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# 2025 Cygnus Alpha Wellhead Platform rig stabilisation deposition

Habitats Regulations Assessment (HRA)



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**RECORD OF THE HABITATS REGULATIONS ASSESSMENT UNDERTAKEN  
UNDER REGULATION 5 OF THE OFFSHORE PETROLEUM ACTIVITIES  
(CONSERVATION of HABITATS) REGULATIONS 2001 (As Amended).**

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# 1. Description of the Activity

Ithaca (NE) E&P Limited (Ithaca) are the operator of the Cygnus Wellhead Platform (AWHP) and are currently undertaking drilling activities at the platform using the Valaris Norway jack-up rig (Figure 1; application reference: DR/2500/5). The project area is located at the Cygnus field in the Southern North Sea (SNS), in UKCS Block 44/12, approximately 162 kilometres (km) from the UK coastline, and 36 km from the UK/Netherlands Median Line, at a depth of approximately 22 metres (m).

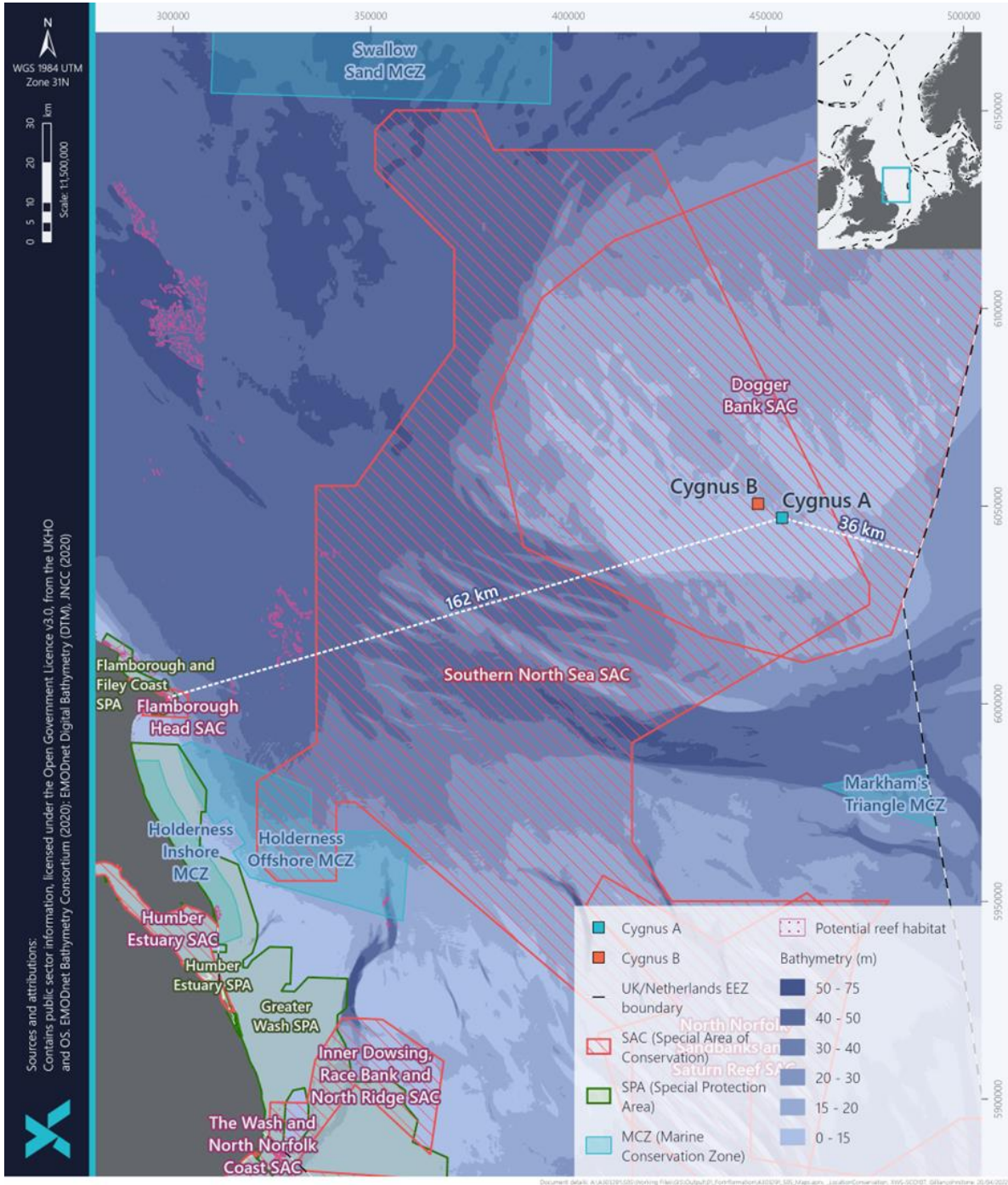


Figure 1. Location of the Cygnus Alpha Wellhead Platform



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The rig is positioned partially over the existing rock pad. One of the legs was positioned outside the rock pad on undisturbed seabed (northeast on Figure 2). Ithaca have identified that there is significant scouring at the rig leg's location. Whilst there is no immediate threat with the scouring towards personnel, the rig or the platform, if the scouring continues, the risk of loss of bearing capacity, hull inclination and uneven leg reactions increases. ROV surveys have shown significant seabed mobility.

