Date: 07 August 2025
Our ref: 27347/519205
Your ref: EN010115

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BY EMAIL ONLY

Dear Sir/Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by Five Estuaries Offshore Wind Farm Limited ("the Applicant") for an Order granting Development Consent for the proposed Five Estuaries Offshore Wind Farm ("Project")

The following constitutes Natural England's formal statutory response to Part 2 of the Secretary of State's Request for Information (RFI) dated 11 July 2025. To inform this response Natural England have reviewed the following documents submitted into Examination by the Applicant:

- [REP8-005] 5.4 Report to Inform Appropriate Assessment - Revision D (Tracked
- [REP8-007] 5.4.3 HRA Screening Matrices - Revision D (Tracked)
- [REP8-009] 5.5.1 Benthic Compensation Strategy Roadmap - Revision C (Tracked)
- [REP8-013] 5.5.5 Guillemot and Razorbill - Evidence, Site Selection and Roadmap - Revision D (Tracked)
- [REP8-023] 9.13 Margate and Long Sands Special Area of Conservation Benthic Mitigation Plan - Revision F (Tracked)
- [REP8A-010] 5.6 Lesser Black-Backed Gull Implementation and Monitoring Plan – Revision D (Tracked)
- [REP8A-012] 9.13 Margate and Long Sands Special Area of Conservation - Benthic Mitigation Plan - Revision G (Tracked)

Natural England has been invited to comment upon:

Part 2

Onshore Ecology

35. Noting the concern raised by Natural England in their Risk and Issues Log [REP8A-053] (Point 27 in J – Onshore Ecology), the Applicant, Essex County Council, Tendring District Council, and Natural England are invited to provide comments on the wording below for an amended Biodiversity Net Gain condition within the Order:

(1) No stage of the authorised project within the onshore Order limits (excluding any onshore site preparation works) may commence until—

(a) a biodiversity net gain strategy for that stage which accords with the outline biodiversity net gain information comprising the Onshore Biodiversity Net Gain Indicative Design Stage Report has been approved in writing by the relevant planning authority in consultation with Natural England; and
(b) at least 10% of the total number of biodiversity units as required for that stage of the development (calculated using a biodiversity metric approved by the relevant planning authority in consultation with Natural England) have been secured and where appropriate proof of purchase provided in accordance with the approved biodiversity net gain strategy and to the satisfaction of the relevant planning authority in consultation with Natural England.

(2) The location for delivery of biodiversity units is to follow a prioritisation exercise, as described in the Onshore Biodiversity Net Gain Indicative Design Stage Report, with priority given to areas inside or within close proximity to the proposed Order limits.

(3) The biodiversity net gain strategy for each relevant stage must be implemented as approved.

(4) Any remaining shortfall in biodiversity units identified following detailed design will be secured prior to construction works being completed.

(5) Any biodiversity net gain strategy under sub-paragraph (1) may cover one or more stages of the onshore works.

Natural England's Comments
Biodiversity Net Gain remains voluntary for NSIP schemes until May 2026; therefore, our comments are provided in an advisory capacity. Natural England would suggest that the wording in point 1(b) is amended for clarity and to reflect current guidance and best practice in applying BNG to phased developments. The recent consultation on BNG for NSIPs also outlines the suggested approach to BNG where NSIP schemes are taking place in phases. Proposed model text in the consultation document (pg.27[1]) states that:

"The biodiversity gain plan must set out how the biodiversity gain objective is expected to be met across the entire development, and how each phase is expected to contribute towards this".

We would therefore suggest that the BNG strategy for a given stage sets out its contribution to the overall 10% ambition for the scheme, and that the condition reflects this approach. For reference, the proposed information requirements for Gain Plans are set out on pg.28 of the consultation and may be helpful for the Applicant. We agree that BNG calculations for each stage should use the approved metric (statutory metric) to align with best practice.

