



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

NORTH FALLS OFFSHORE WIND FARM

Appendix C3 to Natural England's Deadline 3 Submission
Natural England's Benthic Ecology Advice on the Applicant's Deadline 1 Documents

For:

The construction and operation of North Falls Offshore Wind Farm, located approximately 40 km from the East Anglia Coast in the Southern North Sea.

Planning Inspectorate Reference EN010119

18 March 2025

Appendix C3 Natural England's Benthic Ecology Advice on the Applicant's Deadline 1 Documents

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

- [REP1-007] 2.6 Schedule of Mitigation (Rev 1) (Tracked)

1. Detailed comments

Table 1: Natural England's Advice On: Benthic Ecology

Document reviewed: REP1-007] 2.6 Schedule of Mitigation (Rev 1) (Tracked)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Table 2.3, Ref 2.3.4	Natural England welcomes the wider consideration of Section 41 habitats, including those which are irreplaceable, within the schedule of mitigation. However, we advise that the mitigation is not sufficient.	Natural England advises that where avoidance of Section 41 habitats during construction is not practicable, then there should be a requirement to demonstrate how impacts will be minimised.
2	Table 2.3, Ref 2.3.6	Whilst Natural England welcomes the commitment to deploy cables and cable protection 150m or more from Margate and Long Sands Special Area of Conservation (SAC), the Applicant has not demonstrated whether this distance is sufficient to prevent pathways of effect to supporting processes for the Annex I designated sandbank communities within Margate and Long Sands SAC.	<p>Natural England advises that further evidence is required in order demonstrate that this is sufficient to prevent pathways of effect to supporting processes for the Annex I designated sandbank communities within the SAC.</p> <p>We also note that commitments in relation to the nature of cable protection and the feasibility of its removal at the decommissioning phase remain absent.</p>
3	Table 2.3, Ref 2.3.7 and 2.3.11	Natural England welcomes the commitment to remove gravity base foundations from the Project and the associated reduction in temporary disturbance and lasting habitat loss.	Whilst Natural England welcomes the commitments which reduce the worst-case scenario (WCS) of direct and indirect impacts on benthic receptors (i.e. Kentish Knock East Marine Conservation Zone), we advise that further evidence is required to fully identify, quantify and evaluate predicted WCS benthic impacts from sandwave levelling/seabed preparation (including disposal), and turbine foundation placement and scour protection.
4	Table 2.3, Ref 2.3.8	<p>Natural England welcomes the commitment to place turbine foundations at a minimum distance of 50 m from the Kentish Knock East Marine Conservation Zone (KKE MCZ).</p> <p>However, further information and assessment is required in relation to the updated WCS</p>	Natural England advises that a more robust assessment (identification, quantification and evaluation) of anticipated worst-case sediment deposition parameters due to sandwave levelling/seabed preparation (including disposal), turbine foundation placement and scour in the vicinity of KKE MCZ is required.