

Date: 18 March 2026
Our ref: 27843/541774
Your ref: EN010119



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BY EMAIL ONLY

Dear Sir/Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by North Falls Offshore Wind Farm Limited (“the Applicant”) for an Order granting Development Consent for the proposed North Falls Offshore Wind Farm (“the North Falls Offshore Wind Farm Project”)

The following constitutes Natural England’s formal statutory response to the Secretary of State’s Request for Information (RFI) dated 18 February 2026. Natural England has been invited to comment upon the following RFI 3 submissions by the Applicant:

- [C3-006] 11.9 Applicant’s Response to Secretary of State’s Letter dated 28 January 2026
- [C3-011] 7.6 Outline Project Environmental Management Plan (PEMP) (Rev 4) (Tracked)
- [C3-012] 9.75 Habitats Regulations Assessments Land Rights Tracker (Rev 4)
- [C3-014] 7.10 Offshore In-Principle Monitoring Plan (Rev 5) (Tracked)
- [C3-016] 7.2.2.1 Annex 2A Outline Lesser Black-backed Gull Compensation Implementation and Monitoring Plan (CIMP) (Rev 5) (Tracked)

1. [C3-006] 11.9 Applicant’s Response to Secretary of State’s Letter dated 28 January 2026

Ref 7

Natural England notes that the Applicant is requested by the Secretary of State to comment on, or confirm that it is content with, the request by the Marine Management Organisation (MMO) in its response to the all IP consultation [C2-003] in relation to Condition 35, Schedule 8 'Placement of Infrastructure in Proximity to Kentish Knock East Marine Conservation Zone', to include a provision that agreement must be sought with the MMO, *in consultation with the relevant SNCB*, six months prior to installation. Whilst we have not been asked to comment on this provision, we consider that submission of plans for approval 6 months before installation seems reasonable, it is a standard timeframe for pre-construction documentation, and we emphasise the requirement to consult with the relevant SNCB prior to agreement for works inside a marine designated site. Therefore, we support the MMO’s requested wording change.

Ref 9 & Appendix A

We welcome the Applicant’s presentation of a range of guillemot mortality estimates, including UCI mortality estimates, and consider the relevant item in our risks and issues log [Point G4 in REP8-099] to be resolved. We note that there is a line missing in Table A.1, which should detail the UCI

under a 70% / 2% scenario for FFC SPA using the 'West' region productivity.

Our advice on scaling and targets for compensatory measures is fully detailed in REP4-060, and we draw attention to the following advice regarding the compensation quantum, *"the scale of implementation of seabird compensatory measures should be sufficient to address the 95% upper confidence limit (UCL) predicted impact value. The mean or central impact value (CIV) should be used to inform and define success criteria, if appropriate."*

Appendix B

Natural England has reviewed the Applicant's response to our position that the projects contribution to impacts on red-throated diver (RTD) at the OTE SPA are more substantial than those predicted for Morecambe OWF on RTD at Liverpool Bay SPA. We maintain our position and would highlight that as Morecambe OWF represents the only consented project that has sought to deliver compensation through a fundamentally similar measure for this species and impact pathway, consideration and comparison is warranted.

Ref 13

Natural England welcomes the Applicant's proposed changes to the oPEMP to provide additional measures in the form of extending the seasonal restriction on cable laying to apply for the OTE SPA and the 2km buffer. We also welcome the correction of the seasonal restriction dates.

Ref 19

Natural England welcomes the Applicant's acceptance of a reporting cable protection provision in the DCO to include scour prevention and cable protection.

2. [C3-011] 7.6 Outline Project Environmental Management Plan (PEMP) (Rev 4) (Tracked)

We welcome the commitment to a full seasonal restriction on cable laying activities within the OTE SPA and a 2km buffer for the advised period of 1st November to 31st March inclusive.

3. [C3-012] 9.75 Habitats Regulations Assessments Land Rights Tracker (Rev 4)

Natural England notes the removal of the Lantern Marshes land as a potential project-led compensatory measure for Lesser Black-Backed Gull (LBBG) at Alde-Ore Estuary Special Protection Area (AOE SPA). Please see our comments on [C3-016] below for further advice.

4. [C3-014] 7.10 Offshore In-Principle Monitoring Plan (Rev 5) (Tracked)

Natural England welcomes the updates to the Offshore In-Principle Monitoring Plan. However, we note a minor typo in the updates to Tables 5.1 and 5.2 and Paragraph 46, where reference is made to Natural England; this should instead read 'relevant SNCB'.

Section 5.3.2 Marine Geology, Oceanography and Physical Processes – In-Principle Monitoring

Natural England welcomes the Applicant's commitment to undertake pre- and post-construction geophysical surveys to review cable burial, evidence of sandwave recovery, scour, significant seabed level change due to cable protection adjacent to Margate and Long Sands Special Area of Conservation (MLS SAC), and sediment deposition at Kentish Kock East Marine Conservation Zone (KKE MCZ).

We have just one minor comment regarding Table 5-1, Page 19 (In-Principle Monitoring Proposed - Marine Geology, Oceanography and Physical Processes). Within the 'Reasons for monitoring,' we note that monitoring of sediment deposition at the section of cable corridor adjacent to MLS SAC is included within sandwave recovery monitoring. We would advise that monitoring of sediment deposition in proximity to MLS SAC should be identified as a separate reason for monitoring.

5. [C3-016] 7.2.2.1 Annex 2A Outline Lesser Black-backed Gull Compensation Implementation and Monitoring Plan (CIMP) (Rev 5) (Tracked)

Natural England notes that the Applicant is no longer considering the Lantern Marshes land owned by Cobra Mist Limited as a project-led compensatory measure for the North Falls Project to address collision risk impacts on Lesser Black-Backed Gulls at the Alde-Ore Estuary SPA. We reiterate our earlier advice [REP8-100] that, while the Applicant continues to explore potentially suitable compensatory measure options, landowner agreement/s have yet to be secured.

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

Yours faithfully,

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