As an advisory note on securing gains, the recent consultation recognises that there may be cases where 'the final details of the Biodiversity Gain Plan cannot be added until after consent is granted, such as the allocation of off-site gains' (pg.26). In such instances, it proposes that updated Gain Plans and metrics are submitted to the relevant Local Planning Authority (LPA) for approval post-consent. We are awaiting the outcomes of the consultation and final guidance on applying BNG to

[1] OFFSEN FINAL Consultation on BNG for NSIPs May 2025.pdf

NSIPs but wish to highlight this suggested approach. Ultimately, the decision maker should be satisfied that any gains proposed can be appropriately secured.

Natural England supports the approach outlined in (2) and the prioritisation of local opportunities and enhancements, in line with the BNG spatial hierarchy. The Local Nature Recovery Strategy is an important point of reference when planning BNG, directing net gains to locations where they can have the greatest impact for nature and for people. We would like to highlight that the Essex LNRS (including mapping of strategic opportunities) was formally published in July 2025[2].

Marine Mammals

23. The Applicant is requested to revise ES 6.2.7 Marine Mammal Ecology [APP-076], the oMMMP-P [REP7-044], and the Outline Southern North Sea SAC Integrity Plan [REP6-022] to commit to a specific NAS, or package of NAS, in the event that driven or part-driven piles are used during the construction of the Proposed Development, in order to reduce the level of underwater noise generated and its propagation through the marine environment.

Natural England's Comments
Whilst Natural England recognises that the request for information (23) above is addressed to the Applicant; we wish to provide some clarification on this matter to assist the Secretary of State in their consideration of the application.

Natural England wishes to clarify that we have not requested the Applicant commit to a specific type of Noise Abatement System (NAS) or noise reduction method at any time, merely that they should commit to the use of NAS generally. We are also aware that the Applicant is currently investigating the most suitable types of NAS for the physical environment and constraints within the proposed development site. Therefore, we are content with the progress being made by the Applicant on this mitigation measure and do not consider a commitment to a specific system is required at this stage.

Habitats Regulations Assessment
50. Noting that a substantial amount of HRA-related information was submitted at Deadline 8 and 8A which Natural England, as the appropriate nature conservation body, may not have had the opportunity to comment on, Natural England are invited to provide any final comments on any outstanding HRA-related issues.

Natural England's Comments
Natural England is grateful for the opportunity to comment on HRA-related information submitted at Deadlines 8 and 8A. Our comments on the documents listed at the start of this letter can be found in Appendices 1-3 below.

For any queries relating to the content of this letter please contact me using the details provided below.

Yours faithfully,

[redacted]
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Telephone: [redacted]

[2] Local Nature Recovery Strategy | Essex County Council

Appendix 1 – Natural England's Benthic Ecology Advice on HRA-related information submitted at Deadlines 8 and 8A.

Table 1.1: Natural England's Advice on: [REP8-009] 5.5.1 Benthic Compensation Strategy Roadmap – Revision C (Tracked)

Document reviewed: [REP8-009] 5.5.1 Benthic Compensation Strategy Roadmap - Revision C (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	Section 6.4.21 to 6.4.28	We note that the Applicant has included monitoring plans for the project-specific removal of redundant infrastructure compensatory measure. We advise that, as this monitoring is in support of compensation, all relevant attributes of the Annex I sandbank features should be monitored to inform recovery not just topography. Our advice on project-specific measures remains unchanged (see Appendix F of our Relevant Representations [PD2-008]).	Natural England agrees that impacts from cable removal are likely to be localised. However, we advise that the monitoring should be required to consider all relevant attributes of the Annex I sandbank features to inform recovery.
2	Section 6.5.29 to 6.5.35	We reiterate our advice on seagrass habitat creation/restoration provided in our Relevant Rep [PD2-008] which states that: '*there are significant concerns about the deliverability of seagrass restoration, even on a small scale as there have been no long term successes with seagrass restoration in the UK. Seagrass restoration is included as a potential measure only where it would be a minor part of a wider package in terms of the required compensation*…' No further evidence and/or information has become available in support of seagrass restoration as a benthic compensation measure. However, we believe that it is likely this measure will need to be delivered as part	Natural England advises that should this compensatory measure option be accepted, then monitoring would need to be for the duration of the OWF project, including monitoring of further attributes to inform measures to ensure success and/or need for adaptive management measures.

		of a wider project to provide the desired ecological functionality and longevity. It is therefore not clear how the monitoring as set out fits in with a project delivered by others and ensure that monitoring will continue for the duration of the OWF project to report on compensation delivery. Also, it is not clear what the mechanisms would be to ensure deliverability of the measure if monitoring demonstrates an issue and/or what the triggers for implementing adaptive management would be.	