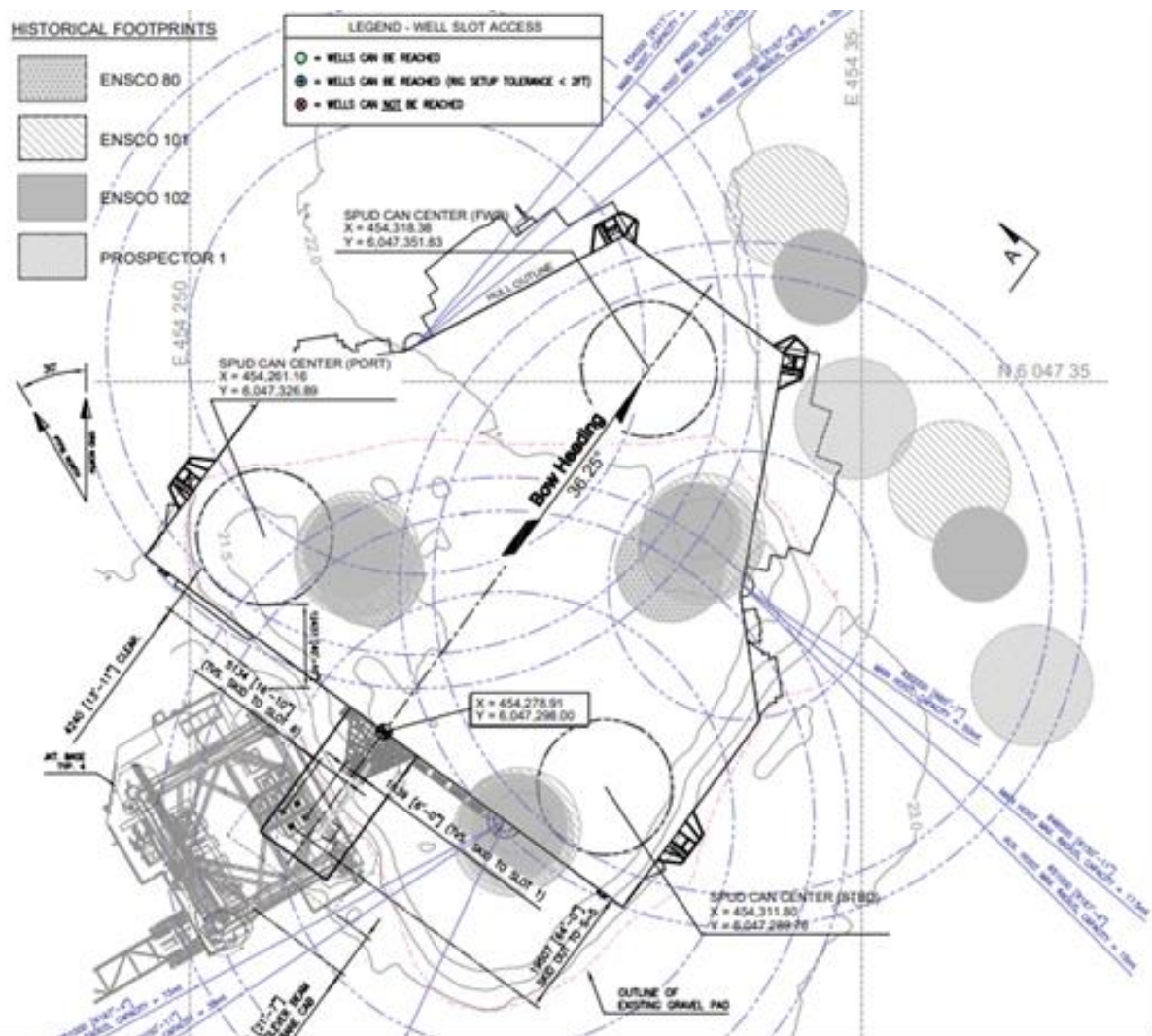


Figure 2. Rock pad layout (purple dotted line) and rig positioning at Cygnus Alpha Wellhead Platform

Ithaca propose to deposit rock around the exposed leg to prevent any further erosion under the rig's leg which may lead to safety issues for personnel on board (Table 1, Figure 3).

The use of alternative, recoverable methods of rig stabilisation have been considered. However, given the rig is already on location, rock is deemed the most appropriate methodology for stabilisation. As the rig is already on location there is limited access to the scouring and erosion occurring beneath an installed footprint. Graded rock naturally fills inaccessible voids beneath and around the spudcan and remains stable under strong currents



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and winter storm conditions and can be placed accurately without positioning equipment close to the leg.

Table 1. Characteristics of rock deposit

Nature of Deposit	Quantity of the Deposit (te)	Potential Area of Impact (m <sup>2</sup> )	Covered area of Dogger Bank SAC	Covered are of SNS SAC (%)
1-5" Rock	2,000	546.44	0.0000044	0.0000015



Figure 3. Dimensions of rock deposit

Ithaca evaluated potential alternatives, including frond matting instead of using rock placement. However, frond matting poses a significant hazard to ROV operations in the vicinity of the rig. ROVs are essential for ongoing surveys and monitoring of scour and seabed mobility at the rig location. Additionally, frond matting may not be effective under waves, may not be durable long term, and is susceptible to scouring and edge scour.

Grout bags were considered as alternative to rock deposition. However, these may degrade over time and, are susceptible to edge scour and suffusion if gaps exist. As a reactive measure, they are not practical for the spudcan design on the rig. Grout bags cannot be positioned beneath the skirts as coverage would be incomplete, and ROV operations close to the leg within an active scour feature would add unnecessary risk. Therefore, they are not considered to be as suitable as rock.

The proposed placement of rock is not able to be recovered, as attempting to remove the rock may cause a greater disturbance to the seabed than leaving it in place due to the material settling into the sandy seabed over time. It should also be noted that the rock is chemically inert which will lessen the impact to the seabed.

The application to be assessed describing this project is DR/2500/6.

### Timing

The rock deposition is expected to be undertaken between 16<sup>th</sup> December 2025 and 31<sup>st</sup> December 2025 with an estimated duration of 4 days.

### Protected areas

The project will take place within the Dogger Bank SAC and the Southern North Sea SAC.



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## 2. Requirement for a Habitats Regulations Assessment

Regulation 5 of the Offshore Petroleum Activities (Conservation of Habitats) Regulations 2001 (As amended) outlines that the Secretary of State, before agreeing to the grant of consent of any activity which is likely to have a significant effect on a relevant site, make an appropriate assessment (AA) of the implications for the site in view of its conservation objectives. This document is the record of the Secretary of State's AA.

Where the term 'Site' is used within this document, it means any site forming the UK National Site Network site. The National Site Network is the UK network of protected sites on land and sea which were designated under the Habitats and Wild Birds directives namely Special Protection Areas (SPA) or Special Areas of Conservation (SAC).

The assessment will first determine what sites and protected features are likely to have conservation objectives which could be significantly affected by the activity and will then proceed to undertake an AA of the implication of these effects on the site's integrity.

## 3. Stage 1: Test of likely Significant effects (LSE) – Is the activity likely to have a significant effect on the site's conservation objectives?

### 3.1 Pressures associated with the activity

The project is considered to exert the following pressures on the environment:

**A change in seabed type:** This incorporates the deposition of hard material such as concrete mattresses, rock or drill cuttings into soft sediment environments such as sandbanks.

### 3.2 LSE Assessment

#### **Conservation Objectives**

The purpose of the LSE test is to assess whether the activity could affect, in any significant way, the conservation objectives of the site. Site features and conservation objectives are taken from relevant Statutory Nature Conservation Bodies' (SNCB) conservation advice packages found on the following webpages:

- [Dogger Bank SAC](#)
- [Southern North Sea SAC](#)



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### Test of likely significant effect

**Note:** In the table below the conservation objectives for each feature have been compiled together where they have sufficient similarity that they can be assessed together as a group.

Feature	Is there likely to be a significant effect on the conservation objectives <b>ALONE</b>		
Pressure	Feature	Conservation Objective	Conclusion
Southern North Sea SAC			
A change in seabed type	Harbour porpoise ( <i>Phocoena Phocoena</i> )	1.Maintain - Harbour porpoise a viable component of the site	No (No noise impacts). The project will not result in the injury of any harbour porpoise and there is no mechanism whereby the long-term condition or reproductive success of harbour porpoise could be significantly affected.
		2. There is no significant disturbance of the species	No (No noise impacts). The project will not emit impulsive noise and there is no mechanism whereby the project could cause significant disturbance that may alter the distribution of porpoise in the site.
		3.Maintain - The condition of supporting habitats and processes, and the availability of prey is maintained	No. The disturbance created by the project will be highly localised and unlikely to disrupt prey availability for harbour porpoise. The sedimentary habitats in the region are exposed to periodic physical disturbance, and the benthic and demersal communities show good recovery to physical disturbance. Harbour porpoise feed on array of fish species and the new hard substratum is unlikely to cause a significant reduction in available prey items as fish will still utilise the area.



