



N O R T H F A L L S

Offshore Wind Farm

Applicant's Comments on Other Deadline Submissions

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1. INTRODUCTION

1.1 Introduction

- 1.1.1 This document has been prepared by North Falls Offshore Wind Farm Limited ('the Applicant') in relation to the North Falls Offshore Wind Farm (hereinafter referred to as 'North Falls' or the 'Project').
- 1.1.2 This document has been prepared by the Applicant for submission at Deadline 3 on Tuesday 18 March 2025, and provides further responses to outstanding matters raised in Relevant Representations and submissions made at Deadline 1.

1.2 Purpose of the document

- 1.2.1 In the Applicant's submissions at Deadline 1 and 2, some matters were deferred to Deadline 3. This document provides further information to address these matters or signposts where further information is provided (Table 1.1).
- 1.2.2 This document is structured as follows:
- Overview of other deadline submissions for which a response is provided at Deadline 3
 - Applicant's Response to Natural England comments regarding comparison of the Offshore Ornithology in-combination assessment with Sheringham Shoal and Dudgeon Extension Projects
 - Applicant's Response to MMO comment regarding Underwater noise policy papers

1.3 Overview

- 1.3.1 Table 1.1 below provides a summary of the information for which the Applicant had deferred their response.

Table 1.1 Overview of other deadline submissions for which a response is provided at Deadline 3

Comment source	Stakeholder Reference	Topic	Response at Deadline 3
Natural England (NE) RR-243	P5, P10, B4, B18, B22 and B26	Seabed and Bedform Mobility, and Implications for Sand	Please see - Further Information Regarding Seabed and Bedform Mobility, and Implications

Comment source	Stakeholder Reference	Topic	Response at Deadline 3
		Wave Recovery after Levelling	for Sand Wave Recovery after Levelling (document reference [9.34])
NE RR-243	A23, A25	Updates to the Outline Offshore Operations and Maintenance Plan	Please see – Outline Offshore Operation and Maintenance Plan [7.20, Rev 1]
MMO RR-216	Para 4.5.4		
NE RR-243	E29	Marine Mammals Disturbance due to Vessel Presence	Please see - Further Information Regarding Marine Mammals Disturbance due to Vessel Presence [9.35, Rev 0]
NE RR-243	F13	Offshore Ornithology Cumulative Effects	Please see - Updated Information for Offshore Ornithology Cumulative Effects Assessment [9.29, Rev 0]
NE RR-243	F31, F32 and F41	Comparison of the Offshore Ornithology in-combination assessment (and Population Viability Analysis) with Sheringham Shoal and Dudgeon Extension Projects	Section 2.1 of this document
NE RR-243	C23	'Core reef' approach in the <i>Sabellaria spinulosa</i> Reef Mitigation Plan (Appendix A of the Outline Project Environmental Management Plan).	Please see - Outline Project Environmental Management Plan, Appendix A [7.20, Rev 1]
MMO RR-216	Para 5.5.4 - 5.5.9	Sandeel and herring Heatmapping	Please see - Sandeel and Herring Heat Maps Clarification Note [9.37, Rev 0]
Ex Q1	Q10.1.4		
NE RR-243	P18, E4, E20, E23, E24, E25, E26, E27, E32, E35	Comments on the draft Marine Mammal Mitigation Protocol MMMP (summarised in	Please see - draft Marine Mammal Mitigation

Comment source	Stakeholder Reference	Topic	Response at Deadline 3
Essex Wildlife Trust [RR-095]	-	Appendix A of the draft Marine Mammal Mitigation Protocol MMMP [7.7, Rev 1])	Protocol MMMP [7.7, Rev 1]
MMO RR-216	Para 5.7.5-5.7.11; 5.7.20; 5.7.29		
MMO D1 Submission [REP1-068]	Section 3	Underwater noise policy papers	Section 2.2 of this document
Appendix I2 to the Relevant Representation of Natural England Seascape, Landscape and Visual [REP1-071]	I5 and I6	Suffolk and Essex Coast and Heaths National Landscape	Please see - Additional Assessment of the Special Qualities of the Suffolk and Essex Coast and Heaths National Landscape and Suffolk Heritage Coast - Technical Note [9.33]
Essex County Council Local Impact Report [REP1-065]	Para 4.15.9-4.15.11	Joint Noise Complaint Handling Protocol	Please see - Onshore substations operational noise and the outline noise complaints protocol [9.32, Rev 0]
Essex County Council Local Impact Report [REP1-065]	Para 3.2.1.22	Ardleigh Neighbourhood Plan	Please see – Planning Statement [2.2, Rev 1]
Essex County Council Local Impact Report [REP1-065]	Para 4.4.2-4.4.4; 4.4.6	Change to the public rights of way layout within the onshore project area around Tendring Brook	Please see – <ul style="list-style-type: none"> • Outline Public Rights of Way Management Plan (OPRoWMP) [7.17, Rev1]; • Public Rights of Way Plan [5.11, Rev1], and • Schedule 3 Part 2 of the Draft DCO [6.1, Rev 4].