Table 1.2. Natural England's Advice on: [REP8-023] 9.13 Margate and Long Sands Special Area of Conservation Benthic Mitigation Plan Revision F (Tracked)

Document reviewed: [REP8-023] 9.13 Margate and Long Sands Special Area of Conservation Benthic Mitigation Plan - Revision F (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	Section 5.1.4	Natural England notes that the Applicant has made a commitment to avoid [other] features (such as Priority Habitats listed under Section 41 of NERC) '*where practicable*' during final cable routing through Margate and Long Sands Special Area of Conservation (MLS SAC). We welcome this commitment, but it only part addresses our concerns regarding potential impacts to Section 41 NERC Habitats.	Natural England advises that where avoidance is not 'practicable' during final routing, then there should be a requirement to demonstrate how impacts have been minimised.
2	Section 7.1.2	The Applicant has clarified that the total area of cable protection to be laid within MLS SAC throughout all phases of the project will be 5,400 m^2, which is welcomed. However, please see our comments in Table 1.3 Point 2 below.	We welcome the Applicant's clarification on the worst-case scenario (WCS) cable protection area/footprint as this ensures that the compensation will remain sufficient for this project. However, please see our comments in Table 1.3 Point 2 below.

Table 1.3: Natural England's Advice on: [REP8A-012] 9.13 Margate and Long Sands Special Area of Conservation Benthic Mitigation Plan Revision G (Tracked)

Document reviewed: [REP8A-012] 9.13 Margate and Long Sands Special Area of Conservation - Benthic Mitigation Plan - Revision G (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	Section 3.2.1	The Applicant has committed to deposit material removed from MLS SAC *"...updrift of levelling / seabed preparation and cable trenching operations (where it is possible to do so whilst keeping material within the SAC) to encourage natural backfill and reworking of material (except where upstream deposition may an adverse impact on another feature)*". This addresses our concern [Issue E33 in our Relevant Representations, PD2-007] that the RIAA does not fully consider the deposition of sandwave levelling dredge material on the same sediment type.	We welcome this commitment which is aimed at encouraging natural backfill and ensuring that material removed from MLS SAC will remain within the 'same sedimentary system' or 'same sediment cell.'
2	Sections 7.1.1 & 7.1.2	In Revision F [REP8-023] the Applicant clarified that the total (WCS) cable protection footprint during all project phases within MLS SAC will be 5,400 m^2. However, this has subsequently been amended to only be for construction. With regards to any requirement for further cable protection within MLS SAC during the operational phase and for maintenance, the Applicant has clarified that this will require a new marine licence. Therefore, the WCS cable protection volume has become unclear between the two revisions of the MLS SAC Benthic mitigation document. There are also inconsistencies between Section 7.1.1 of this document where it is stated that the area of cable protection in the SAC will not exceed 5,400m^2 or 5,400m^3	Natural England advises that the WCS for cable protection remains unclear. We also advise that following clarification on the WCS cable protection parameters for MLS SAC, all relevant documents/plans should be updated for consistency.

		and the RIAA [REP8-005] states that the maximum height of the cable protection will be 1.1 m (i.e. WCS volume would be 5400m^2 x 1.1m = 5,940m^3).	

