

# DOGGER BANK D WIND FARM

## Benthic Compensation

### Roadmap & Evidence

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BENTHIC COMPENSATION - ROADMAP & EVIDENCE

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## Table of Contents

Table of Contents.....	2
Glossary.....	3
1 Introduction.....	4
1.1 Background.....	4
1.2 Compensation Approach.....	5
1.3 Purpose of this Document.....	6
1.4 Consultation.....	6
2 Dogger Bank Special Area of Conservation and Project Impact.....	16
2.1 Overview.....	16
2.2 Conservation Objectives.....	16
2.3 Summary of Potential Impact.....	16
3 Compensation Approach.....	17
3.1 Guidance.....	17
3.2 Delivery Approach.....	17
3.3 Strategic Compensation Delivery.....	17
3.4 Developing and Refining Compensation Measures.....	18
3.4.1 Method.....	18
3.4.2 Longlist.....	18
3.4.3 Shortlist.....	19
4 Shortlisted Measures.....	25
4.1 Introduction.....	25
4.2 Designation of New MPAs and / or Extending Existing MPAs.....	25
4.2.1 Overview.....	25
4.2.2 Measure of Success / Effectiveness.....	25
4.2.3 Scale.....	26
4.2.4 Site Selection.....	26
4.2.5 Delivery Mechanism.....	26
4.2.6 Monitoring and Adaptive Management.....	26
4.2.7 Next Steps.....	27
5 Conclusion.....	27
References.....	30

List of Tables.....	31
List of Acronyms.....	32

Glossary

Term	Definition
DBD Array Area	The area within which the wind turbines, inter-array cables and Offshore Platform(s) will be located.
Deemed Marine Licence (dML)	A consent required under the Marine and Coastal Access Act 2009 for certain activities undertaken within the UK marine area, which may be granted as part of the Development Consent Order.
Development Consent Order (DCO)	A consent required under the Planning Act 2008 to authorise the development of a Nationally Significant Infrastructure Project, which is granted by the relevant Secretary of State following an application to the Planning Inspectorate.
Effect	An effect is the consequence of an impact when considered in combination with the receptor’s sensitivity/value/importance, defined in terms of significance.
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, and includes the publication of an Environmental Statement.
Environmental Impact Assessment (EIA) Regulations	Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, which sets out the EIA process for assessing the likely significant effects of a project on the environment.
Environmental Statement (ES)	A document reporting the findings of the EIA which describes the measures proposed to mitigate any likely significant effects.
Evidence Plan Process (EPP)	A voluntary consultation process with technical stakeholders via Expert Topic Group (ETG) meetings to encourage upfront agreement on the nature, volume and range of supporting evidence required to inform the EIA and HRA process.
Expert Topic Group (ETG)	A forum for targeted technical engagement with relevant stakeholders through the EPP.
Habitat Regulations	<p>As set out in the Planning Inspectorate’s Advice Note 10 (Habitats Regulations Assessment relevant to nationally significant infrastructure projects) the following are covered by the term ‘Habitats Regulations’: the Conservation of Habitats and Species Regulations 2017 (as amended), and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) (for plans and projects beyond UK territorial waters (12 nautical miles).</p> <p>Such regulations set out the requirement for Competent Authorities to consider whether a development will have a likely significant effect (LSE) on a European site (now known as National Network Sites). Where LSE are likely and a project is not directly connected with or necessary to the management of that site(s), an appropriate assessment (AA) is required of the implications of the plan or project for that site(s) in view of its conservation objectives.</p>

Term	Definition
HRA Stage 1: Screening	In Stage 1 of the HRA process, European sites are screened for LSE (either alone or in-combination with other plans or projects). Where it can be determined that there is no potential for LSE to occur to qualifying features of a site, that site is sought to be ‘screened out’.
HRA Stage 2: Appropriate Assessment	In Stage 2 of the HRA process, for sites where LSE cannot be excluded in HRA Stage 1: Screening, further information to inform an appropriate assessment is prepared by the Applicant. The assessment will determine whether the Project alone or in-combination could adversely affect the integrity of the European site in view of its conservation objectives. The Competent Authority (CA) will then draw its own conclusions based on this Report to Inform Appropriate Assessment (RIAA).
Impact	An impact is a change resulting from an activity associated with the Project, defined in terms of magnitude.
Mitigation Hierarchy	A systematic approach to guide decision-making and prioritise mitigation design. The hierarchy comprises four stages in order of preference and effectiveness: avoid, prevent, reduce and offset.
Monitoring	<p>Measures to ensure the systematic and ongoing collection, analysis and evaluation of data related to the implementation and performance of a development. Monitoring can be undertaken to monitor conditions in the future to verify any environmental effects identified by the EIA, the effectiveness of mitigation or enhancement measures or ensure remedial action are taken should adverse effects above a set threshold occur.</p> <p>All monitoring measures adopted by the Project are provided in the Commitment Register.</p>
Offshore Development Area	The area in which all offshore infrastructure associated with the Project will be located, including any temporary works area during construction, which extends seaward of Mean High Water Springs.
Offshore Export Cable Corridor (ECC)	The area within which the offshore export cables will be located, extending from the DBD Array Area to Mean High Water Springs at the landfall.
The Applicant	SSE Renewables and Equinor acting through Doggerbank Offshore Wind Farm Project 4 Projco Limited.
The Project	Dogger Bank D (DBD) Offshore Wind Farm Project
Wind Turbines	Power generating devices located within the DBD Array Area that convert kinetic energy from wind into electricity.

# 1 Introduction

## 1.1 Background

1. As part of its third licensing round in 2008, The Crown Estate identified the Dogger Bank Zone, located between 125km and 290km off the east coast of Yorkshire, as one of the nine offshore wind farm (OWF) development zones in the UK. Following the 2008 licensing round, four project areas were identified within the zone to take to development consent, namely Creyke Beck A, Creyke Beck B, Teesside A, and Teesside B. In 2015, development consent was granted for all four project areas.
2. In 2017, the four project areas were restructured under new ownership arrangements. Creyke Beck A, Creyke Beck B, and Teesside A were renamed as Dogger Bank A (DBA), Dogger Bank B (DBB), and Dogger Bank C (DBC) respectively and would progress collectively as the Dogger Bank Wind Farm in three build-out phases developed by SSE Renewables, Equinor and Vårgrønn. Teesside B was renamed as Sofia Offshore Wind Farm and would be progressed separately from the Dogger Bank Wind Farm by RWE.
3. In 2021, an opportunity was identified by the Applicant to maximise the capacity of the third phase of the Dogger Bank Wind Farm, namely DBC, such that additional capacity of up to 1.5 Gigawatts (GW) of renewable energy could potentially be consented and constructed in the eastern part of the original DBC site. This new development phase is known as Dogger Bank D (DBD), and is an independent project being promoted by a separate commercial entity from the previous phases of the Dogger Bank Wind Farm.
4. The Dogger Bank D Offshore Wind Farm (hereafter referred to as the “Project”) is a proposed OWF located on a shallow sandbank known as the Dogger Bank in the North Sea. The DBD Array Area covers an area of approximately 262km<sup>2</sup> and is located approximately 210km off the north-east coast of England. The Project will have an overall capacity of over 100 Megawatts (MW) and therefore constitute a Nationally Significant Infrastructure Project (NSIP) under Section 15 (3) of the Planning Act 2008. Full details are presented in the Project Description (Volume 1, Chapter 4 Project Description).
5. SSE Renewables and Equinor acting through 'Dogger Bank Offshore Wind Farm Project 4 Projco Limited', hereafter referred to as ‘The Applicant’, is applying for a Development Consent Order (DCO) supported by a range of plans and documents, including an Environmental Statement (ES), which will set out the results of the Environmental Impact Assessment (EIA). The Applicant is also providing a Report to Inform Appropriate Assessment (RIAA) (**document reference 5.3**) alongside the Preliminary Environmental Impact Report (PEIR) for consultation. When submitted as final, these documents will set out the information necessary for the Competent Authority (CA), in this case the Department for Energy Security and Net Zero (DESNZ) Secretary of State (SoS), to fulfil its statutory duty to carry out an Appropriate Assessment (AA). The Habitats Regulations Assessment (HRA) process and AA will evaluate potential impacts of the Project on species and habitats protected under the Habitats Regulations (the collective term used for the Conservation of Habitats and Species Regulations 2017; and the Conservation of Offshore Marine Habitats and Species Regulations 2017). If the AA process concludes that Adverse Effect on Integrity (AEoI) on designated features of protected sites cannot be excluded, a derogation under the requirements of the Habitats Regulations is required. If no suitable alternatives are available, and if there are Imperative Reasons of Overriding Public Interest (IROPI), the Project may proceed, provided that appropriate compensation measures are secured to offset the adverse effects of the Project on a site’s protected features.
6. Full details of the **RIAA** are presented in **document reference 5.3**. This compensation roadmap has been prepared to present a roadmap for securing a compensation measure to support a potential HRA derogation case for potential Project impacts to the Dogger Bank Special Area of Conservation (Dogger Bank SAC).
7. In 2023 The Crown Estate confirmed that a Plan-Level Habitats Regulation Assessment (HRA) would be undertaken to assess the collective environmental impact at plan level of DBD together with six other offshore wind projects identified in either The Crown Estate’s Offshore Wind Leasing Round 3, or The Crown Estate’s 2021 Offshore Wind Extensions opportunity, collectively known as the Capacity Increases Programme (CIP).
8. The Crown Estate’s Capacity Increase Programme (CIP) Plan Level HRA was published in March 2025 (The Crown Estate, 2025). In relation to Dogger Bank SAC, the CIP Plan Level HRA concludes there is potential for AEoI. The CIP Plan Level HRA therefore goes on to present a derogation case and potentially suitable compensation measures. This document sets out the Applicant’s roadmap for securing and delivering compensation, taking into account the recommendations for compensation set out in the CIP HRA and the project level RIAA (which reflects the detailed project level assessment, which supersedes the high level plan level assessment).



## 1.2 Compensation Approach

9. The proposed Array Area and offshore export cable corridor (offshore ECC) constitute the Project's Offshore Development Area and have been developed through extensive site and route selection and evaluation work, taking into account environmental and engineering constraints. As the DBD Array Area was identified following the implementation of an optimised layout on Dogger Bank C, the leasing areas identified through the Crown Estate's third leasing round has governed the location of the site. The Array Area is therefore located within the Dogger Bank SAC, an area designated for the presence of extensive Annex I 'Sandbank slightly covered by seawater all of the time' feature. The Applicant has sought and will continue to seek, wherever possible, to minimise the extent to which additional infrastructure, such as foundations, scour protection, and cable protection are placed within the boundary of the Dogger Bank SAC. However, due to the location of the Array Area, it will not be possible to completely avoid development within the Dogger Bank SAC.
10. In alignment with National Policy Statement (NPS) EN-3 (paragraph 2.6.43), the Applicant has therefore assessed a worst-case scenario (WCS) level of development within the Dogger Bank SAC. Further details on specific impacts are covered in the **RIAA (document reference 5.3)**.
11. The total WCS for long-term habitat loss within the Dogger Bank SAC is a maximum of 2.25km<sup>2</sup>. This represents **0.018%** of the Dogger Bank SACs overall extent of 12,332km<sup>2</sup>. The **RIAA (document reference 5.3)** has not been able to rule out potential AEol for Annex I 'Sandbanks slightly covered by seawater all of the time' feature within the Dogger Bank SAC as a result of the 0.018% impact and therefore potential compensation measures to support an HRA derogation case are required and are outlined in this report.
12. The total WCS footprint for temporary physical disturbance / physical disturbance within the Dogger Bank SAC during construction is 20.33km<sup>2</sup> and during operational and maintenance phase is 2.98km<sup>2</sup>. The biotopes identified within the Offshore Development Area are characteristic of highly disturbed environments and typically have medium to high recoverability (and will therefore recover rapidly from disturbance as a result of construction impacts) (Last *et al.*, 2020). The tolerance, recoverability and sensitivity of the identified biotopes have been discussed further in PEIR Volume 1, Chapter 10 Benthic and Intertidal Ecology of the PEIR.
13. Given the low to medium sensitivity of biotopes within the SAC (in particular due to their high recoverability), the relatively small footprint and the episodic nature of the effect it is considered that temporary physical disturbance for the Project alone would not significantly affect:
  - The extent of the sandbank feature in terms of its sedimentary composition or biological assemblages;
  - The physical structure and function in terms of finer scale topography and sediment composition and distribution;
  - The biological structure and function in terms of the key and influential species and characteristic communities present; and
  - The function of the feature within the site.
14. Therefore, the **RIAA (document reference 5.3)** concludes there is no potential for an AEol of the Dogger Bank SAC in relation to temporary physical disturbance of the seabed from the Project alone, or in combination with other plans or projects during any project phases. As such, there is no compensation requirement in relation to this pressure.
15. Department for Environment, Food and Rural Affairs (Defra) guidance on HRA implementation states that all necessary compensation measures should be taken to ensure that the overall coherence of the Marine Protected Area (MPA) network is secured. It asserts that developers with unavoidable impacts should consider the derogation route or the requirement to satisfy the appropriate authority that there is no adverse effect. This should be done early in the consenting or authorising process to ensure that developers can deliver compensatory measures within reasonable timeframes (Defra, 2021).
16. On the basis of the conclusions of the Project's RIAA, precedent demonstrated by the conclusions of the Crown Estate's Round 4 Plan Level RIAA and conclusions of The Crown Estate's CIP HRA (The Crown Estate, 2025), the Applicant intends to provide a derogation case to support the final DCO application (on a with and/or without prejudice basis, depending on the conclusions of the final RIAA). The derogation case relates to the following features and designated sites:
  - Dogger Bank SAC - Sandbanks (habitat loss);
  - Flamborough and Filey Coast SPA – Kittiwake (collision risk during the O&M phase);
  - Flamborough and Filey Coast SPA – Guillemot and Razorbill (displacement during the O&M phase) (on a without prejudice basis).
17. To support this derogation case, from the outset of the Project, the Applicant has:
  - Ensured the mitigation hierarchy is observed at the EIA and AA stages;
  - Continued to ensure that all relevant alternative solutions (that meet the Project's objectives) have been considered and evaluated as the project has progressed to ensure should any alternative solution that avoids the AEol outcome be identified it has been pursued wherever feasible; and

