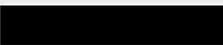


From: [Borghart, Sven \(RWS ZD\)](#)
To: [Dogger Bank D](#)
Cc: [Erfeling, Mareike \(RWS ZD\)](#)
Subject: Espoo notification Dogger Bank D Wind Farm
Date: 29 February 2024 12:13:16
Attachments: [S1 Notification letter to EEA State Pre-app - Netherlands.pdf](#)

U ontvangt niet vaak e-mail van  [Meer informatie over waarom dit belangrijk is](#)

Dear Secretary of State, Dear sir / madam,

On 19 January 2024 a notification letter was sent by the Planning Inspectorate to inform us about the proposed development for the Dogger Bank D Wind Farm. This letter requested us to inform you about whether we, as the government of the Netherlands, wish to participate in the procedure under Regulation 32 in relation to this application. The Netherlands would indeed like to participate in further steps of the procedure for this development. We look forward to receive more information when the development progresses towards the next stages.

In addition, we would like to make several suggestions and comments with regard to the Transboundary Screening document for Dogger Bank D.

Ecology

- It is not clear whether ecological effects will be considered internationally for cumulative impact assessment. That means that not only UK activities will be taken into account and effects will be considered on a population level. Many species are migratory or otherwise play an (in)direct important role for ecology in Dutch water or the broader scale of the North Sea. As such, cumulative effects should be tested at a relevant geographical scale. Many North Sea countries are developing offshore wind farms in order to meet their net zero goals to combat climate change. When using the seas more intensively, there is an increased need for us all to assess impacts on ecology and implement adequate measures to limit these impacts. This is necessary because we have a shared duty to maintain the important ecological services the North Sea provides us with. This is important for both biotic factors (various species) and abiotic factors (e.g., loss of stratification of water layers).
- The Scoping Report has identified spawning and nursery grounds for several species, including tope shark. Additional mitigation and compensation plans for these species would be appreciated.
- In addition, we would appreciate it if monitoring efforts and impact assessment could also focus on non-commercial fish species such as the Twaite shad, Allis shad, Houting, European sturgeon, Starry smooth-hound (*Mustelus asterias*), common stingray, blonde ray and starry ray, as well as shellfish ecology.
- We endorse the importance of the assessment of underwater noise and the effects on marine mammals. In this regard, we ask you to include information on (the best available techniques for) underwater noise reduction, such as mitigation measures, as major effects are predicted for marine mammal species such as harbor porpoise. This has been a real concern for Dogger Bank Teesside A and B and for Dogger Bank South. In the Netherlands, we have set requirements for maximum underwater noise exposure during pile driving. Various noise mitigation measures can reduce noise exposure, for example using a bubble screen during pile driving. These impacts on marine mammals, such as harbor porpoises and grey seals, should also be considered from a cumulative and transboundary perspective, as these species could travel big distances, migrate between the United Kingdom and the Netherlands across the area of the proposed wind farms, and as several areas in Dutch waters have been designated for the protection of these species under the EU Habitats Directive.
- The collision risk for birds and bats is of great importance, especially considering the cumulative effects with other wind farms in the area or on the migration route. Monitoring data is available in the European Seabirds at Sea database ([European Seabirds At Sea \(ices.dk\)](#)). We would also like to refer to the Framework for Assessing Ecological and Cumulative Effects ([Framework for Assessing Ecological and Cumulative Effects - Noordzeeloket UK](#)) in which international cumulative effects of Dutch wind farms have been calculated. Information on mitigation measures to avoid collisions, habitat loss and barrier effects, would be appreciated, as there is a high probability that this wind farm, especially considering international cumulative effects, will have an external effect on bird species living in Dutch Natura 2000 areas. Research on impacts on bat species is still in preliminary stages and much is yet unknown. Nevertheless we do know that their migration routes

cross the North Sea and thus we would like to point out that they ought to be given attention ([Reports on bats - Noordzeeloket UK](#)), especially the bat species Nathusius's pipistrelle.

Commercial fisheries

The Netherlands would like to request that the analysis also looks at the economic value of the fisheries and accounts for possible economic losses that may occur due to lack of or lesser access to important fishing grounds. It is important to note that whilst the Dutch do not have historic rights in the given area, the Netherlands does have a share in the quota in these waters, for instance plaice (PLE/2A3AX4) and herring (HER/1/2-). The construction of the park poses the risk that fisheries may fail to take advantage of fishing their share of quota due to the construction in these specific areas. This may not yet be considered as a risk. Therefore, the Netherlands would like to know what the government or wind farm operators can do to further mitigate potential losses and facilitate commercial fisheries in the area.

Thank you in advance for considering these comments. If any comments or suggestions are unclear or if there is a need to discuss them, let us know.

With kind regards,



Sven Borghart
Advisor North Sea

Rijkswaterstaat Zee en Delta
Department Network Development and Vision



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Water. Wegen. Werk. Rijkswaterstaat