



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

NORTH FALLS OFFSHORE WIND FARM

Appendix N8 to the Natural England Deadline 8 Submission

**Natural England's Response to the Report on the Implications for European Sites
(RIES) [PD-020]**

For:

The construction and operation of the North Falls Offshore Wind Farms located
approximately 40km from the East Anglia Coast in the Southern North Sea.

Planning Inspectorate Reference: EN010119

23 July 2025

Appendix N8 Natural England's Response to the Report on the Implications for European Sites (RIES) [PD-020]

Introduction

Natural England has reviewed the Report on the Implication for European Sites (RIES) [PD-020] for the North Falls Offshore Wind Farm Project. In Table 1, we provide answers to the questions posed within the RIES. Further detailed comments are detailed in Table 2. Tables 3-5 contain Natural England's comments on Annex 1: The ExA's Understanding of Position at Point of RIES Publication.

General Comments

Natural England acknowledges that submissions up to Deadline 6 on the 24th June 2025 have been considered in the RIES. Where we are able to, we have signposted to our updated advice. Natural England recommends that the RIES is updated before it is included within an ExA report to the Secretary of State (SoS) to ensure it captures all HRA-related discussions in the Examination. As previously advised to PINS and BEIS, Natural England does not consider consultation on the RIES adequately discharges the statutory requirement to consult Natural England on Appropriate Assessments, as the RIES draws no AEol conclusions.

If it is considered that the conservation objectives for any designated site interest feature will be hindered, or there is reasonable scientific doubt regarding this, then an Adverse Effect on Integrity (AEol) cannot be excluded.

Please be advised that as a Statutory Nature Conversation Body (SNCB) our remit does not extend beyond advising on the ecological merits of proposals, thus excluding us from making comment on Imperative Reasons of Overriding Public Interest (IROPI) submissions.

Table 1: Questions within the RIESto

RIES ID	RIES Question	Natural England Comment	RAG Status
2. Likely Significant Effects - Identification of Effects			
RIES Q1	To NE: The ExA seeks clarification of your advice on the applicant's screening of LSE pathways for the MLS SAC. Confirm if you consider that there are additional LSE pathways, or LSE pathways excluded by the applicant, which should be assessed for adverse effects on integrity. If yes, provide reasons and confirm what additional assessment you consider is required.	Natural England welcomes the updated RIAA and additional modelling assessment the Applicant submitted at Deadline 7 [REP7-042] However, we note that the updated RIAA has not considered the ecological implications of the predicted sediment deposition within MLS SAC. This is an impact pathway that should have been assessed. The updated modelling shows sediment deposition of up to 0.15m within areas of the SAC, which is an increase on the original assessment. Although, we believe that the risk of an AEol due to construction-related activities is low.	
RIES Q2	To the Applicant	No response required	
RIES Q3	To the Applicant	No response required	
3. Adverse Effects on Integrity			
RIES Q4	<p>To NE: With reference to Tables A3 and A4, can NE confirm if it agrees with the applicant's conclusions of no AEol to the following:</p> <ul style="list-style-type: none"> • Alde-Ore Estuary SPA: Sandwich tern (breeding), avocet (breeding and non-breeding), marsh harrier (breeding), redshank (non-breeding), ruff (non-breeding) and notable assemblage of breeding and wintering wetland birds • Outer Thames Estuary SPA: common tern 	<p>We agree with the Applicant's conclusions of no AEol for Outer Thames Estuary SPA: common tern and Farne Islands SPA: Sandwich tern (breeding), common tern (breeding) and Arctic tern (breeding).</p> <p>Natural England highlights the conclusions reached at both Hornsea Four and Sheringham and Dudgeon Extensions, where we were unable to rule out AEol in-combination for the FFC SPA seabird assemblage. The additional impacts from the Project, taken together with those of other proposed North Sea OWF, mean further reductions to population size to kittiwake, guillemot and razorbill for these key components are likely. Therefore, Natural England are not able to rule out a conclusion of AEol for the in-combination impacts to the seabird assemblage at FFC SPA. However, we note that species-specific compensation (if agreed), would also meet the required compensation for the seabird assemblage as a whole. In this case, no stand-alone compensation proposal would be required.</p> <p>With regards to the Stour and Orwell SPA and Ramsar site, Natural England considers that there will be a residual impact to the site in terms of the loss of potential off-site foraging habitat that would need to be taken into account in future in-combination assessment.</p>	

