



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

Outer Dowsing Offshore Wind Farm

Appendix K to the Natural England Deadline 2 Submission

**Natural England's Response to The Examining Authority's First Written Questions
(ExQ1)**

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

27th November 2024

Appendix K to Natural England's Response and Comments to the Examining Authority's first set of Written Questions

This document sets out Natural England's (NE's) responses to the Examining Authority's first set of Written Questions (ExQ1) and requests for information published on 06 November 2024. Natural England has included responses on those questions directed to NE by the ExA and/or pertain to our remit.

ExQ1	Question to:	Question:	Natural England Response
BE Benthic Ecology, Intertidal, Subtidal and Coastal Effects			
Q1 BE 2.2	Natural England (NE)	<p>Environmental Statement (ES) conclusions</p> <p>The Applicant in ES Chapter 7 Marine Physical Processes [APP-062], Chapter 8 Marine Water and Sediment Quality [APP-063] superseded by AS1-038] and Chapter 9 Benthic and Intertidal Ecology [APP-064] concludes no likely significant effects. The Examining Authority (ExA notes NE's concerns in relation to the assessment and conclusions in relation to Sabellaria Spinulosa reef and Sandbanks.</p> <ul style="list-style-type: none"> • For all other issues in these Chapters, in Environmental Impact Assessment (EIA) terms does NE agree with the Applicant's conclusions of no likely significant effects? • If not, why not? 	<p>Q1 BE 2.2 Until further information and mitigation commitments are provided by the Applicant as set out in our Relevant/Written Rep [RR-045] Natural England is unable to advise further on the significance of impacts on marine processes and benthic receptors in relation to the EIA.</p> <p>We also draw the ExA attention to Natural England's Deadline 1 Appendix B1 [REP1-058] where we provide further advice on EIA concerns with regards to;</p> <ul style="list-style-type: none"> - Potential changes to sediment transport processes and seabed morphology (including seabed level changes) over the lifetime of the Project; and - remaining uncertainty regarding impacts to the Lincolnshire Coast Submerged Forest and future coastal behaviour/change should the beach management strategy change and beach nourishment cease. <p>Natural England also highlights that further responses to this question will need to take into account potential impacts to marine processes from the</p>

ExQ1	Question to:	Question:	Natural England Response
			implementation of the ORBA Change Request should it be accepted.
Q1 BE 2.3	NE	<p>Suspended Sediment Concentration and Seabed Level Changes</p> <p>NE's RR [RR-045 NE Ref B1] states that '<i>Natural England is concerned that impact pathways to key receptors due to construction-related suspended sediment concentration (SSC) and seabed level changes have not been thoroughly considered by the Applicant.</i>'</p> <p>The Applicant has responded [PD1-071 NE Ref B26].</p> <ul style="list-style-type: none"> • Is NE satisfied with the response? If not, please detail specifically what is required. 	Q1 BE 2.3 Natural England draws the ExA to Rows/Points 4 and 19 on Tab B of our Risks and Issues long where we highlight that this issue remains unresolved. Clarification is needed on the MDS seabed disturbance parameters for boulder clearance, pre-lay grapnel run and UXO clearance.
Q1 BE 2.4	NE	<p>Operations and Maintenance Activities</p> <p>Is NE satisfied with the Applicant's response to its concerns relating to the effects of operations and maintenance activities on marine physical processes? [PD1-071 NE Ref B4] If not, please detail specifically what is required.</p>	Q1 BE 2.4 Natural England notes that the Applicant considers that the spatial impact generated by Operation and Maintenance (O&M) activities will be lower than the Maximum Design Scenario (MDS) for construction activities, thus there will be no significant effects and in turn no need to assess them [PD1-071 , NE Ref B4 (and B19)]. Natural England advises that operation and maintenance activities may exert the same pressures on the environment as those activities carried out during the construction phase. However, the O&M activities may compound existing pressures impacting upon marine processes and in turn protected features. We advise that, unless it can be otherwise demonstrated, O&M activities have the potential to slow feature recoverability. Consequently, we advise that this needs to be taken into account for relevant environmental assessments.

ExQ1	Question to:	Question:	Natural England Response
Q1 BE 2.5	NE	<p>Scour Volumes Maximum Design Scenario (MDS)</p> <p>Is NE satisfied with the Applicant's response to its concerns relating to the results of the scour assessment for the Wind Turbine Generator (WTG) foundations? [PD1-071 NE Ref B8] If not, please detail specifically what is required.</p>	<p>Q1 BE 2.5 The Applicant has clarified the rationale for providing an estimate of scour depth, radius, and volume for only 65% of Wind Turbine Generators (WTG) locations. No scour estimates have been provided for the remaining 35% of WTG locations because no scour is expected to develop here. Natural England is therefore satisfied with the Applicant's response in relation to scour protection around turbines but advise that these scour predictions should be validated through monitoring to ensure there are no unexpected changes.</p>
Q1 BE 2.6	The Applicant NE	<p>Cumulative Assessment</p> <p>Can the Applicant please explain in further detail why it has not used the recommended NE and Joint Nature Conservation Committee (JNCC) best practice? [PD1-071 NE Ref B20].</p> <p>Can NE explain the difference between the Applicant's current approach and NE's recommended best practice and the likely implications of not following the best practice?</p>	<p>Q1 BE 2.6 The NE/ Joint Nature Conservation Committee (JNCC) tiered system for scoping projects into cumulative/in-combination assessments is more detailed with seven tiers as opposed to the three-tier approach adopted by the Applicant. This has implications for the projects and level of data included and considered in the cumulative impact assessment (EIA) and in-combination assessment (HRA). For example, Tier 1 in the NE/JNCC system includes built and operational projects where they have not been included in the environmental characterisation survey, i.e. they were not operational at the time the baseline surveys were undertaken and/or any residual impacts may not have yet fed through to, and been captured in,</p>

