

Dr. Stephen R. Mounce,

10/7/2025

Re: Dogger Bank South Project – Written representation (deadline 9 10/7/25)

Dear Planning Inspectorate,

I note your decision to bring the close of Examination forward to Friday 11 July 2025 and the close of deadline 9 to today 10/7/25. Such rapid time tables don't give private citizens enough time to read all the documents and respond in detail.

I fear that this decision, and others to come on Dogger Bank D, and the various solar factory applications on green belt/ prime farmland (effectively the reindustrialisation of the East Yorkshire countryside) are on a fast track to being green lit. That said, I would like to reply to this deadline in order to have my concerns on record.

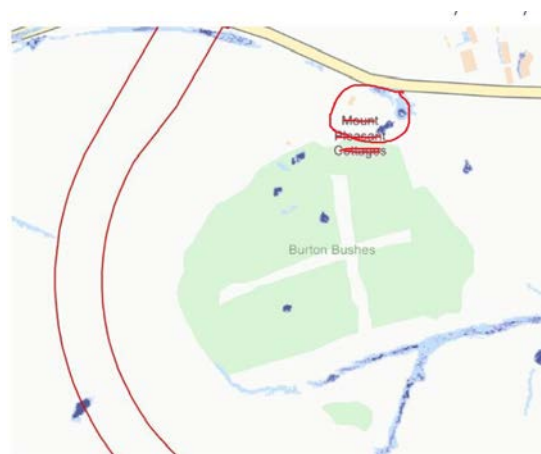
So I am writing finally once again as an Interested Party (20050002) to provide input regarding the Dogger Bank South Project, I still don't believe these points have been adequately addressed and are mainly ignored by the applicant.

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.
- 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.

The scientific and grey literature consistently indicate that underground installations can have significant environmental footprints if not carefully managed. The impacts on soil structure and hydrology are among the best documented, while the indirect impacts on nearby habitats require piecing together ecological studies of other types of development. All evidence suggests that the Applicant's assertion of "no impacts" would be scientifically unsound unless extremely rigorous mitigation and a benign setting make it true. Typically, one would expect an EIA to cite such studies and justify conclusions with evidence. The absence of an impact assessment on soils, hydrology, etc., would run contrary to the known research, which is why raising these points with references is important in planning feedback. I still contend the overland cable route corridor is too close to Burton Bushes.

Best Regards,

Dr Stephen R. Mounce

Addendum: Burton Bushes background

I contend that the corridor and construction sites and buildings are too close to wildlife habitats/ archaeological SSIs to me (e.g. Burton Bushes) and general peaceful amenity areas on the Westwood. There appears to be quite a lot of construction of 'temporary construction compounds' near to or next to various parts of the Westwood (and now looking like directly next to Burton Bushes). The York road will also be significantly disrupted.

I spoke to a transport consultant/ contractor at the 2023 consultation event who gave me a lot of detailed information about the practicalities, timings, HGV, transport disruption, buildings, lengths per section. He explained the overland corridor is split into 15 sections overall, with each section requiring about 12 months of constructions, digging works, HGVs etc. One of these sections (16a) runs down the back length of the Westwood (including alongside Burton Bushes) and is forecast to last for months 15 to 26 of the project (likely earliest 2027 if the plan goes ahead and of course dependent on the National Grid Creyke Beck proposal).

Therefore, likely there could be large scale construction activities, major transport disruption, noise pollution, wildlife/ ecology impacts, amenity impacts, possible knock on archaeological damage for Beverley Westwood for a period of up to 12 months as the plans stand. Incredibly, in section 3.3.3. of the PEIR in point 178 for potential impacts on tourism and users of recreational routes the “effects were assessed as negligible.. no mitigation measures are proposed”. Human health aspects were similarly glossed over in points 168 and 169.

I would like to highlight the following (particularly as the PEIR ignored important information about Burton Bushes and didn't mention it or the Westwood once - very cursory and sub standard):

- Burton Bushes is a unique habitat of 25 acres of ancient woodland (pre 1500s), is designated as a Site of Special Scientific Interest including for *Quercus robur* - *Pteridium aquilinum* - *Rubus fruticosus* woodland (Broadleaved, mixed and Yew).

SSSI designation:

<https://designatedsites.naturalengland.org.uk/SiteList.aspx?siteName=Burton%20bushes&countyCode=&responsiblePerson=&DesignationType=All>

Map:

<https://magic.defra.gov.uk/MagicMap.aspx?startTopic=Designations&activelayer=sssiIndex&query=HYPERLINK%3D%271002049%27>

- The woodland trust has identified over 40 unique ancient trees in this wood:



- It is also a haven for birds, with over 63 varieties including greater spotted woodpecker, tawny owl, chiffchaffs and blackcaps.
- Burton Bushes is also a site of archaeological significance (Earthworks on the floor of Burton Bushes indicate probable agricultural enclosures, probably from the Romano-British period (c. AD 50-390)) - as is the Westwood in general (three Bronze Age Barrows). The neighbouring field to Burton Bushes i.e. containing the corridor could potentially contain similar areas of interest.

English heritage Survey from 2004:

https://historicengland.org.uk/research/results/reports/6453/WestwoodCommonBeverley_anArchaeologicalSurvey_SurveyReport

Whilst I understand the need for these energy infrastructure projects I therefore make representation that this plan has made a poor decision on the onshore export cable corridor route and has not sufficiently thought through and investigated impacts (particularly around ecology, archaeology and heritage) on Beverley Westwood and Burton Bushes with this corridor. It should be moved even further away from Burton Bushes and the Westwood to protect habitats and mitigate the other issues highlighted.