



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

NORTH FALLS OFFSHORE WIND FARM

**Appendix C5 to the Natural England Deadline 5 Submission**  
**Natural England's Benthic Ecology Advice on the Applicant's Deadline 4 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

30 May 2025

## Appendix C5 Natural England's Benthic Ecology Advice on the Applicant's Deadline 4 Documents

### 1. Minor comments

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

- [REP4-014] 7.26 Site Characterisation Report (Rev 1) (Tracked)

**Table 1. Natural England's advice on: Benthic Ecology**

Document reviewed	Update made	Issue resolved?
[REP4-014] 7.26 Site Characterisation Report (Rev 1) (Tracked)	This document has been updated to signpost to: additional mitigation commitments in the Supporting Information on Offshore Additional Mitigation (doc ref 9.55); and new Hydrodynamic and Sediment Dispersion Modelling Results. The document has also been updated to include descriptions of plumes. Maximum design scenario (MDS) for sediment disposal has been reduced overall, but increased x4 within the Array.	There are no benthic technical comments to make in the context of this document alone, comments on the ecological significance of the results of the hydrodynamic/sediment dispersal modelling will be made against the updated ES/MCZ assessments etc. in light of the full detail where they exist.

## **2. Detailed comments**

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

- [REP4-038] 9.52 Outline Sediment Disposal Management Plan (Rev 0)
- [[REP4-039] 9.53 Outline Cable Specification and Installation Plan (Rev 0)
- [REP4-040] 9.54 Hydrodynamic and Dispersion Modelling Report (Rev 0)
- [REP4-041] 9.55 Supporting Information on Offshore Additional Mitigation (Rev 0)
- [REP4-042] 9.56 Hydrodynamic and Sediment Dispersion Modelling Results Interpretation (Rev 0)

**Table 2.** Natural England's Benthic Ecology Advice on 9.52 Outline Sediment Disposal Management Plan (Rev 0)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Section 3.4.1	Natural England highlights that the sediment disposal constraints are lacking consideration of ecological receptors. Whilst we note a loose commitment to a 50m buffer to avoid 'Annex I reef where practicable', we advise these commitments should go further to include that all Section 41 NERC Habitats are avoided particularly where such habitats support rare and/or irreplaceable communities.	<p>Natural England reiterate our advice provided in Appendix C of our RR/WR [RR-243].</p> <p>If avoidance is not possible then it should be clearly demonstrated how the impacts have been minimised and/or remediated, in the case of irreplaceable habitats</p>
2	Section 3 para and section 3.4.1	Natural England notes that the "disposal of sediment will be distributed across the entire red line boundary "within minimal ecological mitigation and no consideration of designated sites or features within that mitigation (Section 3.4.1). Natural England is concerned that both the nature and volume of material to be disposed of within the Array area has been significantly altered; in particular the volume requiring disposal has increased by approximately 4 times, which may result in impacts of greater significance than those originally assessed, particularly within Kentish Knock East MCZ.	<p>Natural England reiterate our advice provided in Appendix C of our RR/WR [RR-243] and also advise that all relevant assessment (EIA and MCZ) require updating with an evaluation of the impacts from the increased disposal volumes within the Array area.</p> <p>We advise that the mitigation measures currently proposed may not be sufficient to avoid an AEoI and/ or hindrance of the conservation objectives of the MLS SAC and KKE MCZ respectively from relevant construction phase impact pathways.</p>

**Table 3.** Natural England's Benthic Ecology Advice on 9.53 Outline Cable Specifications Plan (Rev 0) [REP4-039]

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Section 3.2	Natural England notes that no mitigation commitments have been incorporated into the document. Where boulder clearance is required adjacent to designated sites, boulders should be dispersed to prevent linear concentrations to sediment transport along the cable corridor and to ensure that habitats continue to represent the baseline as is reasonably practicable.	<p>Natural England reiterate our advice provided in Appendix C of our RR/WR [RR-243] in relation to boulder relocation close to designated sites and near shore to ensure that sediment transport is not disrupted.</p> <p>We further advise that boulders placed on the seabed surface as a result of boulder plough activities must be deposited in such a manner as to create a mosaic habitat that is similar in structure and function to the surrounding habitat at the time of carrying out the boulder plough activity.</p>
2	Section 4.3	Natural England notes that mitigation measures are limited to navigation matters and no mitigation commitments relevant to benthic ecological receptors have been proposed.	<p>Natural England reiterates our advice provided in Appendix C of our RR/WR [RR-243] in relation to reducing/mitigating impacts from cable protection particularly adjacent to designated sites.</p> <p>We further advise that a commitment to remove all seabed infrastructure at the time of decommissioning should be secured in the DCO, and that an Outline Decommissioning Plan should also be provided to detail the approach to decommissioning.</p> <p>We highlight that in the Guidance Notes for Industry for the Decommissioning of Offshore Renewable Energy Installations under the Energy Act, 2004, it is expected that <i>“all installations and structures will be fully removed at the end of their operational life to minimise residual liabilities and that approval of decommissioning programmes will be based on this assumption”</i> in accordance with the assumptions set by the International Maritime Organisation in 1989 and in line with OSPAR requirements. Natural England further advises that returning the seabed to its pre-development status will contribute to achieving Good Environmental Status of the wider marine environment as required by the UK's Marine Strategy and as above is in line with OSPAR requirements.</p>

