



# FIVE ESTUARIES OFFSHORE WIND FARM

## 10.79 APPLICANT'S RESPONSE TO PART 2 SUBMISSIONS

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In preparation of this document Five Estuaries Offshore Wind Farm Ltd has made reasonable efforts to ensure that the content is accurate, up to date and complete for purpose.

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## DEFINITION OF ACRONYMS

Term	Definition
AEP	Annual Energy Production
AOE	Alde-Ore Estuary
BNG	Biodiversity Net Gain
CIV	Central Impact Value
DCO	Development Consent Order
ECC	Essex County Council
HRA	Habitat Regulations Assessment
IROPI	Imperative Reasons of Overriding Public Interest
ISH	Issue Specific Hearing
LIMP	Lesser Black Backed Gull Implementation and Monitoring Plan
LNRS	Local Nature Recovery Strategy
LPA	Local Planning Authority
LSE	Likely Significant Effect
MLS	Margate and Long Sands
NAS	Noise Abatement System
NE	Natural England
NERC	Natural Environment Research Council
NF	North Falls Offshore Wind Farm
NSIP	Nationally Significant Infrastructure Project
NSN	Nature Site Network
OLEMP	Outline Landscape and Ecological Management Plan



Term	Definition
RIAA	Report to Inform Appropriate Assessment
SAC	Special Area of Conservation
SPR	ScottishPower Renewables
VE	Five Estuaries Offshore Wind Farm
WCS	Worst-case Scenario



## 1. INTRODUCTION

- 1.1.1 This document has been prepared by Five Estuaries Offshore Wind Farm Limited ('the Applicant'). This document provides comments to the Secretary of State (SoS) on the consultation responses from the other Interested Parties to the consultation letter dated 11 July 2025.
- 1.1.2 Having already commented on submissions by Interested Parties in response to the first SoS deadline (see 10.74 Applicant's Response to Secretary of State Request for Information Part 2 [C1-022]), this document details the Applicant's responses to submissions by the Interested Parties at the second SoS deadline (8 August 2025). This response covers submissions made by Essex County Council (section 2) and Natural England (Sections 3 to 11). The Applicant also notes that Scottish Power Renewables made a submission which was not requested by the Secretary of State in its letter 11 July 2025. The Applicant has responded to this alongside the Secretary of States request on wake effect in 10.80 Wake effects – Combined responses to SoS letters. For completeness, the Applicant has re-submitted 10.78 Wake Effects Assessment as it is referred to in the Applicant's submission.
- 1.1.3 In order to aid the Secretary of State, the Applicant is submitting this response prior to the requested deadline of 13 September 2025. This document should be read in conjunction with 10.77 Applicant's Response to Secretary of State Request for Further Information – Part 3 owing to the closely related topic responses. Where appropriate to do so, the Applicant has provided direct cross-references to 10.77 Applicant's Response to Secretary of State Request for Further Information – Part 3 to provide succinct and complete responses and to avoid repetition.
- 1.1.4 The Applicant is also submitting a number of documents to accompany its response to the Secretary of State. These are listed below in Table 1.1. The Applicant has provided tracked and clean versions where these are documents being revised to aid the Secretary of State's review.
- 1.1.5 Where the Applicant has suggested revised or additional DCO drafting this is underlined within the responses. Struck through text indicates suggested deletions.



