



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Dogger Bank South Offshore Wind Farm

Appendix I1 to the Natural England Deadline 1 Submission
Natural England's comments and advice on Terrestrial Ecology and Ornithology

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

29th January 2025

Appendix I1 – Natural England’s Advice on Onshore Ecology (Land Quality Assessment, Hydrology, Protected Species and Biodiversity Net Gain)

In formulating these comments, the following documents submitted by the Applicant on or before 9th December 2024 have been considered in relation to the impacts of Dogger Bank South (East and West) Offshore Wind Farm (DBS) on the terrestrial environment.

- [AS-048] 10.30 - Response to Natural England's Relevant Representations (Revision 01)
- [AS-051] 6.1 - RIAA HRA Part 2 of 4 – Annex I Offshore Habitats and Annex II Migratory Fish (Revision 3) (Clean).pdf
- [AS-073] 7.18 - ES Chapter 18 - Terrestrial Ecology and Ornithology (Revision 2) (Tracked)
- [AS-095] 8.9 - Outline Code of Construction Practice (Revision 2) (Tracked) (combined)
- [AS-112] 7.21 - ES Chapter 21 - Land Use (Revision 2) (Tracked)

Natural England welcomes the above documents which have resolved issues raised in our Relevant Representation and Written Representations [RR-039] submitted on 6th September 2024.

1. Introduction

The key points raised below focus on singular points in relation to air quality, great crested newts and agricultural land and soils raised from the Applicant’s submission of documents since Relevant Representations. Natural England are satisfied that all concerns raised in our Relevant Representations have now been addressed. We will therefore not be making further comment on onshore matters unless specifically requested by the Examining Authority.

2. Air Quality

Humber Estuary SPA, SAC and Ramsar - Air quality impacts due to construction traffic

Natural England is satisfied that the evidence submitted in Annex A Technical Note, Comparison of Approaches using the Natural England Guidance NEA001 and JNCC Guidance (appended to the Applicant’s Response to Natural England's Relevant Representations [AS-048]), demonstrates that construction traffic associated with the development will not impact on adjacent European Sites based on use of the NEA001 impact thresholds. We note this information has also been included within the [AS-051] RIAA HRA Part 2 of 4 – Annex I Offshore Habitats and Annex II Migratory Fish (Revision 3) (Clean) document, submitted 26 November 2024. Therefore, we concur with the conclusion of no AEOI. [RR-039, I1 and I6]

Humber Estuary SPA, SAC and Ramsar – Air Quality impacts due to vessel movements

Natural England note that use of the screening threshold and the justification around the vessel movements proximity to designated habitats has been agreed with the Inspectorate.

Based on the information provided on the low number of vessel movements required for the landfall elements of the project, and therefore the low number of movements required in proximity we agree with the conclusions and have no further comments to make on this topic. [RR-039, I7]

Humber Estuary SPA, SAC and Ramsar – Air Quality Impacts due to Non-Road Mobile Machinery (NRMM)

Natural England note that the [AS-048] Response to Natural England's Relevant Representations (November 2024) states that there are no Temporary Construction Compounds (TCCs) within 200m of designated sites, this is also included within section 26.5.3.1.2 of [APP-209] ES Chapter 26 Air Quality. We would not provide further advice in relation to potential air quality impacts to Bentley Moor Wood, Ancient Woodland and refer to our [Standing Advice](#) on this topic. [RR-039, I8]

Humber Estuary SPA, SAC and Ramsar – Air Quality Impacts due to Back-up generators

Natural England notes the clarification that the locations and required numbers of back-up generators is not yet known, along with the statement that permits will be required to manage the impacts to designated sites, if they are located in proximity. Natural England prefers to have a front-loaded approach to management of impacts on designated sites to avoid delays in the progression of development proposals at a later stage of the planning process. However, considering the low level of use, and the control measures outlined in the [AS-095] 8.9 - Outline Code of Construction Practice (Revision 2) (Tracked) (combined), Natural England will not require further information on this during the DCO process and will provide additional advice at permitting stage if they are required to be sited in proximity to designated sites. [RR-039, I9]

Humber Estuary SSSI – Air Quality Impacts (All)

[RR-039 I13] Our advice on this topic is as above for representations references [RR-039] I1 to I9.

Burton Bushes SSSI – Air Quality Impacts due to Non-Road Mobile Machinery (NRMM) and Back-up generators

Natural England note that the [AS-048] Response to Natural England's Relevant Representations (November 2024) states that there are no TCCs within 200m of designated sites, this is also included within section 26.5.3.1.2 of [APP-209] ES Chapter 26 Air Quality.

Natural England notes the clarification that the locations and required numbers of back-up generators is not yet known, along with the statement that permits will be required to manage the impacts to designated sites, if they are located in proximity. Natural England prefers to have a front-loaded approach to management of impacts on designated sites to avoid delays in the progression development proposals at a later stage of the planning process. However, considering the low level of use, and the control measures outlined in the [AS-095] 8.9 - Outline Code of Construction Practice (Revision 2) (Tracked) (combined) Natural England will not require further information on this during the DCO process and will provide additional advice

at permitting stage if they are required to be cited in proximity to designated sites. [RR-039, I12]

3. Great Crested Newt District Level Licencing

A District Level Licence has now been granted for this DCO. Natural England therefore have no further advice on this topic. [RR-039, I17]

4. Agricultural Land and Soils

We note that the [AS-095] 8.9 (Revision 2) Outline Code of Construction Practice (Revision 2) (Tracked) (combined), (submitted 2 December 2024) now includes the revisions as requested in our Relevant Representation. As the Soil Management Plan is secured within Requirement 19 of the DCO we have no further comments on this topic. [RR-039, I19]