UK Government

Marine Conservation Zone Assessment for an Application under the Planning Act 2008

Dogger Bank South Offshore Wind Farms

The Marine and Coastal Access Act 2009

May 2026

Contents

1. Introduction

This document presents the Marine Conservation Zone Assessment (“MCZA”) undertaken by the Secretary of State for Energy Security and Net Zero in accordance with Part 5, Chapter 1 of the Marine and Coastal Access Act 2009 (“the MCAA”). The assessment supports the Secretary of State’s decision on the Development Consent Order (“DCO”) Application and the associated Deemed Marine Licences (“DMLs”) for the Project.

For the purposes of the DCO decision, the Secretary of State acts as the public authority responsible for considering whether the exercise of this function could affect any designated Marine Conservation Zone (“MCZ”).

The details of the Project to which this assessment relates are set out in Table 1 (Project Details), as well as Chapter 5 of the Applicants ES [APP-071].

2. Legislative Framework

Marine Conservation Zones are designated under Part 5, Chapter 1 of the Marine and Coastal Access Act 2009 through designation orders made under section 116 of the Act. These designation orders establish the protected features of each site and set the conservation objectives that apply. This statutory framework provides for the protection of nationally important marine habitats, species, and geological and geomorphological features.

Public authorities must comply with the duties set out in sections 125 to 128 of the Act when exercising any function that may affect an MCZ.

Under section 125, a public authority must exercise its functions in the manner it considers will best further, or where that is not possible, least hinder the achievement of an MCZ's conservation objectives for an MCZ. Where the authority believes that a proposed activity may significantly hinder those objectives, it must notify the relevant statutory nature conservation body.

Under section 126, when determining applications for authorisation (including DMLs granted through a DCO), a public authority must not grant authorisation unless it is satisfied that there is no significant risk of hindering an MCZ’s conservation objectives or, where such a risk exists, that the statutory tests relating to alternatives, public benefit, and measures of equivalent environmental benefit have been met.

Section 127 enables statutory nature conservation bodies—Natural England, Natural Resources Wales, and the Joint Nature Conservation Committee—to provide advice and guidance to public authorities on activities capable of affecting protected features and on measures required to maintain or restore them. Public authorities are required to have regard to such advice when exercising relevant functions.

Section 128 provides a mechanism for accountability. Where a statutory nature conservation body considers that a public authority has failed to comply with its duties under sections 125 or 126, or has not acted in accordance with advice or guidance provided under section 127, it may request a written explanation which the authority must provide.

Together, these provisions require the Secretary of State, as the public authority determining the DCO and associated DMLs, to consider whether the Project is capable of affecting MCZ features, to take relevant statutory conservation advice in to account, and to undertake an MCZ Assessment to determine

whether the Project may hinder the achievement of the conservation objectives for any relevant MCZ. The Secretary of State has therefore undertaken this MCZA in accordance with sections 125 to 128 of the MCAA.

2. Project Details

The details of the project are as set out in Table 1 below.

Table 1: Proposed project details

Title of project	Dogger Bank Offshore Wind Farm ("The Project")
Applicants name	RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited
DCO Application	EN010125
Location of works	See Annex 1 for a map of the Project Area, located off the East Riding of Yorkshire Coast, in relation to Marine Conservation Zone ("MCZ") designations.
Description of proposed project	A full description of the Project can be located within the Chapter 5 of the Applicants ES [APP-071]. The Project is an Offshore Wind Farm ("OWF") that would involve the construction and operation of up to two arrays (DBS East and West) with 100 wind turbine generators each accompanied by a network of subsea cables linking the turbines to up to 8 offshore platforms and their foundations including collector platforms, offshore converter platforms and accommodation platforms. The Project would also include the construction of up to two converter stations and would require cabling to connect the array area to the proposed substation to be built by the National Grid at Birkhill Grid.
Relevant Documents	Marine Conservation Zone Assessment [APP-240] Marine Conservation Zone MCZ Appendix 1 Screening Report [REP7-111] Appendix D of the Examining Authority's Report: Marine Conservation Zone Assessment Report Assessment of Coastal Processes at the Dogger Bank South Landfall [REP5-040] Natural England's Risk and Issues Log [REP9-018] In-Principle Monitoring Plan [REP7-115]

2.1 Marine Conservation Zones considered

The Holderness Inshore MCZ and the Holderness Offshore MCZ were considered as part of this assessment, and further details for each site are provided in Tables 2 and 3 respectively.

