



NORTH FALLS

Offshore Wind Farm

Appendix to Applicant's Response to ExA's Second Written Questions (ExQ2)

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Offshore Wind Farm

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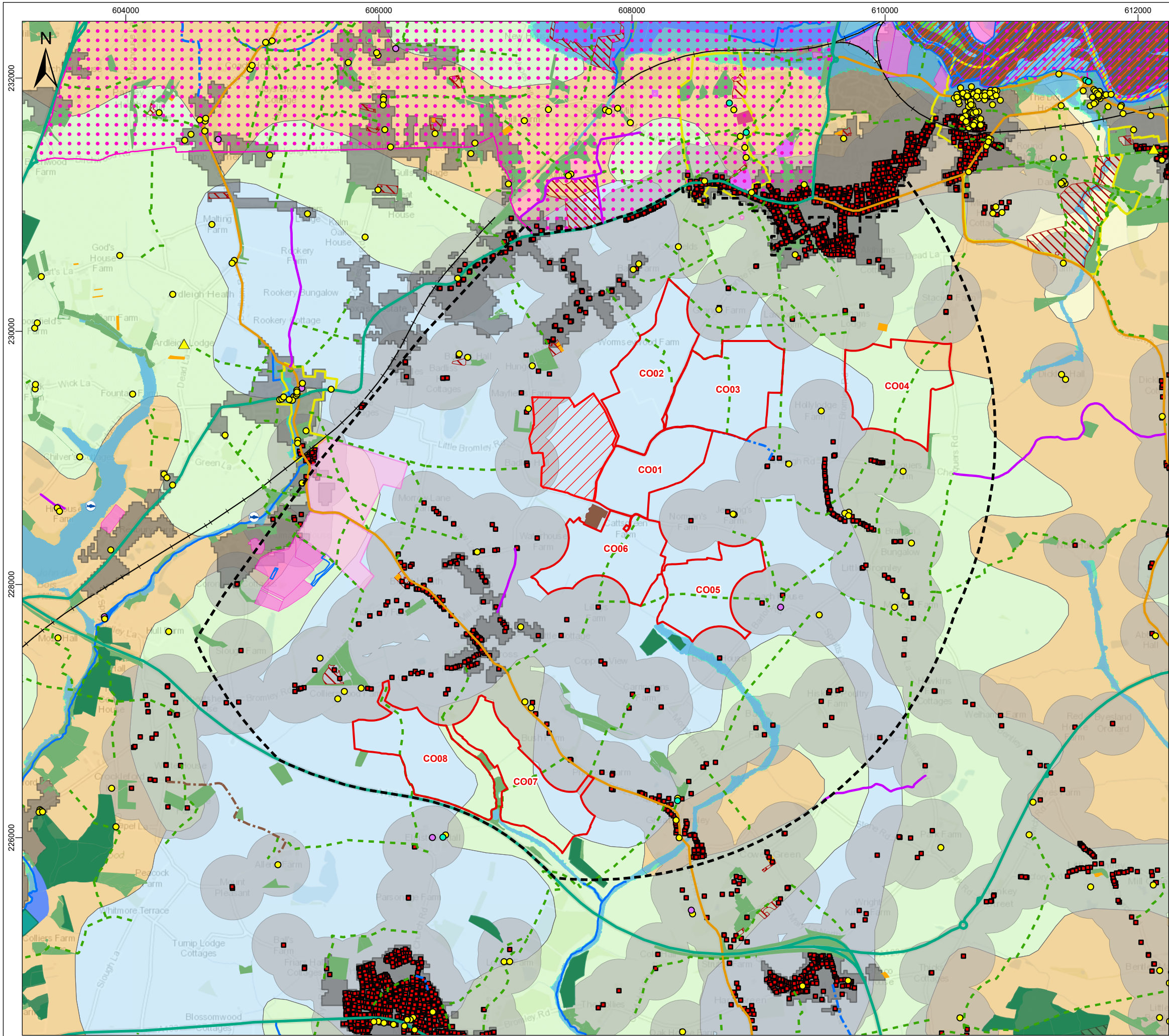
Revision	Date	Status/Reason for Issue	Originator	Checked	Approved
0	May 2025	Deadline 5	RHDHV	NFOW	NFOW

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This Appendix has been produced to support the Applicant's Response to ExA's Second Written Questions (ExQ2) and should be read alongside the Applicant's Response to ExA's Second Written Questions (ExQ2) (**Document Reference: 9.68**).