- Progressed options for compensatory measures in discussion with stakeholders via the Evidence Plan Process (EPP) and additional meetings, with the aim of progressing compensation measures to a suitable mature stage prior to submission of the DCO application. Work undertaken to date on compensation measures and proposed next steps are set out in the following road map documents:
    - Benthic HRA Derogation Compensation - Roadmap & Evidence);
    - Kittiwake Compensation - Roadmap & Evidence; and
    - Guillemot and Razorbill Compensation - Roadmap & Evidence (without prejudice).
18. Alongside the final DCO application the Applicant will produce a derogation case document. Further details are provided in the **RIAA (document reference 5.3)**.
19. As part of the process of developing the HRA derogation case, the Applicant has developed a 'shortlist' of possible compensation options based on the existing Project proposal, recent DCO decisions which have been consented on the basis of protected sites derogation and compensation, and stakeholder feedback received to date.

### 1.3 Purpose of this Document

20. This document introduces the compensation measures considered by the Applicant to support the HRA derogation case in relation to predicted Project impacts on the Dogger Bank SAC.
21. To demonstrate the evolution of the Applicant's benthic compensation measures being progressed at the PEIR stage, this roadmap sets out the longlist of options initially identified by the Applicant, the rationale for exclusion or progression for those measures, and the preferred measure.
22. A longlisting and shortlisting options assessment process undertaken by the Applicant has concluded that a single option would provide the most ecologically effective outcome for derogation, offsetting potential benthic impacts on Dogger Bank SAC:
- Strategic designation of new MPAs and / or extending existing MPAs
23. Further details and justifications on the longlisting and shortlisting process are presented in **Section 3.4**.
24. The purpose of this compensation roadmap is to present progress on proposed compensation measures, and gather stakeholder feedback on work undertaken to date on the Project's compensation proposals and to identify any additional factors requiring consideration ahead of a formal DCO application submission in 2026.

### 1.4 Consultation

25. Stakeholder engagement with Natural England, Joint Nature Conservation Committee (JNCC) and the Marine Management Organisation (MMO) has been established through the EPP and has continued as the Applicant has sought to identify Project suitable compensation measures. Engagement has also taken place with additional key stakeholders including The Crown Estate, Defra, PINS and DESNZ.
26. To date, the Applicant has participated in key consultation events with stakeholders on the dates listed in **Table 1-1**. Additional detail on consultation forums and communications are presented in **Table 1-2**. Further details on consultation are provided in the Environment Statement **Volume 1, Chapter 7 Consultation**.

*Table 1-1 Summary of Stakeholder Engagement*

Date	Meeting Forum & Focus	Attendees
16 October 2023	Expert Topic Group (ETG) 5 (meeting 1) - Seabed Compensation (HRA and Measure of Equivalent Environmental Benefit (MEEB))	Natural England, MMO & JNCC
July 2023 - present	Monthly Project meetings with Natural England (attended regularly to discuss compensation matters in addition to wider development topics)	Natural England
July 2023 - present	Monthly meetings to discuss Project progress including matters relating to derogation and compensation.	MMO
January 2024 - present	Regular Project meetings have been held to discuss the Capacity Increase Programme (CIP) Plan-Level HRA and associated works.	The Crown Estate
15 August 2023	Meeting to discuss Project progress, matters relating to derogation and compensation and wider development topics.	JNCC
15 February 2024 8 March 2024 10 May 2024 29 August 2024 6 February 2025	Meetings to discuss Project progress, matters related to compensation and receive feedback from Defra.	Defra (strategic compensation team)
2 May 2024	ETG 5 Meeting 2 - Seabed Compensation (HRA and MEEB)	Natural England, MMO & JNCC

## BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Date	Meeting Forum & Focus	Attendees
13 November 2024	Project progress and matters relating to derogation and compensation discussed.	PINS

27. In addition to meetings, technical notes have been issued to stakeholders via the EPP process. In advance of, or in response to actions raised via ETG 5, documents issued are as follows:
  - HRA Derogation Long List: Technical Note, Dated 02 October 2023 (Document no. LF000016-CST-DOG-TCN-0002), issued to ETG 5 members on 03 October 2023; and
  - ETG 5 Technical Note: Further Information on Sediment Volume Restoration. Dated 31 January 2024 (Document no. LF000016-CST-DOG-TCN-0005), issued to ETG 5 members on 5 February 2024.
28. In October 2024, Natural England informed the Applicant that they would not be able to engage with ETG 5 until after the Project's PEIR is submitted, and the CIP Plan Level HRA (The Crown Estate, 2025) has concluded, citing primarily resourcing constraints. Following this withdrawal by Natural England from the ETG 5 process, the MMO and JNCC confirmed that they did not feel it was appropriate to continue with the ETG 5 in their absence.
29. A written update on benthic compensation was shared with Natural England on 24 March 2025, titled Benthic Compensation and Measures of Equivalent Environmental Benefit (MEEB) Evidence Update (Document no. PC6250-ERM-XX-OF-TN-EV-0001). Feedback has now been received by the Applicant following Natural England's review (DAS/509197, 24 April 2025).
30. The Applicant will endeavour to re-engage with ETG 5 now the CIP Plan Level HRA (The Crown Estate, 2025) has been published, in order to gain more updated and detailed advice on designation of new MPAs and / or extending existing MPAs as a strategic compensation measure for the Project.
31. Further commitment and information on the ability of OWF developers to rely on the delivery of the Marine Recovery Fund (MRF) was provided by the publication of DESNZ's 'Strategic Compensation Measures for Offshore Wind Activities: Marine Recovery Fund' Interim Guidance and in Defra's Written Ministerial Statement (WMS) (Defra, 2025) on 29 January 2025. The purpose of the DESNZ guidance is to set out how projects can refer to strategic compensation measures in the Offshore Wind Environmental Improvement Package (OWEIP) Library of Strategic Compensation Measures (LoSCM). This guidance sets out that the MRF will encompass compensation required under the Habitats Regulations and MEEB under the Marine and Coastal Access Act 2009. The WMS

commits Defra to designating new MPAs and/or extending existing MPAs to deliver sufficient strategic compensation for likely environmental effects of offshore wind developments.

32. The statement also clarifies which TCE leasing rounds are eligible for this measure. The WMS also asserts that the size of strategic compensation to be delivered by Defra will be sufficient to account for essential maintenance activities required during the operational phase for eligible projects, extending the scope of this measure beyond development impacts alone, should this be required. The guidance goes on to state that where it refers to the term 'compensation' or 'compensation measure', this should be understood to mean both HRA compensation and MEEB.
33. Once operational, the proposed MRF will provide a framework to allow developers to contribute towards strategic compensation measures in a coordinated way through contributions to the fund. The MRF will also provide a mechanism for the delivery of strategic compensation measures, with appropriate input from regulators and the Statutory Nature Conservation Bodies (SNCBs). This coordinated approach should enable ecological benefit to the national site networks to be maximised and delivered in a timely manner.
34. The recent publication of Defra's WMS on strategic compensation (Defra, 2025) and the DESNZ interim guidance on strategic compensation with reference to the MRF (DESNZ, 2025) confirms that strategic delivery of new MPAs and/or extension of existing MPAs could deliver MEEB, to offset unavoidable impacts to the benthic features of MCZs.
35. The Applicant will take Natural England's advice to date and Defra's WMS and Interim Guidance as the most suitable advice for use in considering the MPA designation / extension as a strategic compensation measure for the Project.
36. Relevant consultee feedback on the longlist of benthic compensation measures considered for impacts to Dogger Bank SAC, as well as the Applicant's response to these are presented in **Table 1-2**.



## BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Table 1-2 Consultee Responses in Relation to Dogger Bank SAC Compensation

Consultee	Comment	Applicant Response
<b>Requirement for an HRA Derogation case</b>		
Statement made by JNCC at ETG 5 Meeting 1 16 October 2023	<b>Project requirement for HRA Derogation Case</b>  The Round 4 Plan Level HRA has concluded The Crown Estate can't rule out AEoI, and JNCC's advice is in agreement with the Round 4 Plan Level HRA. JNCC noted any development project being considered within Dogger Bank SAC needs to consider compensation.	The Applicant acknowledges this response and has developed measures for compensating potential adverse effects on the Dogger Bank SAC in relation to habitat loss.
Statement made by Natural England at ETG 5 Meeting 1 16 October 2023	<b>Required Level of Detail for Measure Proposal</b>  The Applicant was directed to review Natural England's checklist on the expectation of derogation information and cross-check with other projects that have gone through examination to check level of detail required by SoS.	The Applicant has reviewed Natural England's checklist and presents a review of it against each of the proposed shortlisted measures in <b>Section 4</b> .
<b>Engagement on Compensation Measures &amp; Guidance</b>		
Natural England Discretionary Advice Service (DAS) Advice response to ETG 5 Meeting 1 on 16 October 2023  DAS/426551 31 October 2023	<b>Applicable Guidance</b>  "...we direct the Applicant to Defra's compensation guidance which is helpful when considering the ecological merits of a derogation case ( <a href="#">Best practice guidance for developing compensatory measures in relation to Marine Protected Areas</a> ). It would benefit the Applicant to review options against the 'Compensation Hierarchy' and assess if the option meets Defra's generic principles of compensation requirements (paragraph 41).	The Applicant has reviewed the Defra guidance signposted by Natural England. This has informed the selection of compensatory measures for shortlisting based upon the hierarchy approach (see <b>Section 3.1</b> ).
Guidance provided by Natural England at ETG 5 Meeting 1 16 October 2023	<b>General Advice on the Consideration of the COWSC LoSCM</b>  In line with recommendations that the Applicant keep all options with ecological merit open, Natural England advised the Applicant to review the Collaboration on Offshore Wind Strategic Compensation (COWSC) LoSCM with a particular focus on designation of new MPAs and / or extending existing MPAs.	The Applicant has reviewed the COWSC LoSCM in response to this guidance; the designation of new MPAs and / or extending existing MPA is the only measure within the LoSCM which is relevant to benthic compensation. The measure of extension of a designated site discussed in the LoSCM has informed the shortlisting process outlined in this roadmap. Please see <b>Table 3-1</b> for further information.
<b>Project Eligibility for Strategic Compensation Measures</b>		
Statement made by Defra during email exchange with the Applicant  Received 14 November 2024        Letter issued by Defra to SSE Renewables Issued 13 February 2025	<b>Clarification on Status of Project for Strategic Compensation</b>  In relation to a question posed to Defra on the Project qualifying for strategic compensation measures which were in development at the time of the question.  A Defra representative responded:  <i>"I can confirm that Dogger Bank D will be within scope as a project which was awarded rights in TCE Round 3 or the TCE 2017 Extensions Round."</i>  This was further confirmed in writing via letter issued to SSE Renewables (date 13 February 2025), stating:  <i>"[DBD] is categorised as a Round 3 project and is therefore listed as eligible in the Written Ministerial Statement published by Defra (Defra, 2025)."</i>	The Applicant welcomes inclusion in the list of TCE leasing rounds that are eligible for strategic compensation measures as outlined in Defra's WMS (Defra, 2025).

BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Consultee	Comment	Applicant Response
Long List Measure: Removal of Pressures		
Statement made by Natural England at ETG 5 Meeting 1 16 October 2023	<p><b>Removal of Pressures: Oil and Gas Structures</b></p> <p>Dogger Bank SAC’s supplementary advice on conservation objectives (SACO) (from JNCC) states that historical infrastructure is hindering the achievement of conservation objectives for the Annex I sandbank feature. Thus, the Applicant proposed the removal of seabed structures as a compensation measure.</p> <p>By way of response, Natural England stated a ‘removal of structures’ measure has ecological merit but may not be feasible or deliverable. Natural England further explained a ‘removal of pressures’ measure would have greater ecological merit and that a ‘removal of pressures’ measure should not exclusively focus on pressures associated with the presence of infrastructure, but should also consider those associated with fisheries, aggregates, or other areas of concern having a negative impact on conservation objectives of the site.</p> <p>It was suggested that the Applicant consider a conversation with Offshore Petroleum Regulator for Environment and Decommissioning (OPRED), The Crown Estate and / or other developers regarding the removal of oil and gas seabed infrastructure.</p>	<p>In July 2023, OPRED published a paper (OPRED, 2023) highlighting the concerns over the legal implications and obligations of oil and gas asset owners regarding decommissioning of oil and gas structures. The paper also raised concerns about offshore wind operators taking on the liability for oil and gas infrastructure in perpetuity and the timescales around decommissioning at OWF consents. In view of these objections, it was concluded that the removal of the disused oil and gas infrastructure was not a feasible measure available to the Project.</p> <p>The Applicant has continued to engage with stakeholders regarding the removal of pressures beyond the removal of infrastructure within the Dogger Bank SAC. The Applicant’s position on this is presented in <b>Table 3-1</b>.</p>
Statement made by Natural England at ETG 5 Meeting 2 2 May 2024	<p><b>Removal of Pressures: Fishing</b></p> <p>Natural England clarified that, although they felt removal of fishing pressures has ecological merit, management of fishing activity falls within the remit of IFCAs (for inshore waters) and the MMO (for offshore territorial waters) and, as such, would be precluded based on additionality. The Applicant was informed that the SNCBs would be open to discussions regarding increasing the level of protection afforded to benthic habitats from fishing pressures, but experience from discussions during the Round 4 Plan Level HRA indicates that securing this measure would be problematic, and it is unlikely that this measure could be achieved.</p>	<p>The Applicant notes this response. The Applicant’s position on this measure is presented in <b>Table 3-1</b>.</p>
Natural England DAS Advice response to ETG 5 Meeting 2 on 2 May 2024 DAS/475170 20 May 2024	<p><b>Removal of Pressures: Telecoms Structures</b></p> <p>Following a question by the Applicant at ETG 5 Meeting 2 on 2 May 2024 on whether the removal of defunct telecoms cables would be a suitable compensation measure, Natural England responded that they do not support the removal of buried and / or surface-laid telecom cables within Dogger Bank SAC as a benthic compensation measure because the cables are generally too small to hinder the conservation objectives of the site.</p>	<p>The Applicant contacted the organisations responsible for telecoms cables within Dogger Bank SAC and subsequently held a meeting with BT on 1 July 2024 to discuss potential for removal of their disused telecommunications cables.</p> <p>The Applicant notes this response and provides an updated position on this measure in <b>Table 3-1</b>.</p>

## BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Consultee	Comment	Applicant Response
<p>Feedback from Aggregate Extraction Licence Holders</p> <p>August - September 2024</p>	<p><b>Removal of Pressures: Aggregate Extraction</b></p> <p>Individual aggregate extraction license holders were contacted on 21 and 22 August 2024, and 2 September 2024 to discuss the viability of managing aggregates licences as a compensatory measure. The British Marine Aggregate Producers Association (BMAPA) were also contacted on 21 August 2024 for its view on this measure. Aggregate licence holders contacted are as follows:</p> <ul style="list-style-type: none"> <li>• Britannia Aggregates Ltd</li> <li>• Cemex UK Marine Ltd</li> <li>• DEME Building Materials Ltd</li> <li>• Tarmac Marine Ltd</li> <li>• Volker Dredging Ltd (acting on behalf of Van Oord for UK operations)</li> <li>• Westminster Gravels Ltd</li> </ul> <p>The stakeholder contacted were not supportive of this measure due to a variety of reasons. Resistance to this option from the aggregate industry stakeholders related to:</p> <ul style="list-style-type: none"> <li>• The aggregates industry maintaining that aggregate extraction operations do not contribute to the unfavourable condition of Annex I sandbank features.</li> <li>• Concerns over additionality as the management of extraction activities is already covered by the MMO through the issuing of marine licences.</li> </ul> <p>It was highlighted that the management of aggregate extraction activities (and associated impacts) should be delivered centrally, not by other industries.</p>	<p>The Applicant used the information provided by BMAPA and aggregate licence holders to inform its compensation shortlisting process. The Applicant's updated position on this measure is presented in <b>Table 3-1</b>.</p>
<p>MMO meeting</p> <p>16 October 2024</p>	<p><b>Removal of Pressures: Aggregate Extraction</b></p> <p>Discussions between the Applicant and the MMO took place during a bilateral meeting. The Applicant sought the MMOs advice on the principles of the OWF industry buying out and limiting aggregate extraction from sites as a form of benthic compensation. MMO pointed the Applicant toward the Marine Spatial Plans and highlighted the MMO's mandate for sustainable development for all marine users. The MMO said preventing other industries would be in contradiction to MMO Marine Spatial Plans and could result in shifting the effect of one seabed user to another, as other aggregate operators could potentially increase production over other sites to balance the reduced production elsewhere.</p>	<p>The Applicant used the information provided by the MMO to inform its compensation shortlisting process (see <b>Section 3.4</b>). The Applicant's updated position on this measure is presented in <b>Table 3-1</b>.</p>
<p>Natural England written response to 'Dogger Bank D Benthic Compensation and Measures of Equivalent Environmental Benefit' report</p> <p>DAS/509197</p> <p>24 April 2025</p>	<p><b>Removal of Pressures</b></p> <p>Regarding removal of pressures, Natural England stated the following in a letter to the Applicant:</p> <p>"Natural England recognise the extent to which the Project have investigated the feasibility of this option and engaged with the aggregate industry. We understand that a variety of obstacles, notably objection from the aggregate industry, precludes this option being advanced by the Project and we support this decision based on the evidence provided."</p>	<p>The Applicant welcomes this feedback from Natural England and has drawn conclusions in alignment with Natural England regarding the viability of removal of aggregates pressures.</p>

## BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Consultee	Comment	Applicant Response
<b>Long list Measure: Sediment Volume Restoration</b>		
<p>Natural England DAS Advice response to ETG 5 Meeting 1 on 16 October 2023</p> <p>DAS/426551</p> <p>31 October 2023</p>	<p><b>Sediment Volume Restoration</b></p> <p>There is currently no evidence to demonstrate that unexploded ordnance (UXO) craters will not naturally restore within the site, that the impacts are sufficiently large to offset the scale of lasting habitat change / loss created by the Project and that the structure and function of the sandbank is sufficiently hindered to warrant remediation actions. If remediation is required, the onus will be on developer to undertake this and therefore can't be considered as compensation.</p> <p>As highlighted, the source of sediment from outside of the site to within will require detailed assessment in its own right. And it is noted for other sandbank SACs that this type of intervention has limited benefit due to natural processes driving location, shape and structure of any sandbanks.</p>	<p>The Applicant has provided additional detail regarding the ecological merit of this measure; a Technical Note detailing further information on sediment volume restoration was prepared by the Applicant and distributed to ETG members on 31 January 2024. Feedback from Natural England was received via DAS (DAS/426551 - see below).</p>
<p>Natural England DAS Advice response to ETG 5 Technical Note: Further Information on Sediment Volume Restoration</p> <p>DAS/426551</p> <p>8 March 2024</p>	<p><b>Sediment Volume Restoration</b></p> <p>Natural England agree to further discussion on the applicability of the measure as part of a package of compensation measures on the longlist.</p> <p>“...further understanding is needed of areas of the site where topography has been impacted to demonstrate if the measure could be viable and to what extent. Monitoring reports for recent UXO campaigns conducted within the site indicate that UXO craters have successfully naturally infilled, therefore the focus might be better targeted at “lasting impacts from other anthropogenic activities that are considered decommissioned”. We note the Project suggests that sediment excavated during construction could be used to infill impacted areas. Consideration would therefore need to be given to the volume and type of sediment likely to be excavated and whether this would be sufficient to restore identified areas.”</p>	<p>The Applicant accepts the feedback provided by Natural England. Further consideration has been given to this measure as outlined in <b>Table 3-1</b>.</p>
<p>Statement made by Natural England at ETG 5 Meeting 2</p> <p>2 May 2024</p>	<p><b>Clarification on Sediment Volume Restoration</b></p> <p>SNCBs noted that, based on the clarification note (see above), the measure may have merit; however, cautioned that there are likely to be issues identifying areas where it could be delivered.</p> <p>Natural England stated that there would need to be surveys undertaken to understand if there are enough craters in the Dogger Bank SAC that require infilling as some have been proven to be infilling naturally.</p> <p>Natural England also has concerns over whether sufficient material would be excavated from Project activities to infill any craters identified, as the sediment cannot be outwardly sourced.</p>	<p>The Applicant has conducted a review of historical construction activities within the Dogger Bank SAC. The outcome concurred with Natural England's position that there are likely insufficient “targets” for this measure to address impacts. This is further discussed in <b>Table 3-1</b>.</p>

## BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Consultee	Comment	Applicant Response
<p>Natural England DAS Advice response to ETG 5 Meeting 2 on 2 May 2024</p> <p>DAS/475170</p> <p>20 May 2024</p>	<p><b>Sediment Volume Restoration</b></p> <p>“Our main concern with the sediment restoration measure is the sourcing of sediment. All material disturbed through sandwave levelling should be re-deposited to aid recovery of the sandbank as standard mitigation, so this measure would not achieve additionality. Similarly, sediment from drill arisings will need to be deposited in similar sediment areas so this could not reasonably be used for the infilling of craters. It is also hard to determine the efficacy of this measure as compensation, without knowing the number and size of expected craters/voids within the site. Evidence to date suggests that UXO craters in particular are infilling naturally. For this to be considered as part of a wider compensatory measure, Natural England would need considerably more detail on the methodology and extent of expected achievable restoration.”</p>	<p>The Applicant investigated the technical deliverability of sediment restoration within Dogger Bank SAC, but concluded that it was not a feasible option for reliably delivering the necessary quantum of compensation likely to be required by the Project. As such, this option was not progressed.</p> <p>The Applicant has amended the description of the ‘removal of structures’ measure to ‘removal of pressures’ and considered supporting measures which would remove aggregate extraction and fishing pressure from SACs. The Applicant’s position on this measure is presented in <b>Table 3-1</b>.</p>
Longlist Measure: Designation of new MPAs and / or extending existing MPAs		
<p>Statement made by Natural England at ETG 5 Meeting 1</p> <p>16 October 2023</p> <p>&amp;</p> <p>Statement made by JNCC at ETG 5 Meeting 1</p> <p>16 October 2023</p>	<p><b>Designation of New MPAs and / or Extending Existing MPAs</b></p> <p>Natural England noted that the designation and / or extension of MPAs has ecological merit but there is currently no existing mechanism for achieving these approaches. Natural England further explained extension of the Dogger Bank SAC would be challenging but there is sufficient understanding and support for extending other SACs with sandbank features, which would also provide ecological merit.</p>	<p>The Applicant acknowledges the statements made by Natural England and JNCC and has prioritised strategic delivery of this measure for benthic compensation (<b>Section 4.2</b>). The Applicant notes that designation of new MPAs and / or extending existing MPAs is out of the Applicant’s control and has engaged with the relevant government and industry bodies as strategic compensation measures are being delivered.</p> <p>The Applicant has engaged further with Defra regarding the progression of this measure as part of a strategic scheme. Viability of this option for the Project has been further confirmed by the WMS (Defra, 2025) and the Interim Guidance note on strategic compensation and the MRF by DESNZ (DESNZ, 2025). The Applicant is satisfied that progress on the strategic delivery mechanism has been made since this the ETG 5 meeting 1 in 2023, and that there is now an agreed mechanism to deliver a compensation measure that SNCBs agree has ecological merit. The Applicant’s updated position on this measure is presented in <b>Table 3-1</b>.</p>
<p>Statement made by Natural England at ETG 5 Meeting 2</p> <p>02 May 2024</p>	<p><b>Project Alone or Collaborative Delivery Designation of New MPAs and / or Extending Existing MPAs</b></p> <p>Project-alone extension of an SAC is not supported by Defra. Potential options exist in collaboration with another project, but it has to have ecosystem functionality. This makes it much larger than the compensation required by any single project, along with a large amount of Defra / SNCB administration burden on taking forward one site. There are also concerns from marine stakeholders regarding seabed availability. Therefore, this is preferred as management on a strategic compensation level. This has been the advice to Outer Dowsing [Offshore Wind].</p>	<p>This measure is being progressed as part of a strategic compensation strategy by Defra. This will reduce the spatial footprint impact caused by multiple OWFs with unavoidable impacts on benthic features (including Annex I sandbank features) within the North Sea sandbank network (see <b>Section 4.2</b>).</p>
<p>DESNZ Call for Information on Quantities of Benthic Strategic Compensation</p> <p>Response issued 7 June 2024.</p>	<p><b>New MPAs and / or Extending Existing MPAs Quantum</b></p> <p>The Applicant, via the Offshore Wind Industry Council (OWIC) Developer Derogation Group, was asked to respond to the DESNZ call for information on quantities of benthic strategic compensation. A response was submitted to DESNZ on 7 June 2024, providing details of the anticipated impacts to the Dogger Bank SAC and Holderness Inshore and Offshore MCZs, based on project parameters current at the time of consultation.</p>	<p>The Applicant awaits further details from DESNZ and Defra on designation of new MPAs and / or extension of existing MPAs as compensation for benthic impacts arising as a result of offshore wind projects. The Applicant will continue to update DESNZ and Defra (as the MRF Operator (MRFO)) on predicted Project impacts as the design envelope continues to be refined.</p>



BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Consultee	Comment	Applicant Response
<p>Natural England, letter response to ETG 5 Meeting 2</p> <p>20 May 2024</p>	<p><b>Ecological Merit and Requirement to Observe the Mitigation Hierarchy Prior To Committing to Compensation</b></p> <p>Should plan- or project-level compensation be required for this Project, then strategic compensation and designation or extension of an MPA is likely to provide the most ecologically effective outcome.</p> <p>However, before this is made available to a given project, due process needs to be followed, with the mitigation hierarchy applied and, if adverse effects are identified and a Habitat Regulations derogation contemplated, no alternative solutions must clearly be demonstrated.</p>	<p>The Applicant has prioritised strategic delivery of this measure for benthic compensation (see <b>Section 4.2</b>). Note that this is the last time that Natural England engaged with the Applicant on benthic compensation matters (see above section on engagement during the EPP), therefore it has been assumed that this is still Natural England’s position and the Applicant has developed measures accordingly.</p> <p>A systematic approach to guide decision-making and prioritise mitigation design has been taken by the Applicant by applying the mitigation hierarchy. The hierarchy comprises four stages in order of preference and effectiveness: avoid, prevent, reduce and offset. Further details on the mitigation hierarchy, embedded mitigation, and additional mitigation measures are provided in <b>Volume 1 Chapter 10 Benthic and Intertidal Ecology, Volume 1 Chapter 4 Site Selection and Assessment of Alternatives</b> and the <b>RIAA (document reference 5.3)</b>.</p> <p>Full details of the Habitats Regulations process are not covered within this document as it is intended as a summary of the potential measures should a habitats regulations derogation case be required.</p>
<p>Record of meeting with Defra</p> <p>06 February 2025</p>	<p>Four mechanisms for designation are currently being considered: new MPAs extension to existing MPAs, adding features into existing MPAs and overlaying designation types. The MMO, Natural England, Cefas and association of IFCAs are responsible for identifying potential MPAs. Defra informed the Applicant that it is currently too early to advise on the location or number of MPAs.</p> <p>It was also noted that new or extended sites may not be co-located with impacts, and MPAs may take the form of MCZs or SACs, or a combination of the two. The overall decision on designation type and location will be a ministerial decision. A very high-level programme was provided:</p> <ol style="list-style-type: none"><li>1. Long list of potential locations by spring 2025 - taking stakeholder views into account on ecological, social and economic factors.</li><li>2. Defra will then look at how they down select and determine which sites are progressed for public consultation.</li><li>3. Public consultation is currently planned for 2026.</li><li>4. Following consultation, based on experience, it is typical for designation to take up to three years.</li></ol> <p>Overall, it is too early to advise on the likelihood of Dogger Bank SAC being extended to the north and it should be assumed that this location will be under consideration.</p> <p>Defra’s MRF consultation will be available in Spring / Summer 2025.</p>	<p>The Applicant acknowledges Defra’s response and has continued to pursue site extension or new site designation as a strategic compensation measure for the long-term habitat loss of Annex I sandbank features in the Dogger Bank SAC.</p> <p>To support the delivery of site extension of the Dogger Bank SAC, should Defra deem the site viable for an extension, the Applicant is committed to carrying out benthic surveys along the offshore ECC to the north of the Dogger Bank SAC.</p> <p>Until further details are available, the Applicant will assume all potentially suitable areas for MPA designation, including sandbanks where evidence is available, will be under consideration for designation. The Applicant welcomed clarity on the indicative timelines from Defra and acknowledge that the process of MPA designation and / or extension is beyond the Applicant’s control. The Applicant will continue to engage with Defra on this topic.</p> <p>In April 2025, Defra launched its consultation for the establishment of the MRF. The Applicant responded to Defra’s consultation for the establishment of the MRF on 12 May 2025.</p>
Longlist Measure: Resolution of Data Gaps		
<p>Statement made by Natural England at ETG 5 Meeting 1</p> <p>16 October 2023</p>	<p><b>Support For Resolution of Data Gaps as A Compensation Measure</b></p> <p>The Applicant identified various instances within the Dogger Bank SAC SACO where data gaps were cited for low confidence in achieving stated conservation objectives.</p> <p>In response, Natural England stated this measure may contribute a small part of a compensatory package but cannot be used as a primary option.</p>	<p>The Applicant notes this response. The Applicant’s updated position on this measure is presented in <b>Table 3-1</b>.</p>

## BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Consultee	Comment	Applicant Response
<p>Natural England, letter response to ETG 5 Meeting 2</p> <p>Dated 20 May 2024</p>	<p><b>Clarification On Support for Resolution of Data Gaps as A Compensation Measure</b></p> <p>Natural England noted that this measure would only be accepted if mechanisms were put in place to ensure that the data produced were applied to secure specific compensation. If this was not achieved, the measure would instead be considered part of monitoring and would not contribute to addressing any potential compensatory requirements.</p>	<p>The measure was proposed to provide the SNCBs with data which would be beneficial in site assessment thereby increasing confidence in setting objectives and predictions of likely impacts. As such, it is not considered that the Project's proposal would meet the criteria stated in Natural England's latest advice. Further details on this measure can be found in <b>Section 3.4.2</b>.</p>
<b>Longlist Measure: Enhancement of harbour porpoise <i>Phocoena phocoena</i> food supply</b>		
<p>Statement made by Natural England at ETG 5 Meeting 1 (JNCC and MMO in agreement)</p> <p>16 October 2023</p> <p>&amp;</p> <p>Response by MMO to statement made by Natural England at ETG 5 Meeting 1</p> <p>28 November 2023</p>	<p><b>Enhancement Of Harbour Porpoise Food Supply</b></p> <p>The Dogger Bank SAC SACO identifies that, as part of a sandbank's function, it provides nutritional resource to marine mammals, such as the designated harbour porpoise population of the spatially overlapping Southern North Sea SAC. The Applicant therefore proposed a measure to enhance food supply for this feature.</p> <p>In response, Natural England stated that there was ecological merit in the proposed measure but that this would be achieved as an indirect consequence of other measures to improve the condition of Annex I Sandbank features rather than a measure to directly enhance the impacted feature.</p> <p>MMO were in agreement that this measure does not directly apply to Annex I sandbank features so cannot be classed as enhancement.</p> <p>JNCC referred to Natural England for response.</p>	<p>The Applicant acknowledges the position of SNCBs on this compensation measure. Further details on this measure can be found in <b>Section 3.4.2</b>. The Applicant's updated position on this measure is presented in <b>Table 3-1</b>.</p>
<b>Longlist Measure: Habitat Creation</b>		
<p>Statements made by Natural England at ETG 5 Meeting 1 (MMO in agreement)</p> <p>16 October 2023</p> <p>&amp;</p> <p>Response by MMO to statement made by Natural England at ETG 5 Meeting 1</p> <p>28 November 2023</p>	<p><b>Habitat Creation</b></p> <p>Natural England informed the Applicant that the creation of alternate Annex I habitats is not compensation for the loss of Annex I sandbanks and therefore Natural England do not support this measure. Natural England further informed the Applicant that seagrass or other elements which could constitute an Annex I Sandbank habitat in certain circumstances could contribute to a package of strategic measures, but it could not be the primary measure, and within the original Defra consultation on the hierarchy of compensation, it is of a lower rank.</p> <p>Natural England consider that habitat restoration is not an appropriate measure to be considered as benthic compensation for impacts to Dogger Bank SAC by the Applicant. Natural England stated that they would theoretically support re-creation of subtidal seagrass bed habitats as a compensatory measure provided it was not the primary measure. Natural England would only support this measure if evidence could be supplied to provide confidence that such habitat creation measures could be delivered successfully within this SAC.</p> <p>The MMO are in agreement with Natural England that the ecological functions of Annex I habitats are not equivalent so cannot be mutually compensated.</p>	<p>The Applicant accepts that there is little potential for habitat creation to compensate for the same feature that is impacted in the same location (i.e. recreation of Annex I sandbank habitat within Dogger Bank SAC). However, in accordance with the Defra best practice guidance (Defra, 2021) for developing compensatory measures, the Applicant has considered whether there may be potential for the creation of other Annex I habitat features that would provide a comparable ecological function to sandbank habitats within the Dogger Bank SAC site or at a different location. Historical records indicate that a large area of native oyster <i>Ostrea edulis</i> was formerly present to the immediate south of Dogger Bank SAC, and there are various examples of successful oyster bed habitat creation across the UK. The Applicant requested clarification over whether SNCBs would welcome a case for restoration towards a more 'natural baseline' (i.e. preindustrial fishing). A proposal to conduct habitat restoration in the form of native oyster <i>Ostrea edulis</i> was presented to stakeholders at ETG 5 Meeting 1.</p> <p>There are no known examples of seagrass bed restoration/creation at depths similar to those within the Dogger Bank SAC. The Applicant will continue to engage with specialist organisations to consider whether appropriate evidence is available. However, if this is not available then it will be concluded that this measure is not a viable option available to the Project. Further details on this measure can be found in <b>Section 3.4.2</b>. The Applicant's updated position on this measure is presented in <b>Table 3-1</b>.</p>

BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Consultee	Comment	Applicant Response
Longlist Measure: Threat Reduction		
Statements made by Natural England at ETG 5 Meeting 1 16 October 2023	<p><b>Threat Reduction</b></p> <p>Various additional measures were identified which may benefit Dogger Bank SAC through reduction of ongoing pressures. Pressures were identified based on information included in the Dogger Bank SAC SACO and were targeted to reduce the impact of identified pressures on the Annex I sandbank feature. Identified pressures suitable for threat reduction included debris removal and associated awareness campaigns, management of ongoing physical and chemical processes and management of invasive non-native species (INNS).</p> <p>Natural England concluded that debris removal and awareness campaigns would not be acceptable and advised the Applicant that Natural England would be publishing a paper on Hornsea Three Project experience. Natural England also concluded that the INNS reduction measure may contribute a small part to a package of measures.</p> <p>On the management of physical and chemical processes, it was advised by Natural England this is more appropriate for coastal sites and, given the distance of the Project from shore, it is considered there is limited potential for this measure to effectively improve Annex I sandbank feature condition.</p>	The Applicant acknowledges the position of Natural England. Further details on how this measure has been considered can be found in <b>Section 3.4.2</b> . The Applicant’s updated position on this measure is presented in <b>Table 3-1</b> .

## 2 Dogger Bank Special Area of Conservation and Project Impact

### 2.1 Overview

37. Located in the Southern North Sea approximately 150km north-east of the Humber Estuary lies the Dogger Bank, the largest single expanse of shallow sublittoral sandbank in UK waters. This extensive sandbank was formed by glacial processes and subsequently submerged due to sea-level rise (JNCC, 2011). It spans depths of less than 20m below chart datum to depths exceeding 50m, particularly where it extends into Dutch and German waters. The Dogger Bank SAC covers 12,331km<sup>2</sup> and is part of a transboundary network with adjoining SACs in Dutch and German jurisdictions (JNCC, 2017).
38. The Dogger Bank SAC is located wholly beyond the 12 nautical mile (NM) limit, and therefore management advice is provided by the JNCC.
39. The site is designated under the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) which transposes EU Habitats Directive (92/43/EEC) into UK law for offshore areas. The site, which was originally designated under Article 4(4) of the EU Habitats Directive, is designated for the following Annex I habitat:
  - (1110) Sandbanks which are slightly covered by sea water all the time.
40. The Dogger Bank SAC is characterised by a variety of sediment types, ranging from fine sands with shell fragments on the sandbank crests to muddy sands at greater depths (Kröncke & Knust, 1995). Occasional patches of coarser sediments, including pebbles, host species such as the soft coral dead man's fingers *Alcyonium digitatum*, the bryozoan sea chervil *Alcyonidium diaphanum*, and fanworms worms Serpulidae (Diesing *et al.*, 2009). The dynamic environment of the bank, shaped by waves and currents, inhibits vegetation growth on its shallower parts but supports diverse benthic communities. Species inhabiting the sediments include segmented polychaete worms, amphipods, and small burrowing clams. On the surface, hermit crabs *Paguroidea*, flatfish *Pleuronectoidae*, starfish *Asteroidea*, and echinoderms like brittlestars *Ophiuroidea* are common (Wieking & Kröncke, 2001). Although the Dogger Bank sandbank is underlain by a muddy glacial sediment, the associated biota is dependent on the sand rather than the deposit for subsistence (Beerman *et al.*, 2023).
41. Historically, the main pressure on the Dogger Bank SAC has been bottom trawling by commercial fisheries although this activity has now been banned within the site boundaries. It is predicted by JNCC that ongoing activities which could put pressure on maintaining and restoring the condition of the SAC will be through installation and / or removal of infrastructure, namely (JNCC, 2022):

- OWFs;
- Cabling; and
- Oil and gas industry activities.