Table 2: Holderness Inshore MCZ

Name of MCZ site: Holderness Inshore MCZ **Location (distance):** There is no overlap with the Holderness Inshore MCZ and the Projects' landfall and permanent burial corridor within the Offshore Export Cable Corridor, with the closest

point where cable burial may take place being located 0.1km outside of the MCZ. The overlap occurs within the Offshore Development area in relation to the cable corridor.
Activities and the pathways likely to impact the MCZ: Cable laying and construction/decommissioning activities within the cable corridor and array area in the Construction and Decommissioning phases as well as maintenance activities and the presence of sour and cable protection in the Operational phase. The potential pathways for impact are below and are all considered indirect effects: • Temporary physical disturbance/temporary habitat loss • Increased suspended sediment concentrations (SSC) • Changes to bedload sediment transport • Invasive species
Conservation Advice package used: Designated Sites View
Date conservation advice was last accessed: 16/02/2026

Table 3: Holderness Offshore MCZ

Name of MCZ site: Holderness Offshore MCZ **Location (distance):** The Holderness Offshore MCZ lies approximately 0.7km to the southeast of the temporary disturbance area for cable installation and 1.2km from the permanent disturbance area. The MCZ lies approximately 11 km off the Holderness coast and there is no overlap with the red line boundary of the Project.
Activities and the pathways likely to impact the MCZ: Cable laying and construction/decommissioning activities within the cable corridor and array area in the Construction and Decommissioning phases as well as maintenance activities and the presence of sour and cable protection in the Operational phase. The potential pathways for impact are below and are all considered indirect effects: • Temporary physical disturbance/temporary habitat loss • Increased suspended sediment concentrations (SSC) • Invasive species
Conservation Advice package used: Holderness Offshore MPA | Advisor to Government on Nature Conservation | JNCC
Date conservation advice was last accessed: 16/02/2026

MCZ Screening

2.2 Screening Considerations

In undertaking the MCZ Screening assessment, Natural England's ("NE's") Conservation Advice Packages, as outlined in Tables 2 and 3, have been considered and the following principles applied:

- Where available, the 'Advice on Operations' (AoO) matrix to determine pressures associated with the proposed activities that may potentially harm the qualifying habitat features and/ or species of the sites has been used. For the Holderness Inshore MCZ, there are currently no AoO from NE, and so the Applicants stated that they have assumed pressures from sites where AoO are present such as the Holderness Offshore MCZ, South Rigg MCZ, Offshore Brighton MCZ.
- Features are assessed against the proximity to the works and relevant seasonality considerations. If no pathway is identified between the Project (source) and feature (receptor) then no further consideration is given to those features in the MCZ Assessment.
- Features deemed sensitive to pressures (medium and high risk) for both direct and indirect pathways
- For pressure/ feature interactions categorised as 'Not Relevant' these are not taken forward into the Screening assessment.
- Pressure/ feature interactions categorised as either 'Insufficient Evidence' or 'Not Assessed' are taken forward into the Screening assessment in accordance with the precautionary principle.

The Advice on Operations ("AoO") category of marine activities used is:

- Energy Generation: Offshore Wind during construction
- Energy Generation: Offshore Wind during operation and maintenance
- Energy Generation: Offshore wind during decommissioning

2.3 MCZ Screening Assessment

The Secretary of State has reviewed the AoO for the Holderness Offshore MCZ, the Applicants' Marine Conservation Zone Assessment [APP-240] as well as the Marine Conservation Zone MCZ Appendix 1 Screening Report [REP7-111] to aid in the screening of pressures in relation to the features of the MCZs.

Table 4: Screening table for the Holderness Inshore and Holderness Offshore MCZs

Holderness Inshore MCZ			
Feature or supporting habitat	**Pressures**	**Capable of affecting (other than insignificantly) either (i) the protected features of the above MCZ; or (ii) any ecological or geomorphological process on which the conservation of any protected feature of the MCZ is (wholly or in part) dependant?**	**Justification**
Subtidal Coarse Sediment Subtidal Mixed Sediment Subtidal Sand Subtidal mud	Abrasion/disturbance of the substrate on the surface of the seabed Changes in suspended solids (water clarity)	Yes	**Abrasion –** There is potential for direct impacts to occur as the Project's offshore export cable corridor within the MCZ. **Water flow/ sediment transportation** - Potential for structures to be placed in the intertidal zone (e.g. HDD exit pit), may result in changes to coastal process and water flow. **Changes in suspended solids (water clarity) -** Potential for sediment disturbed by cable burial/maintenance/decommissioning activities to result in changes in suspended solids within the MCZ.

