THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

Rampion Two Offshore Wind Farm

Appendix DF6 to the Natural England Deadline 6 Submission

Natural England's Advice on Benthic Ecology and Coastal Processes

For:

The construction and operation of the Rampion 2 Offshore Windfarm located approximately 13km off the Sussex coast in the English Channel.

Planning Inspectorate Reference EN010117

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01 August 2024

Appendix DF6 – Natural England's advice on Benthic Ecology and Coastal Processes

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

- [REP5-029 & REP5-030] 6.2.9 Environmental Statement Benthic, subtidal and intertidal ecology (tracked & clean)
- [REP5-074 & REP5-075] 7.12 Outline Scour Protection and Cable Protection Plan (tracked & clean)
- [REP5-082 & REP5-083] 7.17 In Principle Sensitive Features Mitigation Plan Rev E (tracked & clean)
- [REP5-084 & REP5-085] 7.18 In Principle Offshore Monitoring Plan Rev D (tracked & clean)
- [REP5-123] 8.85 Outline Cable Burial Risk Assessment (OCBRA)
- [REP5-126] 8.88 Outline Cable Specification and Installation Plan (OCS&IP)
- [REP5-086 & REP5-087] 7.22 Commitments Register (clean &tracked)
- [REP5-044 & RREP5-045] 6.4.6.3 Coastal processes technical report: Impact assessment (tracked & clean)

1. Summary

We welcome the provision of an Outline Cable Burial Risk Assessment (OCBRA) and an Outline Cable Specification and Installation Plan (OCS&IP) at Deadline 5, as requested within our relevant representations. However, we advise that without the inclusion of site-specific geotechnical data the level of uncertainty on the extent to which the mitigation measures proposed can be applied remains. We advise that an Outline Decommissioning Plan has not been provided.

In relation to the updated documents provided we have a number of outstanding concerns detailed in the tables below. We highlight that with the quantity of outstanding concerns, Natural England advises that should the Secretary of State be minded to consent the project, as submitted, that there is a requirement for the DCO/dML to secure signoff and agreement by the MMO, in consultation with the relevant SNCB, of all final named plans. We do however advise that such an approach transfers uncertainties to the post consent phase with no guarantee risks and issues can be resolved.

2. Detailed Comments

Table 1 Summary of Key Issues Document Reviewed - [REP5-029 & REP5-030] 6.2.9 Environmental Statement Benthic, subtidal and intertidal ecology (tracked & clean)

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
1	9.10	173	9.10.6-9.10.10	We note that the word *'Temporary'* has been removed in relation to '*Habitat disturbance /loss from jack-up vessels and cable maintenance works'*. However, no change has been made to the assessment to reflect that the loss assessed is now not considered temporary.	Unresolved: Natural England advises that the assessment can no longer be relied upon for this and future project assessments.

Table 2 Summary of Key Issues Document Reviewed - [REP5-082 & REP5-083] - 7.17 In Principle Sensitive Features Mitigation (IPSFMP) Plan Rev E (tracked & clean)

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
2	3.1-5.2	23, 45	3.1.1, 5.2.2	We note that these sections are still missing stoney/cobble reef.	This matter is resolved if stoney/cobble reef is included in the final preconstruction Sensitive Features Mitigation Plan (SFMP) to be submitted to the MMO and agreed in consultation with relevant SNCB.

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	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
3	3.4	32	Table 3.2	It is stated in relation to *'Indicative milestones for refinement and agreement of the In Principle Sensitive Features Mitigation Plan'* that this is *'currently in progress (during Examination)'*. Natural England highlights that that we still have outstanding concerns, particularly regarding the levels of mitigation achievable, which is dependent on the geotechnical information, and robust pre-construction surveys.	We advise that residual uncertainty remains in relation to these areas, until more information is known in relation to the site conditions. Therefore, this matter remains unresolved. This will need to be resolved within the Final pre-construction SFMP and will require sufficient data to be included to achieve this
4	5.2	38-44	5.2.4, whole document, Figure 5.3	In relation to *'known black seabream nesting sites'*, micrositing should consider areas where nesting currently exists or has done historically as illustrated in the aggregates data. We advise consideration is also given to habitats known to be suitable for black seabream nesting. Micrositing requirements throughout the document should consistently refer to chalk habitat, stony/cobble reef, *Sabellaria spinulosa*, peat and clay exposures, as well as black seabream habitat. We assume this update is supposed to read '*Chalk, and Peat and Clay exposures'.*	This matter remains unresolved. We advise that all of these features well need to be considered in the final Sensitive Features Mitigation Plan.

