


Yorkshire and North East Area

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Area Director

 (acting)

By email only

Date: 6th June 2025

Dear Sir/Madam,

Interested Party Reference number: DGBS-SP027

Thank you for seeking the Forestry Commission's advice about the impacts that this application may have on the ancient woodland, and ancient & veteran trees, identified in this proposed application. As a Non-Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather, we are providing information on the potential impact that the proposed development could have on woodland. The Forestry Commission is pleased to provide you with the following information that may be helpful when you consider the application:

- Forestry Commission responses to:
 - **EN010125: Application by RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited for the Dogger Bank South Offshore Wind Farms Project**

The Examining Authority's further written questions and requests for further information

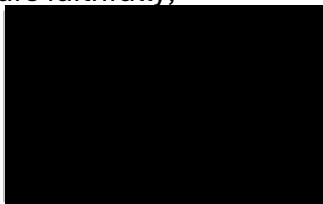
Issued on Tuesday 13 May 2025


ExQ2	Question to:	Question	Forestry Commission Response
Ecology and nature conservation			
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>The Forestry Commission wishes to highlight that Paragraph 180(c) of the NPPF states that, <i>“Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons”</i>. REP4-042 states that, in relation to areas of ancient woodland, <i>“works associated with the Onshore Converter Station (s) will avoid direct impacts to this woodland.”</i>. The document goes on to state, <i>“However, the Priority Habitat may be indirectly affected by activities which generate fugitive emissions (i.e. dust and emissions from an increase in construction traffic and road access)”</i>. It appears that in this case “Priority Habitat” is referring to ancient woodland, an irreplaceable habitat, and that deterioration of the habitat may occur as a result of the planned works.</p> <p>In relation to ancient woodland and trenchless crossing/HDD, it is stated that <i>“the Applicants are committed to trenchless crossing techniques at depth greater than 5m as recommended by the Woodland Trust, unless following detailed geotechnical investigations clear evidence is provided to demonstrate that a shallower depth would not result in adverse impacts on roots, soils or rhizosphere along or above the proposed route.”</i>. It is not clear how geotechnical investigation could provide clear evidence that a shallower depth would not have an impact on the roots, soils or rhizosphere associated with the ancient woodland. Geotechnical investigation may not be sufficient to</p>

ExQ2 Question to: Question		Forestry Commission Response
Ecology and nature conservation		
		<p>ensure that no impacts would occur to biological and organic processes.</p> <p>REP4-044 references the Landscape and Visual Impact Assessment (LVIA) which highlights the importance of retaining and protecting existing woodland, including ancient woodland. The joint Natural England and Forestry Commission Standing Advice on Ancient Woodland advises that proposals in proximity to ancient woodland should have a buffer zone of at least 15m from the boundary of the woodland. Where assessment shows impacts are likely to extend beyond this distance, for example the effects of air pollution from increased traffic and/or industrial processes, the proposal is likely to require a larger buffer zone. We have not been able to find an assessment of whether a 15m buffer would be sufficient in this case.</p> <p>The Standing Advice also highlights that, “<i>Open ground, both temporary and permanent, is an important component of ancient woodlands.</i>”. As such all open ground and individual trees within an area designated as ancient woodland, should be afforded the same protection as wooded areas.</p>
Landscape and visual interest		
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</p> <p>From reviewing the referenced documents, it is not clear whether the potential impacts to the ancient woodlands and ancient/veteran trees, from the changes in hydrology as a result of the proposed works, have been assessed.</p>

ExQ2	Question to:	Question	Forestry Commission Response
Ecology and nature conservation			
		<p>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 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?</p>	
LVI.2.3	ERYC Woodland Trust Forestry Commission	<p>Ancient woodland 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>In relation to ancient woodland and trenchless crossing/HDD, it is stated that <i>“the Applicants are committed to trenchless crossing techniques at depth greater than 5m as recommended by the Woodland Trust, unless following detailed geotechnical investigations clear evidence is provided to demonstrate that a shallower depth would not result in adverse impacts on roots, soils or rhizosphere along or above the proposed route.”</i>. It is not clear how geotechnical investigation could provide clear evidence that a shallower depth would not have an impact on the roots, soils or rhizosphere associated with the ancient woodland. Geotechnical investigation may not be sufficient to ensure that no impacts would occur to biological and organic processes.</p>

Yours faithfully,



, Local Partnership Advisor
Yorkshire and North East Team