



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

NORTH FALLS OFFSHORE WIND FARM

Appendix H3.2 to Natural England's Deadline 3 Submission

**Natural England's comments on 7.15 Outline Horizontal Directional Drill Method
Statement and Contingency Plan [REP1-038]**

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 H3.2 Natural England's comments on 7.15 Outline Horizontal Directional Drill Method Statement and Contingency Plan [REP1-038]

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

- [REP1-038] 7.15 Outline Horizontal Directional Drill Method Statement and Contingency Plan
- [REP1-007] 2.6 Schedule of Mitigation (Rev 1)[List documents]

1.1. Summary

Natural England welcomes the inclusion of this document to address concerns in relation to the implementation of this mitigation measure and potential risk of bentonite frack-out. However, further updates to implementation of management measures are required.

1.2. Detailed comments

Table 1: Natural England's Advice On:

Document reviewed: [REP1-038] 7.15 Outline Horizontal Directional Drill Method Statement and Contingency Plan and [REP1-007] 2.6 Schedule of Mitigation (Rev 1)[List documents]			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Figure 3.2	Natural England notes that key mitigation in the form of further coordination between North Falls and Five Estuaries could help further reduce the impacts. For example; this could include the first project to commence installation, installing the HDD ducts for both projects particularly at landfall	Natural England advises that the Applicant gives this further consideration.
2	Para. 107	Whilst Natural England welcomes the use of walkover surveys to detect bentonite on ground, Natural England is concerned about trampling of vegetation and invertebrate supporting habitat within Holland Haven Marshes SSSI and around Tendering Brook	Natural England advises that when agreeing the final plan that the number of walk overs, route/s taken and by how many people is agreed.
3	Section 4.1	Natural England notes that within the flow chart there is a step missing to determine if clean-up and/or containment is required. We advise that just because there is a visible leak, this shouldn't automatically lead to either of these things occurring given the inert nature of the bentonite.	Natural England advises that the decision tree is refined to help with making any decisions on the course of action to be taken. Please see following points.

		Natural England highlights that the area of spill is not the key detrimental factor, but more the potential depth of any smothering especially where there are sensitive environmental receptors	
4	Section 4. 1	It is not clear what is meant by both manual and/or mechanical clean up.	Natural England advises that more detail is required in relation to the tools and/or methodology to better understand the risk of any damage.
5	Section 4.1	Natural England notes that there is no inclusion of roles and responsibilities for implementing the decision tree. And how consultation with the relevant SNCB will be factored in, when and how.	Natural England advises that more information on roles and responsibilities are included to ensure that the environment is safe guarded.
6	Para. 116	Entry Pits: Natural England notes that bentonite is most likely to occur in the first 30m of HDD. And that further mitigation measures could be employed to minimise potential impacts to area of nature conservation.	Natural England advises that entry pits, and where appropriate exit pits are located >30m away from any sensitive environmental receptors.
7	Para 118 Bullet #4	Natural England notes that containment in itself could be damaging to sensitive environmental receptors.	Natural England advises that the options to contain the spill should be site specific and finalised in consultation with Natural England to ensure that no detrimental compaction and/or vegetation trampling occurs which may effect the recovery afterwards.
8	Para 118 Bullet #5	Natural England notes that an alternative to making any bentonite breakout thicker would be to water it down to spread the impact area, but reduce the likelihood of smothering. We also highlight that if bentonite becomes thicker and more solidified that there is likely to more to result in damage to vegetation when removed.	Natural England advises that all opinions to lessen the environmental impacts from a bentonite break out are considered.
9	Onshore Schedule of mitigation point 2.16.20	Natural England welcomes the inclusion of mitigation measure to avoid tracking through the HHM SSSI to access the HDD compound.	We advise that the mitigation measure is expanded to also include no works vehicles to access the SSSI which would align with the HDD chart.