Table 3 Summary of Key Issues Document Reviewed - [REP5-123] 8.85 Outline Cable Burial Risk Assessment (OCBRA)

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
5	-	2	Executive Summary, 2.1.2	Avoid 'UK Biodiversity Action Plan (BAP) Priority Species and Habitats within the seabed.'	We advise that this should also include all features in point 4 above. We advise this remains unresolved and all the relevant features will need to be included in the final Cable Burial Risk Assessment (CBRA).
6	-	2	Executive Summary, 2.1.3	We advise that achieving sufficient burial is also important to maximise the opportunity to avoid cable protection or future cable repairs in the first instance.	We advise that this will need to be adequately considered in the final CBRA.
7	2	4	2.1.5	Natural England agree that *'sediment mobility'* will need to be a key consideration due to areas of sand waves.	This issue is currently unresolved, and we advise that this will need to be adequately considered in the final CBRA.
8	2	4	2.1.5	We advise that this section needs to consider the environmental consequences of not achieving the target burial depth.	This issue is currently unresolved and we advise that this will need to be adequately considered in the final CBRA.
9	2	4	2.1.7	We note that it is unclear from the Development Consent Order (DCO) condition whether this will include consideration of all cable protection or just that which *'exceeds 5% of navigable depth'.*	We advise that from an environmental impacts assessment perspective, this condition should consider all areas where cable protection might be required. This should be clear in the wording of the DCO condition and all areas will need to be considered in the final CBRA.
10	3.2	6	Table 3.1, C-41	We note that the target burial depth is 1m depending on geological conditions and the risk to the cable. Until such a point when detailed geotechnical information is available, we do not have sufficient	We advise that this remains an outstanding uncertainty in terms of the effectiveness of the mitigation in avoiding/reducing impacts.

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				information to understand how effective this mitigation measure will be and over how much of the route it will be possible.	Therefore, this matter remains unresolved. This will need to be resolved within the CBRA and will require sufficient data to be included to achieve this.
11	3.2	6-7	C-42, C96	It is stated that 'The subsea inter-array cables and the subsea export cables installed using one or a combination of the three methods: ploughing, trenching or jetting'. Until such a point when detailed geotechnical information is available, it is not possible to understand the proportion of each of these methods might be required, and therefore the final level of impact. We note that C-42 and C-96 are similar, but C96 adds post-lay burial techniques to the list of methods.	In relation to the wording of the commitments this could be partially resolved if the commitment was amended to secure that the methodology that results in the least environmental damage being chosen and if consistency was provide in relation to the techniques listed in the commitments register. We advise there remains an outstanding uncertainty in terms of the effectiveness of the mitigation in avoiding/reducing impacts, until such a time where detailed geotechnical information is available. We advise that this information will need to be included and robustly considered in the final CBRA. Therefore, this matter remains unresolved. This will need to be resolved within the CBRA and will require sufficient data to be included to achieve this.

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12	3.2	6	C-43	Without the geotechnical information the feasibility of Horizontal Directional Drilling (HDD) and the burial depths proposed by the Applicant remain insufficiently evidenced.	We refer you to our terrestrial ecology comments (see Appendix J6 and our Risks and Issues Log) in relation to Climping Beach SSSI. In relation marine/coastal process we understand that ' ground investigation will inform a coastal erosion and future beach profile estimation assessment which will advise the need for and design of any further mitigation and adaptive measures to help minimise the vulnerability of these assets from future coastal erosion and tidal flooding.' Natural England advises that the consequence of these investigations being left to the post-consent phase is that the full significance of the issue and the likely effectiveness of the mitigation/adaptive measures are not adequately understood at the assessment stage due to the absence of this information. Therefore, this issue remains unresolved. The coastal erosion and future beach profile assessment should be referred in the commitment register and secured in the DCO. The information within it should be considered in the final CBRA. With this information it may be possible to resolve our concerns, but it is not guaranteed.