1.3.2 In addition, Planting cross-sections [9.30, Rev 1] are provided in response to consultation with Essex County Council, to help improve understanding of the proposed planting effect in the local landscape. These have been prepared to demonstrate planting heights in relation to the proposed onshore substation infrastructure at Year 1 and Year 15 post-planting.

2. APPLICANT’S COMMENTS ON OTHER DEADLINE SUBMISSIONS

2.1 Comparison of the Offshore Ornithology in-combination assessment (and Population Viability Analysis) with Sheringham Shoal and Dudgeon Extension Projects

Table 2.1 Applicant’s Response to Natural England comments regarding comparison of the Offshore Ornithology in-combination assessment with Sheringham Shoal and Dudgeon Extension Projects

Ref	Issue raised	Natural England’s recommendation to resolve issues	Applicant’s Response
RR-243 F31	In the SADEP [Sheringham Shoal and Dudgeon Extension Projects] Examination, Natural England could not rule out AEOI [Adverse Effect on Integrity] for guillemot at FFC SPA [Flamborough and Filey Coast Special Protection Area] from an estimated in-combination annual mortality of 1,498 guillemot based on 70% displacement and 2% mortality, resulting in a reduction in population growth rate of 1.4%. Under the same parameters, the Applicant estimates an in-combination mortality of 1,172 guillemot which results in a 0.5% reduction in population growth rate.	It would be useful to fully understand the differences in the in-combination assessment (and PVA [Population Viability Analysis]) the Applicant presents compared to that from which SoS concluded that AEOI could not be ruled out in combination for guillemot at FFC SPA in the SADEP consent decision.	<p>The Natural England total of 1,498 guillemot appears to come from their Deadline 8 offshore ornithology advice to SADEP (Natural England, 2023), page 19-20], calculated by Natural England from the SADEP data using 70% displacement and 2% mortality of all projects, other than Hornsea 4 which was calculated at 5% (although the calculations do not appear to be shown by Natural England). In [REP8-102], Natural England appears to derive the equivalent reduction in growth rate from The SADEP Report to Inform Appropriate Assessment (RIAA) (Royal HaskoningDHV, 2022), Table 9-112, reading across from a total of 1539 predicted mortalities at 70% displacement and 5% mortality of displaced birds. The stated reduction of growth rate of 1.4% is equivalent to 1 minus the Median Counterfactual of Growth Rate of 0.986 from the Table, expressed as a percentage. The reduction in growth rate quoted by Natural England appears therefore not to be based on a specific PVA run, but the nearest equivalent mortality total in Table 9-112 in the SADEP RIAA (Royal HaskoningDHV, 2022). The Applicant requests that Natural England confirms this interpretation.</p> <p>The North Falls scenario referred to by Natural England is 70% displacement and 2% mortality including Hornsea Project Four (Natural England bespoke approach to seasons and apportioning), RIAA Part 4 [APP-178] Table 4.50. The 0.5% reduction in growth rate is based on 1 minus the Counterfactual of Median Growth Rate of 0.995, expressed as a percentage.</p> <p>PVAs for both SADEP and North Falls were run using the Natural England Seabird PVA tool¹. The Applicant has compared the input parameters for the SADEP PVA with those for North Falls to identify any that might lead to significant differences in results between the SADEP and North Falls PVA results under similar scenarios in terms of the number of predicted displacement mortalities.</p>