RIES ID	RIES Question	Natural England Comment	RAG Status
	<ul style="list-style-type: none"> • FFC SPA: seabird assemblage • Stour and Orwell Estuaries SPA and Ramsar site: avocet (breeding), black-tailed godwit (wintering), dark-bellied brent goose (wintering), dunlin (wintering), grey plover (wintering), knot (wintering), pintail (wintering), redshank (wintering), redshank (autumn passage), waterbird assemblage • Farne Islands SPA: Sandwich tern (breeding), common tern (breeding) Arctic tern (breeding). 	However, given the nature of the farmland habitats being used by the lapwing from the SPA and the availability of similar habitats in the wider area, in this instance we are able to rule out AEOI both alone and in-combination.	
Benthic and Intertidal Ecology and Supporting Marine Processes			
RIES Q5	To NE: Confirm if the ExA's understanding is correct or, if not, clarify which other activities or pathways are of concern.	The ExA's understanding is correct. However, Natural England no longer holds concerns relating to operational impacts on MLS SAC. The updated modelling has demonstrated that any changes to the currents and bed sheer will remain within the Export Cable Corridor (ECC). However, we refer to our answer to Q1 for construction impacts and Appendic B8 and C8.1 of our Deadline 8 response.	
Table 3.1 Annex I Habitats - Margate and Long Sands SAC			
RIES Q6	To NE: Based on the applicant's monitoring commitments in the OIPMP [REP6-031] confirm if you are content that this matter is resolved and that AEol from this LSE pathway can be excluded. If you have outstanding concerns, explain these and the steps you consider are required to resolve them.	With regards to sandwave recovery, Natural England is content with the sandwave recovery monitoring including bedform migration analysis proposed by the Applicant. However, this is related more to impacts on Annex I sandbanks within the array rather than in MLS SAC which is unlikely to be directly affected by construction impacts. Natural England's only remaining concerns are those relating to RIES Q1 above and we refer the ExA to Appendix B8 and C8.1 of our Deadline 8 response which provides further advice on securing the necessary monitoring of residual concerns.	

RIES ID	RIES Question	Natural England Comment	RAG Status
RIES Q7	To the Applicant	No response required	
RIES Q8	To NE: Confirm if the ExA's understanding is correct or, if not explain your outstanding concerns about the WCS parameters for scour prevention and cable protection.	Natural England is grateful for the additional modelling assessment provided by the Applicant at Deadline 7 [REP7-042] and considers that the WCS has now been detailed and modelled. However, Natural England advises that every effort should be made at the time of construction to minimise the amount of cable protection deployed in the marine environment.	
RIES Q9	To the Applicant	No response required	
RIES Q10	To NE: Confirm if the applicant's modelling updates and clarifications address your outstanding concerns. If not, set out the remaining concerns, the reason for them and what steps you consider are required to resolve these such that you could advise that AEoI of the SAC can be excluded. In doing so, provide any evidence you hold the demonstrates the proposed 150m buffer would not be sufficient mitigation to avoid AEoI.	Natural England highlights that uncertainties remain with the modelling as set o in Appendix B8 to our Deadline 8 response. And while we do not believe this will materially impact the determination of the project; we do advise that monitoring of these residual concerns is secured as part of the consenting process.	
RIES Q11	To the Applicant	No response required.	
RIES Q12	To NE: If further modelling interpretation from the applicant shows no LSE effect pathway from placement of cable protection near to the SAC, confirm if your advice is that cable protection still needs to exclude rock protection and be readily removable to avoid AEoI? If so, why?	Natural England advises that even where there is no potential for an LSE, under 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. However, this would not be directly linked to the requirements under the Habs Regs and therefore would not form part of a consideration of AEoI.	

RIES ID	RIES Question	Natural England Comment	RAG Status
RIES Q13	To NE: Confirm if you are content with the applicant's updated sediment dispersion modelling. If not, set out what further measures you consider are needed to manage sediment disposal in a way that avoids AEol to SAC. Provide reasons for your position.	Please see our response to Q1.	
RIES-Q14	To the Applicant	No response required	
RIES Q15	To NE: Confirm that these matters are agreed. If not, set out the remaining concerns and your advice on the steps required to resolve them.	Natural England can agree that there will be no AEol from the following pathways: operation and decommissioning, and/or re-mobilisation of contaminated sediments during construction, operation, and decommissioning. With regards to smothering due to suspended sediment during construction please see response to Q1 above.	