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	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
13	3.2	7	C-269	We advise that it should be acknowledged that the shortest path, may not be the same as the one that avoids most features/has the least environmental impact. Consideration should be given to longer paths if they result in the highest avoidance of sensitive features. We question how the Applicant will continue to avoid these features during the operation and maintenance phase, given that *Sabellaria spinulosa* for example is ephemeral in nature (see point F24 of our risk and issues log).	We advise that this possibility should remain under consideration in the final plan, and that it will need to be resolved within the final SFMP once the pre-construction data is available. We advise that the methodology for how these features will continue to be avoided during the operation and maintenance phase remains unresolved. We would expect to see the operation and maintenance phase, considered as part of an ongoing micrositing plan within the final SFMP.
14	3.2	8	C-272	It is stated that 'The Applicant will seek to utilise the most appropriate technology available at the time of construction and operation, **if required**, to reduce the direct footprint impact from cutting machinery, where practicable'.	We advise that this could be resolved if *'if required'* is removed from the commitments register and this is secured as a condition of the DCO/dML.
15	3.2	7- 8	C-273 & C-270	Please refer to our Deadline 5 Appendix E5 on Fish and Shellfish [REP5-139]. We also advise that the distance from other features such as reef features (*Sabellaria spinulosa* and stoney/cobble reef) are also important and need due consideration.	We refer you to Natural England's Deadline 5 advice on Fish and Shellfish. We advise that the buffer distance for all features listed in point 4 should be secured within the commitments register and considered in the final SFMP.
16	3.3-3.4	8-9	Table 3.2, 3.4.1, 3.3.1	We understand that *'Further surveys and assessment will be undertaken post-consent to inform the Final CBRA'*. Natural	Unresolved: We note that this plan does not include the further geo technical information we have requested pre-consent to provide the

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				England notes that the newest data included in the current table is from 2021 and a lot of the information predates this. We advise that the data referenced here does not appear to provide any meaningful further insight than was provided in the Environmental Statement.	necessary certainty in the mitigation measures. For clarity it should be noted that the characterisation surveys had limitations and that this geophysical data, which had already been included in the assessment, is not the geotechnical information we requested.
17	3.4	12	3.4.3	We understand that 'Geophysical and geotechnical surveys will be carried out before works commence and the information from those surveys will allow route debris, boulders, archaeological features, UXO presence, seabed features, sediment depth and the nature of the seabed to be determined'.	Unresolved: We advise that until this data is collected the effectiveness of many of the mitigation measures at reducing impacts to sensitive features cannot be fully understood.
18	3.4	13	3.4.8	It is stated that *'Smaller depressions, interpreted as spudcan imprints associated with the existing Rampion 1 Windfarm, are observed at the margins with the Rampion 1 site'.*	Unresolved. We advise that the fact spudcan depressions are still present should be acknowledged in terms of the lack of seabed recovery and the likelihood of this occurring where jack-up barges are used in the installation and maintenance of Rampion 2. We advise further consideration is undertaken as part of the consultation on the final OMP, and the consultation on the lessons learnt section of the final CBRA.
19	3.4	13	3.4.9	We note the presence of potentially 'Steep slopes may prohibit the use of particular trenching tools, such as typical post lay	We understand that the aim will be to avoid step slopes as far as possible, but it should be recognised that these may limit the scope of the mitigation measures in some areas. This matter