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<b>Feature</b>	<b>Is there likely to be a significant effect on the conservation objectives ALONE</b>		
<b>Pressure</b>	<b>Feature</b>	<b>Conservation Objective</b>	<b>Conclusion</b>
Dogger Bank SAC			
A change in seabed type	Annex I Sandbanks slightly covered by seawater all the time	1: Restore - Extent and Distribution of sandbanks habitat	Yes.
		2: Restore - Structure and Function comprising distribution of sediment types, biological assemblages and topography	
		3: Maintain - Supporting processes comprising water quality, sediment quality, hydrodynamic regime	No. There will be no mechanism whereby the water or sediment quality could be affected as the deposits are chemically inert. The deposits are too small to significantly alter the movement of sediment or hydrodynamic regime. There will be no changes obvious beyond the several metres from deposit.



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### 3.3 LSE conclusion: Alone

It **cannot** be concluded that the activity is unlikely to cause a significant effect alone on the conservation objectives of the following site(s):

Site	Feature	Conservation Objective	LSE?
Dogger Bank SAC	Annex I Sandbanks slightly covered by seawater all the time	Extent and Distribution, Structure and Function	Y

It **can** be concluded that the activity is unlikely to cause a significant effect alone on the conservation objectives of the following site(s):

Site	Feature	Conservation Objective	LSE?
Southern North Sea SAC	Harbour porpoise ( <i>Phocoena phocoena</i> )	CO1, CO2, CO3	N
Dogger Bank SAC	Annex I Sandbanks slightly covered by seawater all the time	Supporting processes comprising water quality, sediment quality, hydrodynamic regime	N

### 3.4 LSE in-combination assessment

This section determines whether there are impacts from other plans or projects which could act in-combination with those of the project to create a significant effect on conservation objectives.

#### In-combination assessment where an LSE has already been identified:

If a significant effect on the conservation objectives alone has been identified, in-combination effects on those conservation objectives will not be further assessed in the LSE stage as it will be assessed in the AA.

#### Existing Plans or Projects:

The in-combination assessment considers projects which have been approved or where an application has been submitted. Those projects which have been fully completed or being installed are no longer considered within the in-combination assessment. These projects form part of the site's new baseline and the cumulative effect of further activities will be considered by the Habitats Regulations Assessment when evaluating the significance of the effects against the conservation objectives. For example, relatively small impacts in a site which has been heavily impacted over time (and thus has a restore objective) will have a greater significance compared to the same impact in a site with no previous impacts.

#### Other plans or projects occurring in the Site (Dogger Bank SAC; Feature: Annex I Sandbanks slightly covered by seawater all the time):

No further in-combination assessment has been undertaken at the LSE stage as this will be assessed at the stage 2 AA stage.



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Could any other activity act IN-COMBINATION with the project to have a significant effect the conservation objectives?		
Feature	Conservation Objective	Conclusion
Southern North Sea SAC		
Harbour porpoise ( <i>Phocoena Phocoena</i> )	1. Maintain - Harbour porpoise a viable component of the site	No. A review of activities and projects occurring in the SNS SAC have indicated that there will not be any projects which represent a significant risk to supporting habitats, prey availability or harbour porpoise condition. Therefore, the minor effects of the project are unlikely to significantly affect the conservation objectives of the site even when considered in-combination with other plans or projects on-going in the SAC.
	2. There is no significant disturbance of the species	No. A significant number of activities are expected to occur in the SNS SAC during 2025. The management of disturbance and displacement associated with the impulsive noise generated by these projects is being actively managed through the cross-industry developers coordination forum (DCF). The project is not expected to contribute any further impulsive noise into the SAC so is not considered likely to increase disturbance levels in the SAC.
	3. Maintain - The condition of supporting habitats and processes, and the availability of prey is maintained	No. A review of activities and projects occurring in the SNS SAC have indicated that there will not be any projects which represent a significant risk to supporting habitats, prey availability or harbour porpoise condition. Therefore, the minor effects of the project are unlikely to significantly affect the conservation objectives of the site even when considered in-combination with other projects ongoing in the SAC.



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<b>Could any other activity act IN-COMBINATION with the project to have a significant effect the conservation objectives?</b>		
<b>Feature</b>	<b>Conservation Objective</b>	<b>Conclusion</b>
<b>Dogger Bank SAC</b>		
Annex I Sandbanks slightly covered by seawater all the time	1. Restore - Extent and Distribution of sandbanks habitat 2. Restore - Structure and Function comprising distribution of sediment types, biological assemblages and topography	Yes.
	3. Maintain - Supporting processes comprising water quality, sediment quality, hydrodynamic regime	No. There will be no mechanism whereby the water or sediment quality could be affected as the deposits are chemically inert. The deposits are too small to significantly alter the movement of sediment or hydrodynamic regime. There will be no changes obvious beyond the several metres from deposit.



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### 3.5 LSE conclusion: In-combination

#### No Likely Significant Effect – In-Combination

It **can** be concluded that the activity is unlikely to cause a significant effect in-combination with other plans or projects on the conservation objectives of the following site(s):

Site	Feature	Conservation Objective	LSE?
Southern North Sea SAC	Harbour porpoise ( <i>Phocoena phocoena</i> )	CO1, CO2, CO3	N
Dogger Bank SAC	Annex I Sandbanks slightly covered by seawater all the time	Supporting processes comprising water quality, sediment quality, hydrodynamic regime	N

#### Likely Significant Effect Possible – In-Combination

It **cannot** be concluded that the activity is unlikely to cause a significant effect in-combination with other plans or projects on the conservation objectives of the following site(s):

Site	Feature	Conservation Objective	LSE?
Dogger Bank SAC	Annex I Sandbanks slightly covered by seawater all the time	Extent and Distribution, Structure and Function	Y



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## 4 Stage 2: Appropriate Assessment – Could the activity adversely affect the integrity of a site?

Following the LSE assessment (Stage 1) the Secretary of State must undertake an AA to determine whether the proposed activities, when considered alone or in-combination with other plans and projects, could have an adverse effect on the integrity of those sites.

### Integrity test and Conservation Objective Attributes

The “*integrity of the site*” is not defined in the Conservation Objectives. However, EU and UK Government guidance defines the integrity of a site as “*the coherence of the site’s ecological structure and function, across its whole area, or the habitats, complex of habitats and/or populations of species for which the site is or will be classified*” (EC, 2000; Defra, 2012). Therefore, the integrity of the site applies to the whole of the site, and it is the potential impacts across the whole of the site that are required to be appropriately assessed.