ExQ1	Question to:	Question:	Natural England Response
			<p>estimates of baseline conditions. Conversely, the Applicant's Tier 1 includes projects under construction, plus permitted and submitted applications. A further difference between the two approaches, is that the NE/JNCC best practice recommends including a figure or map showing the location of projects scoped into the cumulative assessment from across the wider region, in addition to a further figure or map showing this information overlaid with designated site boundaries or other important areas for protected habitats and species. It is also useful to identify receptors. However, with regards to the marine physical processes impact assessment [APP-062], the figure showing the projects included in the cumulative impact assessment did not overlay designated site boundaries (plus buffer) or other important areas/features for protected species/habitats or marine processes receptors.</p>
Q1 BE 2.8	NE	<p>Secondary Scour</p> <p>The Applicant has highlighted the relative lack of evidence (numerical, empirical and post monitoring studies) concerning secondary scour formation.</p> <ul style="list-style-type: none"> • Is NE satisfied with the Applicant's justification of evidence the Applicant has used? [PD1-071 NE Ref B31] • If not, what evidence would NE like to see the Applicant use? 	<p>Q1 BE 2.8 Natural England advises that whilst we welcome the further evidence provided by the Applicant, we are not currently satisfied that secondary scour and the need for further scour prevention is appropriately assessed.</p> <p>Natural England acknowledges the relative lack of evidence regarding secondary scour formation and</p>

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			<p>prediction. We also welcome the rationale provided by the Applicant for the use of Hornsea One as a suitable analogue with regards to potential secondary scour effects. The Applicant reports the relatively minor changes in bathymetry around foundations that may indicate secondary scour processes. However, it is unclear whether the degree of seabed mobility across the Hornsea One windfarm site is comparable to the areas of high seabed mobility at ODOW and in particular the turbine layout included in the ORBA Change Request should it be accepted by the ExA.</p>
CM Civil and Military Aviation and Communication			
Q1 CM 1.11	The Applicant Natural England	<p>Aviation and navigation lighting attracting birds</p> <p>Paragraph 2.8.240 of NPS EN-3 requires aviation lighting to be minimised or on demand to avoid attracting birds. In Chapter 16 of the ES (Table 16.1) [AS1-042], the Applicant seeks to address the policy and states that <i>“In accordance with ANO Article 223, lighting intensity will be reduced at and below the horizontal and further reduced when visibility in all directions from every WTG is more than 5km.”</i></p> <p>R27 (aviation lighting) of the dDCO [AS1-024] requires consultation with DIO Safeguarding and the Civil Aviation Authority.</p> <ul style="list-style-type: none"> • Can the Applicant elaborate on how the need for lighting to avoid attracting birds will be addressed at the detailed design stage and through the discharging of R27? • Does Natural England have any comments to make on this matter? Should it be identified as a consultee for aviation lighting under R27? 	<p>Q1 CM 1.11 Natural England note that lit structures have been scoped out of the assessment for offshore and intertidal ornithology and an argument made for why impacts are predicted to be negligible. We did not identify this as an issue in our Relevant Representations but can offer the following general comments to assist the Applicant and the ExA.</p> <p>It is not well understood what impacts lighting on offshore structures has on seabirds and migratory birds, with evidence suggesting birds being both attracted and deterred by lights. It is likely that those species with high levels of nocturnal activity (including Manx</p>

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			<p>shearwater and fulmar) are likely to have the greatest sensitivity to lighting. Studies also suggest that blue, green, and other “cool” colour temperature light may be more disruptive to seabirds than “warm’ yellow, or red lights. Potential mitigation methods could include avoiding non-mandatory lighting, reducing the level of illumination, adjusting the colour spectrum of lighting, or using deflectors, within the restrictions imposed by aviation safety requirements.</p> <p>We hope this assists the Applicant in providing further information to the ExA regarding how they propose to minimise impacts on seabirds.</p> <p>We do not consider there is a need for NE to be consulted under R27.</p>
FSE Fish and Shellfish Ecology			
Q1 FSE 1.6	The Applicant and NE	<p>Sandeel fishing ban</p> <p>A ban on sandeel fishing in the English and Scottish waters of the North Sea came into effect on 26 March 2024.</p> <p>To the Applicant:</p> <p>How has this ban been accounted for in your assessment of effects of the Proposed Development on sandeel populations?</p> <p>To the Applicant and NE:</p> <p>If it has not yet been accounted for in the Applicant’s assessment, what do you consider the longer-term effects of this sandeel fishing ban on sandeel populations in the area of the Proposed Development will be?</p>	<p>Q1 FSE 1.6 The sandeel populations are affected by a number of complex and inter-related pressures and therefore there is considerable uncertainty regarding the level of benefits to both sandeels and other receptors that might arise. Accordingly, there is no meaningful way of factoring the closure into the impact assessment and Natural England do not consider it appropriate to do so. There are currently no specific plans to monitor the longer-term effects on the sandeel</p>