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				tracked trenchers and SLB (simultaneous lay and burial) jetting ploughs'.	remains unresolved and will need to be considered further as part of the final CBRA once geotechnical data is available.
20	3.4	14	3.4.12 – 3.4.17	Natural England previously asked for information pertaining to whether cables buried within paleochannels were likely to remain buried (see point F62 of our risks and issues log). We advise this information has not been provided.	This matter is unresolved. We advise that given this forms part of the mitigation strategy this should be detailed within the final CBRA.
21	3.4	16	3.4.25	We advise that the Applicant's pre-construction survey should look to identify habitats suitable for black bream nesting, rather than just sites where nesting is evident. This is due to the interannual variability in nesting locations. See point 4 above.	This matter remains unresolved. We advise that information on this will need to be included in the final SFMP, CBRA, CSIP and OMP, and that there is no guarantee it can be resolved.
22	3.4	16	3.4.25	We understand that there will be no anchoring of vessels in designated site boundaries. We seek clarification as to whether this means jack up barges and/or dynamic positioning vessels will be used instead?	This remains unresolved. We advise neither anchors or JUV should be used within designated sites, and as part of the SFMP we will look for consideration of how jack up leg locations avoid sensitive features (see point 4) outside of sites.
23	3.4	16	3.4.27-3.4.28	Please refer to our comments on the In Principle Offshore Monitoring Plan below [REP5-084 & REP5-085].	-
24	3.4	17	3.4.29-3.4.31	We note this section on Dredging and Disposal does not consider potential impacts on sensitive features.	This matter remains unresolved. This will need to be considered in the final CBRA and commitments secured to ensure all impacts to sensitive features are avoided. .

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25	3.4	17	3.4.34	We note that it has been stated that *'The target burial depth of between 1.0 and 1.5m for the export cables may be insufficient based on consultation feedback from marine aggregate dredgers and this will be further considered in the Final Cable Burial Risk Assessment and, if necessary, either a greater burial depth will be achieved, or cable protection will be placed'*.	This matter remains unresolved. Natural England has concerns that this could lead to additional cable protection being required post-consent that may not have been accounted for in the current worst case scenario assessment. We advise this also has the potential to affect the effectiveness of the mitigation proposed and even if sufficient burial is achieved, this may not prevent cable protection and the long-lasting impacts this may result in. This will need to be thoroughly considered in the final CBRA.
26	3.4	18	3.4.37	We note that the Offshore Export Cable Corridor crosses the Littlehampton Harbour charted anchorage area and that *'pre-construction CBRA will confirm if analysis such as anchor penetration trials will need to be undertaken'*.	See point 25 above.
27	4	21	4	We note that the Applicant has not considered lessons learnt from Rampion 1 in this section and instead suggested they will delay looking at this until post consent when they *'will undertake a more detailed review of the Rampion 1 Lessons Learned and any relevant construction documentation that can be shared by Rampion 1 post Examination'.*	We support this information being included in the final CBRA. We advise it should also consider the post-construction monitoring of Rampion 1. We advise that the lessons learnt should be included rather than *'where relevant*'. Until this is produced this matter remains unresolved and this does not address the concerns we have raised in our relevant representations regarding this matter. We

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					advise this transfers uncertainties to the post consent phase.

Table 3 Summary of Key Issues Document Reviewed - [REP5-126] 8.88 Outline Cable Specification and Installation Plan (OCSIP)

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
28	1.2	7	1.2.3	We note the list of sensitive features here is incomplete, specifically peat and clay exposures, *Sabellaria spinulosa* and stoney/cobble reef are missing (see point 4 above).	See advice on point 4.
29	1.2	7	1.2.4	This should read submitted to the Marine Management Organisation (MMO) for approval, in consultation with the relevant SNCB as listed in 1.4.2-1.4.3.	We advise that this requirement is secured within the DCO/dML.
30	1.2	8	dML Condition 11(1)(n) (Schedule 12) - (ii)	We seek clarification that this plan will include where there is the potential for indirect impacts to designated sites, e.g suspended sediment/sediment plume impacts on Kingmere Marine Conservation Zone (MCZ) and Offshore Overfalls MCZ.	This remains unresolved and should be addressed in the final Cable Specification and Installation Plan (CSIP).
31	2.1	12	2.1.1	It is stated that 'The final export cable, inter array cables and interconnector	This remains unresolved. We advise that it should be demonstrated within the CSIP, how