	Smothering and siltation rate changes heavy Smothering and siltation rate changes (light) Introduction or spread of invasive non native species		**Introduction or spread of invasive non-indigenous species (INIS) -** Potential for infrastructure introduced within the MCZ to be colonised by INIS. **Smothering and siltation rate changes (heavy and light) -** Potential for sediment disturbed by cable burial/maintenance/decommissioning activities to result in smothering and siltation rate changes within the MCZ. Based on the evidence before him, the Secretary of State considers that these pressures have the potential to impact the features of the MCZ, and further assessment is required.
Spurn head (subtidal geological feature)	Habitat Structure changes- removal of substratum (extraction) Electromagnetic changes	Yes	**Water flow** (tidal current) changes, including sediment transport considerations which could impact the geological feature despite its distance form the Project. Based on the evidence before him, the Secretary of State considers that these pressures have the potential to impact the features of the MCZ, and further assessment is required.
Moderate energy circalittoral rock High energy circalittoral rock	Penetration and/or physical disturbance of the substrate below the surface of the seabed, including abrasion Physical change (to another seabed type) Physical change (to another sediment type)	Yes	**Abrasion –** There is potential for direct impacts to occur as the Project's offshore export cable corridor within the MCZ. **Water flow/ sediment transportation** - Potential for structures to be placed in the intertidal zone (e.g. HDD exit pit), may result in changes to coastal process and water flow. **Changes in suspended solids (water clarity) -** Potential for sediment disturbed by cable burial/maintenance/decommissioning activities to result in changes in suspended solids within the MCZ. **Introduction or spread of invasive non-indigenous species (INIS) -** Potential for infrastructure introduced within the MCZ to be colonised by INIS.

	Smothering and siltation rate changes (heavy) Smothering and siltation rate changes (light) Water flow (tidal current) changes, including sediment transport considerations		**Smothering and siltation rate changes (heavy and light) -** Potential for sediment disturbed by cable burial/maintenance/decommissioning activities to result in smothering and siltation rate changes within the MCZ. Based on the evidence before him, the Secretary of State considers that these pressures have the potential to impact the features of the MCZ, and further assessment is required.
Intertidal sand and muddy sand		Yes	**Water flow/ sediment transportation** - Potential for structures to be placed in the intertidal zone (e.g. HDD exit pit), may result in changes to coastal process and water flow. **Changes in suspended solids (water clarity) -** Potential for sediment disturbed by cable burial/maintenance/decommissioning activities to result in changes in suspended solids within the MCZ. **Introduction or spread of invasive non-indigenous species (INIS) -** Potential for infrastructure introduced within the MCZ to be colonised by INIS. **Smothering and siltation rate changes (heavy and light) -** Potential for sediment disturbed by cable burial/maintenance/decommissioning activities to result in smothering and siltation rate changes within the MCZ. Based on the evidence before him, the Secretary of State considers that these pressures have the potential to impact the features of the MCZ, and further assessment is required.
Holderness Offshore MCZ			
Feature or supporting habitat	**Pressures**	**Capable of affecting (other than insignificantly) either (i)**	**Justification**

		the protected features of the above MCZ; or (ii) any ecological or geomorphological process on which the conservation of any protected feature of the MCZ is (wholly or in part) dependant?	
Subtidal Coarse Sediment Subtidal Mixed Sediment Subtidal Sand	Abrasion/disturbance of the substrate on the surface of the seabed Changes in suspended solids (water clarity) Smothering and siltation rate changes heavy Smothering and siltation rate changes (light) Introduction or spread of invasive non native species Habitat Structure changes- removal of substratum (extraction)	Yes	The pressures listed in this row are direct impacts that would not be possible due to the location of works being outside the MCZ site. The closest point of the offshore cable corridor is around 11km south of the Holderness Offshore MCZ which wouldn't allow for direct impacts to the protected features. **Changes in suspended solids (water clarity) -** Potential for sediment disturbed by cable burial/maintenance/decommissioning activities to result in changes in suspended solids within the MCZ. **Introduction of Invasive Non Native Species –** Potential for Project vessels to transport INIS to MCZ. **Smothering and siltation rate changes (heavy) and (light) -** Potential for sediment disturbed by cable burial/maintenance/decommissioning activities to result in smothering and siltation rate changes within the MCZ. Based on the evidence before him, the Secretary of State does considers that these pressures have the potential to impact the features of the MCZ, and further assessment is required.