Q2.0.7 - Figure 4.13 Onshore Substation Site Selection - Long List Options



Legend

Onshore Substation Area of Search

- North Falls and Five Estuaries Co-Located Substation Option
- East Anglia Connection Node (EACN)
- Ardleigh Road Substation
- Site of Special Scientific Interest (SSSI)
- Special Protection Area (SPA)
- Ramsar
- Local Nature Reserve (LNR)
- Ancient Woodland
- Historic Landfill Site
- Camping and Caravan Site
- Fishing Lake
- Residential Property
- Residential Properties 250m Buffer
- Area of Outstanding Natural Beauty (AONB)
- Built-Up Area (ONS, 2023)
- A Road
- B Road
- Railway
- Main River
- Flood Zone 3
- Flood Zone 2

Priority Habitat Type

- Coastal and Floodplain Grazing Marsh
- Coastal Saltmarsh
- Deciduous Woodland
- Good Quality Semi-Improved Grassland
- Lowland Dry Acid Grassland
- Lowland Meadows
- Mudflats
- No Main Habitat but Additional Habitats Present
- Traditional Orchard
- Conservation Area
- Scheduled Monument

Listed Building Grades

- I
- II*
- II

Public Rights of Way (PRoWs)

- Footpath
- Bridleway
- Byway
- Restricted Byway

Agricultural Land Classification (ALC) Grades (2024)¹

- Grade 1
- Grade 2
- Grade 3
- Grade 4

¹ Dataset © Natural England 2024: original survey data from the Agricultural Land Classification detailed Post 1988 ALC Survey © Natural England 1999. Available at Natural England Access to Evidence - Agricultural Land Classification detailed Post 1988 ALC survey.

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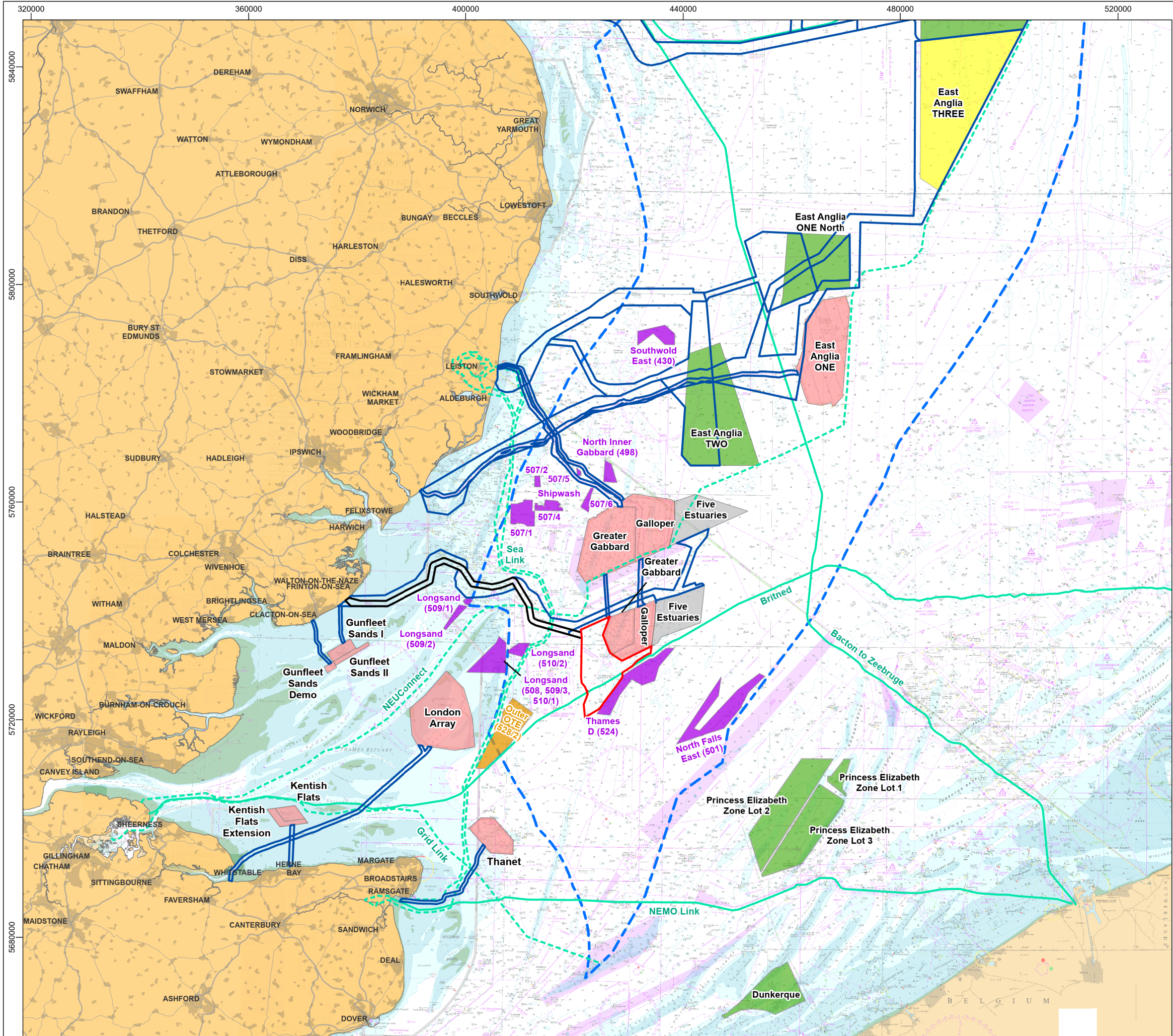
Onshore Substation Site Selection - Long List Options