Table 3.1 Mitigation

RIES Q16	To NE: Confirm if you are satisfied that mitigation proposed for the MLS SAC is adequately secured based on the applicant's response in [REP5-054], and subject to supporting evidence for the 150m buffer as described above. If not, set out what further measures you consider are needed.	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010119/EN010119-001263-9.68 Applicant's Response to ExA's Second Written Questions (ExQ2) (Rev 0).pdf https://view.officeapps.live.com/op/view.aspx?src=https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010119/EN010119-001072-Natural%2520England%2520-%2520Risk%2520and%2520Issues%2520Log.xlsx&wdOrigin=BROWSELINK Natural England notes that the Cable Statement continues to state that “ <i>Up to two export cable circuits will be buried below the seabed where practicable to a defined target burial depth</i> ”. Natural England advises that this mitigation should go further to include application of the re-burial hierarchy (a commitment to attempt cable reburial as a first option, before consideration of use of external cable protection in order to reduce the amount of external cable protection used), and a commitment to minimise amounts of external cable protection and to avoid the use of cable protection within and/or adjacent to MPAs where there may be secondary pathways of effect. These mitigation approaches are stated within Natural England and the Joint Nature Conservation Committee (JNCC) published guidance on nature conservation considerations and environmental best practices for subsea cables in English inshore and UK offshore waters (2022).	
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Table 3.2 Marine Mammals - Southern North Sea SAC

RIES ID	RIES Question	Natural England Comment	RAG Status
RIES Q17	To NE, EWT and MMO: Please review the applicant's amendments to the Outline SIP and Draft MMMP submitted at Deadline 5 and provide comment. Are you content with the applicant's wording in respect of NAS? If you have concerns, please expand. Does this document address your concerns regarding AEol?	<p>Natural England still has an issue with the tentative approach of the Applicant stating that the NAS will be used '<i>if deemed necessary</i>'. This is not in line with Defra's Noise Policy (2025) which requires that the noise reduction methods are considered the default in all English waters and should be factored in to planning of all piling activities and related environmental assessments. It is Natural England's view that the use of NAS <u>is necessary</u> in order to mitigate the in-combination impacts. Thus, we do not consider that the Applicant's current level of commitment to NAS is sufficient to allow a conclusion of no AEol.</p> <p>Additionally, the NAS is still referred to as 'additional mitigation' within the MMMP. We maintain our original position that NAS should not be considered as <i>an additional mitigation</i> but the integral mitigation strategy for reduction of the noise at source in line with the latest Defra Policy (2025). Thus, we advised the Applicant that this is reflected throughout the MMMP (and other documents including SIP).</p>	
RIES Q18	To the Applicant, EWT, local authorities	No response required	
RIES Q19	To the Applicant	No response required	
RIES Q20	To NE: Do NE have any outstanding concerns on this matter? If so, please provide detailed comments.	Natural England does not have any further concerns at this stage.	
RIES Q21	To NE: Can NE clarify if its concerns regarding the use of PAM in respect of UXO clearance are resolved?	The Applicant has not accepted our advice on the use of PAM for UXO clearance and still refer to it as ' <i>unlikely to be required</i> ' ([REP6-030] 7.7 Draft Marine Mammal Mitigation Protocol (Rev 3) (Tracked). Our advice remains that PAM is a required monitoring tool for UXO clearance, alongside visual monitoring, considering that the proposed developed is within a designated SAC for harbour porpoise. JNCC PAM guidelines (2023) state: " <i>One example of when PAM may be required to supplement visual observations is when operations occur within areas considered important to marine mammals. Areas of importance can be defined as discrete areas of important habitat for marine mammal species and may comprise, but are not limited to, areas designated as Marine Protected Areas (MPAs)</i> ".	
Offshore Ornithology			
RIES Q22	To the RSPB	No response required	