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			populations following the closure, however, by reducing the fishing pressure on the sandeel populations in UK waters, the closure has the potential to increase the resilience of the sandeel populations.
HOE Habitats and Onshore Ecology, including Onshore Ornithology			
Q1 HOE 1.10	The Applicant Natural England East Lindsey District Council Boston Borough Council South Holland District Council	The Management of Hedgerows (England) Regulations 2024 The Hedgerow Regulations (1997) are referenced in Chapter 21 of the ES [APP-076] . The Management of Hedgerows (England) Regulations 2024 came into force in May 2024. Do they have any implications for the project and the assessment of effects contained in the ES?	Q1 HOE 1.10 Natural England do not comment on hedgerow management, this usually falls into the remit of the Local Planning Authority (LPA) (unless they are part of a feature / supporting feature of a designated species within a protected site). Therefore, Natural England does not have any further comments to make in response to this question.
Q1 HOE 1.14	The Applicant LCC East Lindsey District Council Boston Borough Council	Monitoring, aftercare and compliance audits Section 3.9 of the OLEMS [PD1-054] provides some information in relation to monitoring with a commitment to provide further detail in the Ecological Management Plan (EMP) and Landscape Management Plan (LMP). <ul style="list-style-type: none"> Do the local authorities have any specific comments to make in relation to proposals and the level of information provided in outline? For the Applicant: <ul style="list-style-type: none"> Please provide further details of monitoring likely to be included in the EMP and LMP, including frequencies and Key Performance Indicators. 	Q1 HOE 1.14 Natural England highlights that while we acknowledge that this question is not directed to us, any monitoring relating to protected species, habitats and SPA functionally linked land should be agreed by the LPA in consultation with the relevant SNCB i.e. Natural England. Also, any commitments to undertake monitoring and appropriate preconstruction consultations should be secured during the consenting phase in the OLEM, EMP and DCO.

ExQ1	Question to:	Question:	Natural England Response
	South Holland District Council	<ul style="list-style-type: none"> • Provide further details on the proposals in the OLEMS (paragraph 79) to appoint an “<i>appropriate external body</i>” with the specific task of undertaking compliance audits. • Can the Applicant clarify the proposed future level of engagement with Lincolnshire County Council, the relevant Local Planning Authorities or any other stakeholders in relation to monitoring and compliance? • Should the OLEMS commit to monitoring at the OnSS for the duration of the operational period rather than for a minimum of 30 years? If not, why not? <p>Please provide further justification for the aftercare period for reinstated habitats of up to five years.</p>	
HRA Habitats Regulations Assessment (HRA)			
1 HRA General Questions			
Q1 HRA 1.1	Natural England (NE)	<p>Assessment of effects of highly pathogenic avian influenza</p> <p>Further to your RR [RR-045] and your Deadline 1 (D1) submission [REP1-061] set out the assessment methodology measures you would wish the Applicant to undertake in order to give consideration to the effects of highly pathogenic avian influenza within the HRA process.</p>	<p>Q1 HRA 1.1 As it stands, the Applicant has discussed the recent outbreaks of Highly Pathogenic Avian Influenza (HPAI) within the Environmental Statement Offshore and Intertidal Ornithology Chapter [AS1-041] under Section 12.4.4 Future Baseline, with a general statement that “<i>the impact assessment will be carried out in a context of declining baseline population for a number of species</i>”. Nonetheless, the Applicant has not set out how this has been done for individual species and colonies within the Report to Inform Appropriate Assessment [AS1-096] nor in the documents submitted on 19 September 2024 with the proposed changes regarding the Offshore Restricted Build Area (ORBA).</p>

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			<p>The recent outbreaks of HPAI, and the potential for further outbreaks in the future, accentuate the continued need for a risk-based approach to impact assessment. Natural England advise it is necessary to consider HPAI when carrying out the integrity judgements for each species and SPA combination during the HRA process. This should take into account the likely degree of impact on individual species at individual colonies and include consideration of apparent changes not only in abundance but also productivity and survival. An assessment of the impacts of the recent HPAI outbreak on seabird populations since the Seabirds Count census (Tremlett et al. 2024) provides a useful reference when considering changes (in terms of abundance) post-HPAI for individual species and SPAs within the context of pre-existing population trends i.e. whether species were previously increasing, declining or stable.</p> <p>As stated within our Deadline 1 response [REP1-061], and as caveated by the authors in Tremlett et al. 2024, increases in abundance/population size may be influenced by losses of breeding adults being buffered somewhat by the recruitment of previous non-breeders into the breeding population, and that this in turn can have knock-on effects on productivity in subsequent years due to large-scale recruitment of</p>

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			<p>inexperienced individuals into the breeding population. Thus, trends in population size should be considered alongside trends in productivity and survival, and productivity data from colonies as well as the Retrapping for Adult Survival (RAS) scheme should also inform judgements of species and colony trends following the outbreak of HPAI.</p> <p>Natural England acknowledges that this remains a qualitative approach to the consideration of potential impacts from HPAI but note that ongoing work looking at developing and refining the Population Viability Assessment (PVA) tool may allow for more quantitative consideration of the impacts from catastrophic events such as HPAI in the future.</p> <p>Tremlett C. J, Morley N and Wilson L. J (2024). UK seabird colony counts in 2023 following the 2021-22 outbreak of Highly Pathogenic Avian Influenza. RSPB Research Report 76. RSPB Centre for Conservation Science, RSPB, The Lodge, Sandy, Bedfordshire, SG19 2DL</p>
Q1 HRA 1.5	NE	<p>Annex I Sandbanks Worse Case Scenario NE is not in agreement with the Applicant on the presented Worse Case Scenario (WCS) of lasting habitat loss/change of Annex I Sandbanks from</p>	<p>Q1 HRA 1.5 In order that a meaningful assessment can be made, Natural England also requires the Applicant to provide a transparent justification for the WCS quantification of habitat loss within</p>

