



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

FIVE ESTUARIES OFFSHORE WIND FARM

**Appendix E7 to Natural England's Deadline 7 Submission
Natural England's Benthic Ecology Advice on the Applicant's Deadline 5 Documents**

For:

The construction and operation of Five Estuaries Offshore Wind Farm, located approximately 57 km from the Essex Coast in the Southern North Sea.

Planning Inspectorate Reference EN010115

03 March 2025

Appendix E7 Natural England's Benthic Ecology Advice on the Applicant's Deadline 5 Documents

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

- [REP5-012] Five Estuaries 5.4.3 HRA Screening Matrices - Revision B (Tracked)
- [REP5-014] Five Estuaries 5.5.2 Outline Benthic Implementation and Monitoring Plan - Revision B (Tracked)
- [REP5-028] Five Estuaries 9.13 Margate and Long Sands Special Area of Conservation Benthic Mitigation Plan - Revision D (Tracked)
- [REP5-042] Five Estuaries 9.31 Schedule of Mitigation - Routemap - Revision B (Tracked)
- [REP5-074] Five Estuaries 10.34.1 Applicant's Comments on Natural England's Deadline 4 Submissions - Revision A
- [REP5-091] Five Estuaries 10.39 Applicant's Response to Rule 17 Requests for Information for Deadline 5 - Revision A

1. Summary

Table 1: Natural England's advice on: Benthic Ecology

Document reviewed	Update made	Issue resolved?
[REP5-012] Five Estuaries 5.4.3 HRA Screening Matrices - Revision B (Tracked)	Screening matrices updated - pathways of effect to physical processes now only included within operational impacts for M&LS SAC, Essex Estuaries SAC.	No change that makes a material difference to the benthic receptors.
[REP5-014] Five Estuaries 5.5.2 Outline Benthic Implementation and Monitoring Plan - Revision B (Tracked)	We note the Applicant has added a commitment to a project alone BIMP for benthic compensation, if strategic compensation is found not to be possible, however, the Applicant maintains that there is no certain requirement for compensation.	Natural England welcomes the commitment and will provide further advice if a project level BIMP is deemed necessary by the Secretary of State.

1.1. Detailed comments

Table 2: Natural England’s Advice On: Margate and Long Sands Special Area of Conservation Benthic Mitigation Plan

Document reviewed: [REP5-028] Five Estuaries 9.13 Margate and Long Sands Special Area of Conservation Benthic Mitigation Plan - Revision D (Tracked)			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
1	Para 5.1.3	A weak commitment of “consideration will also be given to avoidance of other features (such as Priority Habitats under Section 41) and will consider any potential to subsequently reduce the recoverability time during final routing” has been added.	This commitment is not sufficient to address Natural England’s Concerns. Natural England advises that not only are impacts to NERC Habitats considered, but also avoided to provide the necessary mitigation measures
2	Para 7.1.1	Natural England welcomes the commitment to employ “readily removable” cable protection within M&LS SAC, together with a commitment to remove cable protection at the “end of life of the cables”. However, readily removable options should also take into account the environmental impacts from the removal operations.	<p>Natural England welcome these commitments but advise that they are not sufficient to address our concerns. We note that “end of life of cables” is ambiguous, it should be confirmed that end of cable life is the same as “end of project” (noting that cable lifespan can extend to 50 years or more).</p> <p>We continue to advise that unless it can be demonstrated otherwise, the scale of impacts is likely to hinder the ‘maintain’ habitat feature conservation objective of the site whilst cable protection is in situ, and potentially beyond, due to limitations in the ability to remove the infrastructure.</p> <p>Natural England advises that environmental impacts from the removal of cable protection should be considered at the consenting phase and only those external protection options that would minimise the environmental impacts included within the Rochdale envelope.</p>