THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

NORTH FALLS OFFSHORE WIND FARM

Appendix C7 to the Natural England Deadline 7 Submission

Natural England's Benthic Ecology Advice on the Applicant's Deadline 6 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

15 July 2025

Appendix C7 Natural England's Benthic Ecology Advice on the Applicant's Deadline 6 Documents

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

- [REP6-054] 9.54 Hydrodynamic and Dispersion Modelling Report (Rev 1) (Tracked)
- [REP6-050] 9.52 Outline Sediment Disposal Management Plan (Rev 2) (Tracked)
- [REP6-052] 9.53 Outline Cable Specification and Installation Plan (Rev 2) (Tracked)
- [REP6-028] 7.6 Outline Project Environmental Management Plan (Rev 2) (Tracked)
- [REP6-032] 7.10 Offshore In-Principle Monitoring Plan (Rev 1) (Tracked)

1. **Detailed Comments**

Table 1: Natural England's Advice On: [REP6-054] 9.54 Hydrodynamic and Dispersion Modelling Report (Rev 1) (Tracked)

Document reviewed: [REP6-054] 9.54 Hydrodynamic and Dispersion Modelling Report (Rev 1) (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	Fig 7-48	Natural England is concerned that the deposition modelling from seabed preparation activities during construction demonstrates that up to 60cm of sediment is likely to be deposited within Kentish Knock MCZ. This level of smothering and siltation rate change is substantially in excess of the MarESA threshold of 30cm for heavy deposition. Natural England is also concerned that these impacts have not been appropriately identified, quantified (from and ecological perspective) or evaluated in either the EIA of MCZ assessments.	Natural England advises that the EIA and MCZ assessments should be updated in light of the hydrodynamic and dispersion modelling [REP4-040] deposition modelling outputs and that a realistic WCS should be used to inform assessment conclusions. We advise that the impacts within features should be fully identified, quantified, and evaluated within the appropriate ecological context in order to appropriately inform assessments. The results of the Assessment of impacts outside of MPAs also require appropriate identification, quantification, and evaluation. Natural England advises that unless evidence can be presented to demonstrate otherwise, we consider it likely that the achievement of the Kentish Knock East MCZ conservation objectives, which have a 'recover target' will be hindered as a result of lasting changes to structure, extent and distribution of sediment features and that of the biological communities they support. We draw your attention to the recent Dudgeon and Sheringham Shoal Extension Projects decisions (2024) which required MEEB for 1.8ha of cable protection within the Cromer Shoal Chalk Beds MCZ, an area which is considerably less than that which is likely to be subject to lasting impacts within Kentish Knock East MCZ as a result of deposition.
2	Fig 5-52 to 5-75,	Natural England advises that whilst we have no concerns that the modelled changes in peak mean spring bed flow	Natural England advises that the EIA currently fails to set the results of the hydrodynamic modelling in any ecological context.

	and Fig 5-76 to 5-83	velocities (and associated changes in bed shear stresses) are below the MArESA thresholds and therefore unlikely to directly alter benthic communities, we question whether the predicted changes in velocities and shear stresses will result in changes to the sediment character within the zones of influence which results in indirect changes to the extent and distribution of benthic communities within the array.	We advise that all relevant assessments are updated to appropriately consider changes to benthic receptors as a result of predicted changes in hydrodynamic conditions in the vicinity of the array area.
3	Table 6-1	Natural England notes that the use of a Mass Flow excavator (MFE) represents the Worst-Case Scenario (WCS) for sediment dispersion. Whilst we welcome the commitment in [REP6-050] to not discharge sediment with 1km of KKE MCZ, we question whether this includes the use of MFE methods and whether the WCSs of sediment deposition within KKE MCZ are realistic?	Natural England advises that further information be provided on the use of the MFE within 1km of KKE MCZ, and whether the WCS of sediment deposition which has been presented within the MCZ is realistic?