ExQ1	Question to:	Question:	Natural England Response
		<p>the placement of cable protection within Inner Dowsing Race Bank and North Ridge (IDRBNR) Special Area of Conservation (SAC).</p> <ul style="list-style-type: none"> • Please explain why you deem the WCS not to have been assessed? • What does NE deem to be the WCS? • What would NE request of the Applicant to address these concerns? 	<p>IDRBNR SAC, drawing upon previous experience and available information about the ground type along the ECC route. The WCS is also required to include the replenishment of cable protection over the lifetime of the project noting that areas of additional cable protection will require a separate marine licence.</p> <p>Natural England notes that the Cable Burial Risk Assessment [APP-299] and Outline CSIP [APP-278] do not consider from an ecological perspective the dynamic nature of the sandbanks and the ability for the cable to be buried to an optimum depth and remain buried. With limited reference to site specific geophysical and geotechnical investigations to support this. Therefore, it remains unclear to Natural England if a realistic worst-case scenario has been presented. For example: existing cables within the Race Bank sandbank within IDRBNR SAC have become exposed post installation and the structural integrity of those cables is at risk without further external cable protection.</p> <p>Whilst the Applicant has stated that they are committed to using cable protection which is removable and highlight evidence to support the successful removal of <u>some types</u> of cable; the use of only removable types of cable</p>

ExQ1	Question to:	Question:	Natural England Response
			<p>protection is not secured, with all types of cable protection including rock protection (currently not removable without impacting interest feature) remaining within the Rochdale envelope.</p> <p>Without further assessment and securing mitigation measures Natural England is unable to advise with certainty that the impacts wouldn't exceed 5,760m2 of permanent habitat loss.</p>
Q1 HRA 1.6	NE	<p>Further analysis in relation to Sabellaria Spinulosa</p> <p>NE [RR-045] has concerns with the sufficiency of the data in order to draw conclusions, with any confidence, as to the presence, extent and quality of Annex I biogenic reef (Sabellaria Spinulosa). The ExA notes that the Applicant has undertaken an independent re-analysis of the survey data to re-evaluate the potential for Annex I reef [PD1-095].</p> <ul style="list-style-type: none"> • Does the Applicant's independent re-analysis satisfy NE's concerns with the sufficiency of the data in order to draw conclusions as to the presence, extent and quality of Annex I biogenic reef? • If not, why not? Please set out the specific information that would still be required. 	<p>Q1 HRA 1.6 Please see Natural England's s response to Deadline 1 [REP1-059] - The Applicants clarifications and commitments have not been incorporated into the relevant plans and documents and are therefore not sufficient in themselves.</p> <p>Natural England also highlights that we will be providing further advice at Deadline 3 on impacts on suitable habitat for Annex I reef.</p>
Q1 HRA 1.7	NE	<p>Nearshore (depth of closure) area cable protection</p> <p>Noting the Applicant's response to NE in relation to securing the avoidance of cable protection in shallow nearshore areas, citing the conditions of the deemed marine licence [PD1-071] NE Ref NE2):</p> <ul style="list-style-type: none"> • Are NE content with this as a measure? • If not, what would NE propose? 	<p>Q1 HRA 1.7 The Applicant has stated ([PD1-071] NE Ref B6, B11 and B29) that cable protection measures within the inner depth of closure (calculated as approximately 7.1m) are unlikely to exceed 0.35m in height (with the exception of cable crossings), but this is not supported by any detailed engineering design work. In addition to</p>

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			<p>this, the Applicant also states that in the draft Development Consent Order (DCO), cable protection deployment is limited to no greater than 5% of the water depth. But we note that these two measures are not the same. We would therefore request that the Applicant clarifies which of these mitigation measures is proposed and whether any cable crossings are anticipated within the nearshore.</p> <p>We also note that within the Applicant's response they indicate that anchor strike is unlikely. If this is the case, then it would be good to understand the rational for protection within the nearshore, especially when neighbouring projects didn't automatically apply for cable protection here.</p> <p>We also highlight that we are not aware of any other project installing a berm with a height less than 1m in English Waters. Therefore, we have no reference to determine if there are any potential implications for other receptors from the proposals. We advise that the Applicant should provide evidence that within the current design parameters, the structural integrity of the berm can be maintained throughout the project lifetime. And that secondary scouring of any berms will not occur at this location.</p>

ExQ1	Question to:	Question:	Natural England Response
2 Derogation Case and Compensation Measures			
Q1 HRA 2.2	The Applicant and NE	<p>DEFRA Best Practice Guidance on developing compensatory measures for Marine Protected Areas</p> <p>Paragraph 3 of the Without Prejudice Guillemot Compensation Strategy [APP-252] has made reference to DEFRA guidance on developing compensatory measures in relation to Marine Protected Areas. In Footnote 1 the Applicant notes that whilst it is aware of this guidance, it is out for consultation and the project delivery programme did not allow for full inclusion of the recommendations.</p> <ul style="list-style-type: none"> • Has the final version of this guidance now been published and, if so, has it altered from the consultation version? Please provide a copy of any final, published Guidance into the Examination. • If a final version has not yet been published, do any of the recommendations in the draft Guidance have implications for the Proposed Development that have not already been considered? 	<p>Q1 HRA 2.2 In February 2024, Defra carried out a consultation on specific principles relating to marine compensation (Consultation on policies to inform updated guidance for Marine Protected Area assessments - Defra - Citizen Space), following on from the July 2021 consultation on their marine compensation best practice guidance (Best practice guidance for developing compensatory measures in relation to Marine Protected Areas).</p> <p>We do not consider that the recommendations in the draft guidance or the principles hold additional implications for the proposed development beyond those considered in our Relevant Representations.</p>
Q1 HRA 2.3	The Applicant, NE and RSPB	<p>Level of information on compensation measures</p> <p>The RSPB in its D1 submission [REP1-047] has raised a number of overarching concerns about the Applicant's approach to the formulation of its proposed compensation measures and the amount of information that has been provided for kittiwake, guillemot and razorbill regarding, but not limited to, detailed design, timescales, lead-in times and connectivity to the UK National Site Network for guillemot and razorbill. In its latest Risk and Issues Log [REP1-064] NE has also maintained its view that the information provided by the Applicant on the proposed compensation measures, particularly for razorbill and guillemot, is either lacking or not fully explained for a number of issues. In fact, despite the Applicant's response in [PD1-071], there has been no change in the updated Risk and Issues log [REP1-064] from any of NE's previous positions on the offshore ornithological compensation measures.</p>	<p>Q1 HRA 2.3</p> <p>Natural England makes the following observations:</p> <ul style="list-style-type: none"> • In general terms there has been an increasing level of detail provided into the Examinations of relevant projects regarding the nature and effectiveness of the proposed compensatory measures following the Hornsea 3 OWF pre-determination consultation and decision in 2020, and an increased level of