RIES ID	RIES Question	Natural England Comment	RAG Status
RIES Q23	To the RSPB	No response required	
Onshore Ornithology – Stour and Orwell Estuaries SPA and Ramsar Site			
RIES Q24	To NE: With reference to the justification provided in [APP-181] in which the applicant concluded no AEoI on the Stour and Orwell Estuaries SPA and Ramsar site, is NE in agreement that the proposed development would not result in AEoI on these sites. If NE disagree, please set out the reasoning.	Please see our response to RIES Q4 above.	
Onshore Ornithology – Alde-Ore Estuary Ramsar Site			
RIES Q25	To NE: Does NE agree with the conclusions of the applicant with respect to impacts on invertebrate assemblage and plant assemblage of AOE Ramsar site?	Natural England is currently unable to agree with the Applicant's conclusions with respect to impacts on invertebrate assemblage and plant assemblage of AOE Ramsar site owing to evidence gaps in the baseline characterisation. However, the Applicant has committed in [REP6-014] to undertake pre-construction habitat and species surveys which will address the current evidence gaps, inform the impact assessment, mitigation measures, and address any impacts on designated site(s), if relevant.	
4. DEROGATIONS FROM THE REGULATIONS			
RIES Q26	To NE and the Applicant: Based on submissions to date, whilst NE advises it should be possible to exclude AEoI, at Deadline 6 it is still not in a position to do so. Noting the limited time remaining in the examination, the ExA is concerned that it may not be possible for the competent authority to exclude AEoI beyond reasonable scientific doubt on MLS SAC. As such, and in line with the relevant NPS EN-1, the ExA requests confirmation from NE and the applicant at Deadline 7 that they have	Please see our response to Q26 in the Cover Letter of Natural England's Deadline submission [REP7-085] and Appendix C8.2 to the Natural England's Deadline 8 Submission.	

RIES ID	RIES Question	Natural England Comment	RAG Status
	reached agreement that AEol on MLS SAC can be excluded. If the applicant is unable to reach agreement with NE by Deadline 7, the ExA considers that a derogations case is required and should be provided by the applicant for Deadline 7. This can be provided on a without prejudice basis. This is to enable the ExA to examine information during the examination and make a recommendation to the SoS, and so that the SoS has all information available to them at the point of decision.		
RIES Q27	To the Applicant	No response required	
RIES Q28	To the Applicant	No response required	
RIES Q29	To NE: Can NE confirm if they consider the content of the without prejudice compensation schedules [REP5-065] to be sufficient? If NE have outstanding concerns, please set this out.	Natural England has provided comment on the without prejudice compensation schedules at Deadline 6 [REP6-084] and would advise those comments remain outstanding.	
Table 4.1 Ornithology – Lesser Black Backed Gull of AOE SPA			
RIES Q30	To NE: Does NE have outstanding concerns regarding the scale/extent of compensation required for LBBG of AOE SPA? If NE have outstanding concerns, please set this out.	<p>Natural England have advised on calculating the required scale and targets for the compensatory measure to address impacts on LBBG at AOE SPA in REP4-060. We are content that the Applicant has applied this advice to calculate both the scale and target for the measure in line with our preferred approach alongside their own in REP6-012 (Table 5.2). Evidence based nesting densities are used to estimate the amount of habitat that would be required to accommodate the required number of breeding pairs.</p> <p>However, the Applicant states in REP6-012, <i>“that a minimum area of 4ha is likely to be required, if fencing to exclude predators is adopted. A 4ha site is considered likely to be</i></p>	

RIES ID	RIES Question	Natural England Comment	RAG Status
		<p><i>ecologically effective in enhancing LBBG breeding, noting the birds may not use a smaller enclosed space.</i> Natural England agree, and are satisfied that this would be an appropriate scale of implementation.</p> <p>Our outstanding concerns on this issue relate to clarity around the Applicant's position on their potential contribution to a shared location delivered in collaboration with other projects. We note the statement in REP6-012 that, <i>"Should a shared location be taken forward, the scale and North Falls contribution would be discussed with the LBBG Compensation Steering Group"</i>. We consider this to be a sensible way forward, but retain some concerns about measure sufficiency under a collaborative delivery model. We advise that if the measure is to be delivered in collaboration, it would be appropriate to increase the scale of implementation in terms of the area of nesting habitat provided.</p> <p>This might best be achieved by progressing multiple sites that could each, in theory, compensate for the total impacts of both projects. This could reduce the risk of delayed or non-colonisation at one location, noting that the Norfolk Vanguard and Boreas/East Anglia One North and Two LBBG compensation site has again failed to attract breeding birds in the 2025 breeding season.</p>	
RIES Q31	To NE: Does NE have outstanding concerns regarding the quantum of compensation required for LBBG of AOE SPA?	<p>See response to Q30 above.</p> <p>Natural England also wishes to highlight that in addition to questions of scale/extent and quantum, it remains the case that a site or sites for the delivery of the compensatory measures has not been secured. Whilst there are potentially suitable options being explored, no landowner agreements are in place and the details of the proposed interventions are, whilst promising, inevitably limited. The withdrawal of the Lantern Marshes option foregrounds this risk.</p>	
RIES Q32	To the Applicant	No response required.	
RIES Q33	To the Applicant	No response required.	