### 2.2 Conservation Objectives

42. The conservation objectives for the Dogger Bank SAC are to ensure that, subject to natural change, the integrity of the site is maintained. The following attributes of the Annex I sandbank feature must either be 'maintained' or 'restored' to favourable condition:
  - The extent and distribution of the qualifying habitat in the site.
  - The structure and function of the qualifying habitat in the site.
  - The supporting processes on which the qualifying habitat relies.
43. JNCC advises a 'restore' objective for the extent and distribution and the structure and function attributes of the Dogger Bank SAC Annex I sandbank feature, and a 'maintain' objective for the supporting processes of the feature (JNCC, 2022).
44. The condition of the Annex I sandbank feature has been classified as in an unfavourable condition meaning that the feature is declining in condition (JNCC, 2022).

### 2.3 Summary of Potential Impact

45. The Project's RIAA states that: "During operation and maintenance, given the restore objectives, there is potential for an AEoI of the Dogger Bank SAC for both Project alone and in-combination with other plans and projects for long term habitat loss. Subsequently, the Annex I sandbank habitat may not be maintained as favourable in the long term without the implementation of additional compensation measures."
46. The maximum area of seabed within the Dogger Bank SAC subject to long-term habitat loss from the Project alone will be 2.25km<sup>2</sup>, this equates to **0.018%** of the total Dogger Bank SAC area. The WCS suggests that the Annex I sandbank feature will be temporarily replaced by infrastructure foundations, scour protection and external cable protection where the target depth for cable burial cannot be achieved. External cable protection will be confirmed at the ES stage and will only be implemented in the worst case scenario, as cable burial is preferable. The requirement for cable protection will continue to be reviewed while the Project Design Envelope evolves as further technical information becomes available. For further details on the Project Design Envelope please refer to **Volume 1, Chapter 4 Project Description** and commitments in **Volume 2, Appendix 6.3 Commitments Register**.

## 3 Compensation Approach

### 3.1 Guidance

47. Defra (Defra, 2021) and Natural England (Natural England, 2021) provide specific guidance on the delivery of compensation. This guidance has been followed in developing the HRA process.

48. Defra’s compensation hierarchy (set out in the above noted guidance) is structured to reflect that it is not always possible to deliver compensatory measures on a like-for-like basis. As outlined in Defra’s best practice guidance (Defra, 2021), the underlying principle behind the compensation hierarchy is that, where possible, compensatory measures should benefit the same feature which is impacted by the development. The steps in the hierarchy are outlined below:

**Step 1:** Address same impact at same location.

**Step 2:** Same ecological function different location.

**Step 3:** Comparable ecological function same location.

**Step 4:** Comparable ecological function different location.

49. This hierarchy was considered when devising the longlist and shortlist of the potential compensation measures to prioritise those which deliver at the highest levels on the hierarchy.

50. Natural England’s checklist for compensatory measures (Natural England, 2021) ensures that compensation plans meet legal and ecological standards. The checklist is intended to cover aspects of compensatory measures that need to be described in detail when developers are submitting or updating applications where impacts on MPAs are anticipated. Whilst not exhaustive, it lists key areas where sufficient detail is needed to provide the DESNZ SoS with appropriate confidence that compensatory measures can be secured. This roadmap presents a checklist for each of the proposed shortlisted measures in **Section 5**.

### 3.2 Delivery Approach

51. The Applicant has considered three forms of delivery mechanism for compensatory measures: project alone, collaborative and strategic delivery. All mechanisms have been evaluated to ensure that the chosen measure progresses in the most effective way and maximises the ecological benefit while reducing consenting risk.

52. **Project Alone Measures:** These are project alone compensation options tailored to address the ecological impacts of the Project specifically. They focus on offsetting the effects of the Project and are aimed at offsetting project specific impacts.

53. **Collaborative Measures:** These involve delivering compensation alongside other developers, to implement compensation strategies that benefit a broader ecological area or species. They aim to address cumulative impacts across multiple projects or regions, often through shared funding or joint efforts.

54. **Strategic Measures:** These are long-term, large-scale initiatives aimed at improving overall ecological resilience at a regional or national level. They are led by other stakeholders, such as government and industry bodies. They focus on achieving broader conservation goals that wouldn’t be deliverable by a single project and are often planned and implemented over extended periods, potentially beyond the life of a single OWF project. The report presents a checklist for each of the proposed shortlisted measures in **Section 5**.

55. Details of the considered delivery mechanism for each of the long-listed measures have been included in **Table 3-1** Longlist of Measures to Deliver Benthic Compensation for

### 3.3 Strategic Compensation Delivery

56. A key challenge in delivering ecological compensation is ensuring that measures are secure and robust in the eyes of regulators and their advisors. To address this, Defra has been developing a library of ecologically robust strategic compensation measures in partnership with industry and SNCBs. The Applicant has been fully engaged with this consultation process through the OWIC Pathways 2 Growth (P2G) programme.

57. Defra’s (Defra, 2021) definition of strategic compensatory measures are those “that work across a wide area, joining up across projects and organisations to deliver an ecological benefit greater than the sum of its parts and/or measures that can only be delivered by Government (e.g., enhanced protection of MPAs).” The Applicant understands that Natural England regards strategic compensation to have ecological merit and understand that it could effectively offset impacts to species and habitats resulting from the development of multiple OWFs in the North Sea.

58. To alleviate pressures associated with delivering compensation, Defra’s OWEIP, a key part of the British Energy Security Strategy (BESS), was announced in 2022 (UK Government, 2022). This was designed to shorten OWF consent timelines while protecting the marine environment and ensuring that key environmental targets are met. As part of the OWEIP, a set of ecologically robust strategic compensation measures were agreed upon to speed up deployment and provide security for eligible developers who could be secure in the knowledge that particular measures had been centrally approved by DESNZ, SNCBs, devolved administrations and NGOs.



59. The OWEIP is being developed by the UK Government to help offshore wind project applicants address unavoidable impacts to MPAs at a strategic level, facilitated through one or more MRF into which applicants can choose to pay to discharge environmental compensation obligations.
60. The Energy Act 2023 provides the legislative basis for OWF developers to be able to adopt strategic compensation measures, provided they have exhausted all options to mitigate any impacts of development through the application of the mitigation hierarchy. The Applicant notes that secondary legislation will also be required to set up and operate the MRF. At the time of writing, the timeline of this secondary legislation is not yet available.
61. Further commitment and information on the ability of OWF developers to rely on the delivery of the MRF was provided in Interim Guidance by DESNZ (DESNZ, 2025) titled ‘Strategic Compensation Measures for Offshore Wind Activities: Marine Recovery Fund’, and in Defra’s WMS (Defra, 2025). The purpose of the DESNZ guidance is to set out how projects can refer to strategic compensation measures in the OWEIP LoSCM. This guidance sets out that the MRF will encompass compensation required under the Habitats Regulations and also of that required under the Marine and Coastal Access Act 2009. The DESNZ guidance was accompanied by the WMS from Defra (Defra, 2025) which commits Defra to designating new MPAs and/or extending existing MPAs to deliver sufficient strategic compensation for likely environmental effects of offshore wind developments. The statement also clarifies which projects are eligible for this measure and asserts that the size of strategic compensation to be delivered by Defra will be sufficient to account for essential maintenance activities required during the operational phase for eligible projects (including CIP Plan Level developments), extending the scope of this measure beyond development impacts alone.
62. Once operational, the proposed MRF will provide a framework to allow developers to contribute towards strategic compensation measures in a coordinated way through contributions to the fund and discharge their requirements to the Habitats Regulations. The MRF would provide a mechanism for the delivery of strategic compensation measures, with appropriate input from regulators and SNCBs. This coordinated approach should enable ecological benefit to the NSNs to be maximised and delivered in a timely manner.
63. Within the LoSCM, the designation and / or extension of MPAs is the given strategic measure to compensate for benthic impacts to designated features within the NSN. This measure will be strategically led by Defra in consultation with the JNCC and Natural England and it is therefore beyond the ability of the Applicant to deliver. Contribution to the strategic designation and / or extension of MPAs via the MRF is supported by The Crown Estate’s CIP Plan Level HRA (The Crown Estate, 2025) and is the Applicant’s preferred option.
64. In April 2025, Defra launched its consultation for the establishment of the MRF. The consultation sets out draft guidance on how the MRF is intended to operate including the

application process. The Applicant provided a response to this consultation on 12 May 2025. The consultation document stated that final guidance on all aspects of the MRF is expected to be published in Autumn 2025 alongside the Statutory Instrument, and developers will be able to make applications to the MRF once it is live in Autumn 2025. The Applicant is committed to further engagement with Defra and the SNCBs as the delivery of the strategic designation of new MPAs and / or extending existing MPAs progresses.

65. It is the Applicant’s position that to account for benthic impacts across the OWF projects that a strategic approach is preferable. This aligns with the BESS findings (UK Government, 2022) and information provided by Defra (2025) and DESNZ (2025) to date.

## 3.4 Developing and Refining Compensation Measures

### 3.4.1 Method

66. To demonstrate the evolution of the Applicant’s benthic compensation measures being progressed at the PEIR stage, this roadmap sets out the longlist of options initially identified by the Applicant, the rationale for exclusion or progression for those measures, and the preferred measure.
67. The longlist was developed based on the understanding of the current Project Design Envelope, the appreciation of HRA derogation matters in the UK at present and SNCB feedback. From this longlist, a favoured option has been identified by working through shortlist options that were perceived to have merit and be deliverable. During this process, the Applicant has taken account of the latest advice and guidance on derogation matters, available supporting evidence, engagement with stakeholders through the ETG process, timescale of implementation and experiences from other projects in the UK who have developed compensation cases in support of an offshore wind DCO application.

### 3.4.2 Longlist

68. The preliminary stages of the benthic HRA derogation strategy involved the creation of a longlist of measures that might be considered appropriate to compensate for Project impacts to Annex I sandbank features within the Dogger Bank SAC. The aim of the longlist was to put forward all potentially viable measures that might have capacity to deliver the Project’s compensation requirements. The longlist was based on the Project design and scope, experience with HRA within other OWFs in similar geographic regions and stakeholder feedback from ETG meetings.
69. To determine which longlist measures were going to be further developed and shortlisted, the Applicant originally proposed to utilise a rank and scoring methodology based on the ‘Managing Natura 2000 sites’ guidance from the European Commission

(2018). Approaches used by other OWFs has been incorporated into this methodology. However, after the second ETG 5 meeting (2 May 2024) it became apparent to the Applicant that a limited number of measures were deemed viable to both the Applicant and the SNCBs. The Applicant has therefore combined publicly available information with project-specific stakeholder feedback to develop a narrative-based rationale for shortlisting compensation measures. This is presented in **Table 3-1**.

### 3.4.3 Shortlist

70. The shortlisting process identified a single preferred compensation measure for further development: the designation of new MPAs and / or extending existing MPAs to be delivered on a strategic basis.
71. This conclusion was drawn following on from the ETG 5 meeting (2 May 2024) which identified this measure as one of the only feasible options to deliver ecologically effective compensation. Following this meeting other options, including the removal of seabed pressures, were considered, though these proved to be unsuitable due to reasons provided in **Section 4**.

## BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Table 3-1 Longlist of Measures to Deliver Benthic Compensation for Dogger Bank SAC

Measure	Delivery Mechanism	Summary	Rational for Exclusion or Development of Measure
Removal of Pressures: Removal of Structures	Project Alone	The Dogger Bank SAC's SACO document highlights the presence of infrastructure, such as that associated with oil and gas developments, as negatively impacting the condition of Annex I sandbank features. Removal of rock protection, or other infrastructure already present in the site, was proposed to contribute to restoration of subtidal sandbank habitat condition.	<p>Natural England advised that whilst this approach has ecological merit, there may be barriers that affect feasibility of delivery. It was suggested that the Applicant should engage with OPRED for further clarity on this.</p> <p>In July 2023 OPRED released a paper clarifying their position on the potential for removing pipelines and other oil and gas infrastructure. OPRED stated that they would not support this measure and cautioned that to do so would involve offshore wind developers taking on liability in perpetuity, including for environmental consequences, should technical failure occur during removal. OPRED also highlighted the extended timescale likely to be associated with achieving required consents, and the uncertainty over whether the work would ultimately lead to the anticipated environmental improvements. In view of these objections, it was concluded that the removal of disused oil and gas infrastructure was not a feasible measure available to the Applicant.</p> <p>In a letter from Natural England (DAS/475170 20 May 2024), it was confirmed that while they do support the removal of redundant surface-laid oil and gas infrastructure within designated sites (that would not otherwise be decommissioned), they do not support the removal of buried infrastructure due to the likely associated disturbance impacts. The status of oil and gas infrastructure within the SAC is uncertain, though it is probable that a portion may be buried.</p> <p>As such, this method has been <b>excluded</b> from progression to the shortlist as it is unlikely that any methods within this measure would be achievable by the Applicant.</p>
Removal of Pressures: Aggregate Extraction	Project Alone	<p>In the first ETG 5 meeting (16 October 2023) Natural England stated that although they would not support 'removal of structures' as a measure, they would support 'removal of pressures' and noted that there were other pressures affecting Annex I sandbank feature condition, notably fishing activity and aggregate extraction operations.</p> <p>Therefore, the Applicant has considered measures to reduce the activities of aggregate extraction and fishing on Annex I sandbank features.</p> <p>The basic principle underpinning this proposed habitat compensation measure is that an OWF developer would agree to pay a sum of money to the holder of a marine licence that permits extraction of aggregate material from within an area of Annex I sandbank. This payment would be in exchange for agreement to cease operations within this designated habitat. The principle is based on the assumption that following cessation of these activities the area of seabed would subsequently remain undisturbed and recover to a condition closer to baseline.</p>	<p>At the second ETG 5 meeting (2 May 2024) Natural England confirmed that although there are no aggregate extraction operations within the vicinity of the Dogger Bank SAC, they would support removal of pressures associated with this activity at other locations, on a 'same feature, different location' basis.</p> <p>Six aggregate licence holders operating within areas capable of compensating suitable quantum requirements, which operate under licences in the English Channel or North Sea regions, were contacted to ascertain if they were open to working with the Applicant to progress this proposed measure. The licence holders contacted were as follows:</p> <ul style="list-style-type: none"> <li>• Britannia Aggregates Ltd</li> <li>• DEME Building Materials Ltd</li> <li>• Tarmac Marine Ltd</li> <li>• Cemex UK Marine Ltd</li> <li>• Volker Dredging Ltd (acting on behalf of Van Oord for UK operations)</li> <li>• Westminster Gravels Ltd.</li> </ul> <p>In addition, the BMAPA and The Crown Estate were contacted for their views (21 August 2024).</p> <p>Following consultation with aggregate extraction licence holders, this option was concluded to not be feasible, and this measure has been excluded from progression to the shortlist by the Applicant. Further detail on discussions regarding potential removal of pressures from aggregate extraction operations is provided in the Benthic Compensation and Measures of Equivalent Environmental Benefit (MEEB) Evidence Update submitted to Natural England on 24 March 2025.</p> <p>In April 2025, Natural England stated (DAS/509197, 24 April 2025) that "We understand that a variety of obstacles, notably objection from the aggregate industry, precludes this option being advanced by the Project and we support this decision based on the evidence provided."</p>

## BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Measure	Delivery Mechanism	Summary	Rational for Exclusion or Development of Measure
Removal of Pressures: Fishing	Project Alone	Natural England has outlined that although they feel removal of fishing pressures has ecological merit, management of fishing activity falls within the remit of the IFCAs (for inshore waters) and the MMO (for offshore territorial waters) and, as such, would be precluded based on additionality.	The SNCBs would be open to discussions regarding increasing the level of protection afforded to benthic habitats from fishing pressures, but experience from discussions during the Round 4 Plan Level HRA indicates that securing this measure would be problematic, and it is unlikely that this measure could be achieved.  As such, this measure has been <b>excluded</b> from progression to the shortlist by the Applicant.
Sediment Volume Restoration	Project Alone	<p>The Dogger Bank is unique in terms of UK Annex I designated subtidal sandbank sites: it is a deposit of potentially mobile sediment overlying a post-glacial Holocene deposit, i.e. it is not constituted of sandbank sediment throughout its three-dimensional section. However, the depth of surficial sediment is sufficient to support subtidal sandbank communities. In addition, in accordance with the requirements of the EUR28 subtidal sandbanks feature definition, “the associated biota are dependent on the sand rather than on the underlying hard substrata”.</p> <p>In view of this, it should be recognised that removal of this overlying sandy layer and exposure of or damage to the glacial deposits would constitute a reduction in the extent (and volume) of designated sandbank feature.</p> <p>The Applicant identified that these voids in surface sediment associated with the Project and other projects within the Dogger Bank SAC could be infilled with appropriate sediment to restore the extent and volume of the Annex I sandbank feature.</p>	<p>Natural England advised they would not support this measure. In Natural England’s opinion, craters formed during historic OWF installation works on the Dogger Bank have been small and have filled rapidly.</p> <p>The Applicant followed up with additional detail on why it was considered that this measure had ecological merit (email dated 5 February 2024). In the second ETG 5 meeting (2 May 2024) the SNCBs noted that, based on this clarification, the measure may have merit; however, cautioned that there are likely to be issues identifying areas where it could be delivered as well as source material that would be considered suitable for restoration.</p> <p>The Applicant carried out a review of historical construction activities within the Dogger Bank SAC. The outcome of this concurred with Natural England’s position, concluding that it is likely there are insufficient ‘targets’ for this measure to address. As such, it is considered unlikely that this measure could provide a sufficient spatial extent of compensatory habitat to make a meaningful contribution to the Project’s potential derogation requirements. As such, this method has been <b>excluded</b> from progression to the shortlist due to a lack of support from SNCBs.</p>
Extension of an Existing MPA	Strategic	<p>The Dogger Bank SAC does not cover the entire extent of the Dogger Bank topographic feature. As a result, a portion of this feature falls short of the legal protective measures afforded to adjoining sections of sandbank within the SAC boundary. Extension of the MPA to include this remaining portion would be an effective means of providing like-for-like additional habitat to compensate for loss of the subtidal sandbanks feature.</p> <p>In addition, the Applicant has identified the Haisborough, Hammond and Winterton SAC, and the Inner Dowsing, Race Bank and North Ridge SAC as presenting opportunity for MPA extension, with associated increase in spatial extent of Annex I sandbank habitat.</p> <p>An extension to this SAC, or an alternative MPA with similar features, to include the remainder of the feature, or to extend similar features within the North Sea sandbank network, would increase the spatial extent of Annex I sandbank habitats within the national site network.</p>	<p>The Applicant proposed this measure in the longlist of options that was provided to the SNCBs and the MMO on 3 October 2023 (via email). In the first ETG 5 meeting (16 October 2023), the SNCBs confirmed that this measure does have ecological merit but cautioned that [at the time of discussion] there were currently no mechanisms in place to secure delivery. The SNCBs were supportive of extension of either the Dogger Bank SAC, or another MPA that encompassed qualifying Annex I sandbank habitats, which is located within the wider North Sea sandbank network.</p> <p>In the second ETG 5 meeting (02 May 2024), Natural England revised their position and advised that it would be premature to engage in discussions regarding strategic measures ahead of completion of The Crown Estate’s Plan Level HRA. It is noted that, in their written response to the second ETG 5 meeting, Natural England stated should compensation be required for this Project, “<i>then strategic compensation and designation or extension of an MPA is likely to provide the most ecologically effective outcome</i>”.</p> <p>This measure supported in the Interim Guidance from DESNZ (DESNZ, 2025) which confirmed that site extension was one of the measures contained within the LoSCM. The guidance note also confirmed that, as a project which received a seabed lease from The Crown Estate as part of the 2017 Extensions round of leasing, the Applicant could access this strategically through the MRF once it has been established.</p> <p>On 01 February 2024, Defra SoS approved designation and / or extension of MPAs as suitable for strategic delivery within a letter to OWIC, titled “<i>Approval of strategic compensation measures for offshore wind developments</i>”. In this letter, it is confirmed that Defra will work to identify possible modifications to the existing MPA network, including the details of how and when this measure could be used and referred to in consent applications. The Interim Guidance from DESNZ (DESNZ, 2025), and Defra’s WMS (Defra, 2025) was published on 29 January 2025 which validate this compensation approach for benthic impacts.</p>



## BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Measure	Delivery Mechanism	Summary	Rational for Exclusion or Development of Measure
		<p>This measure is supported by The Crown Estate’s Plan Level HRAs for the Round 4 Leasing round which proposed ‘site extension or designation’ as a potential compensatory measure to offset habitat loss and / or direct damage to the subtidal sandbank feature of the Dogger Bank SAC.</p> <p>It is important to note that the extension of an existing site cannot be secured by an individual developer, the process must be centrally led by Defra. The Applicant has engaged with Defra and the SNCBs on the extension of an MPA but ultimately has no control over the location and size of any final site or sites.</p>	<p>The Crown Estate’s CIP Plan Level HRA (The Crown Estate, 2025) supports the extension of an existing MPA through strategic compensation, stating "<i>MPA site extension or designation is the preferred option to compensate for effects on sandbanks</i>" and "<i>There is confidence that sufficient compensation can be provided through site extensions or new site designations to compensate for the impacts to the sandbank features of Dogger Bank SAC</i>".</p> <p>As such, this measure has been <b>shortlisted</b> and is discussed in detail under <b>Section 4</b>.</p>
New Site Designation	Strategic	<p>The Fourth Article 17 UK Habitats Directive Report estimates that 73% of qualifying UK Annex I sandbank habitats are currently located within the SAC network.</p> <p>As such, there remains scope for designation of an additional MPA site containing Annex I subtidal sandbank habitats.</p> <p>The designation of a new site on the basis of Annex I sandbank feature presence would provide equal ecological merit to compensation measures as an extension of the existing Dogger Bank SAC.</p> <p>It is acknowledged that any new designation would need to go through a formal process of designation, including full consultation, and could only be secured as a centralised strategic measure, as opposed to being project-led.</p> <p>Further details provided for measure ‘extension of existing MPA’ above also apply here.</p>	<p>Designation of a new MPA containing Annex I sandbank habitats presents, in theory, equal ecological merit to MPA extension. With respect to MPA extension (see above), Natural England advised that sites within the North Sea sandbank network should be considered. Given the objections raised, to date, by stakeholders such as commercial fisheries regarding spatial squeeze within this area, it is likely that new site designation would face resistance during the consultation process. It is expected that this would be greater than that raised for extension of existing sandbank designations.</p> <p>Further details provided for measure ‘extension of existing MPA’ above also apply here.</p> <p>This measure supported in the Interim Guidance from DESNZ (DESNZ, 2025) confirmed that new site designation was one of the measures contained within the LoSCM. The guidance note also confirmed that, as a project which received a seabed lease from The Crown Estate as part of the 2017 Extensions round of leasing, the Applicant could access this strategically through the MRF once it has been established.</p> <p>This measure has been shortlisted and is discussed in detail in <b>Section 4</b>. This measure is to be delivered by Defra as MRFO with advice from JNCC and Natural England, and the processes for both existing site extension and new site designation are currently being developed.</p> <p>The Applicant will continue to engage with Defra and the SNCBs to ensure that the Applicant is fully appraised of the developments of strategic compensation measures and their suitability for the Project.</p>
Resolution of Data Gaps	Project Alone	<p>There are various instances where the Dogger Bank SAC SACO identifies areas where additional monitoring data would increase confidence in stated objectives. These include volume of infrastructure currently present at the site; effects of hard infrastructure on local hydrodynamic regimes; structure and function of characteristic communities; and impacts on fine scale topography. In lieu of detailed monitoring data, the SNCBs consider it necessary to take a precautionary approach when setting objectives.</p> <p>The Applicant has considered supporting survey work, which may support feature condition assessment.</p>	<p>In the first ETG 5 meeting (16 October 2023), Natural England advised that although they would not support resolution of data gaps as an individual measure, they would, however, welcome its inclusion within a package of measures.</p> <p>Following the second ETG 5 meeting, Natural England stated that this measure would only be accepted if it was ensured that the data produced from the surveys would be applied to secure specific compensation related to the Project. If this was not the case, it would not contribute to addressing potential compensatory requirements and would not be supported by SNCBs.</p> <p>The measure was proposed to provide data to contribute towards the Dogger Bank SAC site assessment, increase confidence in site objectives and assist predictions of likely impacts on the designated feature. However, as a measure alone, this option has not been considered suitable to progress further at this point in time.</p> <p>As such, this method has been <b>excluded</b> from progression to the shortlist due to a lack of support from SNCBs.</p>



## BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Measure	Delivery Mechanism	Summary	Rational for Exclusion or Development of Measure
Enhancement of Harbour Porpoise Food Supply	Strategic	<p>Where like-for-like compensation is not achievable, it is necessary to consider alternative options, such as measures that would provide a comparable ecological function. The Dogger Bank SAC SACO identifies that as part of a sandbank's function it provides nutritional resource to marine mammals, such as the designated harbour porpoise population of the spatially overlapping Southern North Sea SAC.</p> <p>Harbour porpoise <i>Phocoena phocoena</i> rely heavily on sand eel as part of their diet.</p> <p>The Applicant proposed measures that could increase food resources, particularly sand eel biomass, to be employed as compensation for potential Annex I sandbank habitat loss associated with the proposed development.</p>	<p>The SNCBs acknowledged the merit of increasing harbour porpoise food supply. However, they went on to note that this would be achieved as an indirect consequence of other measures to improve condition of Annex I sandbank habitat within the Dogger Bank SAC and should not be proposed as a measure in itself.</p> <p>As such, this method has been <b>excluded</b> from progression to the shortlist due to a lack of support from SNCBs.</p>
Habitat Creation (Other Features)	Project Alone, Collaborative	<p>It is accepted that there is no realistic potential for habitat creation to compensate for the same feature that is impacted (i.e. recreation of sandbank habitat). However, in accordance with the Defra best practice guidance for developing compensatory measures, the Applicant considered whether there may be potential for creation of other features that provide a comparable ecological function to sandbank habitat within the SAC site itself, or at a different location.</p> <p>The Round 4 Plan Level HRA included proposal for the creation of historically present (i.e. pre-industrial fishing) habitat. It is expected that this measure would lead to a greater level of structural diversity than that associated with Annex I sandbank, inclusive of encrusting invertebrates. Historical records indicate that a large area of native oyster <i>Ostrea edulis</i> was formerly present to the immediate south of Dogger Bank, and there are various examples of successful oyster bed habitat creation across the UK. However, it was noted that this measure would not relate to the current SAC conservation objectives given that oyster restoration would promote the establishment of a reef ecosystem, rather than maintain or restore Annex I sandbanks which are slightly covered by seawater all the time.</p> <p>The Applicant proposed habitat restoration in the form of native oyster bed restoration either within the Dogger Bank SAC or within another SAC where this habitat would be appropriate.</p>	<p>Natural England opposes this measure, stating that the restoration of native oyster beds is not appropriate for Dogger Bank SAC. As such, native oyster bed restoration has been <b>excluded</b> from progression to the shortlist.</p> <p>Natural England did state they may support the re-creation of subtidal seagrass bed habitats which, in certain circumstances, can constitute Annex I sandbank habitats as an appropriate measure. Natural England further stated that, for this measure to be supported, evidence needed to be presented to show confidence in the success of such habitat at the depths present in the Dogger Bank SAC.</p> <p>The Applicant will continue to engage with specialist organisations to determine whether appropriate evidence is available. If no such evidence is found, this measure will not be supported. Consequently, it has been <b>excluded</b> from progression to the shortlist. However, the Applicant will review any new evidence that emerges and, if suitable evidence is presented, may reconsider this measure at a later stage.</p>
Threat Reduction	Project Alone	<p>There are a number of compensatory measures that can be employed to reduce ongoing pressures on the Dogger Bank SAC. This includes debris removal, management of physical and chemical processes and management of INNS.</p>	<p>SNCBs do not support the removal of debris as a compensatory measure as it is not sufficient compensation for the changes associated with the Project, a position formalised in a joint position statement following the consenting of the Hornsea Three Project with debris removal as an accepted compensation measure for impacts to Annex I Sandbank features (Joint SNCB Statement, 2023).</p> <p>In the case of management of physical and chemical processes, Natural England advised that it was appropriate at coastal sites but limited offshore and therefore were not supportive of the Applicant bringing</p>

BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Measure	Delivery Mechanism	Summary	Rational for Exclusion or Development of Measure
		<p><b>Debris removal:</b> The Applicant proposed removal of anthropogenic waste; facilitating the rapid recovery / retrieval of lost fishing equipment across the sandbanks. Marine debris and fishing gear removal measures were proposed and accepted as compensation measure for adverse effects on sandbanks from the Norfolk Boreas and Norfolk Vanguard OWFs.</p> <p><b>Management of physical and chemical processes:</b> the Dogger Bank SAC SACO notes that disturbance of sub-surface peat from bottom-trawling and riverine inputs are disrupting ecological function of the Annex I sandbank feature.</p> <p>The SACO also notes that it is not feasible to manage the drivers of these impacts at a site level.</p> <p>The Applicant identified these issues to discuss with SNCBs at the first ETG to understand whether there was scope for a measure which would reduce this pressure.</p> <p>Natural England advised that this measure is more appropriate for coastal sites and, due to the Project being far offshore, there is limited potential for this measure to effectively improve Annex I sandbank feature condition (ETG 5 Meeting 1 on 16 October 2023).</p> <p><b>Management of INNS:</b> The presence of INNS was identified in the Dogger Bank SAC SACO as a pressure impacting the achievement of favourable conservation status for the Annex I sandbank feature.</p> <p>During the ETG 5 meeting, the Applicant and SNCBs discussed addressing this threat through the development of a measure to reduce its impact on the designated feature.</p>	<p>forward this measure for the Dogger Bank SAC.</p> <p>On INNS, Natural England stated that it could contribute to a small part of an overall compensation package but would not contribute as a primary measure to fully compensate for Project impacts to Annex I sandbank habitat.</p> <p>As such, threat reduction through debris removal, management of physical and chemical process or management of INNS have been <b>excluded</b> from progression to the shortlist. These measures were either considered not deliverable by the Applicant or would be of limited impact on the overall compensation case.</p>

## 4 Shortlisted Measures

### 4.1 Introduction

72. As set out in **Table 3-1** Longlist of Measures to Deliver Benthic Compensation for , the sole measure being progressed by the Applicant is designation of new MPAs and / or extension of an existing MPAs As noted in **Section 3.3**, within OWEIP's LoSCM and Defra's WMS (Defra, 2025), MPA site extension is paired with designation of a new MPA. The Applicant is actively engaging with Defra and DESNZ on the development of this strategic compensation measure. Ultimately, the final measure will be decided by Defra following full consultation with stakeholders.

### 4.2 Designation of New MPAs and / or Extending Existing MPAs

#### 4.2.1 Overview

73. The Applicant is developing a HRA derogation case for the Project impacts to the Annex I sandbank feature of the Dogger Bank SAC. Under the derogation case, the option of securing designation of new MPAs and / or extending existing MPAs as compensation via the MRF will be the primary compensation measure. The measure will extend or designate new areas of protected habitat to compensate for impacts that the Project is having on Annex I sandbank habitat features within the Dogger Bank SAC.
74. Extending the existing Dogger Bank SAC would deliver ecological compensation by protecting areas identified as potential Annex I sandbank features adjacent to the site which are currently not protected. Alternatively, an extension to or designation of a different site within the wider North Sea sandbank network into an area which contains suitable Annex I sandbank habitats could also compensate for the potential loss of Annex I sandbank features from Project impacts currently designated within the Dogger Bank SAC.
75. This approach delivers compensation via addressing either 'the same impact in the same location' or 'the same ecological function in a different location' levels of the Defra Compensation Hierarchy (Defra, 2021). SNCBs have confirmed that extending an area of Annex I sandbank presently designated within the wider NSN or designating a new site has ecological merit. The southern North Sea sandbank habitats have broadly similar functions and support features that are relevant to the wider North Sea ecosystem, such as sandeel and harbour porpoise.
76. This measure involves the designation of a previously unprotected area(s) and therefore must be delivered at a strategic level by Defra in conjunction with SNCBs. The designation of new MPAs and / or extension of existing MPAs will require formal

consultation and legal status and therefore cannot be delivered by either the Project alone or by working with other industry partners. As a result, the implementation of this measure is dependent on the development of strategic measures from centralised government and is largely out of the hands of the Applicant. The Applicant has sought to engage Defra, SNCBs and industry bodies working towards the goal of delivering a strategic compensation measure. Information on consultations with stakeholders is included in **Table 1-2** Consultee Responses in Relation to Dogger Bank SAC Compensation.

77. Primary legislation through the Energy Act 2023 is in place to allow offshore wind developers access to strategic compensation measures, however this will need to be supported by secondary legislation to facilitate the creation and management of the MRF which is still forthcoming. It is intended that offshore wind developers will be able to contribute to these strategic measures via contributions to a MRF. Further information on the legal status of strategic compensation and detail on the Interim Guidance note which confirmed that the Project would be eligible to contribute to strategic compensation is presented in **Section 3.3**.

#### 4.2.2 Measure of Success / Effectiveness

78. This compensation measure will be delivered strategically by Defra, ensuring that the designation of new MPAs and / or extending existing MPAs will be sufficient for the Project's compensation quantum, as well as effective. Following the DESNZ call to industry for information on predicted impacts, the Applicant is confident that the scale of compensation provided by this measure will be sufficient. In addition the CIP HRA (The Crown Estate, 2025) states that *"There is confidence that sufficient compensation can be provided through site extensions or new site designations to compensate for the impacts to the sandbank features of Dogger Bank SAC"* and *"This includes any compensation multiplier likely to apply, based on the Dogger Bank Strategic Compensation Plan (NIRAS, 2024a)"*.
79. The legal protection gained through designated status will enable the habitat to deliver the required compensation for the Project's potential impacts on the Annex I sandbank feature of the Dogger Bank SAC. Interim Guidance from DESNZ (DESNZ, 2025) states that the MRFO will be required to provide information regarding the compensation and ongoing management and monitoring to eligible projects to feed into Implementation and Monitoring Plans post-consent. It is recognised that the detailed information usually expected by DESNZ SoS may not be fully available until the Government's MPA designation / extension programme is complete. The WMS (Defra, 2025) therefore commits to the production of high-level Implementation and Monitoring Plans, which would be obtained from Defra by the Applicant and provided to the DESNZ SoS prior to commencing any works which will give rise to AEoI on Dogger Bank SAC. These will contain information on how MPA designation effectiveness would be maintained in terms of enforcement and adaptive management.

80. SNCBs have emphasised during ETG 5 meetings that compensatory measures are preferred where there is ecological merit in terms of site conservation objectives and ecological function of the feature that may be affected by the Project. As a centrally approved measure for benthic compensation, it is expected that this measure satisfies this requirement.

### 4.2.3 Scale

81. The scale of compensation delivered through designation of new MPAs and / or extending existing MPAs will be determined by Defra. The Applicant has provided anticipated WCS impacts to DESNZ via a call to industry which will feed into the development process being undertaken by Defra. This will help ensure that strategic compensation will sufficiently account for the impacts of offshore wind developments that are anticipated to come forward to use MPA designation and / or extension as a strategic compensation measure. Any updates to Project parameters will be provided to DESNZ and Defra so that the necessary compensation quantum for the Project reflects the amount of habitat impacted.
82. The Applicant is seeking to implement this compensation measure at a strategic level, requiring a maximum of 2.25km<sup>2</sup> of like-for-like habitat to be designated to offset impacts<sup>1</sup> long-term habitat loss. Should like-for-like habitat not be available within the newly designated MPA, it is anticipated that ecologically analogous habitat providing similar structure and function to support communities will be designated. It is expected that developers' contributions to the MRF will be scaled according to confidence in the measure's success, which is likely to be related to scale of the measure in relation to impacts. The Applicant is monitoring the progress of the MRF and will include any updates regarding function and operation of the MRF within the Project's DCO application.

### 4.2.4 Site Selection

83. The UK Government has committed to identifying suitable areas for extension or designation to provide strategic compensation for OWF developments. This process is ongoing, and detailed information on the location of MPAs to be designated is not yet available. Through direct engagement with Defra (6 February 2025), it is understood that Defra is expecting advice from Natural England and JNCC on site selection (developing a longlist of locations) in Spring 2025. This will be followed by a consultation period taking stakeholder views into account on ecological, social and economic factors prior to public consultation which is planned for 2026. It is anticipated that following the

selection of a final candidate site (or sites), the designation period will be approximately three years.

### 4.2.5 Delivery Mechanism

84. The Applicant intends to contribute to the MRF to be able to rely on the designation of new MPAs and / or extending existing MPAs as outlined in the LoSCM. As per the Interim Guidance from DESNZ (DESNZ, 2025) the Applicant will continue to engage with SNCBs, Defra, relevant regulators, Local Planning Authorities (if applicable) and relevant stakeholders.
85. In April 2025, Defra launched its consultation for the establishment of the MRF. The consultation sets out draft guidance on how the MRF is intended to operate including the application process. Industry feedback was sought on proposals and processes included in the consultation and a response was issued by the Project on 12 May 2025. The consultation document stated that final guidance on all aspects of the MRF is expected to be published in Autumn 2025 alongside the Statutory Instrument, and developers will be able to make applications to the MRF once it is live in Autumn 2025.
86. Within the consultation document, confirmation was provided that Defra as the MRFO will be responsible for delivery of the strategic compensation measure, including any maintenance, monitoring and, if necessary, adaptive management.
87. The Applicant will be required to pay into the MRF to access MPA designations / extensions as a compensation measure. It is anticipated that the Project's DCO application will also include a requirement to provide post-consent evidence of any agreements with the MRFO and evidence that the full payment (or the first of a series of instalments) has been made to the MRF, as well as provision of an Implementation and Monitoring Plan prior to commencing any works which will give rise to AEoI on Dogger Bank SAC. Defra will be producing high-level Implementation and Monitoring Plans in advance of final MPA designations to assist developers in providing the necessary information to DESNZ SoS, with final updated plans being provided once designation has taken place.

### 4.2.6 Monitoring and Adaptive Management

88. As per the Interim Guidance on the MRF (DESNZ, 2025):
89. *"DESNZ Secretary of State will usually expect to see greater clarity and certainty regarding the compensation and the ongoing management and monitoring before works*

<sup>1</sup> 1. For completeness, the Applicant provided information in relation to habitat damage (i.e. temporary physical disturbance) to DESNZ as requested at the time of the call to industry (see Section 2.1 for quantum of impacts), however the Project's draft RIAA concludes there is no potential for an AEoI of the Dogger Bank SAC in relation to

temporary physical disturbance of the seabed from the Project alone, or in combination with other plans or projects during any project phases. As such, has concluded there is no compensation requirement in relation to this pressure.