ExQ1	Question to:	Question:	Natural England Response
		<p>To the Applicant:</p> <p>The ExA is aware that you have responded to both NE's and the RSPB's Relevant Representations in [PD1-071]. Is it your intention to provide any further responses regarding the detailed additional information on ornithological compensation measures requested by either NE in [REP1-064] or the RSPB in [REP1-047]. If so, then please state when this information is likely to be submitted. If not, then justify your position on this matter.</p> <p>To NE and RSPB:</p> <p>Recent Orders have been made (for example for Hornsea Four and the Sheringham Shoal and Dudgeon Extension Projects) for offshore wind farm projects that contained proposed ornithological compensation measures. Comment on the level of information regarding compensation measures that was submitted to accompany these other projects, and which has been found to be acceptable by the Secretary of State, in comparison with that which has been submitted by the Applicant for this Proposed Development.</p>	<p>refinement in terms of the number and nature of options.</p> <ul style="list-style-type: none"> • We consider the kittiwake compensatory measures to present an equivalent or greater level of detail than that provided by previous developments. However, we consider that the auk compensatory measures are in a comparatively undeveloped state. For the Channel Islands predator fence, this relates less to the aspects of securing the relevant permissions, and more regarding the fundamental rationale for the measure: the key areas where more information is needed are i) reasons for decline/absence of large auks in that locality, particularly guillemot; ii) likely effectiveness of measure, particularly given predators such as rats will be able to access the fenced area via intertidal habitat; iii) more detailed analysis of what nesting habitat might be freed up should the measure be effective. Regarding the secondary measure recreational disturbance management, the key issues are i) a lack of site-based survey information regarding potential issues at those colonies and therefore the extent to which they might

ExQ1	Question to:	Question:	Natural England Response
			<p>provide opportunities for compensatory measures, including the likely scale of those benefits and ii) information regarding landowner and stakeholder engagement to demonstrate that interventions are feasible.</p> <ul style="list-style-type: none"> As noted in our Relevant Representations, the Implementation and Monitoring Plans (IMPs) submitted were essentially 'skeleton' documents. Whilst the amount of detail provided into Examination has varied, up until Round 4 there has generally been an effort to populate the IMPs as far as is possible. However, Offshore Wind Farm (OWF) submissions in 2024 have generally taken the 'skeleton' approach. We highlight the importance of the IMPs and the need to present well-populated versions during the Examination, recognising that the process of finalising the IMPs is an iterative one and therefore will continue beyond any consent.
Q1 HRA 2.4	The Applicant, NE and RSPB	<p>Non-material change to the Hornsea Four Order</p> <p>On 17 July 2024 the Secretary of State accepted a non-material change request to the Hornsea Four Offshore Wind Farm Development Consent Order (SI 2023/800). This change sought to amend the Order to reduce the length of time the proposed artificial nesting structure for kittiwake</p>	Q1 HRA 2.4 The Hornsea 4 OWF non-material change submitted detailed information on the implications of delaying construction of the Artificial Nesting Structure (ANS) for the ability of

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		<p>needs to be in place before operation of the project from four full breeding seasons to two full breeding seasons.</p> <p>Comment on the implications of this recent decision in regard to the lead-in times for the Proposed Development.</p>	<p>the compensatory measures to address the predicted impacts of Hornsea 4 OWF on the Flamborough & Filey Coast (FFC) SPA kittiwake population. This included presentation of colony growth curves that demonstrated that the increased risk of 'mortality debt' that would occur as a result of starting later was not likely to result in that debt not being paid off at an appropriate time. Accordingly, Natural England was content that there was sufficient ecological evidence for the non-material change to be approved.</p>
Q1 HRA 2.6	The Applicant and NE	<p>Use of the Plémont Seabird Reserve by other projects for compensation</p> <p>Are any of the other 'live' offshore wind farm applications such as Five Estuaries, North Falls or Dogger Bank South proposing predator control at the Plémont Seabird Reserve East as a potential compensation measure for their impacts on auk species? If so, then how can the required quantum and effectiveness of the proposed compensation be allocated and assessed between more than one project?</p>	<p>Q1 HRA 2.6 Natural England are not aware of any other 'live' offshore wind applications proposing predator control at the Plémont Seabird Reserve East as compensation.</p>
Q1 HRA 2.14	NE The Applicant	<p>'Without Prejudice' Benthic Compensation</p> <p>NE states that it cannot support the proposed 'Without Prejudice' Compensation Measures Alternative measures for Annex I sandbanks and Reef Creation of Annex I reef as compensation for Annex I Sandbank Habitat Anthropogenic Pressure Removal: Marine Debris and Awareness Campaign [PD1-071 NE Ref NE6].</p> <ul style="list-style-type: none"> • What would NE want to see from the Applicant to be confident that the measure could offset the impacts on Annex I sandbanks and reef creation of Annex I reef? • How has the Applicant progressed the development of other various 'without prejudice' compensation measures? The ExA requests that 	<p>Q1 HRA 2.14 Natural England highlights that the progression of strategic compensation has come about due to the extreme difficulties in delivering project specific benthic compensation. In this context and at this stage, we do not believe that there is merit in progressing and/or placing reliance upon project specific benthic compensation measures.</p>