RIES ID	RIES Question	Natural England Comment	RAG Status
RIES Q34	To NE: With regard to the Deadline 6 submission from the applicant [REP6-013], does NE have any outstanding concerns regarding monitoring for LBBG?	We are content with the approach to monitoring as detailed in REP6-013.	
Table 4.1 Ornithology – Guillemot of Farne Islands SPA			
RIES Q35	To NE: The applicant has proposed a without prejudice schedule 15 for guillemot and razorbill which includes compensation measures for guillemot of the Farne Islands SPA. Is NE content that the measures included in the without prejudice schedule 15 satisfy its requirements for guillemot of the Farne Islands SPA? if not, please explain outstanding concerns.	Natural England are content that the compensatory measure proposed can be implemented at an appropriate scale to address the project's impacts under our preferred parameters (relating to both the impact estimate and scale of the measure) on the Farne Islands SPA populations of guillemot in addition to the impacts on the FFC SPA populations of the same species.	
Table 4.1 Ornithology – Guillemot and Razorbill of FFC SPA			
RIES Q36	To NE: Can NE confirm if it agrees with the scale of compensation set out in the applicant's submission [REP6-023]	<p>The Applicant sets out a range of scales for compensation in REP6-023 (Table 5.2). Natural England do not agree with the Applicant's preferred parameters for calculating the scale of the compensatory measure, but we welcome the presentation of the scale required to address impacts at our advised reference rates for displacement (70%) and mortality (2%) at ratios of 2:1 and 3:1.</p> <p>However, we advise that the measure should be scaled so that it could, at least theoretically, compensate for the 95% UCI of the mortality impact estimate (REP4-060). This is to address the uncertainty of that impact estimate, and so we do not accept the Applicant's argument that this approach is overly precautionary due to the small scale of the impact. Thus, the scale of measure implementation we would advise is not detailed in table 5.2, however, the target for the measure, being set according to the mean impact value, is. That said, we continue to advise that pragmatic approaches to success criteria for this measure are likely to be required, and it may not be appropriate to (only) consider any resulting additional nesting birds and their productivity when assessing success.</p>	

RIES ID	RIES Question	Natural England Comment	RAG Status
RIES Q37	To the Applicant	No response required	
RIES Q38	To NE: Is NE content with the approach of the applicant as set out in [REP6-025] that the detail of post implementation monitoring will be agreed with the Guillemot and Razorbill Compensation Steering Group (or Guillemot Compensation Steering Group)?	Given the uncertainties around certain critical aspects of the measure (e.g., final locations, collaboration with other projects, etc) Natural England are satisfied that discussing and agreeing monitoring proposals with the GRCSG/GCSG is an appropriate approach and proportionate to the level of risk in this instance. We look forward to ongoing engagement on this matter.	
Table 4.1 Ornithology – Kittiwake of FFC SPA			
RIES Q39	To NE: Can NE respond to the applicant's position in [REP6-019] that it will provide for ten nesting spaces on the ANS?	It is our understanding that the Applicant intends to secure the equivalent of 48 nests (a 20% share) at 'The Kittiwakery' (para 77, REP6-019). Natural England consider this is likely to be a suitable scale to compensate for the predicted impacts over the projects lifetime, although we highlight that monitoring data will ultimately inform the assessment of the measure against the success criteria.	
RIES Q40	To the Applicant	No response required.	
Table 4.1 Ornithology – Red-throated Diver of OTE SPA			
RIES Q41	To NE: Do NE agree that peatland management as set out by the applicant [REP1-021] could result in an additional 3.4 adult birds per annum? Please set out any outstanding concerns regarding compensation measures for red-throated diver.	In REP6-015 the Applicant details a range of potential outcomes in terms of the number of additional adult birds that could arise from habitat management, nest raft installation, or a mixture of both (table 5.1). Our interpretation of this information is that the Applicant estimates a potential benefit of 4.3 additional adult birds per year arising from peatland habitat management at 20 sites in Shetland. We agree that this scale of benefit is entirely possible. It is not completely clear across the submitted documents if the Applicant intends to restore (or even create) habitat and make it suitable for breeding RTD, make interventions to protect existing habitat with breeding RTDs, or a mixture of both. In cases where breeding birds would fail if not for habitat management interventions it is clear that a direct additional productivity benefit can be attributed to the measure. Our principle concerns relate to the scale of the measure proposed, as previously detailed in REP3-061 and REP5-110. Natural England also notes and supports the representations of Nature Scot regarding the proposed compensatory measures on Shetland in [REP7-097]. In	