Rev	Date	Remarks	Drwn	Chkd
03	20/05/2025	Third issue	FC	GC
02	20/05/2024	Second issue	FC	GC
01	13/02/2024	First issue	JH	GC

Drawing Number	Figure Number
PB9244-RHD-ZZ-ON-DR-GS-0476	4.13

Scale	Plot Size	Datum	Projection
1:30,000	A3	OSGB36	BNG

Q7.0.5 - Offshore Cumulative Effects Assessment Plan



File ref: C:\Users\305050\OneDrive - Royal HaskoningDHV\E02 GIS\02_Shared\02_Figures\12_Examination\WrittenQuestions\CEA\CEA\OffshoreCEA.aprx



Legend

- North Falls Array Area
- North Falls Offshore Cable Corridor
- East Anglia Shipping Waters Marine Character Area (SCA04)
- Offshore Wind Farm Cable Agreement

Offshore Wind Farm Sites

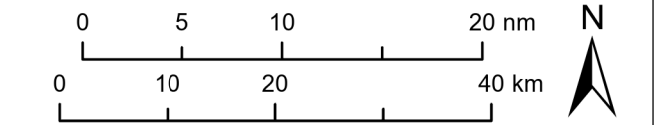
- Active/In Operation
- Consented
- Under Construction
- In Planning

Interconnectors

- Existing
- Proposed (Indicative)

Minerals Aggregates

- Exploration and Option Area
- Production Agreement Area



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Drawing Title

Offshore Cumulative Effects Assessment Plan

Rev	Date	Remarks	Drwn	Chkd
01	15/05/2025	First issue	FC	GK

Drawing Number	Figure Number
PB9244-RHD-ZZ-ON-DR-GS-0672	Q7.0.5

Scale	Plot Size	Datum	Projection
1:700,000	A3	WGS84	UTM31N



Q10.0.10 - Defra (2025) Marine Strategy Part Three: 2025 UK Programme of Measures

