

Dr. Stephen R. Mounce,

6/12/2025

**Re: Dogger Bank South Project – Written representation (deadline 6/12/25)**

Dear Planning Inspectorate,

I am writing again as an Interested Party (**20050002**) to provide further input regarding the Dogger Bank South Project in light of the Secretary of State's Information Request Letter (6 November 2025) — Dogger Bank South Project Unresolved Onshore Issues and Site Commencement, which invites comments on post-examination documents.

I am writing to draw your attention to outstanding, site-specific issues concerning the Burton Bushes Site of Special Scientific Interest (SSSI) and ancient woodland that were raised in my submission dated June 13, 2025, which, to my knowledge, have not yet received a substantive public response from the Applicants or the Examining Authority (ExA). My written representation of June 13, 2025, reinforced existing concerns shared by the Forestry Commission (FC) and introduced new questions regarding immediate threats to Burton Bushes.

The most critical outstanding issue relates to land directly abutting Burton Bushes. I previously highlighted that the former Burton Gate House property, located immediately adjacent to Burton Bushes (0m distance), was recently sold and demolished, and subsequent preparation activities, including the erection of a fence, were observed. I requested confirmation from the Applicant as to whether this land was purchased and, if so, a thorough assessment of the potential impacts any proposed works, temporary compounds, or activities on this land would have on the adjacent ancient woodland and SSSI. I will note that new construction has already occurred on the other side of the road, which is likely temporary compounds, and quite regular traffic disruption is already happening (ahead of the actual decision..) These potential impacts include:

- Root Zone and Soil Disturbance from construction traffic or severance near the woodland boundary.
- Changes in Hydrology due to alteration of drainage patterns or interception of groundwater flow.
- Edge Effects arising from increased light, noise, dust, or chemical pollutants.

A comprehensive, transparent assessment addressing activities planned for newly prepared area so close to such a sensitive site, is in my opinion still lacking, and requires immediate reconsideration of the proposed buffer zone.

Furthermore, my June 13 submission reiterated crucial points previously aligned with the FC's advice:

- Insufficient Buffer Zone: Both I and the FC noted the critical importance of protecting Burton Bushes as an irreplaceable natural resource. We highlighted that indirect impacts, such as dust and fugitive emissions from construction traffic, can cause deterioration of ancient woodland. While the standing advice recommends a

minimum 15m buffer, the FC could not find an assessment demonstrating that this distance would be sufficient against indirect effects. I maintain that the overland cable corridor, currently around a 100 to 125m gap, remains too close to Burton Bushes, and a 0.2km (200m) minimum buffer is necessary to mitigate these indirect and direct effects.

- Hydrological and Geological Assessment: Concerns were raised that hydrological changes resulting from nearby excavation, such as trench de-watering, may inadvertently drain or redirect water, potentially harming water-dependent habitats within the SSSI. The FC explicitly stated it was "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".
- Trenchless Crossing Commitment: The Applicant's commitment to use trenchless crossing techniques at depths greater than 5m, unless clear evidence demonstrates a shallower depth would not cause adverse impacts, was critically reviewed by the FC. The FC explicitly stated it is "not clear how geotechnical investigation could provide clear evidence" to justify a shallower depth without risking impacts to roots, soils or rhizosphere, emphasizing that such investigations "may not be sufficient to ensure that no impacts would occur to biological and organic processes".

I must highlight the urgency of resolving these detailed planning matters concerning the protection of Burton Bushes before the formal determination process is complete. Despite the unresolved issues and the fact that the formal determination process is incomplete, construction of facilities has already apparently commenced, placing these highly sensitive sites at imminent risk. The need for rigorous mitigation measures and definitive boundaries for activity is therefore immediate, particularly concerning the land identified adjacent to Burton Bushes.

I respectfully request that the Secretary of State seeks immediate and clear responses to these specific concerns before rendering a final decision.

Best Regards,

Dr. Stephen R. Mounce  
Interested Party ( )