¹ https://github.com/naturalengland/Seabird_PVA_Tool/tree/master/Documentation

Ref	Issue raised	Natural England's recommendation to resolve issues	Applicant's Response
			The SADEP PVA was run against a background population of 121,754 individuals for the FFC SPA based on a count in 2017 (Aitken <i>et al.</i> 2017; see Table 9-112 in the SADEP RIAA (Royal HaskoningDHV, 2022), whereas the North Falls PVA has used an updated background population from 2022 of 149,978 (Clarkson <i>et al.</i> 2022), a 23% increase of c. 28,000 individuals, compared with the 2017 count. Applying similar levels of impact (in terms of the absolute additional number of mortalities) to an increased population size will reduce the predicted levels of effect, so that a smaller reduction to the population growth rate compared with the baseline (unimpacted) population is expected in the North Falls scenario when compared to the SADEP scenario.
RR-243, F32	In the SADEP Examination, Natural England could not rule out AEOL for razorbill at FFC SPA. As similarly noted for guillemot, despite considering very similar in-combination data, the Applicants PVA has resulted in a significantly lower reduction in growth rate than that calculated by SADEP.	It would be useful to fully understand the differences in the in-combination assessment (and PVA) the Applicant presents compared to that from which Natural England previously concluded that AEOL could not be ruled out in combination for razorbill at FFC SPA in the SADEP consent decision.	See response below.
RR-243, F41	<p>The Applicant concludes that the North Falls project will make no material contribution to the in-combination impact on razorbill at FFC SPA. Natural England highlight that we concluded during the Hornsea 4 and SADEP Examinations that AEOL on the razorbill feature of the FFC SPA for displacement impacts in-combination with other plans and projects could not be ruled out. This was due to a lack of confidence that future population growth rates at FFC SPA could sustain the predicted level of mortality (i.e., we do not expect the recent population growth rates can be sustained). In the SADEP Examination, this conclusion was based on an annual mortality total of 206 which PVA indicated could result in a reduction in population growth rate of 0.6%.</p> <p>We note that the Applicant is now considering a total mortality of 235 (using the NE bespoke approach including HP4) but that the PVA suggests a reduction in population growth rate of just 0.3%.</p> <p>We note that the razorbill population at FFC SPA increased by >50% between the 2017 census (which SADEP used as the reference population), and the 2022 population used by the Applicant. Nonetheless, we anticipate that changes to other parameters are also likely to be relevant.</p> <p>Despite the Applicant's conclusions, we welcome the provision of an in-combination assessment, investigation of impact by PVA and the provision of a without prejudice derogations case.</p>	<p>Natural England request clarity regarding the PVA resulting in a smaller reduction in population growth rate, despite a greater impact being investigated.</p> <p>Natural England anticipate that our previous judgements regarding AEOL for razorbill at FFC SPA are highly likely to be maintained given the increased in-combination mortality impact, albeit the projects contribution to the in-combination total is small.</p>	<p>The Applicant notes that Natural England's SADEP conclusion is based on an annual in combination mortality total of 206, which appears to derive from their Deadline 8 offshore ornithology advice to SADEP (Natural England, 2023; page 23) and to be calculated by Natural England from the SADEP data using 70% displacement and 2% mortality for all projects other than Hornsea 4 for which mortality was calculated at 5%. Natural England appears to derive the equivalent reduction in growth rate from The SADEP RIAA (Royal HaskoningDHV, 2022), Table 9-122, reading across from a total of 215 predicted mortalities. The stated reduction of growth rate of 0.6% is equivalent to 1 minus the Median Counterfactual of Growth Rate of 0.994 from the table, expressed as a percentage. The reduction in growth rate quoted by Natural England appears therefore not to be based on a specific PVA run, but the nearest equivalent mortality total in Table 9-122 in the SADEP RIAA (Royal HaskoningDHV, 2022). As for guillemot, the Applicant requests that Natural England confirms this interpretation.</p> <p>The North Falls scenario referred to by Natural England is 70% displacement and 2% mortality including Hornsea Project Four (Natural England bespoke approach to seasonal apportioning), RIAA Part 4 [APP-178] Table 4.58. The 0.3% reduction in growth rate is based on 1 minus the Counterfactual of Median Growth Rate of 0.997, expressed as a percentage.</p> <p>PVAs for both SADEP and North Falls were run using the Natural England online tool. The Applicant has compared the input parameters for the SADEP PVA with those for North Falls to identify any that might lead to significant differences in results between the SADEP and North Falls PVA results under similar</p>