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		<p>the Applicant set out progress on each measure in a tabulated form which is subsequently updated at each deadline.</p>	<p>However, for clarity Natural England draws the ExA attention to the advice we provided on the Norfolk Vanguard OWF proposed debris removal campaign. This letter provides links to further advice which supports this measure being excluded from project level compensation and DEFRA's library of measures for strategic compensation.</p>
LU Land Use, Geology and Ground Conditions			
Q1 LU 1.1	<p>Natural England (NE)</p> <p>East Lindsey District Council</p> <p>Boston Borough Council</p> <p>South Holland District Council</p>	<p>Written Ministerial Statement (WMS) - Solar and protecting our Food Security and Best and Most Versatile (BMV) Land</p> <p>Lincolnshire County Council's (LCC) Local Impact Report (LIR) [REP1-053] and Written Representation [REP1-043] state that the WMS made on 15 May 2024 (UIN HCWS466) is a relevant policy consideration for the Proposed Development. The Applicant's response to the same point in LCC's Relevant Representation [RR-004] is that the WMS "<i>is in reference to the impact that solar developments have upon BMV land, rather than renewable energy developments in general</i>" [PD1-071].</p> <ul style="list-style-type: none"> • Is the WMS a relevant consideration for the Proposed Development? • If so, explain why and what implications does it have? 	<p>Q1 LU 1.1 Natural England echo the principle of 'meeting standards' with regards to Agricultural Land Classification (ALC) surveys. This is also a requirement of Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (para 4.1). However, Natural England do not consider the Written Ministerial Statement (WMS) relevant to Offshore Wind Nationally Significant Infrastructure Projects (NSIPs).</p>
Q1 LU 1.7	<p>The Applicant</p> <p>NE</p>	<p>ALC and soil surveys</p> <p>NE Written Representation [REP1-063] maintains its position that the Applicant should present 'site specific', both detailed and semi detailed ALC surveys to inform the decision maker in their application of National Policy Statement (NPS) EN-3. The Applicant deems this to be unnecessary at it considers that it has assessed the worst-case scenario</p>	<p>Q1 LU 1.7 There have been post 88 surveys within close proximity, but these cannot be used to validate the provisional ALC mapping. To reiterate Natural England's Relevant Representations ([RR-045] NE Ref H70), the ES should quantify the areas</p>

ExQ1	Question to:	Question:	Natural England Response
	<p>Lincolnshire County Council (LCC)</p> <p>East Lindsey District Council</p> <p>Boston Borough Council</p> <p>South Holland District Council</p>	<p>in the Environmental Statement (ES) by classifying all Grade 3 land as Grade 3a, therefore falling under the definition of BMV land.</p> <ul style="list-style-type: none"> • Explain with reasoning whether it is possible, in the Applicant’s view, that land assumed to be Grade 2, 3 or 4 in the ES could be graded higher, when subject to survey? If not, why not? • Have any ALC surveys been carried out in the vicinity that could be used to consider the accuracy of NE’s Provisional ALC mapping? If so, provide further details and outline any implications. • Can the Applicant point to any examples of similar Nationally Significant Infrastructure Projects being approved by the Secretary of State (SoS) in the absence of ALC surveys? If so, please outline the approach taken and the policy context at the time of approval. <p>Can LCC and the Local Planning Authorities confirm if they consider it necessary for ALC and soil surveys to be carried out prior to the application being decided? Please provide reasoning with reference to policy and any parallels with other projects that the local authorities are aware of.</p>	<p>of land according to Grades 1 to 5 of the ALC, including differentiating between Grades 3a and 3b. Natural England recognise the Applicant’s acknowledgement of the deficiencies within the provisional dataset. However, whilst provisional mapping provides an indication of the ALC grade, and thus the potential impact on the best and most versatile (BMV) agricultural land, it does not provide the soil details required to inform soil management which would feed into the Soil Management Plan. There is a risk of soil damage, ALC degradation and long term or permanent loss of BMV from cable installation. Soil will need to be handled according to best practice and reinstated to a high standard to reduce the impacts. The results from a detailed ALC survey would provide soils data to inform a soil management plan for the whole site regardless of whether the use is permanent or temporary in nature.</p>
Q1 LU 1.8	NE	<p>ALC assessment at a national scale</p> <p>Is Natural England aware of any other projects that have provided an assessment of cumulative impacts in terms of ALC at a national scale as its RR [RR-045] requests?</p>	<p>Q1 LU 1.8 Rampion 2 Environmental Statement has considered cumulative impact regionally and nationally, please refer to document for further details(Rampion 2 ES Chapter 20 Soils and agriculture).</p> <p>The National Policy Statement for Renewable Energy Infrastructure (EN-3) states in paragraph 2.8.72 “Assessment</p>

ExQ1	Question to:	Question:	Natural England Response
			<i>of environmental effects of transmission infrastructure and any proposed offshore or onshore substations should assess effects both alone and cumulatively with other existing and proposed infrastructure”.</i>
Q1 LU 1.9	The Applicant NE	<p>Peat identification and management</p> <p>NE highlight a need for the Applicant to identify deep peat and peaty soils and to produce a Peat Management Plan with a strong recommendation that it should remain in situ [RR-045 and REP1-063]. It states that, according to its data, there are records of deep peat within the area. The Applicant’s response is that a review of publicly available data confirmed that no peat was present within the Order limits as shown on Figure 23.2 [AS1-058]. However, the ExA notes that Chapter 23 of the ES makes reference to “peat” or “peaty surface” in the description of the existing environment in ECC segments 1, 6 and 7 [APP-078].</p> <p>To NE :</p> <ul style="list-style-type: none"> • Please provide any available records of peat in the area <p>To the Applicant:</p> <ul style="list-style-type: none"> • Provide further detail to clarify the position that there is no peat present given the references in the Chapter 23 of the ES? • Provide further details of how peat would be managed, if identified in future surveys? Please identify amendments to the outline Soil Management Plan (SMP) [PD1-040] as appropriate having regard to Natural England’s advice that peat should remain in situ 	Q1 LU 1.9 Natural England advises that a digital dataset on lowland peat is available via LandIS .
Q1 LU 1.10	The Applicant Interested Parties	<p>Dust contamination</p> <p>Concerns regarding the risk of dust contamination of crops during construction are raised by a number of landowners and agricultural businesses in their RRs. The Local Impact Report submitted by East Lindsey District Council, Boston Borough Council and South Holland District Council [REP1-052] also identifies the need for the effective management of dust and communication with landowners. The ExA notes</p>	Q1 LU 1.10 As this question is aimed specifically at dust impacts to crops, rather than sensitive environmental features of designated sites, Natural England does not have any specific comments to make. However, it does complement our request for more