**TABLE 1.1 – LIST OF DOCUMENTS SUBMITTED TO ACCOMPANY THE PART 3 APPLICANT’S RESPONSE**

Number	Document Name	Revision
<b>5.4</b>	Report to Inform Appropriate Assessment (RIAA) (tracked and clean versions)	F
<b>5.5.1</b>	5.5.1 Benthic Compensation Strategy Roadmap (tracked and clean versions)	D
<b>5.5.5</b>	Guillemot and Razorbill – Evidence, Site Selection and Roadmap (tracked and clean versions)	E
<b>5.5.7</b>	Kittiwake Implementation and Monitoring Plan (KIMP) (tracked and clean versions)	E
<b>5.5.8</b>	Guillemot and Razorbill Implementation and Monitoring Plan (GRIMP) (tracked and clean versions)	F
<b>6.2.5</b>	Benthic and Intertidal Ecology (tracked and clean versions)	B
<b>6.2.6</b>	Fish and Shellfish Ecology (tracked and clean versions)	B
<b>6.3.4</b>	Onshore Biodiversity and Nature Conservation (tracked and clean versions)	B
<b>9.13</b>	Margate and Long Sands Special Area of Conservation - Benthic Mitigation Plan (tracked and clean versions)	H
<b>10.77</b>	Applicant's Response to Secretary of State Request for Information - Part 3	A
<b>10.78</b>	Wake Effects Assessment	A
<b>10.79</b>	Applicant’s Response to Part 2 submissions	A
<b>10.80</b>	Wake Effects - combined response to Secretary of State letters	A



## 2. ESSEX COUNTY COUNCIL

Ref	Essex County Council Response	Applicant's response
1	<p><b>Part 2 Paragraph 35 – Wording of Biodiversity Net Gain Requirement</b></p> <p>After the close of the Five Estuaries (VE) Examination in March 2025, ECC published reports regarding achieving a higher Biodiversity Net Gain (BNG) within Essex. According to the Viability Assessment of Biodiversity Net Gain in Essex and supporting documents (Appendices 1A, 1B, 1C), the additional costs to achieve 20% BNG is a relatively small percentage of the overall cost for NSIPs in Essex. Therefore, ECC is requesting all development proposals to investigate for 20% BNG. As the 2 projects share the BNG, and to ensure consistency with the North Falls offshore windfarm (NF), ECC is of the view that the applicant should also investigate and seek to deliver 20% BNG, where possible.</p> <p>The Councils welcome the more detailed wording of the requirement in respect of BNG as it provides clarity and certainty that a minimum 10% BNG will be secured. Sub-paragraph 2 of the suggested wording also broadly reflects the hierarchy for delivery of biodiversity units.</p> <p>As the 2 windfarm projects are of similar nature and in close proximity, the Councils requested the following wording to apply to NF DCO. The proposed revisions are highlighted in yellow:</p> <p>(1) No stage of the authorised project within the onshore Order limits (excluding any onshore site preparation works) may commence until—</p> <p>(a) a biodiversity net gain strategy <del>for that stage</del> 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</p> <p>(b) at least 10% of the total number of biodiversity units <del>as required for that stage of the development</del> (calculated using a biodiversity metric and 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.</p> <p>(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 the proposed Order limits, or within Tendring District or same National Character Area within Essex.</p> <p>(3) The biodiversity net gain strategy for <del>each relevant stage</del> must be implemented as approved.</p> <p>(4) Any remaining shortfall in biodiversity units identified following detailed design will be secured prior to construction works being completed.</p>	<p>The Applicant objects to the imposition of this revised requirement in principle as set out in its response to request 35 in 10.74 Applicants response to SoS request for information – Responses to the Secretary of States consultation 1 – Part 2 [C1-022].</p> <p>The Applicant objects to the Council's position that BNG must be a minimum of 10% and that they are seeking 20%. The delivery of statutory BNG of any amount is not a requirement for this project and there is no legal basis for the imposition of a minimum 10% as measured by the metric in any case. It is not necessary, reasonable or procedurally fair for more than has already been offered by the Applicant (which is already in excess of what is statutorily required for this requirement to be required at this stage).</p> <p>The wording 'at least' is imprecise and unclear and should not be included in a requirement. That, taken together with the ECC position that the Applicant 'should seek to deliver' introduces considerable doubt as to whether the Council would discharge this requirement at the 10% or seek to hold the applicant to ransom for 20% based on the ECC judgement that the 'overall cost for NSIPs in Essex' is a 'relatively small percentage' which is not related to the impacts of this project. It is not appropriate for the Council to seek to impose a doubling of the provision on this project based on their assessment of all NSIPs in Essex, that fails the basic tests of being necessary for <u>this project</u> and related in scale and kind to <u>this project</u>. In addition this assessment is not a policy requirement for this project at any level, including local policy.</p> <p>The Applicant has set out its position on the Secretary of State's proposed requirement wording in relation to BNG in 10.77 Applicant's response to SoS Request for Further Information – part 3 (DESNZ ref 12).</p>