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				cables routes and installation method will be influenced by a range of considerations, including seeking to avoid or minimise environmental impacts and managing cable burial risk'.	the mitigation hierarchy has been followed and the methodology with the least environmental impacts has been chosen.
32	2.1	12	2.1.2	We note that *'Through the final cable routeing it may not be possible to address all potential impacts without compromise. Where conflict arises between routeing and installation considerations, the Applicant will engage with the relevant stakeholders (as set out in Section 1.4) to apply the mitigation hierarchy and seek the most appropriate solution'.*	The Applicant should seek early advice from Natural England on this and this should be secured in the DCO/dML, so that we can advise on the best environmental outcomes.
33	2.1 - 2.2	12-21	Table 2.1, C-271, 2.2.4	We advise this mitigation would be compromised even with sufficient burial conditions, if cable protection is still required for example in the areas of anchoring risk that have been identified.	See points 25 and 26.
34	2.1. 5.5	16, 36	C-283, 5.5.6	We advise that the gravel bags do need to be removed and therefore this should not be *'where practicable'.* We advise that the design of the gravel bed should consider ensuring they are removable and that the bags should be monitored to ensure they remain significantly robust to be removed. We advise this commitment also relates to fish and shellfish.	This could be partially resolved if the commitment was amended to reflect this advice. The matter may be resolvable if this point is fully addressed in the final CSIP.

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				Additionally, we note that Table 5-4 still refers to sand or gravel beds. We advise that it needs to be consistently clear that this is bagged gravel material only.	
35	2.1	16-17	C-300 - C-289 (this is also relevant to the Outline scour protection and Cable Protection Plan [REP5-074 & REP5-075 R])	We continue to advise that this should be thoroughly considered within the Decommissioning Plan (referenced in C111). We note that the Applicant has not addressed our advice to provide an outline decommissioning plan and that a decommissioning plan should be written into the DCO as a commitment pre-construction.	We advise that as an outline decommissioning plan has not been provided into the examination this matter remains unresolved. We advise that a decommissioning plan referred in C111 will need to be provided. This should include offshore information and should be secured under the DCO as being provided pre-construction to the Secretary of State in S105 consultation.
36	2.1	17	C-305 (also applies to IPSFMP)	It is stated that *'Excavated chalk will be used to infill cable trenches produced by mechanical cutter, where practicable'*. We advise that this commitment was a key reason we asked for lessons learnt from Rampion 1. We advise that a clear methodology for how this will be achieved must be included within the CSIP/CBRA, and that this is added to the wording of the commitment. We understand that when	This is unresolved. We advise that this information must be reflected in the wording of the commitment and included in the final CSIP/CBRA.

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				Rampion 1 was constructed a similar commitment was not adhered to and quantities of irreplaceable chalk were lost and so could not be used as infill. Whilst we appreciate Rampion 2 is a different project, the residual risk of this occurring again remains, and it should be evidenced that this will be effectively managed. We advise that the requirement to infill the trenches should be considered across trenching methodologies where this is possible, not just mechanical cutters.	
37	2.1	15-17	C-269, C-272, C-305	It is stated that *'Micrositing and adoption of specialist offshore export cable laying and installation techniques will minimise the direct and indirect (secondary) seabed disturbance footprint'*. We advise that it is not possible to understand how effective this will be based on the information currently available in relation to conditions at the site. We can only ascertain currently that there may be some challenges that cannot be fully understood without geotechnical data.	This matter remains unresolved. This will need to be resolved within the final SFMP/CSIP/CBRA and will require sufficient data to demonstrate mitigation is achievable.
38	2.2,5.4	22-32	2.2.9, 5.4.6	We advise that the separate marine licence will need to consider impacts on fish, marine mammals, and benthic habitats. We advise that clearance should	This will need to be considered as part of this separate licence.

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				be undertaken outside of sensitive seasons, such as March- July inclusive for black seabream as a feature of Kingmere MCZ.	
39	2.2	22	2.2.15	We advise '*permanent loss of habitat where cable protection is required',* is not the only permanent loss of habitat. Given marine chalk is an irreplaceable habitat and a Habitat of Principal Importance Under NERC Act (2006), any loss of this (which includes damage to its physical structure) also constitutes a permanent loss.	This remains unresolved. We advise that we would expected any loss/ or damage to rare chalk, to be considered a permanent impact in the final plans and remediated accordingly.
40	2.2	23	2.2.17	It is stated that *'The Offshore Export Cable Corridor covers Bedrock, stony reef and S. spinulosa reef habitats, these reef habitats were deemed to correlate to those which fall under Annex I of the EC Habitats Directive but not protected under this legislation as they do not represent Annex I habitat designated within an SAC. Bedrock, stony reef and S. spinulosa reef habitats were also observed across the western areas of the Array Area'.*	This remains unresolved. We advise that it should be recognised in the final CSIP that *S. spinulosa,* and Littoral, sublittoral chalk, subtidal chalk are protected as a Habitats of Principal Importance under the Natural Environment and Rural Communities (NERC) Act 2006. And therefore, impacts to these habitats should be avoided.
41	2.2	23	2.2.18	We advise information on the HDD feasibility at Climping should be included in the final CSIP. The selection of the HDD exit pit location in the marine environment in also relevant. We advise that nearshore	Unresolved: We advise this information will need to be included in the final CSIP. See also point 12.

