



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

FIVE ESTUARIES OFFSHORE WIND FARM

**Appendix N8A to Natural England's Deadline 8A Submission**

**Natural England's comments on 9.32 Offshore In-Principle Monitoring Plan (Revision D) (Tracked) [REP7-061]**

For:

The construction and operation of Five Estuaries Offshore Wind Farm, located approximately 57 km from the Essex Coast in the Southern North Sea.

Planning Inspectorate Reference EN010115

14 March 2025

## **Appendix N8A Natural England's comments on 9.32 Offshore In Principle Monitoring Plan (Revision D) (Tracked) [REP7-061]**

In formulating these comments, the following documents have been considered:

- [REP7-061] 9.32 Offshore In-Principle Monitoring Plan (Revision D) (Tracked)

### **Summary**

This response builds on the comments provided on migrating bats offshore in our Deadline 8 comments on Revision D of the Offshore In-Principle Monitoring Plan (REP7-061), and should be read in conjunction with those comments.

## 1.1 Detailed comments

**Table 1: Natural England's Advice On: Migrating Bats Offshore**

Document reviewed: [REP7-061] 9.32 Offshore In-Principle Monitoring Plan (Revision D) (Tracked)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	4.9.2	Natural England welcomes the Applicant's proposal to carry out a gap analysis desk study.	<p>We would also recommend the following publications for consideration by the Applicant:</p> <ul style="list-style-type: none"> <li>• Eurobats wind turbine advice,</li> <li>• Onshore wind turbine advice, Bat and onshore wind turbines- survey, assessment and mitigation by NatureScot, and</li> <li>• Environmental Impact Assessments (EIA) including (but not limited to) the North Irish Sea Array Offshore Wind Farm Chapter 35, the Oriel offshore wind farm Chapter 31, the Codling wind park Chapter 13 and the Arklow Bank wind park Chapter 13.</li> </ul> <p>All the above publications are available online.</p>
2	4.9.3/4.9.4	We also welcome the proposal by the Applicant to determine an appropriate monitoring proposal in collaboration with Natural England.	We advise that a combination of the applicant's monitoring approaches listed in the IPMP have been used for the above EIAs. We advise the Applicant to consider adopting the same approaches here (i.e. not just one of the proposed monitoring approaches, but potentially a combination of all three).
4	4.9.1/4.9.2/ 4.9.3/4.9.4	We note that, as with the previous version, not all potential monitoring options are discussed here.	Despite a number of UK offshore windfarms now being operational, offshore bat monitoring is currently in its infancy, and there is currently no offshore bat survey guidance in the same way as there is for onshore windfarms. However, there is still a need for adequate survey and scientifically appropriate impact assessment. Monitoring bats both offshore and onshore including with respect to interactions with existing arrays should be considered, to improve the

			<p>evidence base regarding potential interactions and inform mitigation strategies if required.</p> <p>Please also refer to our advice in Appendix N8 to our Deadline 8 submission.</p>
5	4.9.1/4.9.2/ 4.9.3/4.9.4	<p>We note in [REP5-074] that the Applicant maintains their position that the data submitted and cited within the German Hydrographic response [RR-035] does not support the conclusion that the proposed development area is within an important area for migratory bats between the UK and Europe.</p>	<p>We would require further information before being able to support this conclusion. We highlight that it is possible that the area could be determined as important for migrating bats, but still with insufficient information to determine impact from offshore wind turbines. For example, we may know that bats are there, but not their behaviour or their flight height. This is key information for the monitoring to capture.</p> <p>We also recommend that some of the references cited within the German Hydrographic response would be useful for the gap analysis desk study. Natural England also encourage the Applicant to further consider the survey/monitoring techniques and mitigation methodologies mentioned in the response.</p>

