

Dr. Stephen R. Mounce,

26/6/2025

**Re: Dogger Bank South Project – Written representation (deadline 26/6/25)**

Dear Planning Inspectorate,

I am writing once again as an Interested Party (20050002) to provide further input regarding the Dogger Bank South Project, specifically in response to the Applicants' comments on the Examining Authority's second written questions, and the input from the Forestry Commission and Woodland Trust. While I appreciate the information provided, several key concerns I previously raised, and which were echoed or supported by other Interested Parties, remain inadequately addressed.

My persistent concerns are as follows:

- Discrepancy in Hydrological Connectivity and Wetland Nature of Burton Bushes/Westwood. I previously stated that the Westwood is often waterlogged with a waterway opening up to the bottom of Burton Bushes. However, the Applicants assert that there is no surface water connectivity to Burton Bushes SSSI. This is in direct contradiction of my observations. As the Forestry Commission raise: '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.'
- Underestimation of Bird Diversity and Status within Burton Bushes SSSI. I previously reported on over 63 varieties of birds in Burton Bushes, including rare species such as greater spotted woodpecker, tawny owl, chiffchaffs, and blackcaps. ERYC, in their comments, stated that bird species are not a cited feature for Burton Bushes SSSI. This dismissal significantly downplays the potential ecological impact on a thriving and diverse bird population (whether formally cited or not). The project should acknowledge and assess the impact on these observed species in Burton Bushes.
- Sufficiency of Buffer Zones for Indirect Impacts on Ancient Woodland and SSSI. Both the Forestry Commission and the Woodland Trust explicitly questioned whether the proposed 15-meter buffer zone is sufficient to mitigate indirect impacts such as dust, noise, or air pollution from construction traffic and industrial processes, requesting supporting analysis to demonstrate this sufficiency. The Applicants' response states their commitment to the buffer based only on general guidance but does not provide the specific analysis requested by the FC and WT to demonstrate its effectiveness against these wider-ranging indirect impacts. This analytical gap should be filled.
- Scientific Basis for Shallower HDD Depth in Ancient Woodland. The Forestry Commission raised a critical point that it is unclear how geotechnical investigation alone could provide clear evidence that a shallower HDD depth (less than 5m) would not impact biological and organic processes (e.g., roots, soils, rhizosphere) within ancient woodland. The Woodland Trust also questioned allowing shallower depths for other constraints if it impacts the woodland negatively. The Applicants explained 'other constraints' relate to a Source Protection Zone and that agreement with ERYC/Natural England is required. However, the fundamental question of the

scientific adequacy of geotechnical investigation for biological impacts, as raised by the FC, remains unanswered.

- Direct Clarification on Drilling Under Burton Bushes/Westwood. I specifically requested confirmation that there would be no drilling under Burton Bushes or the Westwood. While the Applicants state a commitment to Horizontal Directional Drilling (HDD) 'under woodland areas to leave them undisturbed and in situ' and that for Burton Bushes SSSI, only shallow excavations are planned 120m away (no deep trenchless crossings), a direct, unequivocal statement explicitly confirming 'no drilling under Burton Bushes or the Westwood' as a whole is still absent.
- Broader Impacts on Beverley Westwood as a Public Amenity Area. My concerns extend beyond the specific SSSI boundaries to the entire Beverley Westwood, recognized as a unique site and very popular nature amenity area for the public. I specifically highlighted the significant disruption from large-scale construction activities, including noise and transport impacts, expected for up to 12 months in section 16a running alongside the Westwood. While the Applicants address traffic management generally and state construction compounds are 'further away' from the SSSI, they have not adequately addressed the cumulative amenity, noise, and general wildlife impacts on the wider Westwood area or the prolonged disruption to public use. The PEIR's assessment of negligible impacts on tourism and recreational routes, without proposed mitigation, remains unsatisfactory for this highly valued public space.

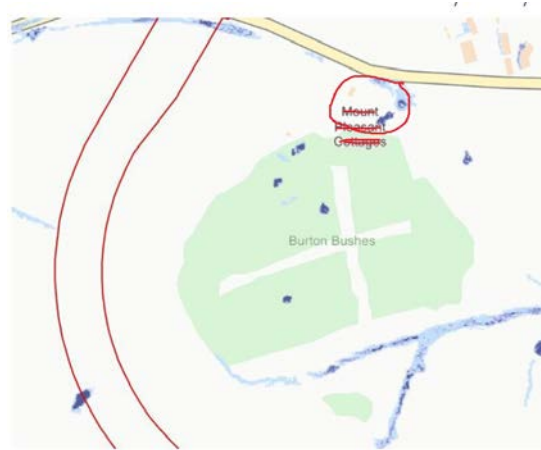
No doubt the Planning Inspectorate may seek further clarification and more robust evidence addressing these outstanding and critical issues to ensure the comprehensive protection of Burton Bushes SSSI, the ancient woodland, the archaeological remains, and the broader Beverley Westwood as a vital public amenity area.

Best Regards,

Dr Stephen R. Mounce

Ps. The following query was originally part of an addendum I posted commenting on the Forestry Commission contribution, I have updated it with a map below:

... I wish to highlight a further concern. It has come to my attention that the property Burton Gate House formerly at lat, long 53.842977, -0.464529 (which is directly adjacent to Burton Bushes) was sold and subsequently demolished in recent months (please see figure below). It appears that the land in this area is currently being prepared in some way, and a fence has been erected between this land and the part of Burton Bushes it abuts (i.e. a 0m distance).



Can the applicant confirm if they have purchased this area of land? If so, what sort of impacts might occur for the adjacent ancient woodland and SSSI due to any proposed works, temporary compounds, or activities on this recently acquired land? This proximity raises immediate concerns regarding:

- Root Zone and Soil Disturbance: The extension of root systems beyond the woodland boundary and the potential for damage or soil compaction from construction traffic.
- Changes in Hydrology: The risk of altering drainage patterns or intercepting groundwater flow, potentially impacting the woodland's soil moisture.
- Edge Effects: Increased light penetration, noise, dust, and chemical pollutants, all of which can degrade the ancient woodland habitat.
- Fragmentation and Connectivity: Hindrance of species movement if this area is going to be used for construction activities.

These potential impacts directly align with the concerns raised in both my previous submission and the Forestry Commission's advice, underscoring the need for a thorough and transparent assessment of any activities planned for this newly prepared area so close to such a sensitive site and a reconsideration of the buffer zone.

Best Regards,

Dr Stephen R. Mounce