To inform an AA, the SNCBs provide supplementary advice on conservation objectives. The “**attributes**” are fundamental to the supplementary advice on conservation objectives. These biological, physical and chemical properties together describe the ecological requirements of the site and the conservation objectives. To determine whether an activity may impact the site’s integrity, an AA will need to consider whether the activity may impair or degrade any of these attributes.

### Attribute Targets

Each attribute has a target of maintain or restore/minimise, and these targets are informed by the condition assessment (undertaken by SNCBs). The targets guide the management approach for the site. Where a target of restore is identified, it means the SNCBs have identified that activities have or are taking place which have degraded an attribute. In these situations, it is important that activities look to minimise, **as far as is practicable**, any further deterioration. Where a target of maintain is proposed, it means the attribute is sufficiently unimpeded that it favourably supports the condition of the feature and no active intervention is required to reduce pressures.

**Note: Where attribute characteristics are similar, they have been grouped together for the purposes of the assessment.**



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## 4.1 Appropriate Assessment Alone: Dogger Bank SAC

Scope of AA:

Feature assessed: Annex I Sandbanks slightly covered by seawater all the time

Attributes related to the conservation objective “*supporting processes*” have not been considered in the AA as this conservation objective was not deemed to be affected.

**Pressure:** Deposition of hard substrate.

Attribute Group 1: Extent and Distribution			
Feature	Attribute	Attribute Target	Magnitude of Impact*
Annex I Sandbanks slightly covered by seawater all the time	Extent and distribution	Restore	Minor effect

\*Details are provided in the conclusion outlined in the text below.

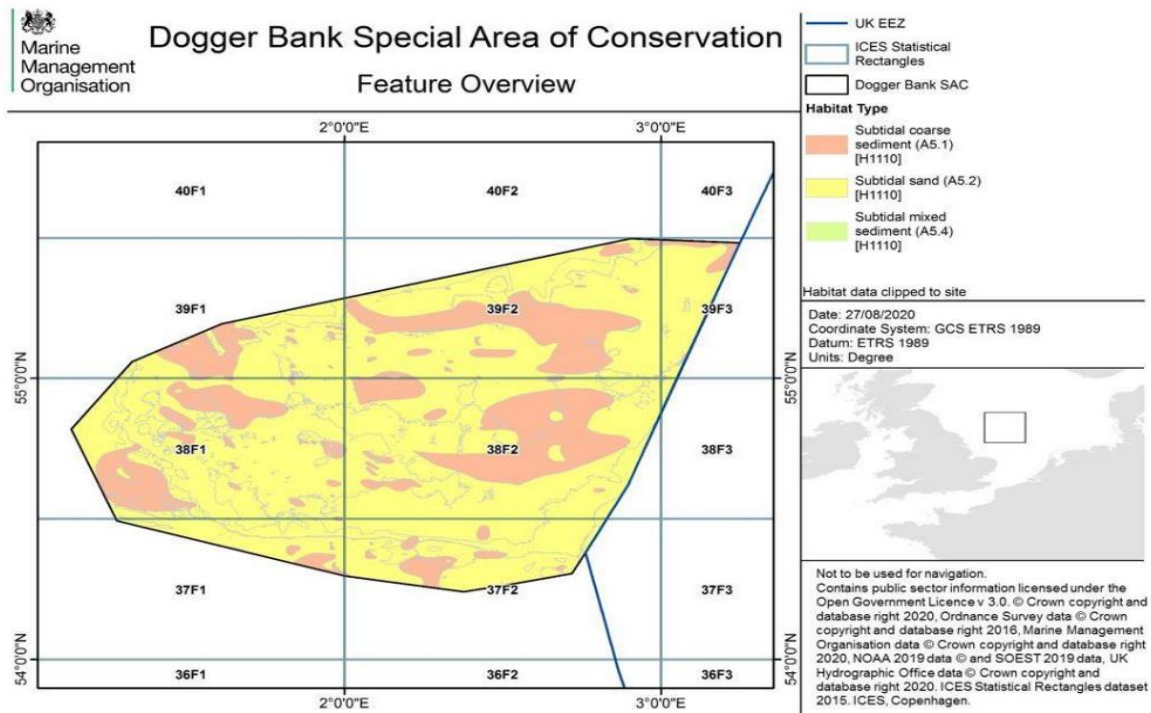


Figure 4. Sediment distribution in Dogger Bank SAC. (Barnfield et al., 2021)

The Dogger Bank SAC has a conservation objective to restore the extent and distribution of the subtidal sandbank feature within the site. This restore objective is driven by the view that the site is in unfavourable condition which is partly due to the presence of existing or consented energy infrastructure (e.g., offshore windfarms and oil and gas infrastructure) which has caused the loss of sandbank habitat.

The placement of rock will cover the area of seabed adjacent to the current location of the rig’s leg, replacing the naturally sandy sediment with a hard substratum. It is not possible to determine whether these will be removed as part of any future decommissioning programme, so the assessment assumes this to be a permanent change. The hard substratum would not be capable of supporting the same infaunal species assemblage as the original sandy



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sediment and thus not offer the same ecological function to the sandbank. This smothering of the sandy sediment with hard substratum will result in a reduction in the total area of sand found on the sandbank and this could result in a direct and proportional reduction in the extent of the feature within the site. The area of this loss or degradation is very small however, namely the area of the deposits in the Dogger Bank SAC from the project results in 546.44 m<sup>2</sup>, which equates to 0.0000044% of the estimated area of sandbank in the site.

The rock will be placed on the seabed surface and initially will remain a prominent feature on the seabed. However, over time it is likely to show varying levels of burial and exposure. For example, multibeam bathymetric imagery provided by the applicant (Figure 5) shows that the effects of previous deposition of rock on sediment transport and physical processes were restricted to the north of the deposition and are of limited extent. This imagery is likely to be indicative of the situation that will be observed at proposed deposit location and shows that whilst there will be localised change in bedforms there is no reason to assume such a change would have adverse effects on the sandbank function.

