expect the Applicant to commit to additional mitigation at this stage. We also highlight that commitments of this nature are not without precedent. During the Rampion 2 OWF Examination, the Applicant committed to a 15dB reduction through the use of NAS to reduce UWN impacts on black seabream in the Kingmere MCZ.

2. Outline Marine Mammal Mitigation Protocol

Natural England advises the Applicant to present the impacts of UXO clearance with and without additional mitigation measures in the final UXO clearance MMMP and UXO clearance Marine Licence Application.

3. In Principle Monitoring Plan

Following a meeting with the Applicant (7th May 2025), the Applicant requested further information on Natural England's advice on potential Marine Mammal monitoring schemes. We acknowledge there are numerous data gaps, however the following ideas relate specifically to impacts resulting from the Dogger Bank South project.

<u>Bottlenose dolphin</u>

We note that the characterisation of bottlenose dolphin baseline distribution relies on the assumption that their distribution along the northeast English coast is the same as in Scotland. Natural England considers this a significant assumption as it directly affects the prediction of the number of animals potentially affected by the project. We would be supportive of the Applicant undertaking post-consent monitoring to provide evidence to support the use of this assumption in future OWF impact assessments.

<u>Operational noise</u>

It is acknowledged in 7.11.11.3 Underwater Noise Modelling Report [AS-138], that the turbine sizes used to inform operational noise modelling are considerably smaller (0.2-6.15 MW) than those to be used at DBS (15-26.5 MW), and that no empirical data is available for turbines of this size. We consider there to be a significant gap in knowledge of the operational underwater noise levels of wind turbine generators of this size. This knowledge gap could be the target of project-level or strategic post-construction monitoring undertaken by the project.

Foraging Behaviour

As per our comments on Prey Impacts in Appendix E5, recent publication from the PrePared project has identified that installation of wind turbines has resulted in a modified predator-prey interaction, with a weaker relationship between porpoises and sandeel density (Fernandez-Betelu *et al.* 2024[1]). From this study around the Beatrice and Moray (East and West) Offshore Windfarms, Natural England advises the applicant to expand their scope of monitoring to investigate these impacts further, particularly with the significance of the array being located in both Dogger Bank SAC and the Southern North Sea SAC.

4. **Effects on Prey Species**

Please refer to Appendix E5 on Natural England's updated advice regarding Harbour Porpoise and Prey Species impacts.

[1] Fernandez-Betelu, O., Iorio-Merlo, V., Graham, I. M., Benhemma-Le Gall, A., Cheney, B.J., Payo-Payo, A., Thompson, P.M. (2024). PrePARED Task 4.1 – Using modelled sandeel distribution maps to characterise spatio-temporal variation in the occurrence and foraging behaviour of harbour porpoises around offshore windfarms. PrePARED Report, No. 001. March 2024.