	Electromagnetic changes Penetration and/or physical disturbance of the substrate below the surface of the seabed, including abrasion Physical change (to another seabed type) Physical change (to another sediment type) Smothering and siltation rate changes (heavy) Smothering and siltation rate changes (light) Water flow (tidal current) changes, including sediment transport considerations		
Ocean quahog	Changes in suspended solids (water clarity) Introduction or spread of invasive non-	No	The pressures identified would not be direct impacts due to the location of the works being outside the MCZ site. The closest point of the offshore cable corridor is around 11km south of the Holderness Offshore MCZ which wouldn't allow for direct impacts to the protected features.

	indigenous species (INIS) Smothering and siltation rate changes (heavy) Smothering and siltation rate changes (light)		**Changes in suspended solids (water clarity) -** Potential for sediment disturbed by cable burial/maintenance/decommissioning activities to result in changes in suspended solids within the MCZ. **Introduction of Invasive Non Native Species –** Potential for Project vessels to transport INIS to MCZ. **Smothering and siltation rate changes (heavy) and (light) -** Potential for sediment disturbed by cable burial/maintenance/decommissioning activities to result in smothering and siltation rate changes within the MCZ.
North sea glacial tunnel valleys	N/A	No	There is no advice available regarding the sensitivity of North Sea glacial tunnel valleys to the pressures of renewable energy infrastructure. The Applicants screened out this feature from further assessment, as it is a geological feature rather than a ecological feature. It is therefore not sensitive to changes in suspended sediment concentrations or invasive species. The Secretary of State agrees and this feature is not considered further.

Table 4: Feature/pressure interactions from Screening to be taken to Stage 1

MCZ Name	Feature(s)	Pressure(s)
Holderness Inshore MCZ	Subtidal Coarse Sediment Subtidal Mixed Sediment Subtidal Sand and mud Spurn head (subtidal geological feature) Moderate energy circalittoral rock	**Increased suspended sediment concentrations (SSC):** Smothering and siltation rate changes (light and heavy) Changes in suspended solids (water clarity) **Changes to bedload sediment transport:**

	High energy circalittoral rock Intertidal sand and muddy sand	Water flow (tidal current) changes, including sediment transport considerations **Temporary physical disturbance / temporary habitat loss:** Abrasion / disturbance of the substrate on the surface of the seabed **Introduction of Invasive Non-Native Species**
Holderness Offshore MCZ	Subtidal Coarse Sediment Subtidal Mixed Sediment Subtidal Sand Ocean quahog	**Increased suspended sediment concentrations (SSC):** Smothering and siltation rate changes (light and heavy) Changes in suspended solids (water clarity) **Introduction of Invasive Non-Native Species**

3. MCZ Screening Conclusion

The Secretary of State considers that the Project could affect the protected features of the above (Table 4) MCZs or any of their conservation objectives. This is due to many of the works relating to seabed preparation and cable installation leading to increased suspended sediment concentrations which can lead to smothering of the protected features as well as the presence of scour/cable protection and potential changes to physical processes.

Therefore, the Project **will require further assessment** regarding its impact on the protected features of the MCZ. The Applicants grouped the pressures into four pathways, as summarised in Table 4 above. These are: increased suspended sediment concentrations (SSC), changes to bedload sediment transport, temporary physical disturbance / temporary habitat loss and the introduction of invasive non-native species.

4. Stage 1 MCZ Assessment

Below is the Secretary of State's assessment of the Project which has been **deemed capable** of affecting the designated sites listed in Table 4.

4.1 Project Alone Assessment for Holderness Inshore and Offshore MCZ

Table 5– Project Alone Assessment

Name of MCZ: Holderness Inshore MCZ				
Qualifying feature or species (include sub-features and supporting habitats)	**Pressure**	**Is there a significant risk of the activity hindering the achievement of the conservation objectives stated for the MCZ?**	**Justification**	**Can impacts be mitigated for beyond what has been suggested in the application?**
Subtidal Coarse Sediment Subtidal Mixed Sediment Subtidal Sand and mud Moderate energy circalittoral rock High energy circalittoral rock	Temporary Physical Disturbance/Temporary Habitat Loss Increased suspended sediment Introduction of Invasive Non-Native Species (INNS)	No	**Increased Suspended Sediment** The Applicants have considered Stage 1 of the MCZ Assessment in their MCZ Assessment report [REP7-111F1]. They consider that that all pathways to increased Suspended Sediment Concentrations (SSC) would be temporary during construction, maintenance and decommissioning phases of the project. For intertidal sand and muddy sand, the Applicants considered that the maximum predicted deposition resulting from trenching will be up to 5 cm within and immediately adjacent to the area of trenching, with a maximum change of 25 cm occurring in localised hotspots. Therefore, it is unlikely	**No** - There are no additional mitigation measures that have been identified by the Secretary of State.