Relevant Receptors	Programme of measures used to achieve or maintain GES (Defra, 2025) (measures of relevance to North Falls shown in Bold)	Implications for North Falls
Cetaceans	<ul style="list-style-type: none"> • there should be no significant decrease in abundance caused by human activities • population ranges are not significantly lower than favourable reference values for the species • the long-term viability of cetacean populations is not threatened by incidental bycatch 	<p>As stated in Defra (2025)¹ the situation regarding cetaceans has been stable since 2012. It is notable that a number of offshore wind farms have been constructed and operational in this time. Furthermore, ES Chapter 12 Marine Mammals [APP-026] and the RIAA Part 3 [APP-176] concludes North Falls alone will have no significant effects on cetaceans. This conclusion is also supported by 9.14 Further Information Regarding Marine Mammals [REP1-057]; 9.35 Further Information Regarding Marine Mammals [REP3-046]; and Marine Mammal Assessment Clarifications [document reference 9.81].</p> <p>Therefore, North Falls will not hinder this measure.</p>
Seals	<ul style="list-style-type: none"> • the long-term viability of seal populations is not threatened by incidental bycatch 11 • population abundance and distribution are consistent with favourable conservation status • grey seal pup production does not decline substantially in the short or long-term 	<p>As stated in Defra (2025), the situation regarding seals has been improving since 2012 and it is noted that a number of offshore wind farms have been constructed and operational in this time. Furthermore, ES Chapter 12 Marine Mammals [APP-026] concludes North Falls alone will have no significant effects on seals and the RIAA Part 3 [APP-176] concludes there will be no adverse effect on integrity of sites designated for seals which takes into account the conservation objectives of Special Areas of Conservation which refer to maintaining or restoring the populations and distribution of qualifying species. This conclusion is also supported by 9.14 Further Information Regarding Marine Mammals [REP1-057]; 9.35 Further Information Regarding Marine Mammals [REP3-046]; and</p> <p>Therefore, North Falls will not hinder this measure.</p>

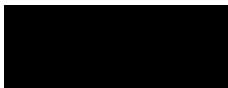
¹ Defra (2025). Marine strategy part three: 2025 UK programme of measures. Available at: https://assets.publishing.service.gov.uk/media/67990f039a6dc0352ab341e1/Marine_strategy_part_three_-_2025_UK_programme_of_measures.pdf

Relevant Receptors	Programme of measures used to achieve or maintain GES (Defra, 2025) (measures of relevance to North Falls shown in Bold)	Implications for North Falls
Birds	<ul style="list-style-type: none"> the long-term viability of marine bird populations is not threatened by deaths caused by incidental bycatch in mobile and static fishing gear the population size of marine bird species has not declined substantially since 1992 because of human activities widespread lack of breeding success in marine birds caused by human activities should occur in no more than 3 years in 6 there is no significant change or reduction in population distribution of marine birds caused by human activities reduce risks to island seabird colonies from non-native mammals (operational target) 	<p>Defra (2025) notes that the need to tackle climate change and commitment to legally binding net zero targets is an exemption to this measure and therefore the need for offshore wind farms, such as North Falls outweighs the measure.</p> <p>However, where adverse effects on the integrity of relevant SPAs cannot be ruled out for North Falls, compensation will be secured and delivered.</p> <p>Therefore, North Falls will not hinder this measure.</p>
Fish	<ul style="list-style-type: none"> incidental bycatch is below levels which threaten long-term viability and recovery of fish populations the population abundance of sensitive species is not decreasing due to anthropogenic activities and long-term viability is ensured for each fish species protected under The Conservation of Habitats and Species Regulations 2017 or the Conservation of Offshore Marine Habitats and Species Regulations 2017 (M4.6), population abundance and geographic distribution meets established favourable reference values v• for listed fish species the area and the quality of the habitat is sufficient 	<p>As stated in Defra (2025), the situation regarding fish has been improving since 2012 and it is noted that a number of offshore wind farms have been constructed and operational in this time.</p> <p>HRA screening for North Falls confirmed there will be no Likely Significant Effect on fish species protected under the Habitats Regulations.</p> <p>ES Chapter 11 Fish and Shellfish Ecology [APP-025] concludes North Falls will have no significant effects on fish; and ES Chapter 10 Benthic and Intertidal Ecology [APP-024] confirms there will no significant effects on habitats.</p> <p>Therefore North Falls will not hinder this measure.</p>
Benthic	<ul style="list-style-type: none"> the physical loss of each seabed habitat type caused by human activities is minimised, and where possible reversed habitat loss of sensitive, fragile, or important habitats caused by human activities is prevented, and where feasible reversed the extent of habitat types adversely affected by physical disturbance caused by human activity should be minimised the extent of adverse effects caused by human activities on condition, function and ecosystem processes of habitats is minimised 	<p>North Falls has adopted a series of embedded mitigation secured through the DCO to minimise and avoid impacts upon sensitive benthic habitats including:</p> <ul style="list-style-type: none"> The offshore cable corridor was selected in consultation with key stakeholders to select a route which minimised impacts on designated sites, such as avoiding overlap with the Margate and Long Sands SAC; <p>Cables and cable protection will not overlap the Margate and Long Sands SAC and will be placed 150m or more from this site;</p> <p>Reduction of the design envelope with the removal of the option to use Gravity base systems (GBS) foundations;</p>