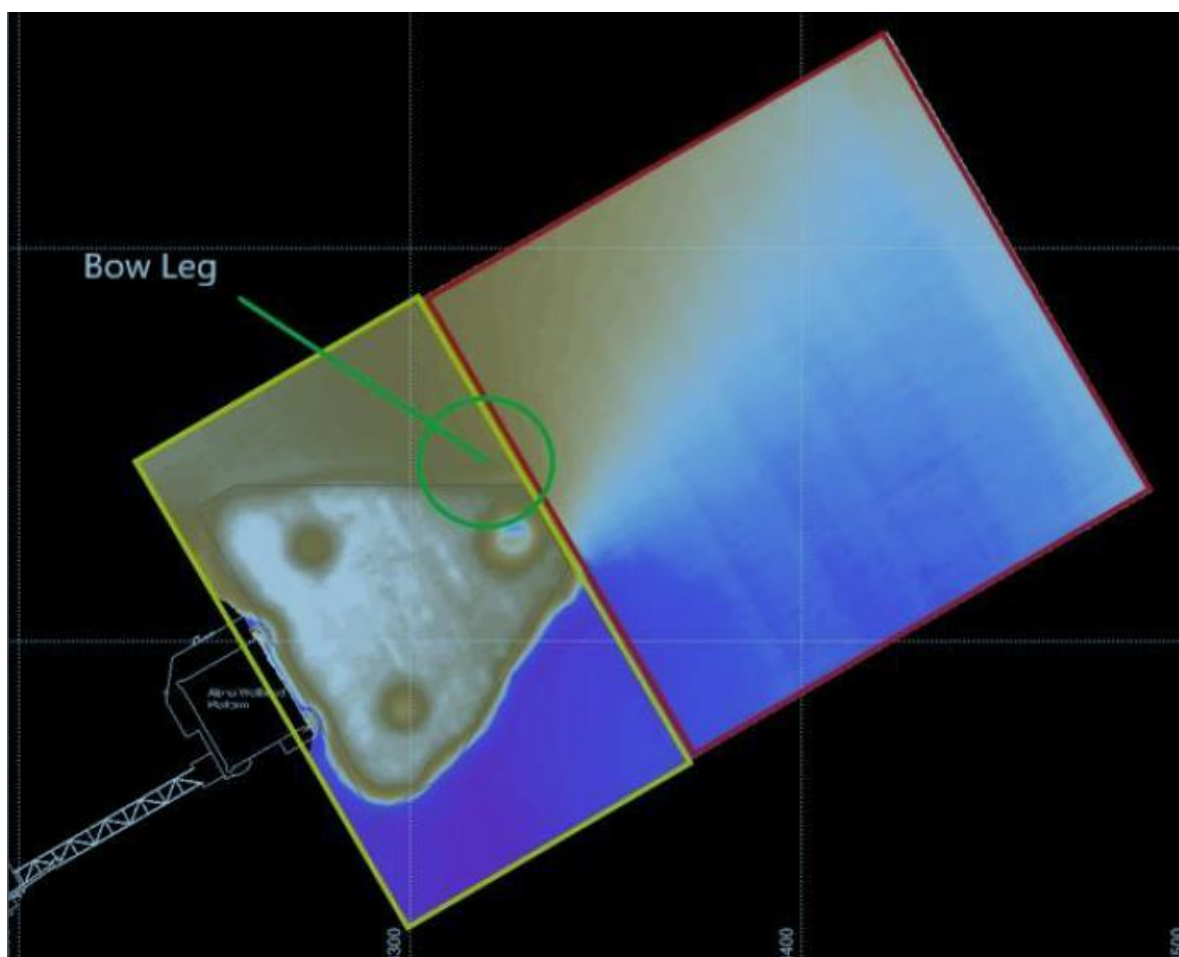


Figure 5. Multi-beam echosounder result from Survey Area showing the existing rock pad at Cygnus Alpha Wellhead Platform (Fugro, 2024)

The area to be covered by deposits is already characterised by the existing rock pad to the south and the deposition of rock (546.44 m<sup>2</sup>) will not significantly change the characteristics of the immediate area. Ithaca have provided imagery from the existing rock pad at Cygnus AWHP which shows a degree of colonisation by benthic fauna (Figure 6). While this has not been

characterised and only imagery is available at present it appears that the rock placed does not remain uninhabited.



Image 5: formation of rock pad

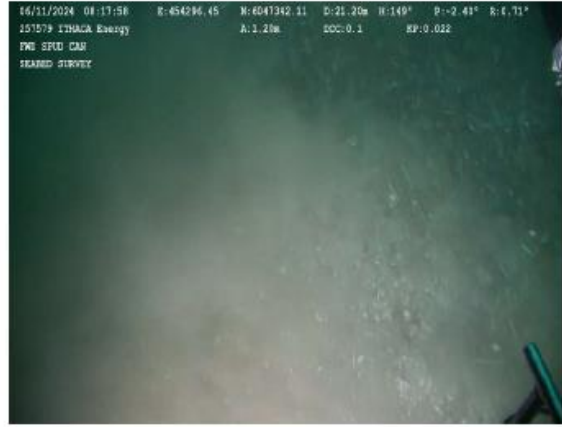


Image 6: interface between rock pad & seabed adjacent

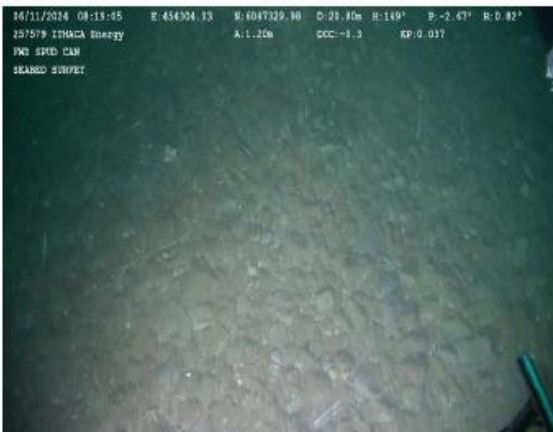


Image 7: formation of rock pad

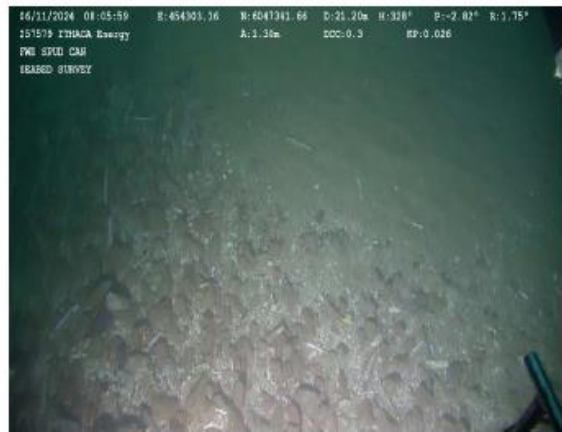


Image 8: interface between rock pad & seabed adjacent

Figure 6. Images of Cygnus Alpha rock pad and Adjacent Seabed (Fugro, 2024)

Whilst the project will cause some further change to the extent of sandy habitat in the SAC, the area of seabed that will be covered by rock is so small that it cannot make a significant change to the large-scale topography, sediment composition or biological assemblages of the sandbank feature in site.

Attribute Group 2: Structure and Function			
Feature	Attribute	Attribute Target	Magnitude of Impact*
Annex I Sandbanks slightly covered by seawater all the time	Structure - Physical structure: finer scale topography	Restore	Negligible effect: any changes in topography created by flow will likely not stretch more than several metres from the deposit.
	Structure - Physical structure: sediment composition and distribution	Restore	Minor effect: Very localised changes in sediment composition expected.



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Attribute Group 2: Structure and Function			
Feature	Attribute	Attribute Target	Magnitude of Impact*
	Structure - Biological structure: key and influential species	Restore	Minor effect: Very localised changes in key and influential species associated with rock deposits
	Structure - Biological structure: characteristic communities	Restore	Minor effect: Very localised changes in characteristic communities associated with rock deposits
	Structure - Function	Restore	Minor effect: Very localised changes function associated with rock deposits

\*Details are provided in the conclusion outlined in the text below.