			that sand/mud features will be impacted due to their distribution and distance from the works. For other features, the redeposition of suspended sediments will be local to any construction, operation and decommissioning activities and within the natural range of turbidity, as supported by the modelling undertaken within Chapter 8 (Marine Physical Environment) of the Environmental Statement. Further, biological communities recorded within the MCZ have either a Low sensitivity to the pressures of SSC or are Not Sensitive and will therefore not be impacted or will recover fully within two years. It can be concluded that the conservation objective of maintaining the protected features of the Holderness Inshore MCZ in a favourable condition or restoring them to favourable condition will not be hindered by temporary increases in SSC and subsequent deposition effects related to the construction, operation and decommissioning of the Project. **Physical disturbance** In relation to temporary physical disturbance during the construction phase, the Applicants have committed to no anchoring activities taking place within the MCZ, which removes the pathway for direct effects and the potential to hinder the conservation objectives of the Holderness Inshore MCZ. **Invasive Non-Native Species** During the construction phase, the Applicants considered that vessels or infrastructure from other regions could introduce species that displace native organisms. Risks throughout the operational and decommissioning phases are not considered to be higher than those found during construction. The impact of this has been described as 'Low-	

			risk' within NE's AoO for the MCZ, and the Secretary of State accepts that there is existing vessel activity within the vicinity which is incorporated into the existing baseline risk off INNS introduction. The risk of spreading INNS will be mitigated by the following regulations and guidance, secured in the Outline Pollution Environmental Management Plan: • International Convention for the Prevention of Pollution from Ships (MARPOL). The MARPOL sets out appropriate vessel control procedures and maintenance. • The Environmental Damage (Prevention and Remediation (England)) Regulations 2015, which set out a polluter pays principle where the operators who cause a risk of significant damage or cause significant damage to land, water or biodiversity will have the responsibility to prevent damage occurring, or if the damage does occur will have the duty to reinstate the environment to the original condition. • The International Convention for the Control and Management of Ships' Ballast Water and Sediments (BWM Convention), which provide global regulations to control the transfer of potentially invasive species. The Secretary of State is content that with these mitigation measures in place, the risk of INNS introduction will not represent a hindrance to the conservation objectives of the MCZ. **Conclusion** Based on the information before him, the Secretary of State is satisfied that the Project alone will not negatively impact the protected features of the Holderness Inshore MCZ or it's conservation objectives though this impact pathway. The	

			Applicants has identified appropriate mitigation to ensure the impacts are reduced as far as practicably possible.	
Spurn Head	Changes to bedload sediment transport	No	**Water flow/Sediment transportation** There is a potential for changes in the bedload sediment transport to occur as a result of the protection measures of the offshore export cable within the nearshore environment which could affect the Spurn Head geological feature of the site. The Applicants has predicted that 90% of the route will be able to be buried. The longshore sediment transport modelling for the worst-case scenario for the nearshore cable protection measures indicated that an average of 4.2% of the annual net sediment budget could be interrupted if the cable protection measure occupied the full water column creating a complete blockage. However, the reality is that over 80% of the water column would be open allowing sediment to bypass the structure due to a commitment to using cable protection with maximum height of 0.5m above the seabed in water depths of less than 10m. As the geological feature of Spurn Head is 53 km away from the export cable corridor, the applicants contended that Spurn Head would have tolerance to any changes in bedload sediment transport as it already adjusts to a highly variable sediment budget driven by coastal erosion. NE disagreed [REP6-071], stating that they could not rule out a breach at Spurn Head if a change in sediment transport occurred, and that further stages of the MCZ assessment were required as a result. The MMO were confident [REP8-048] that the Applicants' estimate of the scale of impacts was reasonable in that the structures would only affect physical processes in the immediate vicinity, and the ExA agreed, citing that they were satisfied [ER D.2.46] that a decrease in suspended sediment in the water column at the geological feature due to the presence of infrastructure would not hinder the conservation objectives to maintain the favourable condition of Spurn Point. The ExA noted that the concern of an increased sediment bedload was the pathway for effect in this instance, aiding in this conclusion. The ExA agrees with the applicants' conclusions that there would be no material change to sediment supply to Spurn	**No** - There are no additional mitigation measures that have been identified by the Secretary of State.

			Point and the Humber Estuary, and did not believe that NE provided enough evidence as to why this would be the case. The Secretary of State is inclined to agree. The ExA suggested that the Secretary of State could consider NE's suggestion to include an additional condition to undertake physical remediation to address the sediment blockage and any repairs to a breach at Spurn Point should it occur. The Secretary of State considers that the Applicants commitment to cable bundling, the restriction of cable protection to 0.5 m within the 10m depth corridor and the commitment to post construction monitoring (secured within the (In Principle Monitoring Plan (IPMP)) of the nearshore cable protection along with any associated sediment accretion is adequate to mitigate impacts in this regard. Further, the commitment to adaptive management also set out in the IPMP would cover any remediate actions required in relation to Spurn Point. **Conclusion** Based on the information before him, the Applicants' documents and comments from NE during the Examination and in response to his request for further information, the Secretary of State is satisfied that the Project alone will not negatively impact the protected features of the Holderness Inshore MCZ or it's conservation objectives. The Applicants has identified appropriate mitigation to ensure the impacts are reduced as far as practicably possible, while also committing to monitoring to confirm the predictions of the Environmental Statement.	

