



NORTH FALLS

Offshore Wind Farm

Applicant's Response to Natural England's Deadline 8 submissions

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1. INTRODUCTION

1.1 Introduction

- 1.1.1 This document has been prepared by North Falls Offshore Wind Farm Limited ('the Applicant') in relation to the North Falls Offshore Wind Farm (hereinafter referred to as 'North Falls' or the 'Project').
- 1.1.2 This document has been prepared by the Applicant for submission on Monday 28 July 2025, and responds to submissions received at Deadline 8 from Natural England.

1.2 Purpose of the document

- 1.2.1 This document provides key points of correction and clarification in response to the following submissions by Natural England's at Deadline 8:
- Appendix N8 to the Natural England Deadline 8 Submission Natural England's Response to the Report on the Implications for European Sites (RIES)
 - Appendix C8.1 to the Natural England Deadline 8 Submission Natural England's Benthic Ecology Advice on the Applicant's Deadline 7 Documents
 - Appendix K8 Natural England's Risk and Issues Log

2. APPLICANT’S RESPONSE TO NATURAL ENGLAND’S DEADLINE 8 SUBMISSIONS

2.1 Applicant’s Response to Natural England’s comments regarding Appendix C8.1

Table 2.1.1 Applicant’s Response to Natural England’s minor comments regarding Appendix C8.1

APPLICANT REF	SECTION	NATURAL ENGLAND’S COMMENTS	APPLICANT’S RESPONSE
D8.1	RIAA Paragraphs 50 to 60, Hydrodynamic and Sediment Dispersion Modelling Report, Document Reference 9.54, Rev 2 [REP7-042] Figure 7-12	Natural England is concerned that contradictory information has been presented between the Hydrodynamic and Sediment Dispersion Modelling Report, and the RIAA Part 2. Natural England notes that within the RIAA “Deposition of SSCs arising from the above works could result in 5cm to 15cm sediment depth in an area of c. 1.5km2 (0.23% of the SAC) overlapping the MLS SAC, as shown by the sediment dispersion modelling (Hydrodynamic and Sediment Dispersion Modelling Report, Document Reference 9.54, Rev 02).” However, within the modelling report it is stated that “Figure 7-12 shows the total sediment deposition thickness greater than 5cm which occurs during export cable trenching activities. All sediment deposition occurs within the export cable corridor and is <5cm	Where the RIAA refers to “ <i>Deposition of SSCs arising from the above works could result in 5cm to 15cm sediment depth in an area of c. 1.5km2 (0.23% of the SAC) overlapping the MLS SAC, as shown by the sediment dispersion modelling (Hydrodynamic and Sediment Dispersion Modelling Report, Document Reference 9.54, Rev 02).</i> ” This is based on the worst case scenario for seabed preparation, including sandwave levelling. Trenching is a separate activity from seabed preparation. The information Natural England quotes from the modelling report, is also reflected in paragraph 58 of the RIAA Part 2 [REP7-013] which states “ <i>Changes in seabed level greater than 5cm from seabed trenching for export cable installation are spatially restricted and do not interact with the MLS SAC and will therefore not change the condition of the SAC.</i> ”
		We also note that the Applicant’s conclusion that “there is no potential for an AEoI of this attribute due to increased SSC and sediment deposition,” has not been supported with consideration of the ecological implications or sensitivity of the species present. For example, the predicted deposition has not been set in the context of MarESA pressure benchmark thresholds for smothering or considered in light of the specific communities present and their likely sensitivity to the depths of deposition that are predicted. We also refer the Applicant to our small-scale habitat loss policy provided in Annex 1 below.	Ecological implications are assessed throughout the RIAA. For example, page 34 of the RIAA Part 2 [REP7-013] provides the assessment of effects of suspended sediment concentrations, sediment deposition (smothering) and bedload transport on the structure and function of sandbank communities. This assessment considers the ecological implications of the sediment deposition and concludes there will be no AEoI. The Applicant is aware of Natural England’s small-scale habitat loss policy relating to project infrastructure within designated sites, however there is no habitat loss due to the Applicant’s commitment to avoid overlap with the Margate and Long Sands SAC and Kentish Knock East MCZ in response to pre-application consultation with Natural England.

2.2 Applicant’s Response to Natural England’s comments regarding Appendix K8 Risk and Issues Log

Table 2.6 Applicant’s Response to Natural England’s comments regarding Appendix K8

APPLICANT REF	POINT	NE REF	NE - RELEVANT AND WRITTEN REPRESENTATION	NE COMMENT CONSULTATION, ACTIONS, PROGRESS AT DEADLINE 7 (COLUMN O OF NE DOCUMENT)	NE RAG AT D7	NE COMMENT CONSULTATION, ACTIONS, PROGRESS AT DEADLINE 8 (COLUMN Q OF NE DOCUMENT)	NE RAG AT D8	APPLICANT RESPONSE AT D8
(C) Benthic Ecology								
D8.2	1	C1, C13, C38	Further information is required to provide the necessary confidence in the Worst-Case Scenario (WCS) for cable protection requirements adjacent to Margate and Long Sands SAC, and the remaining cable route, over all project phases.	No change.		Progressed. Whilst the Worst-Case Scenario (WCS) for cable protection requirements adjacent to Margate and Long Sands SAC has been outlined within the RIAA, the WCS for the remaining cable route is still not clear.		A maximum of 10% of the offshore export cables could require surface laid cable protection. This is secured by the area and volume of export cable protection stated in Schedule 1, Part 3 of the dDCO. This could be placed anywhere in the offshore cable corridor seaward of the nearshore 5mCD contour, in accordance with the Outline Cable Specification and Installation Plan [9.53, Rev 4]. The Applicant has modelled the maximum 10% of the offshore export cables having surface laid cable protection within the offshore cable corridor, including highly conservative worst case scenario locations in proximity to the most sensitive receptors (6.27km of