RIES ID	RIES Question	Natural England Comment	RAG Status
		addition, we retain some concerns around the Applicant's ability to secure suitable sites and collect baseline data within the required time frames, should the measure be required. However, we note that progress in this area has been made, with survey work currently ongoing.	
RIES Q42	To NatureScot	No response required.	
RIES Q43	To NE: Given the information provided by the applicant [REP5-054] regarding monitoring and adaptive management for red-throated diver. Do NE have outstanding concerns on this matter?	Natural England do not have any outstanding concerns relating to the Applicant's proposed approach to monitoring or adaptive management for the red-throated diver compensation measure.	

Table 2: Detailed Comments

NE ID	Page/ Section/Table Ref	Natural England Comment	RAG Status
Topic Name – Marine Mammals			
	Annex II marine mammal matters (page 37-40)	<p>Natural England would like to draw the attention to a newly published paper on iPCoD modelling : <i>van Geel NCF, Benjamins S, Marmo B, Nabe-Nielsen J, Wittich A, Risch D, Todd VLG and Wilson B (2025) Suitability of assessing population-level impacts from construction of a single wind farm – a case study on North Sea harbour porpoises. Front. Mar. Sci. 12:1539143. doi: 10.3389/fmars.2025.1539143</i></p> <p>The authors in the paper conclude the following:</p> <ul style="list-style-type: none"> - When only single development is assessed, the construction of an individual wind farm is unlikely to result in significant impacts on the North Sea harbour porpoise population. However, no population-level impacts at the North Sea scale does not mean there is no local impact on porpoise presence, but instead suggests that the large North Sea population is inherently resilient to local impacts. This is not surprising given the relatively small spatial and temporal scale of the impact of a single development in relation to the abundance and geographic range of the population. - Population-level impact assessments should include all natural and anthropogenic pressures experienced by the population of interest including bycatch in fisheries, underwater noise from shipping, chemical pollution, vessel collisions, habitat degradation, prey depletion, biological interactions, and climate change. Various co-occurring pressures can currently not or only partially be captured by these models, which may result in an incomplete picture of long-term population trajectories. - A lack of long-term population-level impacts of individual offshore wind developments, should not be interpreted as implying that impacts of OWF development is necessarily negligible, but instead highlights the fact that model outputs should always be evaluated with the cumulative pressures in mind. - Scenarios where adjacent wind farm operators each independently conclude that their developments do not pose a significant risk to the local porpoise population need to be avoided. - The authors consider that a ~0.5% annual reduction in population size indicates a significant decrease in abundance. 	

		<p>Having reviewed several iPCoD modelling reports, Natural England is largely in line with these conclusions. It is our view that iPCoD modelling does not carry much value when assessing the impacts of a single development. In such circumstances, the dose response curve assessment should be the primary assessment method.</p> <p>Furthermore, given the limitations of accounting for all pressures within a model, Natural England considers any population decline, as a result of a cumulative impacts of multiple development, as significant warranting further investigation.</p> <p>Considering the limitations of the IPCoD modelling outlined above, the outcomes of the DRC assessment suggesting significant effects for harbour porpoises and seals ([REP5-069] 9.81 Marine Mammal Assessment Classification: Table 2.3 and Table 2.4), cannot be overlooked for cumulative and in-combination disturbance effects.</p>	
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NATURAL ENGLAND'S COMMENTS ON ANNEX 1: THE EXA'S UNDERSTANDING OF POSITION AT POINT OF RIES PUBLICATION

Table 3: (Table A1) - Benthic Ecology

European Site	Qualifying Feature	LSE Pathway	NE agrees with the Applicant that AEol can be excluded (Y/N)
Margate and Long Sands SAC	H1110 Sandbanks which are slightly covered by sea water all the time	Changes to SSCs and bedload transport	Y – based on updated RIAA and modelling assessment.
		Smothering	See response to Q1.
		Re-mobilisation of suspended sediments	

