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Five Estuaries Offshore Wind Farm
Limited
Natural England

Your Ref:

Our Ref: EN010115

Date: 23 December 2024

Dear Sirs

The Infrastructure Planning (Examination Procedure) Rules 2010 (as amended) – Rule 17

Application by Five Estuaries Offshore Wind Farm Limited for an order granting development consent for the Five Estuaries Offshore Wind Farm project

Request for further information

We are writing under Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010 (as amended). Requested information relates to benthic ecology.

For the Applicant

Benthic Mitigation and Sediment Deposition

- 1) With regard to Natural England (NE) item E30 [PD2-007], explain why an un-caveated commitment to using readily removable cable protection (if required), together with the removal of protection during decommissioning, cannot be included in section 7 of the Margate and Long Sands Special Area of Conservation Benthic Mitigation Plan [REP4-022]?
- 2) How have NE's concerns regarding sediment deposition from sandwave levelling [item E33 in item E33 in PD2-007] been addressed?

Consideration of Alternatives

- 1) Noting the Applicant's response in [REP1-051] to NE item F48 in [PD2-008], can the Applicant explain whether or not the offshore export cable corridor could be further co-ordinated with the North Falls Offshore Wind Farm (NF OWF) to potentially avoid the Margate and Long Sands Special Area of Conservation (MLSSAC)? If further coordination with the NF OWF would not be possible, explain why that is considered to be the case?

- 2) Paragraph 2.3.7 in the Benthic Compensation Strategy Roadmap (BCSR) [APP-047] states that the location of the final cable route for the Proposed Development will be informed by necessary separation from cables proposed as part of the NF OWF project. What separation distance between the project's export corridor cables would be necessary and how is that distance determined?

Compensation Measures

With regard to compensation measures, the Applicant should address NE's comments in [PD2-008] as follows:

- 1) NE item F11: Submit evidence that redundant telecommunications cables are currently causing a significant impact to qualifying features of the MLSSAC.
- 2) NE item F12: Provide a status update on any discussions held with the owners of redundant telecommunications cables.
- 3) NE item F16: The ExA notes the Applicant's response in [REP1-051] to NE's Relevant Representation. Amongst other things, that states it would be disproportionate to undertake surveys of redundant telecommunications cable locations as strategic compensation is the preferred option. Nevertheless, in the absence of evidence relating to the nature or timing of that strategic compensation, what level of confidence can be attributed to the effectiveness of that compensatory measure and why?
- 4) NE items F17, F27 and F37: Provide an update on what steps have been or will be taken by the close of Examination to update the Outline Benthic Implementation and Monitoring Plan [APP-048].

For Natural England

- 1) The Applicant has provided a Technical Note – Methodology for Determining MDS (Offshore) Rev B [REP4-034]. Has the submission of [REP4-034] addressed your concerns, as stated under items E1 and E7 in [PD2-007]. If not, explain why that is the case?
- 2) Provide an update on MLSSAC's condition, building on evidence already submitted at [REP4-063].

Responses should be submitted by **Deadline 5 (10 January 2025)**.

Yours faithfully

Grahame Gould

Grahame Gould
Lead Member of the Panel of Examining Inspectors

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