Table 1.4: Natural England's Advice on: [REP8-005] 5.4 Report to Inform Appropriate Assessment - Revision D (Tracked)

Document reviewed: [REP8-005] 5.4 Report to Inform Appropriate Assessment - Revision D (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	11.2.22	We note Section 11.2.22 has been updated with reference to the updated condition assessment for MLS SAC published in January 2025. While this inclusion in the RIAA is welcomed; our concerns regarding potential lasting impacts on the SAC due to the placement of cable protection within the designated site have not been considered. Therefore, we continue to agree to disagree with the Applicant on the scale and significance of impacts of cable protection placement on MLS SAC interest features and priority habitats. Therefore, the advice we provided on the RIAA in our Relevant Representations [PD2-008] still stands.	As advised in our Relevant Representations [PD2-008], while we are unable to agree with the Applicant on the scale and significance of effect due to the placement of cable protection within MLS SAC, we welcome the Applicant's inclusion of the without prejudice benthic compensation measures. We also advise that every effort should be made to reduce the impacts through the adoption of robust mitigation measures. Natural England also advises that should further commitments and/or changes to project design be made by the Applicant then the impact assessment should be updated.

Table 1.5 Natural England's Advice on: [REP8-007] 5.4.3 HRA Screening Matrices - Revision D (Tracked)

Document reviewed: [REP8-007] 5.4.3 HRA Screening Matrices – Revision D (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	HRA Screening Matrix 4	We note that HRA Screening Matrix 4 has been updated to acknowledge that pathways of effect to sandbanks (which are slightly covered by sea water all the time) exist and, therefore, there is a potential for LSE.	This update is welcome although it does not change our advice.

Appendix 2 – Natural England's Ornithology Advice on HRA-related information submitted at Deadlines 8 and 8A.

Table 2.1: Natural England's Advice On: [REP8-007] 5.4.3 HRA Screening Matrices – Revision D (Tracked)

Document reviewed: [REP8-007] 5.4.3 HRA Screening Matrices - Revision D (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	HRA Screening Matrix 25, pg. 64	We note that the Applicant has updated HRA Screening Matrix 25: Alde-Ore Estuary Special Protection Area (AOE SPA). The Applicant considers it highly unlikely that migrating marsh harrier from this SPA have connectivity with the Five Estuaries array to the east, and as such, the Applicant has concluded that a Likely Significant Effect (LSE) due to collision risk can be discounted for both alone and in-combination effects. However, based on evidence from ringing and tracking studies, we do not agree with this assumption or conclusion.	Natural England advise that marsh harrier should have been screened into the collision risk assessment to account for post-breeding dispersal. We also consider that the assessment should have been based on the presumption that marsh harrier could depart in any direction post breeding. Moreover, we advise that the autumnal dispersal of adults and juveniles is not necessarily southward (BTO 2025, Strandberg et al. 2008). Therefore, we maintain our recommendation that marsh harrier should have been included in the migratory Collision Risk Modelling (mCRM). However, we recognise that such an exercise would be unlikely to identify significant impacts on the SPA. Therefore, whilst maintaining our view that the Applicant's approach does not reflect best practice, we do not consider the lack of a mCRM a major omission in this instance.
2	HRA Screening Matrices 26 & 27, pg. 67-68	We note that the Applicant has updated HRA Screening Matrix 26: Minsmere-Walberswick SPA. The Applicant has presumed that marsh harrier migrating to and from Minsmere-Walberswick SPA would not be at risk of collision from the Five Estuaries (VE) array, and it has discounted the feature from any LSE. However, as we have advised above, evidence from ringing and tracking studies does not support this presumption.	Natural England advises that the SPA lies north not west of the VE array. Therefore, we consider it would have been appropriate for marsh harrier should be screened into the mCRM to account for its likely migratory route from the south and post-breeding dispersal (see comment above, NE ref. 1). In addition, this would have aligned the SPA risk assessment with that of the overlapping Ramsar site (see Matrix Table 27). However, as with Alde-Ore Estuary SPA above, we do not consider this a major omission.

