



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Outer Dowsing Offshore Wind Farm

Appendix C4 to the Natural England Deadline 4 Submission

**Natural England's Advice on the Benthic Ecology Technical Report [REP3-018] and
the Envision Offshore Export Cable Corridor *Sabellaria Spinulosa* Image Reanalysis
Report [REP3-035]**

For:

The construction and operation of Outer Dowsing Offshore Wind Farm located
approximately 54 km from the Lincolnshire Coast in the Southern North Sea.

Planning Inspectorate Reference EN010130

3rd February 2025

Appendix C4 - Natural England's Advice to the Benthic Ecology Technical Report [REP3-018] and the Envision Offshore Export Cable Corridor *Sabellaria Spinulosa* Image Reanalysis Report [REP3-035]

In formulating these comments, the following documents updated and submitted by the Applicant at Deadline 3 have been considered in relation to Benthic Ecology:

- [REP3-018] 6.3.9.2 Chapter 9 Appendix 2 Benthic Ecology Technical Report (ECC) V3
- [REP3-035] 15.13 Envision Offshore Export Cable Corridor *Sabellaria Spinulosa* Image Reanalysis and Report.

Summary of Advice

Benthic Baseline Characterisation

1. Natural England welcomes the inclusion of the Applicant's clarifications to concerns raised in our Relevant Representations [RR-045] to both the Benthic Ecology Technical Report [REP3-018] and the Envision Offshore Export Cable Corridor *Sabellaria Spinulosa* Image Reanalysis and Report [REP3-035].
2. Within Appendix R of the Benthic Ecology Technical Report v3 REP3-018, the Applicant has presented their clarifications and feedback on the baseline characterisation relating to the *Sabellaria spinulosa* extent and distribution within Appendix R. As such, Natural England can now agree with the results and conclusions presented in the Benthic Ecology Technical Report v3 [REP3-018]. This report supersedes APP-155.
3. With the addition of Appendix A in 15.13 Envision Offshore Export Cable Corridor (ECC) *Sabellaria spinulosa* Image Reanalysis and Report V3 [REP3-035] (superseding 6.3.9.2 Envision Data Analysis document [APP-158]), Natural England's concerns in relation to the methods and analytical techniques used to determine the extent and distribution of Annex I *S. spinulosa* reef through the ECC have now also been addressed.

4. While these clarifications and explanations have been included as an additional appendix provided at the end of each document, Appendix R in [REP3-018] and Appendix A in [REP3-035]; Natural England strongly recommends that a summary paragraph at the beginning of each document is included to sign post to the appendices. This is to guide the user of the document to read these annexes in conjunction with the method, analysis and results as these sections have not been updated. This will ensure the context and clarifications provided are not lost, especially when these documents are relied upon during the post consent phase.

Annex I *Sabellaria spinulosa* Reef Supporting Habitat and Processes

- While Natural England's concerns regarding the presence of existing reef are addressed, Natural England's position regarding supporting habitat and processes for Annex I *Sabellaria spinulosa* reef within Inner Dowsing Race Bank and North Ridge (IDRBNR) Special Area of Conservation (SAC) as advised in our relevant representations [RR-045] and at Deadline 1 [REP1-059] remains unchanged.
- Under the Supporting Processes attribute for IDRBNR SAC there is a 'Restore' target for the environmental conditions in those locations that are known, or which become known, to be important for *Sabellaria spinulosa* reef formation. We consider any lasting change/loss of supporting habitat for Annex I *Sabellaria spinulosa* reef from the placement of cable protection will hinder the recovery of this feature and therefore the ability to meet the conservation objectives for the site and would require compensation.
- We draw the Examining Authority's attention to our advice regarding supporting habitats and process for Annex I *Sabellaria spinulosa* reef in Appendix C2 [REP3-067] and Appendix C3 [REP3-068] at Deadline 3. While the Applicant is confident the export cable route can be micrositied around any existing Annex I *Sabellaria spinulosa* reef, Natural England advises the Applicant undertakes and submits into examination an assessment of supporting habitats and processes for potential Annex I *Sabellaria spinulosa* reef, to demonstrate that the recovery of this feature will not be hindered by the installation of the export cable and/or the lasting placement of cable protection. This will provide the Secretary of State comfort an adverse effect on integrity to IDRBNR SAC Annex I reef features and habitats/processes in which it relies upon will be avoided.