Ref	Essex County Council Response	Applicant's response
	<p><del>(5) Any biodiversity net gain strategy under sub-paragraph (1) may cover one or more stages of the onshore works.</del></p> <p>The strike-through text highlighted in yellow should be deleted as the development is not progressing in stages and the calculations should apply to the whole development, an approach which is also agreed by the applicant.</p>	
2	<p><b>C1-007 - 10.73 Applicant's Response to Secretary of State Request for Information Part 1 - Secretary of State Consultation response for Part 1 to letter dated 11 July 2025</b></p> <p>The Councils note that the submissions in response to Part 1 of the letter have been published and wish to provide the following comments in view of the applicant's response (C1-007).</p> <p><b>Paragraph 6 - Compulsory Acquisition &amp; Temporary Possession</b></p> <p><u>Plot 17-024 around Normans Farm</u> ECC supports the proposed approach of the applicant which retains the planting buffer around the perimeter of this plot, in line with the Outline Landscape Ecological Mitigation Plan (OLEMP), ensuring that there is continuous landscaped screening along the eastern boundary (behind Jennings' Farm) and along the northern side of Ardleigh Road as an important landscape and visual mitigation.</p>	<p>This is welcomed by the Applicant and supports the rationale set out by the Applicant in 10.73 Applicant's Response to Secretary of State Request for Information - Part 1 [C1-007] for the permanent rights it is seeking to acquire in the field to the east of Norman's Farm.</p>
3	<p><b>Paragraph 15 - Timeframes for Investigation of Noise Complaints</b></p> <p>Both Councils have consistently requested improvements to the investigation and resolution of any noise complaints during operational stage, in the interests of the local amenities.</p> <p>Since the close of VE examination, the Outline Noise Complaints Protocol (REP7-080) had been updated by the 3 relevant parties. The Councils note that the latest version submitted by the applicant in response to Part 1 of the letter (C1-018 – 10.36, May 2025, Revision C) is the same as the one submitted to the NF DCO examination at Deadline 5. However, this revision still lacks a Joint Noise Panel to collectively deal with the potential cumulative noise impacts.</p> <p>The current approach proposed by the applicant is fragmented and down to individual operator to investigate any noise complaints, without considering that there could be a scenario that more than 1 operator(s) may also contribute to the noise issues, and the potential for all operators to act as swiftly as possible once complaint is received. This fragmented approach acts against the coordinated concept amongst the relevant parties and affirmed the piecemeal nature of these inter-related NSIPs, which have been repeatedly raised as a significant matter by the Councils as well as by the local communities. It is considered that such piecemeal investigation approach is inadequate to address any cumulative operational impacts.</p> <p>As there is no precedent case for collocation of so many substations in such close proximity and that cumulative impacts on the local residents could not be fully anticipated, the Councils strongly</p>	<p>The Applicant notes that each operator can only be responsible for its own compliance, it cannot be responsible for the compliance of other operators. It therefore must be down to each operator to investigate complaints. It is not for a person to control or remediate the noise of a neighbouring property it has no right to or ability to control or even enter the premises of – such a position is patently unreasonable. An operator cannot be in breach of a DCO because another operator under another consent has not responded to a noise complaint timeously.</p> <p>The Applicant has responded to the SoS proposed revision to requirement 15(2) in relation to the noise complaints protocol in 10.77 Applicant's Response to SoS Request for Further Information – Part 3.</p>