Name of MCZ: Holderness Offshore MCZ				
Qualifying feature or species (include sub-features and supporting habitats)	**Pressure**	**Is there a significant risk of the activity hindering the**	**Justification**	**Can impacts be mitigated for beyond what has been suggested in the application?**

		achievement of the conservation objectives stated for the MCZ?		
Subtidal Coarse Sediment Subtidal Mixed Sediment Subtidal Sand Ocean quahog	Increased suspended sediment Introduction of Invasive Non-Native Species (INNS)	No	**Increased Suspended Sediment** The Applicants noted that many activities during the construction, maintenance and operation and decommissioning phases of the Project activities will result in an increased SSC, with the greatest disturbances occurring during the construction phase. This includes cable pre-installation activities, export cable burial, deployment of jack up vessels and the placement of cable protection. The Applicants' MCZ assessment, however argues that as there is no Project overlap with the MCZ, with the nearest point being the Offshore Export Cables Construction Buffer Zone located 0.7 km north-west of the Project, and that any increases in SSC are expected to be localised and short term, and are likely to remain within the range of background levels site. The redeposition of suspended sediments will be local to the construction activity and within the natural range of turbidity, as supported by the modelling undertaken within Chapter 8 (Marine Physical Environment) of the Environmental Statement. Further, biological communities recorded within the MCZ have either a Low sensitivity to the pressures of SSC or are Not Sensitive and will therefore not be impacted or will recover fully within two years. Throughout the Examination, NE [REP5-053 and REP8-051] disagreed with the appropriateness of the mitigation measures that had been suggested in relation to increased sediment deposition from the construction phase within the MCZ. NE were advocating for the use of a fall pipe or down pipe for disposal of dredged material and the depositing of dredged material updrift of areas of dredging activity. The Secretary of State noted that similar	Yes – The use of a fall pipe or down pipe to dispose of dredged sediment.

			commitments had been made in the Outer Dowsing and Five Estuaries offshore wind farm applications, and so in the first information request dated 6 December 2025, the Applicants were requested to commit to the use of a fall pipe or similar within designated sites. In their response to the first information request, the Applicants agreed to explore options to dispose of dredged material upstream of the direction of net sediment transport via a discharge pipe, a down pipe or similar. They also agreed to dispose of sediment as close to the seabed as is practicable. These commitments were added to the Cable Statement (Revision 6) as well as the Commitments Register (Revision 5). As such, the Secretary of State considers that the Applicants have sufficiently mitigated any impacts caused by increased sediment concentrations and that any residual effects would be minor and would not hinder the conservation objectives of the MCZ. In relation to ocean quahog, the ExA [ER D 3.27] was satisfied that any residual, unmitigated impacts of the Project would not hinder the conservation objectives for the feature, which is to maintain the population in numbers which enable it to thrive. The Secretary of State agrees with this conclusion and does not consider this feature further. **Introduction of Non-Native Invasive Species** During the construction phase, the Applicants considered that vessels or infrastructure from other regions could introduce species that displace native organisms. Risks throughout the operational and decommissioning phases are not considered to be higher than those found during construction. The impact of this has been described as 'Low-risk' within NE's AoO for the MCZ, and the Secretary of State accepts that there is existing vessel activity within the vicinity which is incorporated into the existing baseline risk off INNS introduction. The risk of spreading INNS will be mitigated by the following	

			regulations and guidance, secured in the Outline Pollution Environmental Management Plan: • International Convention for the Prevention of Pollution from Ships (MARPOL). The MARPOL sets out appropriate vessel control procedures and maintenance. • The Environmental Damage (Prevention and Remediation (England)) Regulations 2015, which set out a polluter pays principle where the operators who cause a risk of significant damage or cause significant damage to land, water or biodiversity will have the responsibility to prevent damage occurring, or if the damage does occur will have the duty to reinstate the environment to the original condition. • The International Convention for the Control and Management of Ships' Ballast Water and Sediments (BWM Convention), which provide global regulations to control the transfer of potentially invasive species. The Secretary of State is content that with these mitigation measures in place, the risk of INNS introduction will not represent a hindrance to the conservation objectives of the MCZ. **Conclusion** Based on the information before him, the Secretary of State is satisfied that the Project alone will not negatively impact the protected features of the Holderness Offshore MCZ or it's conservation objectives . This is due to the distance between the Project and the MCZ being sufficiently far enough away that the impacts are considered to be indiscernible for increased SCC and the risk of the introduction of INNS can be sufficiently managed.	