Relevant Receptors	Programme of measures used to achieve or maintain GES (Defra, 2025) (measures of relevance to North Falls shown in Bold)	Implications for North Falls
		<ul style="list-style-type: none"> Turbine foundations will be a minimum of 50m from the order limits and therefore a minimum of 50m from the of the Kentish Knock East MCZ; <p>ES Chapter 10 Benthic and Intertidal Ecology [APP-024] confirms there will no significant effects on habitats and therefore, North Falls will not hinder this measure.</p>
Non-indigenous species	<ul style="list-style-type: none"> the number of newly introduced non-indigenous species (NIS) is minimised and where possible reduced to zero the rate of spread of invasive NIS, because of human activities is minimised and reduced where possible 	<p>ES Chapter 10 Benthic and Intertidal Ecology [APP-024] has assessed there would be no significant effect of colonisation of non-native species on the offshore project area.</p> <p>The risk of spreading INNS will be reduced by employing biosecurity measures as secured via the Outline Project Environment Management Plan [REP3-011, Section 7.2.2].</p> <p>Therefore, North Falls will not hinder this measure.</p>
Commercial fish and shellfish	<ul style="list-style-type: none"> the fishing mortality rate of populations of commercially exploited species is at or below levels which can produce the Maximum Sustainable Yield (MSY) or equivalent metrics the Spawning Stock Biomass of populations of commercially exploited species are above biomass levels capable of producing the MSY 	<p>Chapter 11 Fish and Shellfish Ecology [APP-025] and ES Chapter 14 Commercial Fisheries [APP-028] have assessed there would be no significant effect from North Falls over Fish and Shellfish Ecology or Commercial Fisheries.</p> <p>A series of embedded mitigation, secured through the DCO, are in place to avoid interference with fishing activities including:</p> <ul style="list-style-type: none"> Outline Fisheries Liaison and Coexistence Plan (FLCP) [REP4-018] Timely and efficient distribution of Notice(s) to Mariners' (NtMs), Kingfisher notifications and other navigational warnings of the position and nature of works associated with the Project; <p>Therefore, North Falls will not hinder this measure</p>
Food webs	<ul style="list-style-type: none"> the species composition and relative abundance within representative feeding guilds are indicative of a healthy marine food web the balance of abundance between representative feeding guilds is indicative of a healthy food web the size structure of fish communities is indicative of a healthy marine food web 	<p>ES Chapter 10 Benthic and Intertidal Ecology [APP-024], ES Chapter 11 Fish and Shellfish Ecology [APP-025], ES Chapter 12 Marine Mammals [APP-026] and ES Chapter 13 Offshore Ornithology [APP-027] have taken consideration of prey species and food web linkages and conclude there will be no significant effect as a result of North Falls</p>