Ref	Essex County Council Response	Applicant's response															
	<p>maintain the request that any noise complaints during operational stage are addressed by all three developers (VENF &amp; National Grid) concurrently. These projects are collocated and could be responsible for individual or cumulative noise breaches, this is a collective responsibility.</p> <p>While the Councils welcomed the retention of an acoustic consultant following commencement of operation of the substation(s), there is no reason why the overall investigation timeframe could not be shortened as requested. Moreover, it is also important to ensure that any investigation approach should apply to the entire operational period of the substation (with an indicative design life of 30 years), which is far beyond the 18 months as suggested for the retention period.</p> <table><tr><th></th><th>Applicant's proposal</th><th>Councils' proposal</th></tr><tr><td>Initial site walkaround</td><td>2 working days reduced to 48 hours</td><td>48 hours</td></tr><tr><td>Appointment of noise consultant</td><td>10 workings days</td><td>5 workings days if no retained acoustic consultant</td></tr><tr><td>Noise measurement</td><td>10 workings days</td><td>5 workings days (with an additional 2 workings days under special circumstance such as inappropriate weather condition)</td></tr><tr><td>Reporting to LPA</td><td>15 to 20 workings days</td><td>10 workings days</td></tr></table> <p>As shown in the above table, the new insertions in the latest Protocol do not significantly shorten the proposed timeframe for complaints to be investigated, and it is still around 8.5 weeks for a recommended mitigation by the nearest operator.</p> <p>Even if the initial walkaround is jointly conducted by all 3 operators within 48 hours, the subsequent process will be repeated respectively by the 3 operators if source of breach could not be identified by the other 2 operators, it means the entire complaints process could be up to 24 weeks after the initial site walkaround. Such timeframe is significantly longer than the typical timeframe to mitigate noise complaints under the statutory nuisance regime:</p> <ul style="list-style-type: none"><li>&gt; Acknowledgement: about 3 working days</li><li>&gt; Investigation: 1 - 4 weeks</li><li>&gt; Abatement Notice period: 7 – 28 days</li></ul> <p>Therefore the applicant's proposed timeframe is wholly unacceptable for the length of time that the complainant has to endure the problem. The Councils consider that the timeframe must be massively reduced to ensure complaints are reasonably dealt with in an expedient manner and in a coordinated fashion by all 3 operators.</p> <p>To ensure that the protocol is undertaken with collective responsibility, we request that dDCO requirement 15(2) is revised to reflect a collaborative complaint handling approach in the noise investigation protocol as set out below. The following wording has been proposed for the NF dDCO at the end of the Examination:</p>		Applicant's proposal	Councils' proposal	Initial site walkaround	2 working days reduced to 48 hours	48 hours	Appointment of noise consultant	10 workings days	5 workings days if no retained acoustic consultant	Noise measurement	10 workings days	5 workings days (with an additional 2 workings days under special circumstance such as inappropriate weather condition)	Reporting to LPA	15 to 20 workings days	10 workings days	
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Ref	Essex County Council Response	Applicant's response
	<p><i>15.-(2) Prior to the commencement of operation of Work No. 11, the undertaker will consult and agree with Five Estuaries and National Grid a noise investigation protocol to be submitted to and approved by the discharging authority. The noise investigation protocol must identify how the undertaker, Five Estuaries and National Grid will jointly investigate noise.</i></p> <p>The Councils could not agree with the applicant's response that the primary purpose of the Joint Noise Protocol is to identify the method to investigate a complaint. The main purpose of such a document should be for protecting the amenity level of nearby sensitive receptors, especially given the co-location of all the proposed substations. It is essential to outline an acceptable method or investigation approach in this certified document, which could then be further developed and finalised to discharge requirement 15 at a later stage.</p> <p>The Councils also do not agree with the applicant's assumption that any breach of the noise limits would be down to mechanical fault(s) within a plant.</p> <p>The focus should not be about the likelihood of a breach, it is about if there is a noise complaint, whether there is a breach, who is responsible for such breach, what would be the best way to handle and rectify the issue in a prompt manner, to protect the amenity levels of the sensitive receptor(s), and implement any mitigation measures as soon as possible if required.</p>	



### 3. NATURAL ENGLAND

Ref	Natural England Response	Applicant's response
7	<p><b>Natural England's Comments with regards to an amended Biodiversity Net Gain condition within the Order.</b></p> <p>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:</p> <p><i>"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".</i></p> <p>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.</p> <p>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 NSIPs but wish to highlight this suggested approach. Ultimately, the decision maker should be satisfied that any gains proposed can be appropriately secured.</p> <p>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.</p>	<p>The Applicant has set out its position on the Secretary of State's proposed wording in relation to BNG in 10.77 Applicant's response to SoS Request for Further Information – part 3 (DESNZ ref 12).</p>
8	<p><b>Marine Mammals</b></p> <p>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.</p> <p>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.</p>	<p>A detailed response is provided in 10.77 Applicant's response to SoS Request for Further Information – part 3 (DESNZ Ref 7).</p>
9	<p><b>Habitats Regulations Assessment</b></p> <p>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.</p>	<p>The Applicant has responded to Natural England's additional comments in the relevant sections below.</p>