4.2 Part 2 – In-combination

The Applicants has taken the approach to use the recommended tier system (Natural England and DEFRA, 2022) to identify projects to consider in their cumulative effect assessment as part of the of MCZ Report [REP7-111]. The tiers were assigned at the time the Application was submitted to the Planning Inspectorate so there is the potential that the stage of a project may have progressed since then. The tiers are:

- Tier 1: built and operational projects;
- Tier 2: projects under construction;
- Tier 3: projects that have been consented (but construction has not yet commenced);
- Tier 4: projects that have an application submitted to the appropriate regulatory body that have not yet been determined;
- Tier 5: projects that have produced a PEIR and have characterisation data within the public domain;
- Tier 6: projects that the regulatory body are expecting to be submitted for determination (e.g., projects listed under the Planning Inspectorate programme of projects); and
- Tier 7: projects that have been identified in relevant strategic plans or programmes

The offshore wind farms within the vicinity of the MCZ were screened out of further cumulative assessment due to distance from the site or the stage of project construction not combining with the Project. The pipeline projects are all in operation and no detail on their decommissioning activities is available for assessment. As such, these projects are considered to be contributing to the existing baseline and are screened out of cumulative assessment. The Secretary of State is content with the Applicants' approach to the cumulative assessment and notes that no issues were raised on this point during Examination. The projects or plans identified as having the potential for cumulative impacts with the Project are listed in Table 6 below:

Table 6–Named Plans and Projects considered within the Assessment for the Holderness Inshore and Offshore MCZs[1]

Holderness Inshore and Offshore MCZ		
Project number	**Name of identified plan or project to which there is a pathway to MCZ.**	**Screened In or Out of Cumulative Assessment?**
1	Westermost Rough (Tier 1)	Out
2	Humber Gateway (Tier 1)	Out
3	Triton Knoll (Tier 2)	Out
4	Dogger Bank A (Tier 2)	Out
5	Dogger Bank B (Tier 2)	Out
6	Dogger Bank D (Tier 6)	Out

[1] The Applicants used a conservative range of two spring tidal ellipse excursions (i.e.30km) from the North Falls offshore Project area as the screening buffer for this cumulative assessment. Plans and projects prior to 2018 have been considered a baseline, so only projects established since then have been considered in this assessment.

7	Hornsea 1 (Tier 1)	Out
8	Hornsea Project Two (Tier 1)	Out
9	Hornsea Project Four (Tier 4)	Out
10	Northern Endurance CCS (export pipeline) (Tier 3)	In
11	Eastern Link 2 (Tier 6)	Out
12	VikingLink Inter- connector (Tier 1)	Out
13	Third Eastern Link HVDC cable (Tier 7)	Out
14	Fourth Eastern Link HDVC cable (Tier 7)	Out
15	National Grid HND Bootstrap (Tier 7)	Out
16	Centrica operated Easington to Rough 47/3B 36 inches gas import / export pipeline (PL150)	Out
17	Spirit Energy operated Easington to York platform methanol pipeline (PL2918)	Out
18	Perenco operated West Sole to Easington gas pipeline (PL28)	Out
19	Gassco operated Langeled pipeline Sliepner Rise to Easington (PL2071)	Out

Table 7- In-combination Assessment for the Holderness Inshore and Offshore MCZs

Name of MCZ: Holderness Inshore and Offshore MCZs				
Qualifying feature or species (include sub-features and supporting habitats)	**Pressure**	**Is there a significant risk of the activity hindering the achievement of the conservation objectives stated for the MCZ?**	**Justification**	**Can impacts be mitigated for beyond what has been suggested in the application?**
Subtidal Coarse Sediment Subtidal Mixed Sediment Subtidal Sand	Changes in suspended solids (water clarity) Smothering and siltation rate changes	No	The impacts discussed above in relation to the Dogger Bank South Project on the Holderness Inshore and Offshore MCZ are considered to be temporary and localised, so there is reduced scope for there to be overlapping cumulative impacts with other projects. The Secretary of State notes that the Project identified with potential cumulative impacts – the Northern Endurance CCS (export pipeline) - crosses through both MCZs and is 2.3 km to the south of the	**No** - There are no additional mitigation measures that have been identified by the Secretary of State. beyond