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				installation techniques should also be covered.	
42	2.2	23	2.2.20	We advise that Natural England should be consulted through the CSIP on the Applicant's identification of '*suitable locations for the temporary storage of excavated material, in areas which minimise impacts on sensitive features and designated sites'* once the pre-construction data is available.	This remains unresolved. We advise that Natural England should be consulted through the submission of the final CSIP on storage of excavated material.
43	2.2	23	2.2.22	We advise that it should be recognised here that black seabream also nest outside of Kingmere MCZ and that there is long term aggregates data that evidences them nesting within the export cable route itself.	This remains unresolved and will need to be addressed in the final CSIP.
44	2.2	23	2.2.23	We advise that consideration needs to be given to identifying suitable black bream nesting habitat pre-construction and monitoring this post construction to demonstrate it is still suitable nesting habitat.	This remains unresolved and it will need to be considered in all the final CSIP/ SFMP/CBRA.
45	3.1	25	3.1.4	We advise that this paragraph should specifically refer to micrositing, rather than constraint of the cable corridor for clarity.	This remains unresolved and it will need to be addressed in the final CSIP.
46	4.3	27	Table 4.3	We note that a 1m target burial depth is included within the commitments, rather than 1m-1.5m	This remains unresolved and a consistent commitment needs to be provided across all post-consent plans on cable burial depth.

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47	5.1	30	5.1.1	Natural England advises that this section should include the methodology to be used for each section and why, as well as how the method selected minimises the impact on sensitive environmental features. Details of the micrositing plan should also be included.	This remains unresolved. We advise this information will need to be included here in the final CSIP and that Natural England is consulted as early as possible on this data.
48	5.4	31	5.4.1	We note the phrasing *'It is estimated that approximately 20% of the array and interconnector cables may require protection measures'.*	We advise that whilst it may be an estimate at this stage, the Applicant cannot go above the amount assessed in the worst-case scenario. We advise this maximum must be secured as part of the project parameters in the DCO/dML.
49	5.4	33	5.4.10-5.4.11	In relation to clearing boulders it is suggested that either a boulder plough and boulder grab will be used dependant on the density of boulders. It is also suggested that *'boulders will be moved to adjacent areas of seabed within the same habitat type. No boulders will be removed and placed on priority sensitive habitat areas to ensure no impacts from boulder placement will arise on such receptors'.*	This remains unresolved. We advise that consideration will need to be given to the methodology that represents the least environmental impact in the final CSIP We advise that the second point is a key commitment, and we would have concerns if this was not carried out. This should be a commitment included in the commitments register and demonstrated in the final CSIP.
50	5.4	33	5.4.12-54.14	'A Pre-Lay Grapnel Run (PLGR) and an associated route clearance survey of the final cable route will be undertaken'.	Micrositing of the cable should also ensure that impacts from the pre-construction, site preparation grapnel run will avoid sensitive features. Therefore, this could be resolved if

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					mitigation is adequately secured in the final CSIP
51	7.1	43	7.1.1	We advise that this information on cable reburial protocol should be included in the final CSIP, as opposed to may be included.	This remains unresolved. A detailed cable reburial protocol will be required in the final plan CSIP
52	8.1	44	8.1.2	We note that *'The Applicant considers the cables on this Proposed Development to have a high probability of successful installation by burial, at the target depth'.* We advise that the evidence provided to date, does not provide sufficient support for such a statement.	Unresolved: We advise this statement is not currently adequately evidenced.