#### 4. APPLICANT'S RESPONSE TO NATURAL ENGLAND'S ADVICE ON [REP8-009] 5.5.1 BENTHIC COMPENSATION STRATEGY ROADMAP – REVISION C (TRACKED)

NE Ref	Section	Key Concern and/or Update	NE Advice to Resolve Issue	Applicant's Response
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.	<p>The Applicant's preference is to secure the benthic compensation (if required) through the Marine Recovery Fund (MRF). As per their submission to the SoS's Consultation Part 1 (C1-006), Defra have confirmed the Applicant's eligibility for the MRF.</p> <p>However, should cable removal or the removal of redundant infrastructure be taken forward as a compensation measure, the scope for monitoring will be further discussed with the stakeholder group. The agreed monitoring would be included in the final Benthic Implementation and Monitoring Plan for approval by the Secretary of State. If required, the provision of the final Benthic Implementation and Monitoring Plan and consultation would be secured through Part 4, paragraph 20(b) of the 10.72 Draft Development Consent Order Without Prejudice Schedules.</p>
2	Section 6.5.29 to 6.5.35	<p>We reiterate our advice on seagrass habitat creation/restoration provided in our Relevant Rep [PD2-008] which states that:</p> <p><i>'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...'</i></p> <p>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 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.</p>	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.	<p>The Applicant's preference is to secure the benthic compensation (if required) through the MRF. However, should seagrass restoration be taken forward as a compensation measure, the scope (including duration) for monitoring will be further discussed with the stakeholder group. The agreed monitoring would be included in the final Benthic Implementation and Monitoring Plan for approval by the Secretary of State. If required, the provision of the final Benthic Implementation and Monitoring Plan and consultation would be secured through Part 4, paragraph 20(b) of the 10.72 Draft Development Consent Order Without Prejudice Schedules.</p>





## 5. APPLICANT'S RESPONSE TO NATURAL ENGLAND'S ADVICE ON [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	NE Advice to Resolve Issue	Applicant's Response
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.	<p>The requirement to demonstrate where avoidance is not practicable and how impacts would be minimised is already secured through the draft DCO.</p> <p>As noted in 9.13 Margate and Long Sands SAC – Benthic Mitigation Plan – Revision G [REP8A-011] and welcomed by Natural England, the Applicant will seek to avoid Priority Habitats under Section 41, where practicable. However as acknowledged in the plan, habitats such as "subtidal sands and gravel" are present within a number of areas of the Offshore ECC, including MLS SAC, and it may not be possible to avoid all this habitat.</p> <p>The requirement to minimise impacts upon features of conservation interest is secured within 9.12 Outline Cable Specification and Installation Plan (CSIP) – Revision D [REP7-040], where it states at paragraph 2.2.19: "All phases of the cable routing and design will seek to minimise impacts on features of conservation interest, including consideration of the use, type and location of cable protection."</p> <p>Post-consent, a Design Plan will be submitted to the MMO in accordance with the relevant dML Conditions. The Design Plan will detail the proposed location of the export cables including through the M&amp;LS SAC. The Design Plan will also provide details of exclusion zones or micro-siting requirements for "any habitats of principal importance identified as part of [ the pre-construction] surveys". The Design Plan will be consulted upon with the relevant consultees and subsequently finalised ahead of any cable installation works. The Design Plan, including the final routes and associated justification, will be consulted upon with the relevant statutory authorities and subsequently finalised ahead of any cable installation works.</p>
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 <sup>2</sup> , 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.	<p>This is noted by the Applicant. The following documents have been updated for the purposes of clarification –</p> <ul style="list-style-type: none"> <li>&gt; 6.2.5 Benthic and Intertidal Ecology - Revision B;</li> <li>&gt; 6.2.6 Fish and Shellfish Ecology - Revision B;</li> <li>&gt; 5.5.1 Benthic Compensation Strategy Roadmap - Revision D;</li> <li>&gt; Report to Inform Appropriate Assessment - Revision F; and</li> <li>&gt; 9.13 Margate and Long Sands Special Area of Conservation Benthic Mitigation Plan - Revision H.</li> </ul>