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		<p>that the local authorities deem the mitigation measures listed in Table 2.1 of the outline Air Quality Management Plan (AQMP) [APP-270] to be robust. The Applicant's response to RRs [PD1-071] identifies mitigation specified in the outline Construction Traffic Management Plan [APP-289], outline SMP [PD1-040] and the outline CoCP [PD1-038]. The latter refers to the implementation of a "<i>Dust Management Plan</i>" but this document is not identified in the Schedule of Mitigation [PD1-058] or in R18 of the dDCO [AS1-024].</p> <ul style="list-style-type: none"> • Does the Applicant intend to produce a "Dust Management Plan"? If so, how would this plan be secured? Should it be identified in the Schedule of Mitigation and R18 of the dDCO? Will an outline Dust Management Plan be submitted into the Examination? If not, why not? • The ExA notes that the Applicant met with the Land Interest Group (LIG) on 4 September to discuss concerns and the outline CoCP. Can Interested Parties please comment on the mitigation proposed by the Applicant and specify any additional measures that they consider to be necessary. Is the Applicant committed to implementing all of the measures identified in Table 2.1 of the outline AQMP which are identified as "highly recommended"? If so, should this be made clearer in the outline AQMP? • Can the Applicant provide feedback on the approach and conclusions of the Technical Report: Dust Deposition Modelling submitted by TH Clements & Son Ltd with its Written Representation [REP1-050]? Does this report have any implications beyond the study area of the ES or for other plots not included in the TH Clements & Son Ltd assessment? 	<p>sensitive thresholds for assessing impacts to designated ecological features.</p>
Q1 LU 1.11	<p>The Applicant</p> <p>Interested Parties</p>	<p>Stone contamination</p> <p>The ExA notes the concerns raised by multiple Interested Parties regarding the potential for stone contamination of Grade 1 soils and associated implications for agriculture. The Applicant responds [PD1-071] by referring to a commitment in the outline SMP to conduct post-construction soil surveys. If stones are present on land previously stone</p>	<p>Q1 LU 1.11 Natural England advises that where topsoil is proposed to be stripped, typically for construction compounds; access tracks and laying cabling, the soil handling methodology (movement, storage & replacement)</p>

ExQ1	Question to:	Question:	Natural England Response
		<p>free, “an aftercare programme (as outlined in section 5.11 of the oSMP) will be agreed upon, and remediation works will be undertaken.”. However, the outline SMP [PD1-040] does not appear to include a commitment to ensure that stone free land remains so after construction.</p> <ul style="list-style-type: none"> • Should the outline SMP include a specific commitment to ensure that land identified as stone free in pre-construction surveys is returned this condition post-construction? • Can the Applicant elaborate on the reasons why it cannot commit to aluminium trackway being the primary method for haul roads? • The Written Representation from TH Clements & Son Ltd [REP1-050] identifies issues apparent following the completion of other projects in the area, including Triton Knoll and Viking Link. Can the Applicant comment on the effectiveness of mitigation to avoid residual stone contamination on these projects and whether any lessons can be learned from them? 	<p>and soil protection proposals are reviewed to ensure that appropriate mitigation is in place to allow for the restoration of the land to the baseline ALC Grade.</p> <p>The restored soil profile should be determined by the detailed ALC survey that will identify stone content as part of the assigned grade methodology.</p>
Q1 LU 1.14	The Applicant NE	<p>Soil handling</p> <ul style="list-style-type: none"> • Should the outline SMP [PD1-040] include explicit reference to the need to follow the Institute of Quarrying’s Good Practice for Handling Soils in Mineral Working in relation to soil handling? If not, why not? • What are Natural England’s comments on the Applicant’s suggestion in its response to its Relevant Representation [PD1-071] that the winter working agreement (as per table 22.7 of Chapter 22 Onshore Ornithology [APP-077] would be beneficial to soil handling? Should this be identified in the outline SMP? 	<p>Q1 LU 1.14 Natural England advises that as a requirement of the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, soils should be handled in a dry and friable state. The institute of Quarrying guidance supersedes the MAFF, 2000 Good practise guide for handling soils and should be referred to when contractors are assessing whether a soil is dry enough to handle/stockpile.</p> <p>Please refer to previous advice given at Relevant Representations [RR-045] which included Natural England’s assessment of document 8.1.3 Outline Soil Management Plan [APP-271].</p>
Q1 LU 1.23	NE	Scoping and pollution management	Q1 LU 1.23

