

Date: 24 June 2025
Our ref: Case: 27843 Consultation: 501996
Your ref: EN010119



National Infrastructure Planning
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BY EMAIL ONLY

Dear Sir/Madam,

North Falls Offshore Wind Farm

The following constitutes Natural England's formal statutory response for Examination Deadline 6.

1. Natural England's Deadline 6 Submissions

Natural England has reviewed the documents submitted by the Applicant at Deadline 5. An update of Natural England's position regarding documents relevant to our remit is provided in Annex 1, including anticipated timing of responses. Natural England is also submitting the following detailed responses, signposted from Annex 1:

- EN010119 501996 North Falls Appendix B6 – Natural England's Marine Processes and Benthic Ecology Advice on the Applicant's Deadline 5 Documents – Deadline 6.pdf
- EN010119 501996 North Falls Appendix E6 – Natural England's Marine Mammals Advice on the Applicant's Deadline 5 Documents – Deadline 6.pdf
- EN010119 501996 North Falls Appendix G6 – BTO RR 788 Rhoades et al kittiwakes FINAL.pdf
- EN010119 501996 North Falls Appendix H6 – Natural England's LBBG Compensation Site Advice on the Applicant's Deadline 5 Documents – Deadline 6.pdf
- EN010119 501996 North Falls Appendix K6 – Natural England's Risk and Issues Log DL6.xls

2. [REP5-065] 9.73 Without Prejudice HRA DCO Schedules (Rev 0)

Natural England has reviewed the Without Prejudice HRA DCO Schedules and notes that the additional without prejudice compensation for guillemot and razorbill uses very similar

wording to that for kittiwake. Natural England provided comments on this wording in our Relevant Reps [Appendix A, RR-243] with regards to kittiwake. We therefore advise that the same comments in our Relevant Reps regarding the kittiwake compensation schedule should be viewed as applicable to the guillemot and razorbill compensation where relevant.

3. British Trust for Ornithology (BTO) Research Report 788 – Review of Methods used to Calculate Scale of Artificial Nesting Structures Proposed as a Compensation Measure for Kittiwake Mortality at Offshore Wind Farms (Rhoades et al., 2025¹¹)

Natural England highlighted at Deadline 4 [REP4-062] the difficulty of applying different methods to calculate the scale of compensatory measures required for seabirds. To help progress this issue, Natural England commissioned the British Trust for Ornithology on behalf of the Collaboration in Offshore Wind Strategic Compensation (COWSC) to carry out an independent, evidence-based review of existing methods and consider possible alternatives. This review focuses on the use of Artificial Nest Structure (ANS) compensation measures for kittiwake, whilst briefly considering applicability for other species and measures.

Natural England previously provided the Applicant with an 'in press' copy of this report to inform their approach, noting at the time that the formal research report was not scheduled to be published until sometime in May. The BTO report has now been published and is available from the BTO website. We are submitting the report into the Examination, which can be found in Appendix G6 to this Deadline 6 submission. Natural England is currently considering the recommendations of the BTO report; in the meantime, our advice to the Applicant remains that the Hornsea 3 part 2 method should be used to calculate the number of breeding pairs required to compensate for impacts on kittiwake.

The BTO report recommends an approach conceptually similar to that adopted by Hornsea 3 but taking into account additional population constraints. The report also recommends monitoring to assess/validate the parameters used in terms of ANS self-sustainability, and adaptive management strategies where the observed demographic rates diverge significantly from those assumed in the compensation calculations. We advise that the Applicant should consider the findings and recommendations of the finalised BTO report in their compensation documents.

For any queries relating to the content of this letter please contact me using the details provided below.

Yours faithfully

Marine Senior Officer – Sussex and Kent Area Team

E-mail: [REDACTED]

Telephone: [REDACTED]

¹Rhoades, J., Johnston, D.T., Humphreys, E.M. & Boersch-Supan, P.H. (2025). Review of methods used to calculate scale of artificial nesting structures proposed as a compensation measure for Kittiwake mortality at offshore wind farms. BTO Research Report 778, BTO, Thetford, UK.