### Physical structure & Function

The rock deposit is specifically intended to stabilise the rig and prevent further scouring which is a safety issue for the rig. The rock will be placed close to the seabed surface and initially will remain prominent features on the seabed over time. However, it is likely to show varying levels of burial and exposure.

The deposition of rock will change the local topography given the change in substrate size relative to the surrounding environment (rock for stabilisation vs. sandbank). The rock will represent a slightly elevated feature relative to the surrounding sand. It will also likely cause some degree of scour, deposition and alteration in sediment transport (i.e., changes in bedforms in the immediate vicinity). The extent of this localised change in topography is uncertain, however, observations from the multibeam data collected over the existing rock pad deposit (Figure 5) show significant seabed change and deposition is only likely to extend a few tens of meters from the deposit location. As such, it is not anticipated that significant changes to either the large scale or finer scale topography of the SAC will take place from the much smaller additional deposit proposed under this application.

### Biological Structure & Function

Rock deposits have previously been placed at this location as part of other rig-stabilisation projects, and Ithaca has provided imagery showing their condition after ten years *in situ*. These images offer a useful indication of how the proposed rock deposits may appear in the future. Unlike other sandbanks with high bedload transport, the evidence suggests these deposits are unlikely to become buried beneath sediment. Instead, they will likely persist as a stony substratum of cobbles interspersed with small patches of sand and sediment. The imagery shows this substratum to be relatively stable and, in some areas, supporting a faunal turf, with occasional mobile fauna such as crabs and starfish (Figure 7). This represents a distinct habitat compared to the adjacent flat, featureless sandy seabed.



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Figure 7. Screenshot from 2025 Footage Taken at Bow Leg at Cygnus Alpha (DR/2500/6, 2025)

Although no biological survey data are available to compare the existing rock protection with surrounding sediment, it is expected that species dependent on open soft-sediment environments such as certain sessile infaunal species will decline, while epifaunal species and those associated with hard surfaces and structural complexity will increase.

The Dogger Bank, while dominated by sands and soft sediments, also contains extensive areas of coarse gravelly substrata (Figure 4). Both the JNCC survey report (Ware & McIlwain, 2015) and the SAC site selection report (2011) note that some areas of the SAC feature gravelly, stony substrata with pebbles and cobbles. It is therefore plausible that the proposed rock deposits will be colonised by assemblages with similarity to those found on naturally occurring coarse sediments. For example, Diesing *et al.* (2009) observed that epifauna on pebbles in the Dogger Bank SAC included the soft coral *Alcyonium digitatum*, the bryozoan *Alcyonidium diaphanum*, and serpulid worms, with occasional occurrences of the brittlestar *Ophiothrix fragilis*, the bryozoan *Flustra foliacea*, and the anemone *Bolocera tuediae*. Motile fauna, such as hermit crabs and starfish, was also recorded across various sediment types, including coarse stony habitats.

Whilst areas covered by rock are considered a loss of sandbank habitat for the purposes of HRA extent and distribution assessments, due to the naturally occurring presence of stones, rocks and gravel in areas of the Dogger Bank, these deposits may still provide functional habitat for some sandbank-associated communities offering refugia, feeding opportunities, and aggregation areas. Mobile organisms such as crustacea, amphipods, polychaetes, and fish may utilise these areas. There is also evidence of sediment accumulating/visible between the stone clasts which may offer possibilities for benthic fauna. However, further evidence from monitoring and survey work is required to fully understand how these deposits integrate into the natural environment and their ecological implications.

In summary, given the information above and the limited extent of deposition of rock (546.44 m<sup>2</sup>; 0.0000044% of the estimated area of sandbank in the site), no significant effect



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is expected on key and influential species, characteristic communities or the function of the sandbank. The impact area is too small relative to the area of the SAC for the rock placement to negatively affect the structure and function of the site.



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## 4.2 Appropriate Assessment In-combination: Dogger Bank SAC

**Note: The attributes assessed in the in-combination assessment are the same as those in the assessment alone, only the attribute group titles are shown to reduce the size of the document**

<b>Attribute Group 1: Extent and Distribution</b>
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<b>Attribute Group 2: Structure and Function</b>
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The Dogger Bank SAC is an area of significant industrial activity comprising oil and gas, offshore wind, carbon storage and marine aggregates. Much of this activity has resulted in the deposition of infrastructure and hard substrates (e.g., rock protection and concrete mattresses) on the seabed. JNCC undertook an assessment of the condition of the Annex I Sandbank feature in the Dogger Bank SAC and determined it was in unfavourable condition due in large part to the extent of infrastructure and seabed deposits on the sandbank feature. It is JNCC's view that the amount of infrastructure on the sandbank is of such a scale that it is causing a significant degradation in habitat extent and ecological function. This conclusion has resulted in targets requiring the restoration of the following conservation objective attribute groups:

- Extent and Distribution
- Structure and Function

Because of the restore target, further degradation could take the site further away from its conservation objective.

### Infrastructure within the site - Existing Baseline

Supplementary Advice on Conservation Objectives for Dogger Bank SAC (JNCC, 2022) does not reference the total amount of deposits or infrastructure in the SAC and there is no direct evidence from monitoring to inform the condition assessment. The assessment is instead based on expert judgement. This is used to determine if loss of habitat is happening at a scale which could degrade the site's condition.

To help address this uncertainty and evaluate the level of degradation the site has experienced as well as understanding the contribution this application could make to the overall condition of the site, the Department has undertaken a review to understand how much of site is potentially affected by hard deposits. The steps of this review are outlined below:

#### Step 1: Designation Baseline

Oil and gas infrastructure has been located within the Dogger Bank SAC for years, and it is difficult to map the historically placed infrastructure. However, it has been reasonably assumed that the site was in an acceptable condition at its time of designation and did not require restoration. This assumption has been taken from the JNCC SAC Selection Assessment Document which was produced to support the designation of the site (JNCC, 2011). It states the following:

#### Conservation of structure and functions - Annex 1 sandbank

- Degree of conservation of structure: The report states "*a suggested grading is II: structure well conserved*".



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- Degree of conservation functions: The report states “*a suggested grading is II: good prospects*”.

The overall grade for the conservation of structure and function criterion is grade B (good conservation). The report further indicates that “*active restoration of habitat on the Dogger Bank would be difficult since the structure and functions of the habitat and methods to restore it are not known (and are unlikely to be cost-effective). However, a cessation of anthropogenic disturbance could allow natural recovery of the biological communities associated with Dogger Bank.*”

- Restoration possibilities: The report states “*the suggested grading for this criterion is II: restoration possible with average effort*”.

### Step 2: Deposits made between 2011 - 2016

The Department undertook a review of consented deposits between 2011 and 2016 (Department for Business, Energy & Industrial Strategy, 2021). This identified that within the Dogger Bank SAC 0.064763 km<sup>2</sup> of deposits were placed on the seabed, which represents 0.000525% of the SAC.