APPLICANT REF	POINT	NE REF	NE - RELEVANT AND WRITTEN REPRESENTATION	NE COMMENT CONSULTATION, ACTIONS, PROGRESS AT DEADLINE 7 (COLUMN O OF NE DOCUMENT)	NE RAG AT D7	NE COMMENT CONSULTATION, ACTIONS, PROGRESS AT DEADLINE 8 (COLUMN Q OF NE DOCUMENT)	NE RAG AT D8	APPLICANT RESPONSE AT D8
								cable protection length in the nearshore beyond 5mCD and 6.27km of cable protection length in the section of the offshore cable corridor adjacent to the Margate and Long Sands SAC, taking into account the 150m buffer) (the Hydrodynamic and Dispersion Modelling Report [REP7-041/042]). This modelling shows the effects will be highly localised around the cable protection and therefore validate the conclusions of the ES and RIAA that the effects will not be significant and there will be no AEOL of the Margate and Long Sands SAC.
D8.3	6	C6, C44, C50	Further clarification/evidence is required to demonstrate that an appropriate buffer has been applied around the infrastructure closest to the KKE MCZ boundary to ensure that direct impacts from wake effect, scour, etc. and indirect effects from changes to marine processes will not impact on the interest features of the MCZ. Without the application of a suitable buffer, there is a risk that proposed mitigation does not sufficiently avoid impacts to the MCZ.	Progressed. Please see above. However, we await clarification from the Applicant on the WCS sediment deposition thickness and extent at the MCZ.		Further progressed. The Applicant has provided clarification on the WCS sediment deposition thickness and extent at the MCZ due to construction-related activities [REP7-042]. However, uncertainty still remains regarding the buffer and operational indirect effects due to changes in physical processes which may result in changes to the supporting physical environment in the MCZ.		The Applicant responded to this point in the Applicant's Response to Natural England's Deadline 7 submissions [9.115, Rev 0], Section 2.6, Applicant's Ref REP7-090_c4. The Applicant provided the Hydrodynamic and Dispersion Modelling Report [REP7-041/042] at Deadline 7, along with an updated MCZA Report [REP7-019/020], which confirms the worst case scenario sediment deposition thickness and extent along the eastern edge of the MCZ. In their Appendix C8.1, Natural England states: <i>"Natural England can now agree with the conclusions of the MCZ assessment"</i> . Therefore, the Applicant considers there is no remaining uncertainty. Natural England is requesting additional monitoring and the Applicant has proposed an adaptive approach to monitoring which it considers appropriate and proportionate, as presented in the In Principle Monitoring Plan [7.10, Rev 3].
D8.4	17	C23	The Applicant proposes that that whole of the red line boundary becomes a disposal location. However, as set out in Appendix C of our RR/WR [RR-243] we do not currently agree with the impact assessment for which site characterisation for sediment disposal is reliant upon. Further agreement on the MDS and WCS and evidence is required to support statements.	Progressed for M&LS SAC only where deposition within the SAC is predicted to be below MarESA thresholds as per [REP4-040]. However, unless evidence can be presented to demonstrate otherwise, we consider it likely that the achievement of the KKE MCZ conservation objectives, which have a 'recover target' will be hindered.		Natural England is concerned that contradictory information has been presented between the Hydrodynamic and Sediment Dispersion Modelling Report [REP4-040], and the RIAA Part 2. The RIAA presents modelling outputs that predict deposition above MarESA thresholds within the SAC the ecological impacts of this have not been assessed. As per our response to Q1 of the RIES we advise the risk of AEOL is low, whilst the modelling report states that deposition of up to 5cm will be limited to within the ECC.		Please see the Applicant's response to D8.1 above.

2.3 Applicant's Response to Natural England's comments regarding Appendix N8

Table 2.8 Applicant's Response to Natural England's comments regarding Appendix N8 (RIES response)

APPLICANT REF	QUESTION	RESPONSE FROM NATURAL ENGLAND	APPLICANT'S RESPONSE
D8.5	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	Ecological implications are assessed throughout the RIAA. For example, page 34 of the RIAA Part 2 [REP7-013] provides the assessment of effects of suspended sediment concentrations, sediment deposition (smothering) and bedload transport on the structure and function of sandbank communities. This assessment considers the ecological implications of the sediment deposition and concludes there will be no AEOL.



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Offshore Wind Farm



HARNESSING THE POWER OF NORTH SEA WIND

North Falls Offshore Wind Farm Ltd

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

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