



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Dogger Bank South Offshore Wind Farm

Appendix C6 to the Natural England Deadline 6 Submission
Natural England's comments and updated advice on Benthic and Intertidal Ecology

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

13th June 2025

Appendix C6 – Natural England’s Advice on Benthic and Intertidal Ecology at Deadline 6

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 Benthic and Intertidal Ecology:

- [REP5-040] 15.6 Assessment of Coastal Processes at the Dogger Bank South Landfall
- [REP5-041] 15.7 Ecological Halo Effects Technical Note (Rev01)

Our detailed comments on documents submitted by the Applicant in relation to Benthic and Intertidal Ecology as listed above are provided in Table 1 below.

Overview

i) Halo effect

Natural England welcomes the provision of the Applicant’s Ecological Halo Effects Technical Note [REP5-041]. We agree that, based on currently available evidence, 50m is an appropriate buffer to use to assess the potential area of impact. However, we disagree with the exclusion of ecological halo effects surrounding cable protection from the Applicant’s estimate. Whilst the magnitude and extent of the halo will be lower for cable protection, we advise that an ecological halo is still likely to result from the placement of cable protection within the Dogger Bank SAC. We also disagree that it is appropriate for the predicted impact area to be reduced by 75% based on wake/bed shear stress effects. We therefore advise that a revised estimate should be provided based on the full impact area with the inclusion of cable protection.

ii) Cable Protection within designated sites

In [REP5-040], the Applicant has stated that cable protection may be required within the array areas and inter-platform cable corridor where bedrock is exposed at the seabed. The known and expected locations where cable protection will be required have not been provided. Natural England acknowledges that the Applicant does not intend to update the CBRA further within Examination timeframes. However, we consider that particularly within Designated Sites, cable protection requirements should be justified by evidence rather than arbitrary conditions. We accept that conditions based on 10%/20% of cable lengths have been widely implemented, however we advise that in each case it should be demonstrated that these requirements are necessary. We highlight that the Applicant has included provisions for

sandwave levelling to ensure burial, and fisheries byelaws within DB SAC significantly reduce risks to asset integrity. We consider that the mitigation could be applied further to demonstrate why these quantities are necessary or reduce them further.

Natural England highlights that the Secretary of State when determining the Application will need to be satisfied that as part of the derogations case that the public interest tests have been satisfactorily met. Specifically, that all reasonable alternatives have been explored and implemented to reduce the environmental impacts. We advise that by proposing to build out to the maximum compensated for, when there are alternative options to reduce impacts, there is a risk of undermining their derogations case.

Table 1 - Natural England's Advice On: [REP5-041] 15.7 Ecological Halo Effects Technical Note (Rev01)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Section 3.1	Natural England acknowledges the Applicant's statements that advice regarding assessment of ecological halo effects has not been made to other projects. Natural England reiterates that our advice is provided on a case-by-case basis, and we have raised concerns regarding ecological halo effects in this instance due to the location of the Dogger Bank South array areas being wholly within a Special Area of Conservation designated for its benthic habitat, and more specifically for its soft-substrate (i.e. not rocky) habitat and associated ecosystem. We highlight that no other Round 4 projects have array areas within designated sites. Whilst halo effects did not feature in the Environmental Statements for Dogger Bank A, B, C and Sofia (formerly Creyke Beck A&B and Teesside A&B), they are a key component of their post-consent Benthic Monitoring Plans and is reflective of increased understanding of potential risks to the marine environment.	To note.
2	Section 3.2	Natural England has previously responded to the Applicant's statements about halo effects not being raised earlier in the consultation process in [REP2-065]. As noted previously, whilst the specific terminology had not been used, it appeared that the impact pathway had been scoped into the assessment. In addition, there was limited opportunity to understand the full scope of what the Applicant was including	To note.