## 6. APPLICANT RESPONSE TO NATURAL ENGLAND'S ADVICE ON: [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	NE Advice to Resolve Issue	Applicant's Response
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 have 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.'	This is welcomed by the Applicant.
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 <sup>2</sup> . 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 <sup>2</sup> or 5,400m <sup>3</sup> 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 <sup>2</sup> x 1.1m = 5,940m <sup>3</sup> ).	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.	<p>As stated in Section 3.3 of 9.13 Margate and Long Sands SAC – Benthic Mitigation Plan – Revision H (and previous revisions), <b>it is expected that it will be possible to effectively bury the cables in the M&amp;LS SAC based on the ground conditions and anticipated required burial depth</b>. However, it is not possible to completely rule out the potential need for cable protection if burial fails for any reason (e.g. due to equipment breakdown, or presence of unexpected boulders/ cobbles in the London clay that may hamper burial). Therefore, <b>the footprint and associated volume of cable protection in this area is a worst case design scenario</b>. The flow chart (Figure 4.1 of 9.13 Margate and Long Sands SAC – Benthic Mitigation Plan – Revision H) provides an overview of the process that will be followed to ensure that <b>cable protection is the last option</b> following primary, secondary and tertiary means of cable burial and will be considered only when all other options have been exhausted.</p> <p>9.13 Margate and Long Sands SAC – Benthic Mitigation Plan – Revision G [REP8A-011] provided the correct MDS. The area of potential habitat loss due to cable protection (5,400m<sup>2</sup>) is the key parameter. To multiply that area by the maximum height of 1.1m assumes a consistent rectangular profile of cable protection along the entire length, in reality this would not be the case. As such the maximum volume (5,400 m<sup>3</sup>) assumes a more realistic trapezoidal profile.</p> <p>The trapezoidal cross-sectional profile and the equation for calculating volume is presented in Figure 5 of 10.20.1 Technical Note - Methodology for Determining MDS (Offshore) - Revision C [REP6-037]. 0.20.1 Figure 7 of Technical Note - Methodology for Determining MDS (Offshore) - Revision C [REP6-037] presents the maximum cable protection design in the context of the size and proximity to the Margate and Long Sands sand bank.</p>



NE Ref	Section	Key Concern and/or Update	NE Advice to Resolve Issue	Applicant's Response
				<p>The following documents have been updated in accordance with the SoS's Request for Information (dated 21 August 2025) to clarify the maximum design scenario of cable protection in MLS SAC if it is required:</p> <ul style="list-style-type: none"><li>&gt; 6.2.5 Benthic and Intertidal Ecology – Revision B;</li><li>&gt; 6.2.6 Fish and Shellfish Ecology – Revision B;</li><li>&gt; 5.5.1 Benthic Compensation Strategy Roadmap – Revision D;</li><li>&gt; 5.4 Report to Inform Appropriate Assessment – Revision F; and</li><li>&gt; 9.13 Margate and Long Sands Special Area of Conservation Benthic Mitigation Plan – Revision H.</li></ul>





## 7. APPLICANT RESPONSE TO NATURAL ENGLAND'S ADVICE ON: [REP8-005] 5.4 REPORT TO INFORM APPROPRIATE ASSESSMENT - REVISION D (TRACKED)