	(light and heavy) INNS		offshore export cable corridor for the Project. The pipelines are seabed infrastructure, built in 2024. The Applicants' MCZ assessment [REP7-111] cited the short term, localised nature of the impacts of increased suspended sediment concentrations and the low sensitivity of receptors to the impact pathway. As the overall volumes of sediment disturbed would be spread across the operational lifetimes of the Projects and Northern Endurance CCS, and that any changes will be within background levels of sediment suspension, it can therefore be concluded that the conservation objective of maintaining the protected features of the Holderness Inshore and Holderness Offshore MCZs in a favourable condition or restoring them to favourable condition will not be hindered by cumulative increases in SSC. The Applicants have considered this cumulative effect to be negligible for this MCZ from the pressures of changes to SSC and subsequent smothering. In relation to the introduction and spread of INNS, the risk would be similar for the Northern Endurance CCS as that identified for the Project and would have a similar effect as the Projects' Offshore Export Cable Corridor. Both Projects have committed to adhere to relevant regulations and guidance mitigation. Therefore, while there is potential for increased disturbance, the areas affected by both projects would be minimal. **Conclusion** Based on the information before him the Secretary of State is content that there will be no cumulative impacts arising from this Project on the Holderness Inshore and Offshore MCZ. The location of the projects away from both the MCZ reduce the potential for temporary impact overlap with the Project itself reduces the risk of cumulative effects combined with the already considered small and temporary scale of the impacts arising from the Project alone,	those secured for the Project alone (Table 5).

			lead to a conclusion of no cumulative impact.	
Spurn Head	Changes to bedload sediment transport	No	The Northern Endurance CCS pipeline makes landfall in close proximity to the Spurn Head geological feature. As a result, the project has committed to no rock protection landward of 10 m Lowest Astronomical Tide. As it has been established in the sections above that there will be no interruption of wave driven alongshore sediment supply to the beaches south of the landfall and to Spurn Head, there exists no potential for cumulative effects on changes to bedload sediment transport between the Projects and the Northern Endurance CCS pipeline. As such, the favourable condition of the conservation objectives will not be hindered.	**No**

5. Stage 1 MCZ Assessment Conclusion

The MCZ Screening Assessment (Table 3) determined that the Project is capable of affecting either (i) the protected features of the above MCZs ; or (ii) any ecological or geomorphological process on which the conservation of any protected feature of the above MCZ is (wholly or in part) dependant of the following site(s):

- Holderness Inshore MCZ
- Holderness Offshore MCZ

An alone and in-combination Stage 1 MCZ assessment has been undertaken of the implications of the Project in consideration of the applicable conservation objectives.

In conclusion the Secretary of State is satisfied that there is no risk of the Project hindering the conservation objectives for the above MCZs. This conclusion is based on the Applicants' MCZ report [REP7-111] and analysis within their modelling report [REP2-017] as well as conclusions from the Examining Authority on this matter [ER D4.1] that the conservation objectives of both sites would not be hindered by the Project. The Secretary of State has taken into account the comments from E in respect to the use of a fall pipe for the disposal of dredged material and the conclusions in relation to Spurn Head, comments received during the Examination of this Project by NE [REP3-057, REP8-051].NE conclude that the impacts will remain localised to the area of activity and that for both MCZs the baseline level of SCC and deposition will return to normal after works conclude.

The Secretary of State is reassured by commitments set out in the final Cable Statement [REP6-043] in relation to cable bundling and restrictions on cable protection, as well as commitments to post construction monitoring within the IPMP [REP7-115] of nearshore cable protection which would trigger adaptive management actions if required. The Secretary of State also notes that no anchoring is to take place within the Holderness Inshore MCZ where the offshore development area overlaps with the protected site.

The Secretary of State is satisfied that the Applicants has considered all reasonable alternatives for the Project and that no further mitigation measures could be undertaken by the Project to reduce the impact to the MCZs further.

References

Natural England and DEFRA (2022) Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards; Phase III: Expectations for data analysis and presentation at examination for offshore wind applications

Annex 1

Figure 1: The Location of the Dogger Bank South Project (red boundary line) in relation to the Marine Conservation Zones.


300000
350000
400000
450000
N
Legend:
Offshore Development Area
Offshore Export Cable Corridor
DBS East Array Area
DBS West Array Area
Inter-Platform Cable Corridor
Holderness Inshore MCZ
Holderness Offshore MCZ
0 10 20 km
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© Natural England Copyright 2024. © OpenStreetMap (and) contributors, CC-BY-SA
S2 P01 12/03/2024 Suitable for Information JH SB CC
SUI REV DATE DESCRIPTION DRW CHK APR
Title:
Location of Holderness Inshore MCZ and Holderness Offshore MCZ in Relation to the Offshore Development Area
Figure: 1-1
Drawing No: PC2340-RHD-OF-ZZ-DR-Z-0776
Co-ordinate system: WGS 1984 UTM Zone 31N
Page Size: A3
Scale: 1:700,000
Project: Dogger Bank South Offshore Wind Farms
Report: Environmental Statement
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