Table 4: (Table A3) - Offshore Ornithology

European Site	Qualifying Feature	LSE Pathway	NE agrees with the Applicant that AEol can be excluded	Edit – if required
Alde-Ore Estuary	Sandwich tern, breeding	Disturbance/displacement O&M	?	Yes
		Collision risk O&M		

SPA and Ramsar site				
Alde-Ore Estuary	Avocet, breeding		?	Yes
SPA and Ramsar site	Avocet, non-breeding Marsh harrier, breeding Redshank, non-breeding Ruff, non-breeding Notable assemblage of breeding and wintering wetland birds	Collision risk O&M		
Outer Thames Estuary SPA	Common tern (breeding)	Collision risk O&M	?	Yes
	Red-throated diver (nonbreeding)	Disturbance/displacement C Disturbance/displacement O&M	Y	No No
Flamborough and Filey Coast SPA	Seabird assemblage, breeding	Disturbance/displacement O&M Collision risk O&M	?	No - see response to Q4 above.
	Razorbill, breeding	Disturbance/displacement O&M	Yes	Yes alone, no in-combination (albeit contribution is very small)
Stour and Orwell Estuaries SPA and Ramsar	Avocet, breeding Black-tailed godwit, wintering Dark-bellied brent goose,	Collision risk O&M	?	Yes

	wintering Dunlin, wintering Grey plover, wintering Knot, wintering Pintail, wintering Redshank, wintering Redshank, autumn passage Waterbird assemblage			
Farne Islands SPA	Sandwich tern, breeding Common tern, breeding Arctic tern, breeding	Collision risk O&M	?	Yes
	Guillemot, breeding	Disturbance/displacement O&M	No	Yes alone, no in-combination (albeit contribution is small).
Forth Islands SPA Etc etc – all Scottish SPAs and there are a lot of them in the table			Yes	We have not commented on AEOI conclusions for Scottish sites – these are a matter for Naturescot.

Table 5: (Table A4) - Onshore Ornithology

European Site	Qualifying Feature	LSE Pathway	NE agrees with the Applicant that AEol can be excluded
Hamford Water SPA	Little tern (breeding)	Disturbance within European site (direct)	Yes

		Disturbance on functionally linked land (direct) Habitat loss on functionally linked land (direct)	
	Avocet (wintering) Dark bellied brent goose (wintering) Shelduck (wintering) Teal (wintering) Ringed plover (wintering) Grey plover (wintering) Black-tailed godwit (wintering) Redshank (wintering)	Disturbance within European site (direct) Disturbance on functionally linked land (direct) Habitat loss on functionally linked land (direct) Indirect effects on functionally linked land	Yes
Hamford Water Ramsar	Ringed plover (migration) Common redshank (migration) Dark bellied brent goose (wintering) Black-tailed godwit (wintering) Grey plover (wintering)	Disturbance within European site (direct) Disturbance on functionally linked land (direct) Habitat loss on functionally linked land (direct) Indirect effects on functionally linked land	Yes
Stour and Orwell Estuaries SPA	Waterbird assemblage	Disturbance within European site (direct) Disturbance on functionally linked land (direct) Habitat loss on functionally linked land (direct) Indirect effects on functionally linked land	Yes - see response in Q4 above.
Stour and Orwell Estuaries Ramsar	Waterfowl assemblage (wintering)	Disturbance within European site (direct)	Yes - see response in Q4 above.

		<p>Disturbance on functionally linked land (direct)</p> <p>Habitat loss on functionally linked land (direct)</p> <p>Indirect effects on functionally linked land</p>	
Colne Estuary (Mid-Essex Coast Phase 2) SPA	<p>Little tern (breeding)</p> <p>Dark-bellied brent goose (wintering)</p> <p>Waterbird assemblage (breeding)</p>	<p>Disturbance on functionally linked land (direct)</p> <p>Habitat loss on functionally linked land (direct)</p> <p>Indirect effects on functionally linked land</p>	Yes
Colne Estuary (Mid-Essex Coast Phase 2) Ramsar	<p>Waterfowl assemblage (wintering)</p> <p>Dark bellied brent goose (wintering)</p>	<p>Disturbance on functionally linked land (direct)</p> <p>Habitat loss on functionally linked land (direct)</p> <p>Indirect effects on functionally linked land</p>	Yes