NE Ref	Section	Key Concern and/or Update	NE Advice to Resolve Issue	Applicant's Response
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.	<p><b>The Applicant maintains that with or without the installation of cable protection within the SAC there will be no AEol and therefore no requirement for benthic compensation.</b></p> <p>9.13 Margate and Long Sands SAC – Benthic Mitigation Plan – Revision G [REP8A-011] includes robust measures which will be adopted by the Applicant to minimise any impact upon the MLS SAC, which allows the conclusion of no Adverse Effect on Integrity to be met for the site.</p> <p>As outlined in Section 3.3 of the 9.13 Margate and Long Sands SAC – Benthic Mitigation Plan – Revision H, effective cable burial within the M&amp;LS SAC is expected based on the ground conditions. However, cable protection may still be required if burial is unsuccessful due to unforeseen issues (e.g. equipment failure or unexpected boulders/cobbles in the London Clay). Therefore, the footprint and volume of cable protection represent a worst-case design scenario. Due to the expectation that burial will be successful, if required the area/ volume of cable protection is considered small, especially in the context of the wider SAC and the feature that is available throughout the site.</p> <p>Nevertheless, and as noted by Natural England, a without prejudice case has been put forward, and any compensation measures should only apply if cable protection is installed within Margate and Long Sands SAC. There is a strong preference from the Applicant to contribute to the Marine Recovery Fund, see 5.5.1 Benthic Compensation Strategy Roadmap -Revision B [REP7-027].</p>



## 8. APPLICANT RESPONSE TO NATURAL ENGLAND'S ADVICE ON: [REP8-007] 5.4.3 HRA SCREENING MATRICES - REVISION D (TRACKED)

NE Ref	Section	Key Concern and/or Update	NE Advice to Resolve Issue	Applicant's Response
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.	<p>Whilst the Applicant acknowledges there is a potential pathway of effect, as noted within the updated screening matrices, we wish to reiterate there is no potential for an AEoI on the feature 'sandbanks (which are slightly covered by sea water all the time)' within the Margate and Long Sands SAC.</p> <p>As stated in 6.2.5 Benthic and Intertidal Ecology – Revision B and 5.4 Report to inform Appropriate Assessment – Revision F, <u>if</u> cable protection is used within the SAC, the maximum design scenario is 5,400 m<sup>2</sup> and a maximum volume of 5,400 m<sup>3</sup> which relates to 0.0008% of the SAC. This cable protection will be removable following the life of the project, and once it is removed it is expected that the sandbank would recover quickly. Therefore, the benthic compensation case is a without prejudice case and any compensation measures should only apply if cable protection is installed within Margate and Long Sands SAC.</p> <p>Relevant other mitigation is stated within 9.13 Margate and Long Sands SAC – Benthic Mitigation Plan – Revision H.</p>



9. APPLICANT RESPONSE TO NATURAL ENGLAND'S ADVICE ON: [REP8-007] 5.4.3 HRA SCREENING MATRICES – REVISION D (TRACKED)  
(ORNITHOLOGY ADVICE)

NE Ref	Section	Key Concern and/or Update	NE Advice to Resolve Issue	Applicant's Response
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.	This is welcomed by the Applicant.
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.	This is welcomed by the Applicant.



## 10. APPLICANT RESPONSE TO NATURAL ENGLAND'S ADVICE ON: [REP8-013] 5.5.5 GUILLEMOT AND RAZORBILL EVIDENCE, SITE SELECTION AND ROADMAP - REVISION D (TRACKED)

NE Ref	Section	Key Concern and/or Update	NE Advice to Resolve Issue	Applicant's Response
1	Section 1.2.3	<p>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.</p> <p>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).</p>	<p>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)).</p>	<p>The Applicant has responded to this point in 10.77 Applicant's Response to SoS Request for Further Information – Part 3, see Section 16. Additionally, the relevant updates have been included in 5.5.5 Guillemot and Razorbill Evidence, Site Selection and Roadmap – Revision E.</p>
2	Section 1.2.2-5, Table 3, Sections 8.1.10-24, Tables 8 and 9.	<p>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.</p>	<p>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:</p> <ul style="list-style-type: none"> <li>&gt; 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).</li> <li>&gt; 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.</li> </ul> <p>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).</p> <p>Therefore, were Five Estuaries to adopt this approach, this would facilitate a consistent calculation of the scale of compensation required by each developer.</p>	<p>The Applicant has responded to this point in 10.77 Applicant's Response to SoS Request for Further Information – Part 3, see section 16. Additionally, the relevant updates have been included in 5.5.5 Guillemot and Razorbill Evidence, Site Selection and Roadmap – Revision E.</p>