3	Section 7	Natural England notes that no monitoring has been proposed which considers impacts on benthic receptors.	Natural England advises that in the event the cable protection is required adjacent to Margate and Long Sands MCZ, an OIPMP should be developed to monitor the impacts (temporal and spatial changes) of cable protection on benthic features within the SAC.
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**Table 4.** Natural England's Benthic Ecology Advice on 9.54 Hydrodynamic and Dispersion Modelling Report (Rev 0) [REP4-040]

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Figures 7.6 and Figure 7.36	Natural England notes that the sediment deposition prediction plots have not considered the MarESA pressure benchmark thresholds (of 5cm and 30cm) and only present deposition >50 cm. It is not, therefore, clear how the modelling has been used to assess the significance of impacts from sediment deposition particularly within Margate and Long Sands SAC and Kentish Knock east MCZ.	<p>Natural England advises that presenting predicted pressures from elevated sediment deposition using contours which are relevant to MarESA pressure benchmark thresholds would facilitate robust and transparent assessments of impacts from these pressures particularly within Margate and Long Sands SAC and Kentish Knock east MCZ.</p> <p>In the absence of this information, it is not possible to determine the WCS and therefore robustly assess the impacts from sediment deposition within the designated sites to determine the likelihood of an AEol and/ or hindrance of the conservation objectives of the MLS SAC and KKE MCZ respectively from relevant construction phase impact pathways.</p>

**Table 5.** Natural England's Benthic Ecology Advice on 9.55 Supporting Information on Offshore Additional Mitigation (Rev 0) [REP4-041]

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Section 2.1.1 to 2.1.7	Natural England welcomes the reduction in MDS afforded by the measures outlined. However, we consider that mitigation commitments should go further to avoid impacts	Natural England reiterates our advice provided in Appendix C of our RR/WR [RR-243] and also point to comments in Table 2 above in relation to REP4-039] 9.53 Outline Cable Specification and Installation Plan (Rev 0)].

		to Margate and Long Sands SAC and Kentish Knock East MCZ and Section 41 Priority Habitats particularly where such habitats support rare and/or irreplaceable communities.	
2	Section 2.1.1 para 4.	Natural England welcomes the additional buffer between Margate and Long Sands SAC and the installation of the offshore cables and any associated cable protection.	<p>Natural England advises that further interpretation of the hydrodynamic modelling is required to demonstrate that cable protection near the SAC will not modify sediment transport pathways/processes operating on/near the SAC and in turn lead to morphological changes that could alter the extent, distribution and composition of benthic communities within the SAC.</p> <p>In the absence of this information, it is not possible to determine the likelihood of an AEoI on MLS SAC the operational phase. Unless it can be demonstrated otherwise, the scale of impacts is likely to further hinder the conservation objectives of the site, taking the site further away from achieving its 'restore objective'. (We refer the Exa to Annex I of Appendix C of our RR/WR [RR-243].</p>

**Table 6.** Natural England's Benthic Ecology Advice on 9.56 Hydrodynamic and Sediment Dispersion Modelling Results Interpretation (Rev 0) [REP4-042]

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Section 4	Natural England notes that the changes in current speeds and bed shear stresses due to the presence of turbines and/or cable protection presented in [REP4-042] have not been used to predict the morphological changes (such as scour/sediment accretion, changes in sediment character) that could alter the extent, distribution	Natural England advises that further interpretation of the hydrodynamic modelling is required to provide a robust and transparent understanding of likely WCS impacts on benthic ecological receptors from changes in supporting processes within Margate and Long Sands SAC and Kentish Knock east MCZ.

		and composition of benthic communities within the adjacent designated sites during the operational phase. It is not therefore possible to determine the likely nature and/or extent of these secondary pathways of effect or determine whether they may extend into Margate and Long Sands SAC and/or Kentish Knock East MCZ.	In the absence of this information, it is not possible to determine the likelihood of an AEol and/ or hindrance of the conservation objectives of the MLS SAC and KKE MCZ respectively during the operational phase.
2	Sections 4.3.2 to 4.3.4	Natural England considers that the assessment of receptor sensitivity, impact magnitude and effect significance altogether lack consideration of ecological receptors.	Natural England advises that further interpretation of the hydrodynamic modelling is required and should be considered in the context of ecological receptors to provide a robust and transparent understanding of likely WCS impacts from changes in marine processes within Margate and Long Sands SAC and Kentish Knock east MCZ.