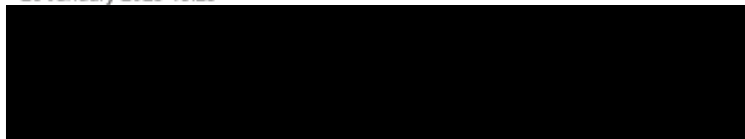
Relevant Receptors	Programme of measures used to achieve or maintain GES (Defra, 2025) (measures of relevance to North Falls shown in Bold)	Implications for North Falls
	<ul style="list-style-type: none"> • productivity of each of the representative feeding guilds, characterised by key species, is indicative of a healthy marine food web 	Therefore, North Falls will not hinder this measure.
Hydrographical conditions	The hydrographical conditions descriptor does not have indicators. Its target centres around compliance and relies on regulation and licensing to prevent or mitigate adverse impacts	<p>ES Chapter 8 Marine Geology Oceanography and Physical Processes [APP-022] has assessed there will be no changes to the tidal current or wave regimes due to the presence of structures on the seabed (i.e. wind turbines and offshore platform foundations).</p> <p>Therefore, North Falls will not hinder this measure.</p>
Contaminants	<ul style="list-style-type: none"> • concentrations of contaminants measured in water, sediment or marine biota comply with appropriate threshold values • biological or ecological effects on sea life due to contaminants are below thresholds agreed by OSPAR • occurrence and extent of significant acute pollution events are minimised • the adverse effects of significant acute pollution events on the health of species and on the condition of habitats (such as their species composition and relative abundance) are minimised and, where possible, eliminated 	<p>The Applicant is committed to the use of good industry practice techniques and due diligence regarding the potential for pollution throughout all construction, operation and maintenance, and decommissioning activities. For example, measures to control accidental release of drilling fluids whilst ensuring that any chemicals used are listed on the Oslo and Paris Conventions (OSPAR) List of Substances Used and Discharged Offshore which Are Considered to Pose Little or No Risk to the Environment (PLONOR) (OSPAR, 2021). This mitigation is outlined the Project Environmental Management Plan [REP3-011], and secured in the Draft DCO.</p> <p>Therefore, North Falls will not hinder this measure.</p>
Underwater noise	<ul style="list-style-type: none"> • levels of anthropogenic impulsive sound sources do not exceed levels that adversely affect populations of marine animals • levels of anthropogenic continuous low-frequency sound do not exceed levels that adversely affect populations of marine animals 	<p>The Applicant has taken account of the recently published national underwater noise policy papers and mitigation measures are in place to avoid or minimise underwater noise as outlined in the Marine Mammal Mitigation Protocol (Document Reference 7.7, Rev02) and Outline Site Integrity Plan (Document reference 7.8, Rev 1) submitted at Deadline 5.</p> <p>Therefore, North Falls will not hinder this measure</p>

Q15.0.5 - Email from the Belgian Directorate General of Shipping dated 20th January 2025 confirming that their “consultation on the Formal Safety Assessment is closed and the result is positive”



From:
Sent:
To:
Cc:

20 January 2025 15:23



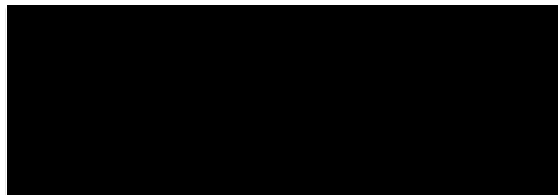
Subject:

RE: North Falls Offshore Wind Farm - Galloper Recommended Ferry Route

Dear 

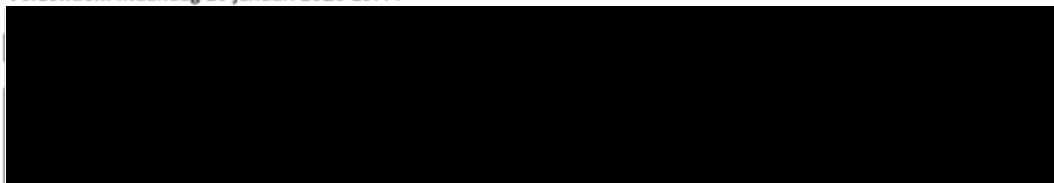
Apologies if I was not clear: our consultation on the FSA is closed and the result is positive

Met vriendelijke groeten,



Van:

Verzonden: maandag 20 januari 2025 15:44



Onderwerp: RE: North Falls Offshore Wind Farm - Galloper Recommended Ferry Route

Dear 

Thank you for the below response, and apologies for my delayed reply.