Table 4 Summary of Key Issues Document Reviewed - [REP5-084 & REP5-085] 7.18 In Principle Offshore Monitoring Plan Rev D (tracked & clean)

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
53	4.5	20	4.5.4	Based on our concerns regarding the adequacy of the baseline characterisation data and point 2.2.17 of the OCSIP, we do not agree that it can be assumed that sensitive features (listed in point 54 below)	This point remains unresolved. This will need to be included in the final OMP.

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	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
				that would require micrositing around do not exist in the array area. Therefore, the array area should be subject to the same geophysical surveys and drop-down video where sensitive features are identified as the cable corridor. If any features are identified that were not present in the characterisation survey there would be a requirement to microsite turbine and cable locations to avoid these. Additionally, we highlight that due to features like *Sabellaria spinulosa* being ephemeral, this could be present in locations in the pre-construction surveys, where it was not present in the characterisation survey, particularly given these surveys were already dated at the time the application was submitted (see point F24 of our risks and issues log).	
54	4.5	21	Table 4.3 IPOMP, Table 7.1 IPSFMP	We highlight that each column and the text above still does not consistently list the features to be monitored. We advise that these should be chalk habitat, stony/cobble reef, *S. spinulosa*, peat and clay exposures. We advise that there is still no consideration of the identification and monitoring of habitats with the potential to support black seabream nesting (which should also be included	This point remains unresolved. All these features will need to be considered in the final OMP. Detail will also need to be included on the monitoring of habitats with the potential to support black seabream nesting.

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
				within section 4.6, see our Deadline 5 [REP5-139] advice on fish and shellfish). We advise that where these features are identified, drop down video is likely to be required to confirm their presence and extent.	
55	4.5	21	Table 4.3	We advise that table 4.3 is updated in line with table 7.1 of the In Principle Sensitive Features Mitigation Plan and Table 4-2 of this plan. Specifically, that the geophysical survey must include sidescan sonar and therefore table 4.3 should not read *'sidescan or Multi-Beam Echo Sounder'.*	This remains unresolved, the surveys that inform the final OMP will need to include sidescan sonar.
56	4.5	21	Table 4.3	Natural England advises that we do not agree that 'where no stony reef, peat or clay exposures, and/or S. spinulosa reef, is identified by the pre-construction survey, no post-construction surveys will be undertaken.' We advise that monitoring needs to consider the full list of sensitive features (point 54 above), and that given the Applicant has suggested impacts to chalk for example may not be possible to avoid in all areas, it follows that post-construction surveys will be required. Additionally, Natural England advise that monitoring of the areas where gravel bags	This matter remains unresolved. This will need to be resolved as part of the consultation on the final OMP.

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
				have been used in the nearshore will be required. We advise that it also cannot be confirmed at this stage that one post construction survey will be sufficient and that if recovery is not demonstrated by that survey, then it is likely further surveys will be required.	

Table 5 Summary of Key Issues Document Reviewed - [REP5-086 & REP5-087] 7.22 Commitments Register (clean &tracked)

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
57			General Comment	Natural England has provided advice on commitments where they are relevant to specific plans above. We also provided advice within our Deadline 5 response.	Unresolved: This advice has not been addressed.

Table 6 Summary of Key Issues Document Reviewed - [REP5-044 & RREP5-045] 6.4.6.3 Coastal processes technical report: Impact assessment (tracked & clean)

Point number	Location within Submitted Document			Natural England Response	
	Section	Page	Paragraph, Table or Figure Number	Key Concern	Natural England's Advice to resolve the issue
58	-	11, 62, 67	Figure 1-1, Figure 2-2, Figure 2-3.	We note that these Figures have been updated to show the MCZ boundaries where they were missing and to make the 500m buffer clearer. These figures demonstrate that both Kingmere MCZ and Offshore Overfalls MCZ are within the spring tidal excursion buffer and the 500m buffer, and that the 50m buffer appears to extend into Kingmere MCZ. We note that no changes or additions have been made to the assessment and therefore our comments remain as they were at the relevant representation stage.	We recognise the update to the figures. However, we note that no updates to the assessment have been made to address our relevant representation comments. Therefore, this matter remains unresolved, and we cannot agree to conclusions of the final assessment