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Interested Party reference 20050168

3rd June 2025

FAO Examining Authority

Dear Sir/Madam

Reference: EN010125

Proposal: Application by RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited for an Order Granting Development Consent for the Dogger Bank South Offshore Wind Farms

The Woodland Trust's response to the Examining Authority's Second Written Questions (ExQ2) are set out in the table below.

Kind regards

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Programme Officer - Woods Under Threat

ExQ2	Question to:	Question	Woodland Trust Response
ENC.2.5	The Forestry Commission The Woodland Trust ERYC	Burton Bushes Site of Special Scientific Interest (SSSI) and ancient woodland The DL4 submission from Dr Stephen Mounce [REP4-100] raises concerns with potential effects on Burton Bushes SSSI and ancient woodland. Confirm your views on the potential effects from the proposed development on Burton Bushes SSSI and ancient woodland. Do you consider the mitigation measures as currently proposed and included in the oEMP [REP4-042] and oLMP [REP4-044] would be sufficient? If not, explain why not and clarify what other measures you would like to see included?	<p>We consider that the mitigation measures proposed by the applicant in REP4-042 are lacking in detail and therefore it is not possible to assess whether they are sufficient. For example, it is stated that ancient woodland <i>“will be avoided”</i>; that Cable Corridor <i>“avoids all areas of ancient woodland”</i>; that works associated with the Onshore Converter Station <i>“will avoid direct impacts”</i> and woodland <i>“will not be directly impacted because trenchless techniques such as Horizontal Directional Drilling (HDD) will be used.”</i></p> <p>We understand that the applicant has committed to a <i>minimum</i> buffer zone to ancient woodland of 15 metres, however, we have not been able to find details of the actual proposed buffer width, or supporting analysis to demonstrate the buffer width will be sufficient to mitigate indirect impacts, such as dust, noise, or vibration.</p> <p>It is also stated that <i>“In the instance of trees being within an area of ancient woodland, the Applicants are committed to using trenchless crossing techniques, such as HDD, at depths greater than 5 meters.”</i></p> <p>Areas of ancient woodland are as designated on Natural England’s Ancient Woodland Inventory. Open habitats are important component of woodlands. Natural England and Forestry Commission’s standing advice states: <i>“‘Wooded continuously’ does not mean there’s been continuous tree cover</i></p>

			<p><i>across the whole site. Not all trees in the woodland have to be old. Open ground, both temporary and permanent, is an important component of ancient woodlands.”</i></p> <p>The applicant should clarify whether ancient woodland will be afforded the protection irrespective of whether there are trees present.</p> <p>With regards to HDD, we have not found information to confirm the location of associated work areas, including entry and exit points, in relation to the ancient woodland, and how it has been ensured that such points are sufficiently far from ancient woodland and their buffer zones to ensure mitigation of impacts.</p>
LVI.2.2	The applicants Woodland Trust Forestry Commission	<p>Hydrological effects on ancient woodland The applicants: How would the draft DCO [REP4-005] or the supporting documents mitigate any effects from changes to hydrology on ancient woodland inside and outside the order limits, such as ancient woodland in Burton Bushes SSSI? Could the hydrogeological risk assessments in the embedded mitigation measures in ES Chapters 19 and 20 [APP-158, table 19-3 and REP1-014, table 20-3] be updated to include effects on groundwater flows and works near Burton Bushes SSSI? This is currently only for accidental spills and leaks of contaminants mitigation and not groundwater flows.</p> <p>Woodland Trust, Forestry Commission: Do you</p>	<p>We have not been able to find an assessment of potential hydrological or hydrogeological impacts on ancient woodland, their soils and rhizosphere, or on veteran trees, their rooting systems, health and vitality. The applicant should provide information to demonstrate that the proposals for trenching and drilling will not result in any adverse impacts on ancient woodland or veteran trees.</p>

		consider that the draft DCO and supporting documents adequately protect ancient woodland inside and outside the order limits from effects from changes to hydrology as a result of the proposed development? Why, or why not	
LVI.2.3	ERYC Woodland Trust Forestry Commission	<p>Ancient woodland</p> <p>The applicants have updated the oEMP [REP4-042] to state that ancient woodland in the onshore converter station zone would be avoided via the use of trenchless crossing techniques such as horizontal directional drilling at a minimum depth of 5 metres, unless the applicants are able to demonstrate that a shallower depth is acceptable due to other constraints. Do you consider this wording to be acceptable and do you have any outstanding concerns regarding the protection of ancient woodland in any other regards? If so, set out what these are, and how the applicants could overcome them.</p>	<p>We are unclear as to the meaning and significance of including the caveat “<i>due to other constraints</i>” and would suggest this should be removed from the agreed wording. If the applicant is able to fully demonstrate that a shallower drilling depth would not impact the ancient woodland, its soils and rhizosphere, then it would be appropriate to consider the evidence supporting a reduction in depth. However, it would not be appropriate to amend the drilling depth for other reasons (other constraints), if the result would be a negative impact on ancient woodland.</p> <p>We note that the ERYC would be consulted on any proposed amendment to drill depth.</p>