Would you be in a position to confirm if your consultation on the FSA has now closed, or if not when you anticipate that it will do so?

With Thanks,



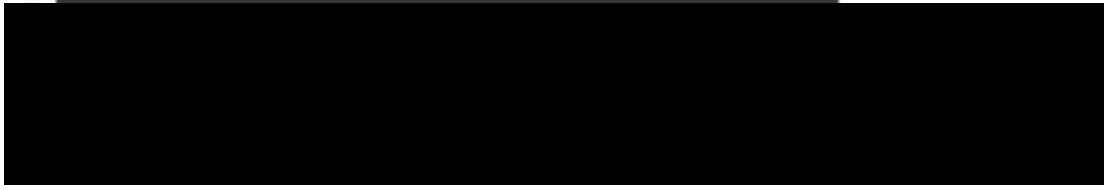
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From: [Redacted]
Sent: 10 January 2025 06:47



Subject: RE: North Falls Offshore Wind Farm - Galloper Recommended Ferry Route

Dear [Redacted]

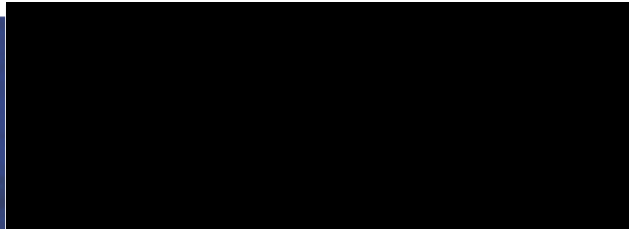
I wish you a very happy and successful 2025.

We have read the FSA carefully and submitted it to the Belgian stakeholders for possible comments. I have only received positive reactions.

We would like to thank you and the team for the FSA and have no further questions for the moment

Kind regards,

Met vriendelijke groeten,



Van: [Redacted]
Verzonden: donderdag 9 januari 2025 18:19

2

Aan: [REDACTED]

CC: [REDACTED]

Onderwerp: RE: North Falls Offshore Wind Farm - Galloper Recommended Ferry Route

Dear [REDACTED] and [REDACTED]

Happy New Year, I hope you had a good Christmas break and that you are all well.

I just wanted to check in on whether you had any updates to provide on the below? Please do let us know if you have any queries or need further information.

Many Thanks,



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From: [REDACTED]

Sent: 26 November 2024 14:19

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: North Falls Offshore Wind Farm - Galloper Recommended Ferry Route

Dear All,

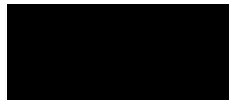
Following our meeting back in September to discuss the North Falls project, please find attached the document we have prepared on the alternative route options that could be used in the event that the Ostend routeing were to re-open and the Recommended Route is removed.

We would be very grateful for any feedback and a position update within four weeks (i.e., pre Christmas). In the meantime, we would be very happy to arrange a call to run you through the report if this is of any use. Let me know if so and I will liaise with the North Falls project to arrange.

I also attach a PDF of the September meeting minutes for reference.

Any queries please do feel free to get in touch.

Many Thanks,





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From: [REDACTED]
Sent: 18 October 2024 15:04

Subject: RE: North Falls Offshore Wind Farm - Galloper Recommended Ferry Route

Hi [REDACTED]

Many thanks for your swift reply.

I can confirm relevant content on this will be included in addition to the safety aspects – apologies, I can see the wording under the FSA heading below wasn't clear on this point.

Many Thanks,



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From: [REDACTED]
Sent: 18 October 2024 14:17

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: North Falls Offshore Wind Farm - Galloper Recommended Ferry Route

Hi [REDACTED]

Many thanks for her proposed structure.

