



FIVE
ESTUARIES
OFFSHORE WIND FARM

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VOLUME 5, REPORT 5.2: OUTLINE
BENTHIC IMPLEMENTATION AND
MONITORING PLAN – REVISION C
(TRACKED)

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DEFINITION OF ACRONYMS

Term	Definition
AEoI	Adverse Effect on Integrity
BCSG	Benthic Compensation Steering Group
BIMP	Benthic Implementation and Monitoring Plan
Cefas	Centre for Fisheries, Environment and Aquaculture Science
COWSC	Collaboration on Offshore Wind Strategic Compensation
DCO	Development Consent Order
dSAC	Draft Special Area of Compensation
ECC	Export Cable Corridor
EIA	Environmental Impact Assessment
ES	Environmental Statement
ETG	Expert Topic Group
HHW	Haisborough, Hammond and Winterton
HRA	Habitats Regulation Assessment
JNCC	Joint Nature Conservation Committee
M&LS	Margate and Lond Sands
MMO	Marine Maritime Organisation
MRF	Marine Recovery Fund
NE	Natural England
NGO	Non-Governmental Organisation
pSAC	Possible Special Area of Compensation
RIAA	Report to Inform Appropriate Assessment
SAC	Special Area of Conservation
SNCB	Statutory Nature Conservation Bodies
SoS	Secretary of State
VE	Five Estuaries Offshore Windfarm



GLOSSARY OF TERMS

Term	Definition
Benthic ecology	Benthic ecology encompasses the study of the organisms living in and on the sea floor, the interactions between them and impacts on the surrounding environment
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Projects (NSIP).
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the importance, or sensitivity, of the receptor or resource in accordance with defined significance criteria.
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Directive and EIA Regulations, including the publication of an Environmental Statement.
Export cables	Cables that transfer power from the offshore substation(s) or the converter station(s) to shore.
Export cable corridor (ECC)	The specific corridor of seabed (seaward of Mean High Water Springs (MHWS)) and land (landward of MHWS) from the Five Estuaries array area to the proposed substation areas, within which the export cables will be located.
Geophysical	Relating to the physics of the earth.
Impact	An impact to the receiving environment is defined as any change to its baseline condition, either adverse or beneficial, resulting from the activities associated with the construction, operation and maintenance, or decommissioning of the project.
Intertidal	The area of the shoreline which is covered at high tide and uncovered at low tide.
Maximum design scenario (MDS)	The maximum design parameters of each asset (both on and offshore) considered to be a worst case for any given assessment.
Mitigation	Mitigation measures, or commitments, are commitments made by the project to reduce and/or eliminate the potential for significant effects to arise as a result of the project.
Planning Inspectorate (PINS)	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects (NSIPs).



Term	Definition
Report to Inform Appropriate Assessment (RIAA)	A process which helps determine likely significant effects and (where appropriate) assesses adverse impacts on the integrity of European conservation sites and Ramsar sites. The process consists of up to four stages of assessment: screening, appropriate assessment, assessment of alternative solutions and assessment of imperative reasons of over-riding public interest (IROPI) and compensatory measures.
Cable protection	Cable protection may be placed on the seabed to protect from current and wave action.
Subtidal	The region of shallow waters which are below the level of low tide.



1 INTRODUCTION

- 1.1.1 Five Estuaries Offshore Wind Farm (VE - hereafter referred to as the 'Applicant') is a proposed extension to the operational Galloper Offshore Wind Farm. VE would be located approximately 37 kilometres (km) off the coast of Suffolk, England (at its closest point), comprising of both offshore and onshore infrastructure. The onshore connection works are located within the administrative area of Tendring District Council, within Essex County Council. VE will have an overall capacity of greater than 100 Megawatts (MW) and therefore constitutes a Nationally Significant Infrastructure Project (NSIP) under the Section 15 (3) of the Planning Act 2008. Full details of the project description are presented in Volume 6, Part 2, Chapter 1: Offshore Project Description.
- 1.1.2 The final proposed offshore export cable corridor (ECC) has been developed through extensive route selection and evaluation work, taking into consideration environmental and engineering constraints. The ECC passes through the Margate & Long Sands Special Area of Conservation (M&LS SAC) overlapping with the tip of the most northerly of the 9 sandbanks identified within the SAC (Long Sands Head).
- 1.1.3 The Applicant is applying for a Development Consent Order (DCO) supported by a range of plans and documents, including an Environmental Statement (ES) which will set out the results of the Environmental Impact Assessment (EIA). The Applicant is also submitting a Report to Inform Appropriate Assessment (RIAA) (Volume 5, Report 4), which sets out the information necessary for the competent authority, in this case the Secretary of State (SoS), to undertake a Habitats Regulations Assessment (HRA) to determine if there is any Adverse Effect on Integrity (AEoI) on the national site network.

1.2 PURPOSE OF THIS DOCUMENT

- 1.2.1 This document details the outline implementation and monitoring proposals for the potential 'without-prejudice' measures which VE may develop if compensation is required in relation to:
- > Potential loss of sandbanks slightly covered by sea water all the time (hereafter referred to as 'sandbanks') at M&LS SAC resulting from the installation of cable protection material on the offshore export cables in those parts of the SAC where they cross the designated sandbank features.

1.2.2 As of the 29th January 2025, Defra released a Written Ministerial Statement and interim guidance regarding the Marine Recovery Fund. The Applicant believes this provides significant comfort to the Secretary of State that if compensation is required the use of MPA designation and/ or extensions of MPAs can be relied upon.