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
		<p>in their assessment prior to application due to the Applicant's approach to the Evidence Plan Process.</p> <p>We also note the Applicant's statements regarding halo effects not being included in the Plan Level HRA. Natural England highlights that the SNCB's did raise the importance of the ecological function of Dogger Bank SAC during the Plan Level discussions and a preference for compensation which would deliver equivalent functionality. However, equally as the Applicant has argued for other impact pathways, the Plan Level HRA is a high-level assessment that can be superseded by the Project Level assessment. We would also highlight that the requirement for being considered in Examination is a requirement of it being raised within Relevant Representations. Therefore, whilst it would be beneficial for matters to be raised and addressed pre-application, it is not essential.</p>	
3	Section 4.1 (para 19) and Section 4.2.3 (Para 55, 56, 65)	<p>Natural England acknowledges that turbine foundations with associated scour protection will form a larger structure than cable protection; however, we disagree that it can be assumed that cable protection will only be in "small patches". Whilst it is hoped that minimal cable protection will be needed, the Applicant has applied for 10% of the cumulative length of inter-array cables (a total area of 1,081,571m²; 751,560m² (array cable protection) + 330,011m² (inter-platform cable protection)[REP4-051]) which could be deployed in 400 x 15.2 m strips (6,080 m²; Section 4.2.3). Therefore, whilst Natural England agrees that the magnitude</p>	<p>We advise that insufficient evidence has been presented to rule out the possibility that an ecological halo could be created by the placement of cable protection within the SAC, the worst-case impact should therefore be factored into the predicted impacts and any subsequent compensation.</p>

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		and extent of the ecological halo will be lower for the cable protection, we advise that an ecological halo is still likely to result from the placement of cable protection within the Dogger Bank SAC.	
4	Para 35	Natural England notes that the Applicant appears to consider changes to the benthic communities as a result of alteration of trophic level integrations and predation to be not within the definition of 'ecological halo'.	Natural England advises that all ecosystem and community changes as a result of the placement of hard structure should be evaluated and considered within the scope of ecological halo impacts. [R&I, C8]
5	Para 59	Natural England does not agree with the Applicant that it is <i>"unlikely that significant changes to the sediments or benthos would occur outwith the permanent change from the footprint of infrastructure"</i> and that the ecological halo will be restricted to the footprint of physical change already assessed. As per our previous advice [REP4-127] we highlight that the Applicant acknowledges it is likely that there will be a <i>"change from one Annex 1 sandbank biotope to another Annex 1 sandbank biotope"</i> .	We maintain our previous advice (as set out in [REP2-065] and [REP4-127]) that insufficient evidence has been provided to address our concerns, and that a change in biotope would represent the Conservation Objective being taken further away from its restore objective. Furthermore, we maintain our advice that a more robust assessment is needed of the potential worst-case area of impact on benthic communities. [R&I, C8]
6	Para 59	Natural England agrees with the Applicant that <i>"effects would be limited to the immediate vicinity (<50m) from the foundations (Lefaible et al., 2019, De Backer et al., 2020, Breackman et al., 2020, Li et al., 2023)."</i> , assuming that the foundations in this case includes scour and rock protection.	Natural England advises that in the absence of more objective site-specific evidence, 50m from the edge of any scour/cable protection should be used as a worst-case scenario for the extent of benthic ecological halo effects which may be significant in HRA terms.

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7	Para 60	Natural England does not agree that commercial fishing activities within the array areas will remove the likelihood of localised changes to trophic levels interactions/predation on the benthic communities in the vicinity of hard structures. Such assumptions would require the notion to be made that commercial fishing leaves the area altogether devoid of pelagic species (noting that the area is already closed to bottom towed gear).	Please see Comment 4 above.
8	Para 69	<p>Natural England considers that the Applicant appears to be confusing pathways of effect from tidal wake effects/changes to bed shear stress on benthic community receptors, with those from ecological halo effects. We advise that benthic community changes and pathways of effect brought about by changes in shear stress and those induced by ecological halo pressures are different.</p> <p>Whilst we agree the ecological halo is unlikely to be uniform and will present an asymmetrical form to some degree, we do not consider it's an appropriate worst-case scenario to assume that effects from ecological halo's would be restricted to 25% of the total seabed surrounding hard structures. Such an assumption would also incorrectly assume that changes to trophic level interactions were also asymmetric in extent.</p>	Natural England advises that in the absence of further evidence, the extent of the ecological halo should be considered separately from the extent of changes in bed shear stress.