### Step 3: Deposits made between 2017 – 2025: OPRED permits

A review of the deposits applied for within the SAC was undertaken by OPRED in 2025 and covered the years 2017 to 2025 and this showed that up to 0.024 km<sup>2</sup> have been placed on the seabed in the Dogger Bank SAC (see 8. Appendix for full list of applications). Note that these are the upper limits of consented deposits, not the actual amounts which may be less. Though the review does not show the full picture and there may be some deposits that have been missed, it represents a large proportion of the deposits. It also does not include infrastructure which has been removed.

### Step 4: Offshore Wind Deposits

The total deposits of windfarm infrastructure and scour protection in the SAC total 13.52 km<sup>2</sup>.

### Results

The Dogger Bank SAC was formally designated in 2017, but was recommended to the EU in 2011, which is when the SAC site selection document was written (JNCC, 2011). At this point in time, the SNCBs stated that the condition of the site was acceptable although some restoration of SAC habitat was advisable with average effort required. The table below summarises the deposits placed in the site between 2011 and 2025.

### Deposits undertaken from 2011 to 2025 (non-exhaustive)

Deposit activity description	Area (km <sup>2</sup> )
Total Deposits 2017–2025: OPRED Approvals (see 8. Appendix)	0.024 (figure may not include every deposit within the time period)
Total Deposits 2011–2016: OPRED Approvals	0.064763
Windfarm Infrastructure and rock scour protection	13.52*



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Deposit activity description	Area (km <sup>2</sup> )
Total Area - Deposits in Dogger Bank SAC: OPRED approvals and Offshore Wind	13.61
Total Area - Deposits in Dogger Bank SAC: OPRED approvals without Offshore Wind Infrastructure	0.089
<b>Total Proportion of Dogger Bank SAC affected by hard substrate deposits since 2011</b>	<b>0.1103%</b>
<b>Total Proportion of Dogger Bank SAC affected by hard substrate deposits since 2011 (excluding OWF)</b>	<b>0.00072%</b>

Note: The area of the Dogger Bank SAC is 12,331 km<sup>2</sup>.

\*Source: Dogger Bank South Report to Inform Habitats [Regulations](#) Assessment. [Website](#)

The table below itemises deposit activities to be applied for or to be undertaken in the future within the Dogger Bank SAC known at the time of writing.

#### Projects potentially taking place within the Dogger Bank SAC

Activity	Company	Disturbance (Temporary and permanent, km <sup>2</sup> )
Scouring protection at Cygnus Bravo (not submitted yet)	Ithaca (NE) E&P Limited	0.0055
Dogger Bank D Wind Farm	Doggerbank Offshore Wind Farm Project 4 Projco Limited	Unknown – At pre-application stage
<b>Total</b>		<b>0.0055 km<sup>2</sup></b>
<b>Total (percentage of Dogger Bank SAC area)</b>		<b>0.000045%</b>

The estimates presented above are potentially overestimates as these represent the deposit quantities applied for and in practice the deposited quantities are often less than this; for example, these include provision for gravity base structures for the earlier Dogger Bank windfarms, which incorporated very large seabed footprints but were not utilised in the end. It should also be noted that this is not an exhaustive list of every deposit and there may be some which have not been included. However, these are not likely to be large deposits or represent significant areas.

The review has identified that between the site being recommended for designation to the present day approximately 13.61 km<sup>2</sup> of deposits have been placed on the seabed. Further, additional deposits are planned at Cygnus Bravo, and a windfarm is at pre-application stage (details of which are not known at the time of writing). As discussed above, this may not be an exhaustive list of deposits within the SAC. However, it does represent a very large proportion of the permitted deposits. The cumulative area of deposits and infrastructure already placed amounts to 0.1103% and known deposition in the future amounts to 0.000045% of the site which is an extremely small proportion of the total extent of the feature in the SAC. It is not clear how the SNCBs have ascertained that such a small proportional area of seabed deposits could impact the functionality and biological assemblages of the SAC to an extent whereby its condition would be considered unfavourable. However, the addition of a further 546.44 m<sup>2</sup>



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of deposits, which equates to 0.0000044% of the feature, in addition to the 0.1103% of the feature that is already affected by deposits would make a negligible difference to the condition of the site.

The site has conservation objective targets to restore the extent and distribution as well as the structure and function of sandbank habitat. The restoration objective is that activities must look to minimise, as far as is practicable, changes in substratum within the site. Considering the restoration objective, the contribution made by the rock deposits from this project on the condition of the site and the effect it would have on the site's restoration potential would be so small as to be immaterial.

<b>Conclusion</b>		
<b>Feature</b>	<b>Adverse Effect on Integrity</b>	<b>Reason</b>
Annex I Sandbanks slightly covered by seawater all the time	No	Very little of the SAC has been covered by seabed deposits since its designation (0.1103%). The additional hard substratum proposed to be deposited by the project amounts to a further 0.0000044% of the site. Such a small additional contribution on top of the small existing area of the SAC affected by deposits, is unlikely to significantly alter the condition of the site. The coherence of the habitats and species which underpin the complex of sandbank habitats across the site will not be altered.



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## 5. Conclusion of Habitats Regulations Assessment

An assessment has been undertaken to determine whether the Ithaca rock deposits at the Cygnus AWP to stabilise the rig and prevent further scouring could significantly impact the conservation objectives of any site within the UK National Site Network. The likelihood of a significant effect on the conservation objectives of the following site and features could not be ruled out for the following sites and features:

- Dogger Bank SAC – Sandbanks covered by seawater all the time

The AA has determined that the effects of the project on the SAC will be minimal and not significant.

The Secretary of State, therefore, concludes that the proposed project will not detract from the restore objectives of the site or adversely affect the integrity of the SAC, either alone or in combination with other plans and projects.



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## 6. Statutory Nature Conservation Body Consultation

### JNCC comments (received 10<sup>th</sup> December 2025)

#### Dogger Bank SAC

##### **Likely Significant Effect**

We **agree** that it **cannot** be concluded that the activity is unlikely to cause a significant effect alone on the conservation objectives of the Dogger Bank SAC in relation to Annex I sandbanks noting the whole of the Dogger Bank SAC is designated as Annex I sandbank.

We **agree** that it **cannot** be concluded that the activity is unlikely to cause a significant effect, **in-combination with other plans or projects**, on the conservation objectives of the Dogger Bank SAC in relation to Annex I sandbanks.

##### **Appropriate Assessment (AA) Alone**

We **agree** that it **can** be concluded that the activity is unlikely to cause adverse effect on integrity **alone** on the conservation objectives of the Dogger Bank SAC in relation to Annex I sandbanks.

##### **Appropriate Assessment (AA) In-combination**

We disagree that it can be concluded that the activity is unlikely to cause adverse effect on integrity, in-combination with other plans or projects, on the conservation objectives of the Dogger Bank SAC in relation to Annex I sandbanks.

We recognise that the area impacted by deposits as provided in Table 1 is small in comparison to the overall site area. However, we do not consider 546.44m<sup>2</sup> to be an insignificant footprint and, as the site is already in unfavourable condition, the additional footprint of the proposed deposits would take the site further away from its restore objective. We therefore disagree with the statement that “*the contribution made by rock deposits from this project on the condition of the site and the effect it would have on the site’s restoration potential would be so small as to be immaterial*”.