*which give rise to the adverse effect for which compensation is required can commence. When the MRF is operational, this information would normally be provided by the MRF Operator to the applicant for submission to the DESNZ Secretary of State as a full Implementation and Monitoring Plan.”*

90. *“It is recognised that the detailed information usually expected by DESNZ Secretary of State may not be fully available until the Government’s MPA designation/extension programme is complete. The WMS therefore commits to the production of high-level Implementation and Monitoring Plans, which should be obtained from Defra by the applicant and provided to the DESNZ Secretary of State before works which give rise to the adverse effect for which compensation is required can commence. These plans will contain the following information:*

- *High level explanation as to how designation of an MPA will compensate for effects on each relevant habitat and, where possible, ratios used.*
- *Implementation timetable and an explanation of the MPA designation process.*
- *Information on current monitoring, long term management and reporting of MPAs, and any differences for MPAs designated for compensation purposes.*
- *Information on how the effectiveness of the MPA designation would be maintained in terms of enforcement and adaptive management.*
- *Commitment to providing an updated IMP as the designation process continues and detail is resolved.”*

91. The DCO will indicate a requirement to provide a full Implementation and Monitoring Plan as soon as this is available from Defra on completion of the MPA designation / extension programme.

92. Defra as the MRFO will be responsible for delivery of the strategic compensation measure, including any monitoring and adaptive management required. Confidence that new MPA extension and / or designation can deliver suitable and sufficient ecological compensation is high. However, the Applicant will continue to engage with Defra to understand how the MRF will be used to secure adaptive management should it be required.

#### 4.2.7 Next Steps

93. With the publication of Defra’s WMS (Defra, 2025) on strategic compensation and the Interim Guidance from DESNZ (DESNZ, 2025), the Applicant is confident that an HRA derogation case for the Project can be delivered strategically.

94. The next steps for the Applicant are to:

- Continue to engage with relevant stakeholders as the delivery of strategic compensation measures are developed and secondary legislation is put in place.
- Keep up to date with progress on the MRF and continue to contribute to delivery groups as relevant.
- Engage stakeholders with a targeted Section 42 consultation for Project compensation measures in Q4 2025.
- Engage with DESNZ and Defra as the Applicant progresses design refinements to ensure that records for compensation quantum requirements for long-term habitat loss are accurate.

## 5 Conclusion

95. The process for developing an HRA derogation case for the Project’s impact to the Annex I sandbank feature of the Dogger Bank SAC has led the Applicant to conclude that the only measure which is agreed on by all key stakeholders is new site designation and / or extension of an existing MPA which is delivered strategically via the MRF.

96. Error! Reference source not found.presents a summary of the current Project status regarding proposed compensation measures against Natural England’s checklist. The Applicant will continue to update this table as information becomes available regarding the establishment of the MRF and the Project progresses through the DCO application process.



## BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Table 5-1 Natural England's Checklist for Compensation Measures

Natural England Compensation Checklist Item		Project Status: Designation of New MPAs and / or Extending Existing MPAs
a	What, where, when: clear and detailed statements regarding the location and design of the proposal.	Designation of new MPAs and/or extension of existing MPAs (such as to Dogger Bank SAC or another suitable site within the North Sea) to deliver suitable equivalent habitat to the Annex I sandbank feature being impacted by the Project. This measure will be delivered strategically by Defra as the MRFO. The Applicant will access this measure through a contribution to the MRF.
b	Why and how: ecological evidence to demonstrate compensation for the impacted site feature is deliverable in the proposed locations.	<p>Areas of unprotected sandbank do not receive the same legal protection as adjacent designated Annex I sandbanks in protected sites such as the Dogger Bank SAC. By designating new MPAs or extending existing MPAs to cover unprotected Annex I sandbank features, the legal protections afforded to existing SAC will encompass the new sandbank feature. This will ensure any Annex I sandbank feature lost to the Project infrastructure will be effectively replaced with like-for-like or analogous habitat.</p> <p>It is understood that the identification of candidate extension or new MPA areas will be led by Defra to ensure that the overall coherence of the MPA network is maintained, and that Defra will use advice from Natural England and the JNCC to inform this identification.</p> <p>Although this is a strategic compensation measure, the Applicant can assist with site selection, data collection / collation / analysis and early phase consultation alongside Defra if required.</p> <p>This approach is supported by central government and SNCBs alike as outlined in Defra's WMS (Defra, 2025). SNCBs support the designation of new MPAs and / or extension of existing MPAs that encompass qualifying Annex I sandbank habitats under the condition it is within the wider North Sea sandbank network.</p>
c	For measures at sea, demonstrate that measures have been secured e.g. agreements with other sea or seabed users.	As it stands, the process of delivering designation of new MPAs and/or extending existing MPAs will be led by Defra as MRFO, in turn making them the body responsible for obtaining relevant permissions and engaging with other marine users. Details of the designation of new MPAs or extension of existing MPAs process are currently unconfirmed, but it is assumed that a full consultation process with other sea users will be conducted prior to designation. JNCC will be responsible for the final designation process and will underpin Defra's delivery work.
d	Policy/legislative mechanism for delivering the compensation (where needed).	The Energy Act (2023), provides the legislative basis for OWF developers to be able to adopt strategic compensation measures, provided they have exhausted all options to mitigate any impacts of development through the application of the mitigation hierarchy. Currently, centralised government are working together to develop the secondary legislation to facilitate the creation and management of the MRF. In the meantime, Defra's WMS (Defra, 2025) and Interim Guidance from DESNZ (DESNZ, 2025) have been published (see <a href="#">Written Ministerial Statement</a> and <a href="#">Strategic compensation measures for offshore wind activities: Marine Recovery Fund Interim Guidance - GOV.UK</a> ). These publications include an outline of the measures currently within the LoSCM. The Interim Guidance by DESNZ outlines the MRF which, when operational, will be used to deliver measures listed in the LoSCM (including designation of new MPAs and / or extending MPAs), and Defra's WMS confirms that Defra will be producing high-level Implementation and Monitoring Plans in advance of final MPA designations to assist developers in providing the necessary information to DESNZ SoS, with final updated plans being provided once designation has taken place.
e	Agreed DCO/DML conditions.	The Applicant will secure the relevant conditions within the DCO / dML to ensure the Applicant can access strategic compensation measures through contributions provided to the MRF. The Applicant will review the Interim Guidance on the MRF (DESNZ, 2025) and the outcomes of Defra's consultation for the establishment of the MRF in Autumn 2025, and any further statements prior to producing a draft DCO, which will be submitted in support of the Environmental Statement.
f	Clear aims and objectives of the compensation.	<p>Designation of new MPAs and/or extension of existing MPAs aims to:</p> <ul style="list-style-type: none"> <li>Where AEoI has been concluded, compensate for unavoidable impacts to Annex I sandbank features of the Dogger Bank SAC.</li> </ul> <p>The objectives are:</p> <ul style="list-style-type: none"> <li>To achieve like-for-like compensation through extension of an existing MPA with subtidal sandbank features within the North Sea sandbank network.</li> </ul>
g	Mechanism for further commitments if the original compensation objectives are not met – i.e., adaptive management.	Due to the nature of this measure as a strategic level compensation option, Defra as the MRFO has overall responsibility for the strategic compensation measure, including delivery, maintenance, monitoring and adaptive management..

## BENTHIC COMPENSATION - ROADMAP & EVIDENCE

Natural England Compensation Checklist Item		Project Status: Designation of New MPAs and / or Extending Existing MPAs
h	Clear governance proposals for the post-consent phase – we do not consider simply proposing a steering group is sufficient.	Due to the nature of this measure as a strategic level compensation option, Defra as the MRFO has overall responsibility for the strategic compensation measure, including delivery, maintenance, monitoring and adaptive management. The Applicant assumes that post-consent governance will be split between the relevant government bodies who are responsible for site designation and management.
i	Ensure development of compensatory measures is open and transparent as a matter of public interest, including how information on the compensation would be publicly available.	Due to the nature of this measure as a strategic level compensation option, this component is beyond control of the Applicant. It is expected that a public consultation will be carried out during the site designation process.
j	Timescales for implementation especially where compensation is part of a strategic project, including how timescales relate to the ecological impacts from the development.	Compensation measures are required to be in place before the works that give rise to adverse effects on ecological features begin. Strategic compensation measures will have their timeframes determined by the SoS, allowing them to be decided on a case-by-case basis for individual developments.  In line with current Interim Guidance and via the DCO / dML, the Project will provide evidence to the SoS of any agreements with the MRFO and evidence that the full payment (or the first of a series of instalments) has been made to the MRF.
k	Commitments to ongoing monitoring of measure performance against specified success criteria.	Due to the nature of this measure as a strategic level compensation option, commitments to ongoing monitoring requirements and specified success criteria will be established and managed by Defra as part of the site designation and/or extension and monitoring. The Applicant's commitment to contributing towards the MRF can be interpreted as a commitment to ongoing monitoring to be delivered by the MRF operator.
l	Proposals for ongoing 'sign off' procedure for implementing compensation measures throughout the lifetime of the project, including implementing feedback loops from monitoring.	As per the strategic compensation measures for offshore wind activities: Marine Recovery Fund Interim Guidance (DESNZ, 2025)  <i>"When the MRF is operational, this information would normally be provided by the MRF Operator to the applicant for submission to the DESNZ Secretary of State as a full Implementation and Monitoring Plan.</i>  <i>It is recognised that the detailed information usually expected by DESNZ Secretary of State may not be fully available until the Government's MPA designation/extension program is complete. The WMS therefore commits to the production of high-level Implementation and Monitoring Plans, which should be obtained from Defra by the applicant and provided to the DESNZ Secretary of State before works which give rise to the adverse effect for which compensation is required can commence. These plans will contain the following information:</i> <ul style="list-style-type: none"> <li><i>High level explanation as to how designation of an MPA will compensate for effects on each relevant habitat and, where possible, ratios used.</i></li> <li><i>Implementation timetable and an explanation of the MPA designation process.</i></li> <li><i>Information on current monitoring, long term management and reporting of MPAs, and any differences for MPAs designated for compensation purposes.</i></li> <li><i>Information on how the effectiveness of the MPA designation would be maintained in terms of enforcement and adaptive management.</i></li> <li><i>Commitment to providing an updated IMP as the designation process continues and detail is resolved."</i></li> </ul>
m	Continued annual management of the compensation area including to ensure other factors are not hindering the success of the compensation e.g. changes in habitat, increased disturbance as a result of subsequent plans/projects.	Due to the nature of this measure as a strategic level compensation option, continued annual management of the new MPAs and/or MPA extensions will be managed by the relevant government bodies. This will be enabled by the Applicant's commitment to contributing towards the MRF and any agreements between the Project and Defra as the MRFO.  It should be noted that Defra has committed to delivering sufficient compensation scale via designation of new MPAs and / or extending existing MPAs as a strategic option to offset benthic impacts related to offshore wind developments in the UK. This commitment has been outlined in the WMS (Defra, 2025).

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List of Tables

Table 1-1 Summary of Stakeholder Engagement.....6

Table 1-2 Consultee Responses in Relation to Dogger Bank SAC Compensation .....8

Table 3-1 Longlist of Measures to Deliver Benthic Compensation for Dogger Bank SAC .....20

Table 5-1 Natural England's Checklist for Compensation Measures.....28

List of Acronyms

Acronyms	Definition
AA	Appropriate Assessment
AEol	Adverse Effect on Integrity
Annex I Sandbanks	Annex I (1110) Sandbanks which are slightly covered by sea water all the time
BESS	British Energy Security Strategy
CA	Competent Authority
CIP	Capacity Increase Programme
COWSC	Collaboration on Offshore Wind Strategic Compensation
DAS	Discretionary Advice Service
DB	Dogger Bank
DBA	Dogger Bank A
DBB	Dogger Bank B
DBC	Dogger Bank C
DBD	Dogger Bank D
DCO	Development Consent Order
Defra	Department for Environment, Food and Rural Affairs
DESNZ	Department for Energy Security & Net Zero
dML	deemed Marine Licence
BMAPA	British Marine Aggregate Producers Association
EIA	Environmental Impact Assessment
EPP	Evidence Plan Process
ES	Environmental Statement
ETG	Expert Topic Group

Acronyms	Definition
GW	Gigawatts
HRA	Habitat Regulations Assessment
IFCA	Inshore Fisheries and Conservation Authority
INNS	Invasive Non-Native Species
IROPI	Imperative Reasons of Overriding Public Interest
JNCC	Joint Nature Conservation Committee
LoSCM	Library of Strategic Compensation Measures
MEEB	Measure of Equivalent Environmental Benefit
MMO	Marine Management Organisation
MPA	Marine Protected Area
MRF	Marine Recovery Fund
MRFO	Marine Recovery Fund Operator
MW	Megawatts
NM	Nautical mile
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
NSN	National Site Network
Offshore ECC	Offshore Export Cable Corridor
OPRED	Offshore Petroleum Regulator for Environment and Decommissioning
OWEIP	Offshore Wind Environmental Improvement Package
OWF	Offshore Wind Farm
OWIC	Offshore Wind Industry Council
PEIR	Preliminary Environmental Impact Report
PINS	Planning Inspectorate



Acronyms	Definition
P2G	Pathways 2 Growth
RIAA	Report to Inform Appropriate Assessment
SAC	Special Area of Conservation
SACO	Supplementary Advice on Conservation Objectives
SNCB	Statutory Nature Conservation Body
SoS	Secretary of State
UXO	Unexploded Ordnance
WCS	Worst-Case Scenario
WMS	Written Ministerial Statement