1.2.3 It should be noted that strategic compensation is the Applicant's and Natural England's preferred option, should compensation be ultimately required.



1.2.4 Within the Written Ministerial Statement, and expanded upon in the interim guidance, Defra recognises that detailed information usually expected by DESNZ Secretary of State may not be fully available until the Government's MPA designation/extension programme is complete. The WMS therefore commits to the production of high-level Implementation and Monitoring Plans (IMP), which should be obtained from Defra by the applicant and provided to the DESNZ Secretary of State before works which give rise to the adverse effect for which compensation is required can commence. This high level IMP must then be submitted for approval by DESNZ secretary of state.

1.2.5 Whilst the Applicant's preferred option is strategic compensation via the MRF, if for whatever reason strategic compensation was not ultimately possible and a project alone measure were implemented, it is expected that the final BIMP will be agreed with a Benthic Compensation Steering Group (BCSG) comprising of the Applicant and relevant authorities, including Natural England, to be established post-consent.

~~1.2.2~~ The final need for, and form of, an implementation and monitoring plan will depend on whether compensation measures (if required) are delivered under the DEFRA strategic compensation scheme/ marine recovery fund (MRF), or a different project alone measure, such as infrastructure removal is progressed. Depending on the outcome of strategic led compensation, the Applicant would prepare the relevant Benthic Implementation and Monitoring Plan (BIMP) for approval by the Secretary of State (SoS).

~~1.2.3~~ The Applicants preferred option for compensation is to provide a proportionate contribution to a strategic compensation measure or MRF. If this is the case, it is expected that a project steering group will not be required, as delivery of the strategic compensation option would be a Defra led exercise.

~~1.2.4~~ However, if the strategic compensation was not ultimately possible and a project alone measure were implemented, it is expected that, the final BIMP will be agreed with a Benthic Compensation Steering Group (BCSG) comprising of the Applicant and relevant authorities, including Natural England, to be established post-consent.

1.2.51.2.6 As described in the sections below, for each of the compensatory measures to be implemented, the final BIMP will include details of the:

- > Scale and location;
- > Design;
- > Delivery process;
- > Delivery timeframe;
- > Monitoring and adaptive management; and
- > Reporting.

1.2.61.2.7 This document, therefore, provides an outline BIMP, if project alone measures were required, that would be developed for one of the following compensatory measures proposed:

- ~~SAC extension~~
- > ~~Anthropogenic pressure removal, including;~~
- > ~~Redundant infrastructure removal; and~~
 - ~~Removal of aggregate industry pressure.~~



- > Seagrass bed habitat creation / restoration



2 PROPOSED BIMP STRUCTURE

2.1.1 It should be noted ~~that 5.5.1~~that 5.5.1 Benthic Compensation Strategy Roadmap = Revision B [APP-047] has detailed how the Applicant could contribute to these processes.

2.2 BACKGROUND

2.2.1 The Applicant will provide context details in the Final BIMP, confirming the reason for its need and its aims and objectives.

2.3 CONSULTATION

2.3.1 The Applicant will summarise all relevant consultation that has been undertaken during development of the Final BIMP. Key decisions, agreements, and any outstanding issues remaining under discussion (with resolution pathways) will be captured. Ongoing engagement, for example to provide updates on monitoring, (post-discharge of the Outline BIMP) will be outlined here.

2.4 DELIVERY MECHANISMS

2.4.1 The Applicant will confirm all relevant agreements/ consents required to fulfil the chosen compensation measure e.g., asset owner/ partnership agreements.

2.5 SCALE AND LOCATION OF COMPENSATION

2.5.1 The Applicant will identify a suitable location for the chosen compensation measure to be implemented. ~~For the SAC extension, this will be driven by Defra at a strategic level.~~ For the proposed~~other~~ measures, factors such as the availability of anthropogenic pressure for removal and the likelihood of successful implementation at the required scale will be considered.

2.5.2 The scale and location of compensation will be discussed with Natural England and other stakeholders and will be dependent on the compensation measure taken forward, if required, and the scale of the cable protection required. Details on the identified scale/ location will be specified in this section of the Final BIMP

2.6 DELIVERY PROCESS

2.6.1 This Applicant will outline the delivery process for the chosen compensation measure, including ecological considerations which ensure the compensation measure has the maximum potential for success.

2.6.2 The delivery process for the chosen compensation measure, if required, will be in discussion with Natural England and other relevant stakeholders and will be detailed in this section of the Final BIMP.

2.7 DELIVERY TIMESCALES

2.7.1 This section will identify the proposed timeframe for the delivery and long-term delivery of the compensation measure chosen, if required.



2.8 MONITORING AND ADAPTIVE MANAGEMENT

- 2.8.1 This section will identify the monitoring procedure and adaptive management principles and processes that have been agreed with the BCSG, including the scenarios under which adaptive management measures are required. It will be developed in line with the evidence base that has been provided within 5.5.1 Benthic Compensation Strategy Roadmap [APP-047].
- 2.8.2 Following discharge of the BIMP, the BCSG will be engaged in relation to implementing adaptive management if required.

2.9 REPORTING

- 2.9.1 This section will set out the reporting requirements associated with monitoring and adaptive management. In doing so, it will confirm the necessary objectives and timescales for the reporting.



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