#### SNS SAC

##### **Likely significant Effect**

We **agree** with the conclusion that the activity is unlikely to cause significant effect alone on the SNS SAC in regard to seabed disturbance and deposition of hard substrate.

We **agree** with OPRED’s conclusion that the activity is unlikely to cause significant effect **in-combination with other plans or projects**.

#### Comments to OPRED



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JNCC would like to take this opportunity to highlight that we are reviewing the Habitats Regulations Assessment template used by OPRED. We would like time to consider the approach to in-combination assessment and new site baselines. In addition, JNCC don't believe that the evidence presented in the AA rules out, beyond all reasonable scientific doubt, an adverse effect on a site's integrity. We will follow up with more detailed comments on this in due course.

#### **OPRED response**

OPRED does not fully agree with the opinion of JNCC on this matter. OPRED does not consider there to be sufficient grounds, justification, or evidence to support the assertion that the placement of very small deposits of rock within the Dogger Bank SAC has the potential, in combination with other plans and projects, to adversely affect the integrity of the site.

The rock deposit is very small, covering only 546 m<sup>2</sup>, and any effects will be confined to the immediate vicinity of the deposit location, which lies within the 500 m zone of an operational gas platform. Two of the three legs have been placed on an existing rockpad and the third leg is placed on sandbank habitat, which is where the scouring has taken place. Such a minor deposit in an area that already contains infrastructure and existing rock deposits is not considered capable of causing significant ecological impact. OPRED therefore does not agree that this small deposit will result in a significant reduction in the population of any species or lead to a meaningful loss of functional habitat.

The sediment distribution at Dogger Bank includes extensive areas of coarse, gravelly substrate with pebbles and cobbles, which are identified in the conservation advice as an inherent part of the Annex I feature subtidal sandbanks that are permanently covered by seawater. The naturally occurring presence of stones, rocks, and gravel means that the rock deposit may be colonised by assemblages similar to those found naturally on coarse sediment. Indeed, the applicant has demonstrated through studies that previous rock deposits in the same area have, over time, become interspersed with sand and sediment, supporting faunal turf and mobile fauna. Consequently, OPRED does not consider that introducing a small area of stones and rocks will significantly alter the biological or physical structure of the sandbank. For example, it will not substantially change species composition or the trophic structure of the bank.

JNCC's position states that the footprint of 546 m<sup>2</sup> is not an insignificant footprint, and the additional deposit will take the site further away from its site restoration objective. In comparison the Dogger Bank SAC's footprint is 12,331 km<sup>2</sup> and the additional footprint of the rock deposit alone, and not in combination with other plans and projects is 0.0000044%.

In order to assess the in-combination effect of the project, OPRED has undertaken a quantification of the total area of the SAC affected by infrastructure and hard substratum. It was concluded that from 2011 (when the data was collated), the footprint of deposits in the Dogger Bank SAC (oil and gas) is 0.00072% of the total site. That figure increases to 0.1103% when including offshore wind farms. This means that more than 99% of Dogger Bank SAC is unaffected by the deposit of hard substratum. Future deposits (that are in the planning system) amount to an additional 0.000045% of the area of Dogger Bank.



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JNCC has not stated which physical or ecological processes, or which populations, are considered to be degraded or impaired by the proposed deposits. It is OPRED's opinion that the cumulative increase in the hard substratum footprint resulting from the current proposal is so small that its effect on site integrity would be immaterial. It is important to reiterate that 'integrity' in this context refers to the ability of the site as a whole to maintain its ecological functions and to support the habitats and species for which it has been designated. Based on the evidence and analysis presented, OPRED maintains that the proposed deposits will not compromise the integrity of the Dogger Bank SAC due to the small scales involved.



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## 7. References

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Ware, S. & McIlwaine, P. 2015. Dogger Bank SCI Monitoring Survey – CEND 10/14 Cruise Report. Marine Evidence Survey Data, No. 3.

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## 8. Appendix

Table 2. Total Dogger Bank SAC Deposits 2017–2025: OPRED Approvals.

Operator	Name	Reference Number	Applied for – Deposit area (km <sup>2</sup> )
DNO North Sea (ROGB) Limited	Ketch Decommissioning Project - PL1612 and PL1613 removal	ML/818/0	0.0010340
DNO North Sea (ROGB) Limited	Schooner Decommissioning Project - PL1222 and PL1223	ML/819/0	0.0012800
ENI Energy E&P UK Limited	Cygnus Rock Stabilisation Works	DR/2500/0	0.0054720
Ineos UK SNS Limited	Cavendish Platform and Jacket removal	ML/1031/0	0.0000500
Tampnet AS	Cygnus Fibre Optic Cable Scour Protection	ML/863	0.0001000
Wintershall	Wingate Plug and Abandonment works	WIA/1824 ML/1231/0	0.0001300
Chrysaor Production (U.K.) Limited	Kelvin decommissioning	ML/891	0.0004000
Chrysaor Production (U.K.) Limited	Monroe well abandonment	ML/1007/0 and CL/758/5	0.0021000
Chrysaor Production (U.K.) Limited	Katy plug and abandonment - Well 44/19b-K1Z	ML/1067	0.0004000
Chrysaor Production (U.K.) Limited	Kelvin TM decommissioning	ML/1256 and CL/757/8	0.0005720



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Operator	Name	Reference Number	Applied for – Deposit area (km <sup>2</sup> )
Chrysaor Production (U.K.) Limited	Munro MH decommissioning	ML/1257 and CL/758/8	0.0009620
ConocoPhillips Production (U.K.) Limited	Murdoch MD well abandonment rig stabilisation	WIA/930 ML/526	0.0004000
Ithaca (NE) E&P Limited	Cygnus A&B Pipeline Deposits	EX/256/2025 & EX/257/2025	0.0002160
Neptune E&P UK LTD	Greater Cygnus Area Appraisal Well	DRA/528, DEP/1436, DR/1437	0.0021300
Neptune E&P UK LTD	Cygnus platform A and B pipeline stabilisation works within 500m safety zones	EX/144/2023	0.0006228
Premier Oil E&P UK Limited	Hunter Rock Placement	ML/1072	0.0053000
Premier Oil E&P UK Limited	Hunter Rock Placement	ML/1172 and CL/1481	0.0004020
Premier Oil E&P UK Limited	Hunter P&A	WIA/1642	0.0007910
Premier Oil E&P UK Limited	Rita P&A operations	ML/1211 and CL/1513	0.0002010
Premier Oil E&P UK Limited	Hunter 44/23a-12Z P&A operations	ML/1249 and CL/1527	0.0007910
Perenco UK Limited	Tyne	DCA/39, ML/248	0.0006470
Perenco UK Limited	Tyne	DP/14/18	0.0004580
Tampnet AS	Murdoch bypass	SA/1166 - ML/495	0.0000360