I would like to re-iterate our demand to expand the "formal safety assessment" dealing with safety and indirectly environmental issues with an assessment of economical (f.ex detour – longer traject – more fuel) and direct environmental (detour – longer traject – more fuel – more CO2 and other emissions)

Kind regards,

4

Met vriendelijke groeten,



Van: [Redacted]
Verzonden: donderdag 17 oktober 2024 15:22



Onderwerp: RE: North Falls Offshore Wind Farm - Galloper Recommended Ferry Route

Hi All,

Many thanks again for your time last month to discuss the North Falls project. I can confirm the project is progressing the requested risk assessment document on alternate deviations, and hope to be in a position to issue in late November.

Please find below an outline of the document that we are currently populating. I would be grateful if you could let me know of any suggested additions to this so we can incorporate, ideally by the end of next week.

To note, the document will include appropriate narrative for each section, plus figures/maps to illustrate the narrative where needed.

Proposed structure:

- **History / background**
 - Overview of the Sunk Routeing Measures including the Galloper Recommended Ferry Route. This will include the history and reasoning for implementation.
 - A summary of relevant past consultation will be presented.
- **Methodology**
 - Details of the data sources used and methodology applied (IMO Formal Safety Assessment)
- **Summary of Galloper Recommended Ferry Route usage:**
 - Past usage (i.e., when the Ostend routeing was still active)
 - Current usage based on study of recent AIS data.
- **Potential Deviations**
 - Presentation of potential deviations identified in the event that the Ostend routeing re-opens. This will include the distances relative to the original routeing.
 - Where available, AIS data will be used to evidence existing use of the identified alternate routeing to / from Belgian ports.
- **Formal Safety Assessment**
 - A formal safety assessment will be undertaken on the identified deviations to assess risk levels associated with use of the alternate deviations identified from a navigational safety perspective, including qualitative assessment of the collision and deviation risks. Environmental impacts in terms of vessel emissions will also be considered.

I'm not aware of any comments on the draft meeting minutes we provided. We plan to finalise these by end of next week, and so I have attached again for ease in case there were any comments before then.

Many Thanks,



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From: [REDACTED]
Sent: 19 September 2024 12:02
To: [REDACTED]
Cc: [REDACTED]

Subject: RE: North Falls Offshore Wind Farm - Galloper Recommended Ferry Route

Hi All,

Many thanks again for time recently to discuss the North Falls project and the Galloper Recommended Ferry Route. Please find attached our draft minutes of the meeting for your review, plus the slides we shared.

With Thanks,



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From: [REDACTED]
Sent: Wednesday, September 11, 2024 11:16 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: North Falls Offshore Wind Farm - Galloper Recommended Ferry Route

Dear [REDACTED] and [REDACTED]

Many thanks for your time earlier in the week to discuss the North Falls project, and the proposed removal of the Galloper recommended ferry route. Soon we will be providing draft minutes of the meeting for

comment, together with the slides we presented, however in the interim we wanted to follow up directly with a summary of the meeting outcomes.

Based on the meeting, our understanding of your position is that you have no objection in principle to the removal of the Galloper recommended ferry route, however this is subject to a documented risk assessment that demonstrates that safe, viable deviations are available should the original Ostend routeing ever re-open. This documented risk assessment should also include consideration of the impacts on the environment from any increased vessel emissions.

The North Falls Project can confirm its intention to progress such a study that will be an extension of the work already undertaken, and we will keep you updated on progress. This study will feed into the Formal Safety Assessment that will form the basis of the joint UK/Belgium IMO application post consent of the project.

In the meantime, we would be very grateful if you could confirm your position in writing at your earliest convenience i.e., that you have no objection in principle to the route removal, albeit with this being subject to the production of the aforementioned study. A formal response in writing will allow us to enter into examination for the project with evidence of an agreed way forward.

If you require any further information to produce a formal response in writing, please do not hesitate to reach out.

Regards

[Redacted]

North Falls Offshore Wind Farm

[Redacted]

W: www.northfallsoffshore.com

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NORTH FALLS

Offshore Wind Farm



RWE

HARNESSING THE POWER OF NORTH SEA WIND

North Falls Offshore Wind Farm Limited

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

To contact please email contact@northfallsoffshore.com

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