Table 2: Natural England's Advice On: [REP6-050] 9.52 Outline Sediment Disposal Management Plan (Rev 2) (Tracked)

Document reviewed: [REP6-050] 9.52 Outline Sediment Disposal Management Plan (Rev 2) (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	Table 2-1 and Para 16.	Whilst Natural England welcomes the reduction in the MDS volumes for sediment disposal within the array, these are not sufficient to make a material difference to benthic receptors.	N/A
2	Section 3.4, para 27.	Whilst Natural England welcomes the mitigation to "Disposal of any dredged sediment will be at a distance that is greater than 1km from the KKE MCZ to allow natural sedimentary processes to continue unaffected" we advise that based on the hydrodynamic and dispersion modelling results provided in [REP6-054], this mitigation may not be sufficient to remove the	We advise that the mitigation measures currently proposed may not be sufficient to avoid hindrance of the conservation objectives of the KKE MCZ from relevant construction phase impact pathways.

		likelihood that the conservation objectives of the Kentish Knock East MCZ will be hindered.	

Table 3: Natural England's Advice On: [REP6-052] 9.53 Outline Cable Specification and Installation Plan (Rev 2) (Tracked)

Document reviewed: [REP6-052] 9.53 Outline Cable Specification and Installation Plan (Rev 2) (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update** .	**Natural England's Advice to Resolve Issue**
1	Section 3.2 para 16	Natural England welcomes the adoption of mitigation to ensure no linear arrangement of boulders following boulder clearance.	Natural England advises that this measure is secured on a named plan on the DCO/dML and for this proposed mitigation is considered sufficiently secured.
2	Section 4.3 Para 41.	Natural England welcomes the commitment to avoid cable protection in water < 5m CD, however, we advise that to mitigate potential impacts to bedload transport and any associated changes to benthic ecology along the Essex coastline this commitment should go further to landward of 10m LAT.	Natural England reiterates our advice that to mitigate potential impacts to bedload transport and any associated changes to benthic ecology along the Essex coastline this commitment should go further to landward of 10m LAT. We further advise that measures be secured via the DCO.

Table 4: Natural England's Advice On: [REP6-028] 7.6 Outline Project Environmental Management Plan (Rev 2)(Tracked)

Document reviewed: [REP6-028] 7.6 Outline Project Environmental Management Plan (Rev 2)(Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	Para 7.2.3	Natural England welcomes the adoption of mitigation to "place boulders in a habitat similar in structure and function. This will ensure the randomised layout of boulders will be maintained (i.e. there will be no linear arrangement)."	Please see Point 1 of Table 3 above.

Table 5: Natural England's Advice On: [REP6-032] 7.10 Offshore In-Principle Monitoring Plan (Rev 1) (Tracked)

Document reviewed: [REP6-032] 7.10 Offshore In-Principle Monitoring Plan (Rev 1) (Tracked)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Para 17 and Table 5-1	Natural England advises that owing to the results of the deposition modelling from seabed preparation activities in [REP6-054], and the significant potential for lasting impacts to the features of Kentish Knock MCZ, specific targeted monitoring of the extent and distribution of benthic features and their supporting processes should be included within the In-Principle Monitoring Plan.	Natural England advises that the IPMP should include specific targeted monitoring of benthic features within Kentish Knock MCZ in order that the nature, extent and duration of impacts from seabed preparation activities can be compared against predictions within the EIA and MCZ assessments (once those assessments have been appropriately updated – see Table B1 point 1 above). Therefore, we advise that the Applicant should commit to intensive monitoring of the affected area within the MCZ, including monitoring of potential changes to sediment composition, seabed level and morphology and should include thresholds of change to trigger remedial action if impacts are observed to be greater than predicted. This monitoring would need to be included in the IPMP and secured in the DCO/dML.
2	Tables 5-1 and 5-2	Natural England notes that the Applicant has committed to monitoring within MLS SAC to determine changes to physical processes from adjacent cable protection during the operational phase, but that commitments do not sufficiently include benthic ecological receptors.	Natural England advises that a monitoring commitment should be added within Table 5-2 to ensure that monitoring objectives include consideration of changes to ALL benthic features in light of the Conservation Objectives for the site, not just geogenic and/or biogenic reef. Natural England notes and welcomes the provision requiring adaptive management measures to be implemented should impacts be greater than predicted.