Table 2.2: Natural England's Advice On: [REP8-013] 5.5.5 Guillemot and Razorbill Evidence, Site Selection and Roadmap - Revision D (Tracked).pdf

Document reviewed: [REP8=013] 5.5.5 Guillemot and Razorbill - Evidence, Site Selection and Roadmap - Revision D]

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Section 1.2.3	We have identified that the razorbill compensation quantum (CQ) calculated using the Hornsea 4 method and provided to Natural England by the Applicant (on 6th February) appear not to take into account the revised survival rates set out in our interim advice (SNCBs 2024). We are concerned that the CQ target for razorbill has not been calculated correctly. In particular, the Applicant should consider the change in the razorbill survival rates for age classes 0-1yrs and 1-2 yrs from the compounded rate of 0.630, presented in Horswill and Robinson (2015) to the corrected rate of 0.792 for each of those year classes (see SNCBs 2024).	The Applicant should clarify whether the CQs provided were derived using the latest demographic rate advice. If this is not the case, the Applicant should redo the calculation and present the revised CQ for the SoS's consideration (also noting our comment on philopatry below (NE ref. 2).
2	Section 1.2.2-5, Table 3, Sections 8.1.10-24, Tables 8 and 9.	We note that the Applicant has calculated compensation quanta (CQs) for guillemot and razorbill using the Hornsea 4 method but has not used the philopatry rates to provide an estimate of the proportion of birds likely to recruit back into the Nature Site Network (NSN). Given the compensation sites are remote from the NSN, we advise that doing so would help scale the compensation measure appropriately to ensure adequate contribution to NSN coherence.	Natural England's headline advice on calculations for seabird compensation requirements was set out in [REP5-095]. We also provided further advice in [REP8-051] including: • CQs for guillemot and razorbill should be calculated by applying the Hornsea 4 method with an additional step to account for the fact that only the proportion of birds that are expected to disperse from the compensation site can be considered as potentially contributing to NSN coherence (by recruiting into colonies within the network). • The impacts derived from Natural England's advised reference displacement rates for scaling compensatory measures, i.e. 70% displacement and 2% mortality should be considered. Further,

			the **scale** of implementation of seabird compensatory measures should be sufficient to address the 95% upper confidence limit (UCL) predicted impact value, to account for the uncertainty of that impact estimate and give comfort that the measure could hypothetically compensate the upper end of the impact estimate. However, the mean or central impact value (CIV) should be used to inform and define the **target** for success criteria, if appropriate. We highlight that this approach (*i.e.* considering philopatry) has been adopted by North Falls OWF, the Examination of which has recently completed. North Falls are seeking auk compensation potentially in collaboration with Five Estuaries (*e.g*. North Falls, REP6-023). Therefore, were Five Estuaries to adopt this approach, this would facilitate a consistent calculation of the scale of compensation required by each developer. We recommend the Applicant provides full detail of the expected numbers of produced recruits that would disperse or stay at the natal colonies. We advise the Applicant does this by providing the CQ targets for guillemot and razorbill calculated using the Hornsea 4 method but presented to show the proportion likely to disperse into the NSN. In doing so, we recommend the Applicant follows North Falls's example and uses the 0.17 natal dispersal rate for razorbill from Lavers *et al* (2007) and the 0.58 rate for guillemot from Horswill and Robinson (2015).
3	Sections 8.1.10-24, Tables 9	The Applicant has calculated the potential number of breeding pairs of guillemot and razorbill that could be achieved at compensation sites by estimating the number of additional	Whilst acknowledging the difficulty in estimating the potential level of compensation each site can deliver, we highlight that the calculations undertaken by the Applicant are speculative and uncertain, especially