NE Ref	Section	Key Concern and/or Update	NE Advice to Resolve Issue	Applicant's Response
			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 and 10	<p>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 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.</p> <p>Natural England notes the following issues:</p> <p><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.</p> <p><u>Productivity</u></p>	<p>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 concerning correction factors and anticipated changes in productivity.</p> <p><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.</p> <p><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.</p> <p>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.</p>	<p>The levels of compensation proposed are designed to cater for the worst case scenario (using UCI and 3:1 ratios) to ensure that <b>the compensation is adequate for the impact despite the uncertainties in productivity and correction factors</b>. While there is some uncertainty around baseline productivity rates, the evidence clearly indicates that compensatory measures in the southwest have the potential to meet the project's requirements. This is especially true if the measure is progressed collaboratively between developers, and rolled out across the region.</p> <p><u>Correction Factors</u> The Applicant appreciates the points raised regarding correction factors, productivity estimates, and the importance of robust baseline monitoring. These considerations will be addressed through the collaborative monitoring framework as the measure progresses. The approach is designed to be adaptive, allowing for refinement based on site-specific data and evolving understanding of local conditions. Robust baseline surveys at the sites have commenced. We agree that establishing appropriate correction factors and integrating contemporary productivity data will be important, and these will be derived as</p>





NE Ref	Section	Key Concern and/or Update	NE Advice to Resolve Issue	Applicant's Response
		<p>To estimate the level of increased productivity, the Applicant has used the difference between 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).</p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>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.</p> <p>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.</p>	<p>part of the ongoing site monitoring and delivery process.</p> <p><u>Productivity</u> While we acknowledge the variability in productivity estimates, the small differences highlighted are well within the expected range of uncertainty and do not materially affect the overall merit or projected outcomes of the measure. The strategic, collaborative model proposed is intended to accommodate such uncertainties and ensure that any necessary adjustments can be made in response to emerging data. <b>Despite the uncertainties in the productivity rates the compensation measures planned are more than sufficient for the compensation targets set out by Natural England at Deadline 8.</b></p> <p>The Applicant has presented both the national and regional mean productivity quoted in Horswill and Robinson in paragraph 8.1.15 of 5.5:Guillemot and Razorbill Compensation - Evidence, Site Selection &amp; Roadmap – Revision E (and previous revisions). The values presented are correct. The Applicant's position is that the regional rate is the most appropriate for the site. However, if the productivity rates are lower than assumed, then the potential compensation benefits will be higher than those presented in our roadmap.</p> <p>Paragraph 8.1.25 of 5.5:Guillemot and Razorbill Compensation - Evidence, Site Selection &amp; Roadmap – Revision E provides further explanation of how the upper and lower figures were derived.</p>



## 11. APPLICANT RESPONSE TO NATURAL ENGLAND'S ADVICE ON: LESSER BLACK-BACKED GULL PROPOSED COMPENSATION SITES.

Document Reviewed	Update Made	Issue Resolved	Applicant's Response
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].	The commitment to undertake these surveys is set out in 5.5.6 Lesser Black Backed Gull Implementation and Monitoring Plan – Revision E and the Applicant has provided suggested drafting for inclusion with Schedule 15 of the draft DCO as part of its response to the Secretary of State consultation part 3. The Applicant is undertaking these surveys this summer and will provide the reports to Natural England in due course.
[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].	This is welcomed by the Applicant.
[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.	Noted. The Applicant is undertaking these surveys this summer and will provide reports to Natural England in due course.



PHONE  
EMAIL  
WEBSITE  
ADDRESS

COMPANY NO

0333 880 5306

[fiveestuaries@rwe.com](mailto:fiveestuaries@rwe.com)

[www.fiveestuaries.co.uk](http://www.fiveestuaries.co.uk)

Five Estuaries Offshore Wind Farm Ltd  
Windmill Hill Business Park  
Whitehill Way, Swindon, SN5 6PB  
Registered in England and Wales  
company number 12292474