Ref	Issue raised	Natural England's recommendation to resolve issues	Applicant's Response
			<p>scenarios in terms of the number of predicted displacement mortalities.</p> <p>The SADEP PVA was run against a background population of 40,506 individuals for the FFC SPA based on a count in 2017 (Aitken et al. 2017; see Table 9-112 in the SADEP RIAA (Royal HaskoningDHV, 2022)), whereas the North Falls PVA has used an updated background population from 2022 of 61,345 (Clarkson et al. 2022), a 51% increase of c. 20,800 individuals, compared with the 2017 count. Applying similar levels of impact (in terms of the absolute additional number of mortalities) to an increased population size will reduce the predicted levels of effect, so that a smaller reduction to the population growth rate compared with the baseline (unimpacted) population is expected in the North Falls scenario when compared to the SADEP scenario.</p> <p>See the Applicant's Response to Relevant Representations from Natural England ([REP1-044] NE-266 / F41) for the response to Natural England's advice that AEOL on the razorbill feature of the FFC SPA for in combination displacement impacts from OWFs could not be ruled out, due to a lack of confidence that future population growth rates at FFC SPA could sustain the predicted level of mortality.</p>

2.2 Underwater noise policy papers

Table 2.2 Applicant's Response to MMO comment regarding Underwater noise policy papers

Ref	Comments from Stakeholder	Applicant's Response
REP1-068, Section 3	<p>The MMO would highlight that the Underwater noise policy papers have been published, by DEFRA, JNCC, NE and Cefas. These set out the direction of travel into reducing the noise at source for piling and sets out further detail on how UXO mitigation</p> <ul style="list-style-type: none"> • Reducing noise policy • UXO position statement • NE/JNCC/Cefas joint position on Noise Abatement <p>The MMO has included links above but will enter these into the examination at Deadline 2 (if another interested party has not done this at Deadline 1). The MMO would ask the Applicant how the publication of these documents changes their Applicant and what updates will be made and at which deadline. This will assist in manging resources to review the most up to date information.</p>	<p>The Applicant has taken into consideration the published policy papers for North Falls.</p> <p>With regards to the Reducing Noise policy and NE/JNCC/Cefas joint position on Noise Abatement, the Applicant notes that potential mitigation options, including Noise Abatement Systems (NAS), are proposed within the Outline Site Integrity Plan (SIP) [APP-243] which would be finalised post-consent in line with the final design of the Project. As secured by condition to the proposed deemed marine licences in the draft DCO, in the event that piling is required. It is recognised that upon assessment of more developed design information, any need for the implementation of NAS will be decided in consultation with the licencing authority. The Applicant is planning appropriately for the potential requirement for NAS but maintains the position that the effects may be suitably mitigated through further design refinement and embedded mitigation.</p> <p>In regard to the Unexploded Ordnance (UXO) position statement, the Applicant has considered these changes and ensured the Draft Marine Mammal Mitigation Protocol (MMMP) incorporates the latest guidance for UXO clearance. An updated version of the Draft MMMP [7.7, Rev 1] is provided at Deadline 3.</p>

3. REFERENCES

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Natural England (2023) Sheringham Shoal Extension and Dudgeon Extension Offshore Wind Farms Appendix B3 to the Natural England Deadline 8 Submission Natural England's Offshore Ornithology Position (Revision 2). Available at: [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010109/EN010109-002129-Natural%20England%20-%20Other-%20EN010109%20441148%20SEP%20DEP%20Appendix%20B3%20-%20Natural%20England%E2%80%99s%20Offshore%20Ornithology%20Position%20\(Revision%202\)%20Deadline%208.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010109/EN010109-002129-Natural%20England%20-%20Other-%20EN010109%20441148%20SEP%20DEP%20Appendix%20B3%20-%20Natural%20England%E2%80%99s%20Offshore%20Ornithology%20Position%20(Revision%202)%20Deadline%208.pdf) [Accessed: March 2025]

Royal HaskoningDHV (2022) Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects Report to Inform Appropriate Assessment (RIAA). Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010109/EN010109-000432-5.4%20Report%20to%20Inform%20Appropriate%20Assessment.pdf> [Accessed: March 2025]



NORTH FALLS

Offshore Wind Farm



HARNESSING THE POWER OF NORTH SEA WIND

North Falls Offshore Wind Farm Ltd

A joint venture company owned equally by SSE Renewables and RWE.

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