	and 10.	fledglings required to generate these adults and then, for guillemot, applying a correction factor of 0.667 (from Walsh *et al* 1995), to convert individuals to pairs. The calculation is also based on assumptions regarding current productivity and the expected improvements in productivity arising from the compensation measure. Natural England notes the following issues: <u>Correction Factors</u> Natural England suggest caution in applying a correction factor to calculate a potential increase in breeding pairs. Walsh *et al* (1995) state the recommended census unit for guillemots is the individual on land and advise against the routine use of a correction factor due to problems of interpretation and some evidence that at some colonies the relationship between the number of breeding pairs and the number of adults is different (e.g. del Nevo, 1990). Indeed, Harris (1989) makes a plea for the presentation of original counts rather than 'corrected' figures in published work. Furthermore, Harris *et al* (2015) subsequently point out that the correction factor to convert individuals into breeding pairs changed substantially over the course of their long-term study due to decreases in survival and colony attendance, a situation that may well be replicated in the declining southwest colonies under discussion. <u>Productivity</u> To estimate the level of increased productivity, the Applicant has used the difference between	concerning correction factors and anticipated changes in productivity. <u>Correction Factors</u> Regarding the application of the correction factor from Walsh *et al* (1995), we note that where more accurate studies of guillemot populations are considered necessary, the most suitable method is established by counting individuals at truly randomised study plots and working out a bespoke value (Harris *et al*, 1983). Photographs showing mapped nests in these plots can be replicated and compared year on year where productivity monitoring is undertaken. Natural England therefore advise that consideration be given to establishing site-specific correction factors at colonies/regions where compensatory measures are implemented. In-lieu of this, breeding pairs derived from counts of individuals should be treated as indicative estimates. <u>Productivity</u> We note the national mean productivity quoted in Horswill and Robinson is 0.672 (SD 0.147) and not 0.64 cited by the Applicant (see section 8.1.14). Furthermore, the regional average quoted in Horswill and Robinson (0.82) includes the Irish and Celtic seas as well as the Channel and so may not be representative of south-west England. It is also based on data older than 2008 (Mavor *et al* 2013, Cook and Robinson 2010). More up-to-date data from the SMP indicates a downturn in productivity (Harris et al 2024), and data recorded between 1989 and 2019 found mean productivity in Wales was 0.71 (Johnstone et al. 2023). This suggests the expected productivity in south-west England could be lower than anticipated by the Applicant.

		current productivity and expected productivity, assuming (in the absence of local data), current productivity for guillemot matches the national average, cited as 0.64 (from Horswill and Robinson 2015) and expected productivity equals the regional average of 0.82 (from Horswill and Robinson 2015). In doing so the Applicant has derived an inevitably speculative assessment of the compensation measures' potential that likely has limited scope to predict the capability of the short-listed sites. Due to these uncertainties, restricting the proposed measure to the 3 short-listed sites risks failure, especially if they are shared with other OWF developers seeking similar compensation in the area. The Applicant's proposed adaptive management, particularly the provision of additional sites could ameliorate the risk, but it will be essential to have monitoring in place to inform progress and identify any shortfalls in their predictions should they emerge. A more clearly defined collaboration with other OWF developers would likely deliver a more beneficial outcome by integrating more sites from the region.	In Tables 9 and 10 the Applicant presents a range of expected additional breeding pairs for guillemot and razorbill, respectively but it is unclear what parameters were altered to derive the upper and lower figures. Regardless, and more importantly, we advise that these figures are best configured using local data obtained from monitoring. Thus, we re-iterate and emphasise the importance of implementing a robust monitoring regime early to establish the baseline. More generally, Natural England advises that the sporadic nature of historic and recent monitoring of mainland auk colonies in the south-west introduces significant uncertainty as regards population trends. Further, there is limited information regarding pressures on these colonies, despite the recent, welcome efforts of developers to gather initial data. In that light, it is important for the Applicant's proposed collaborative approach to integrate an appropriate level of ongoing monitoring of both the candidate colonies and the pressures on them. Baseline monitoring could also consider contemporary baseline data collection in the early phases at non-short-listed sites without recent count data, but with historic breeding records of auks. This could be useful to identify additional intervention sites should adaptive management be required. Natural England consider that this work would be best approached strategically under the proposed collaborative delivery model.

Appendix 3 - Natural England's Lesser Black-Backed Gull Proposed Compensation Sites Advice on any HRA-related information submitted at Deadlines 8 and 8A.

Table 3.1: Natural England's advice on: Lesser Black-Backed Gull Proposed Compensation Sites.