Annex 1: Natural England's Response to the Applicant's Documents Submitted at Deadline 5 Relevant to our Remit

PINS Document Reference	Document Name	Natural England's Response/Position Summary
Deadline 5		
REP5-001	9.64 Cover Letter	Natural England has no comments to make on this document.
REP5-003	1.3 Guide to the Application (Rev 8) (Tracked)	Natural England has no comments to make on this document.
REP5-005	2.3 Design Vision (Rev 1) (Tracked)	Natural England has no comments to make on this document.
REP5-007	2.6 Schedule of Mitigation (Rev 2) (Tracked)	Natural England has provided an update in our Risk and Issues Log in relation to this document.
REP5-009	6.1 Draft Development Consent Order (dDCO) (Rev 6) (Tracked)	Natural England has no comments to make on this document.
REP5-013	7.7 Draft MMMP (Rev 2) (Tracked)	Natural England's response to this document is provided in Appendix E6.
REP5-015	7.8 Outline Site Integrity Plan for the SNS SAC (Rev 1) (Tracked)	Natural England's response to this document is provided in Appendix E6.
REP5-023	7.13 Outline Code of Construction Practice (Rev 3) (Tracked)	Natural England has no comments to make on this document.
REP5-025	7.14 Outline Landscape and Ecological Management Strategy (Rev 4) (Tracked)	Natural England has provided an update in our Risk and Issues Log in relation to this document.
REP5-027	7.15 Outline HDD Method Statement and Contingency Plan (Rev 2) (Tracked)	Natural England's response to this document is provided in Appendix B6.
REP5-030	7.30 Schedule of Changes to Draft DCO (Rev 5)	Natural England has no comments to make on this document.
REP5-035	9.30 Indicative Planting Cross-Sections at the Onshore Substation (Rev 2)	Natural England has no comments to make on this document.

PINS Document Reference	Document Name	Natural England's Response/Position Summary
REP5-039	9.33 Assessment of the Special Qualities of the Suffolk and Essex Coast and Heaths National Landscape and Suffolk Heritage Coast – Technical Note (Rev 1) (Tracked)	Natural England has no comments to make on this document.
REP5-041	9.37 Environmental Statement Chapter 23 Onshore Ecology Supplemental Information – Technical Note (Rev 1) (Tracked)	Natural England has no comments to make on this document.
REP5-043	9.52 Outline Sediment Disposal Plan (Rev 1) (Tracked)	Natural England has no comments to make on this document.
REP5-045	9.53 Outline Cable Specification and Installation Plan (Rev 1) (Tracked)	Natural England's response to this document is provided in Appendix B6.
REP5-054	9.68 Applicant's Response to ExA's Second Written Questions (ExQ2) (Rev 0)	Natural England has provided an update in our Risk and Issues Log in relation to this document.
REP5-055	9.69 Applicant's Response to Natural England's Deadline 4 Submissions (Rev 0)	Natural England has provided an update in our Risk and Issues Log in relation to this document.
REP5-056	9.70 Applicant's Response to Deadline 4 Submissions (Rev 0)	Natural England has no comments to make on this document.
REP5-065	9.73 Without prejudice HRA DCO Schedules (Rev 0)	Natural England has provided a comment on this document in Section 2 of this Cover Letter.
REP5-066	9.74 Applicant's Further Responses to Actions List from ISH1 and ISH2 (Rev 0)	Natural England has no comments to make on this document.
REP5-067	9.75 HRA Land Rights Tracker (Rev 0)	Natural England has no comments to make on this document.
REP5-068	9.78 Position Statement on various issues relating to National Landscapes (Rev 0)	Natural England has no comments to make on this document.
REP5-069	9.81 Marine Mammal Assessment Clarifications	Natural England's response to this document is provided in Appendix E6.
REP5-070	9.82 Appendix to Applicant's Response to ExA's Second Written Questions (ExQ2)	Natural England has no comments to make on this document.

PINS Document Reference	Document Name	Natural England's Response/Position Summary
REP5-071	9.83 Applicant Position Paper on Galloper Recommended Route (Rev 0)	Natural England has no comments to make on this document.
REP5-072	9.84 Habitat Regulations Assessment Lesser Black-backed Gull Compensation - Gedgrave Marshes Impact Assessment (Rev 0)	Natural England's response to this document is provided in Appendix H6.