Document reviewed	**Update made**	**Issue resolved?** Yes/No/Progressed
[REP8A-010]/Section 5.3.4	Natural England welcomes the Applicant's commitment to carry out seasonally appropriate surveys prior to implementation of the compensatory measure at Alde-Ore Estuary Special Protection Area (AOE SPA), to inform mitigation measures for potential impacts to the designated sites.	If appropriately secured in the DCO, then this mitigation would resolve issues J7, J10, J11, J12, J24 in Natural England's Risk and Issues Log and P19 in our PADSS [REP8A-053].
[REP8A-010]/Section 5.4.2	We note that the Applicant has also updated the post-implementation programme for maintenance of the proposed AOE SPA site to include a commitment to remove vegetation if it is considered to be having a detrimental impact on designated interest features.	This resolves issue J23 in our Risk and Issues Log [REP8A-053].
[REP8-007]	Designated sites associated with compensatory measures at Orfordness are included in the matrices. The matrices for Alde-Ore Estuary Ramsar site, SPA and SAC, and Orfordness – Shingle Street SAC (106, 107, 108 and 110) have identified that a likely significant effect (LSE) cannot be screened out at this stage alone or in combination for those species and habitats at potential risk. This inclusion is not a tracked change (so not new); our previous comments at Deadline 7 were focused on document 5.4.1 HRA Site Integrity Matrices – Revision B and C (Tracked), where we urged caution in accepting conclusions of no LSE when baseline surveys had not been completed.	Our previous comment on the integrity matrices document was *"Progressed pending securing seasonally appropriate surveys and adaptive mitigation strategy commitment."* The information provided does not update this view as the document included for review is different. However, seasonally appropriate surveys have now been proposed to inform any mitigation requirements, and therefore the underpinning issue can be resolved to our satisfaction, subject to these being secured in the DCO.

References

Cook, A.S.C.P. & Robinson, R.A. 2010. How Representative Is the Current Monitoring of Breeding Seabirds in the UK. BTO, Thetford.

Del Nevo, A.J., (1990). Reproductive biology and feeding ecology of common guillemots Uria aalge on Fair Isle, Shetland (Doctoral dissertation, University of Sheffield).

Harris, M.P., Wanless, S. and Rothery, P., (1983). Assessing changes in the numbers of guillemots Uria aalge at breeding colonies. Bird Study, 30(1); 57-66.

Harris, M.P., (1989). Variation in the correction factor used for converting counts of individual Guillemots Uria aalge into breeding pairs. Ibis, 131(1); 85-93.

Harris, M.P., Heubeck, M., Newell, M.A. and Wanless, S., (2015). The need for year-specific correction factors (k values) when converting counts of individual Common Guillemots Uria aalge to breeding pairs. Bird Study, 62(2); 276-279.

Harris, S.J., Baker, H., Balmer, D.E., Bolton, M., Burton, N.H.K., Caulfield, E., Clarke, J.A.E., Dunn, T.E., Evans, T.J., Hereward, H.R.F., Humphreys, E.M., Money, S. and O'Hanlon, N.J. 2024. Seabird Population Trends and Causes of Change: 1986–2023. British Trust for Ornithology, Thetford, Norfolk.

Horswill, C. and Robinson, R.A. (2015). Review of Seabird Demographic Rates and Density Dependence. JNCC Report no. 552.

Johnstone, I, Dodd, S and MacDonald, M. 2023. Marine Characterisation Research Project (MCRP), Work package 6: Guillemot and razorbill colony counts and estimation of breeding productivity. RSPB, pp 1-30.

Lavers, L. J., Jones, I. L. and Diamond, A. W., (2007). Natal and breeding dispersal of Razorbills (Alca torda) in eastern North America. Waterbirds, 30; 588-594.

Mavor, R.A., Heubeck., M., Schmitt, S. & Parsons, M. 2008. Seabird Numbers and Breeding Success, 2006. Joint Nature Conservation Committee, Peterborough.

SNCBs (2024). NE and NRW interim advice regarding demographic rates, EIA scale mortality rates and reference populations for use in offshore wind impact assessments.

Walsh, P.M., Halley, D.J., Harris, M.P., Del Nevo, A., Sim, I.M.W. and Tasker, M.L., (1995). Seabird monitoring handbook for Britain and Ireland: a compilation of methods for survey and monitoring of breeding seabirds. JNCC/RSPB/ITE/Seabird Group