ExQ1	Question to:	Question:	Natural England Response
		<p>Can NE comment on the Applicant's response to its Relevant Representations [PD1-071] regarding the scoping of Chapter 23 of the ES (NE reference H19) and pollution management (NE reference H22)?</p>	<p>Chapter 23 of the ES (NE ref H19) Natural England agrees with the Applicant's response and have no further concerns. The activities associated with the maintenance stage of the project are unlikely to cause impacts on the designated sites with geological features. The activities associated with the decommissioning and construction stages are accounted for.</p> <p>Pollution Management (NE ref H22) Natural England agrees with the Applicant's response based on the measures that are included in the Outline Code of Construction Practise (CoCP), secured by DCO Requirement 18. We have no further concerns.</p>
MM Marine Mammals			
Q1 MM 1.5	NE and the MMO	<p>Interim Population Consequences of Disturbance Modelling Report As part of its 19 September 2024 submissions the Applicant submitted an Interim Population Consequences of Disturbance Modelling Report [PD1-094]. The modelling does not assume density dependence and the Applicant contends that the results are considered to be highly conservative. Do you agree with the Applicant's analysis and, if not, please provide a justification for your response?</p>	<p>Q1 MM 1.5 The Interim Population Consequences of Disturbance (iPCoD) modelling is a tool to link disturbance to changes in health, and consequently population level impacts; however, many of the inputs into this model are based on expert elicitation, as empirical evidence is not available. This results in a model based on assumption. iPCoD is the best available option for assessing potential population level impacts of a project, but since much is based on assumption, iPCoD models should be interpreted with care. Natural England</p>

ExQ1	Question to:	Question:	Natural England Response
			<p>identifies iPCoD as a useful tool which should be used with other methods of assessing disturbance (for example, Effective Deterrent Range (EDR) and dose response. Natural England does not consider iPCoD to be highly conservative, but it is a useful tool to be used to indicate if the project has potential to cause a decline in population size relative to an unimpacted population. If iPCoD modelling results show any decline in population size, this could indicate a significant impact, and therefore should be assessed in more detail, reviewing the iPCoD results with other methods to assess disturbance, such as EDR and dose response.</p> <p>Regarding the iPCoD modelling for this project, in the results for minke whale, harbour seal (stable and declining populations) and grey seal, the impacted and unimpacted values for disturbance from piling are the same. A counterfactual of population size (the ratio in population size between impacted and unimpacted populations) of 1 indicates an issue with variability and the model inputs and outputs need to be reviewed. To have a more informed understanding of the potential for impact, the median population size and the 95% Confidence Intervals which indicate the uncertainty, should also be presented for all species. Owing to</p>

ExQ1	Question to:	Question:	Natural England Response
			<p>uncertainty in the model outputs, Natural England will assess the significance of each decline on a case-by-case basis. Here, further discussions on the impact of disturbance on harbour porpoise and bottlenose dolphin, and other species that show a decline once the inputs and outputs have been reviewed, are needed.</p>
OR Offshore and Intertidal Ornithology			
Q1 OR 1.2	Natural England (NE) and RSPB	<p>Outstanding areas of disagreement</p> <p>Table 1.1 of Response to the Rule 17 Letter dated 3 July 2024, Doc Ref 14.2 [AS-013] and The Applicant's Responses to Relevant Representations, Doc Ref 15.3 [PD1-071] present a breakdown of what the Applicant considers to be the key areas of disagreement on assessment methodology for offshore and intertidal ornithology. Do you consider that the Applicant has adequately captured in these documents all the outstanding issues and outstanding areas of disagreement over methodology or are there any other assessment methodology matters that have been omitted in these two documents?</p>	<p>Q1 OR 1.2 Please refer to Appendix K1 for Natural England's response regarding offshore ornithology. This sets out those outstanding issues that have yet to be addressed, and those that have been addressed within the ORBA assessment.</p>
Q1 OR 1.4	The Applicant, NE and the RSPB	<p>Closure of the English and Scottish North Sea waters for sandeel fishing</p> <p>Paragraph 43 of the Kittiwake Compensation Plan [APP-250] refers to the permanent closure of the sandeel fishing industry in English and Scottish waters from 1st April 2024. What impact is this likely to have on sandeel populations and consequentially prey availability for seabird species? When will the first monitoring results of sandeel populations become publicly available? Has this ban on sandeel fishing been factored into any of the Applicant's assessment methodology?</p>	<p>Q1 OR 1.4 By reducing the fishing pressure on the sandeel populations in UK waters, the closure has the potential to increase the resilience of the sandeel populations, which in turn has the potential to provide benefits for foraging seabirds. However, sandeel populations are affected by a number of complex and inter-related pressures and therefore there is considerable uncertainty regarding the level of benefits to both sandeels and seabirds</p>

ExQ1	Question to:	Question:	Natural England Response
			<p>that might arise. Accordingly, there is no meaningful way of factoring the closure into the seabird impact assessments.</p> <p>Currently there are no specific plans to monitor sandeel populations following the closure.</p>
OG Oil, Gas and Other Offshore Infrastructure			
Q1 OG 1.3	<p>The Applicant</p> <p>Diamond Transmission Partners RB Limited</p> <p>Lincs Wind Farm Limited</p> <p>Race Bank Wind Farm Limited</p> <p>TC Lincs OFTO Ltd</p>	<p>Impacts on other offshore infrastructure arising from the potential extension of Special Areas of Conservation (SACs)</p> <p>Concerns have been raised by Diamond Transmission Partners RB Limited [RR-017], Lincs Wind Farm Limited [RR-037], Race Bank Wind Farm Limited [RR-054] and TC Lincs OFTO Ltd [RR-066] regarding the possibility of impacts on the operation of other offshore infrastructure arising from the potential extension of the Inner Dowsing Race Bank and North Ridge SAC and/or the Haisborough, Hammond and Winterton SAC. The Applicant provided a response to these Relevant Representations on 19 September [PD1-071] noting that any proposals would be subject to consultation at a later date.</p> <p>The Applicant's Without Prejudice Benthic Compensation Evidence Base and Roadmap document [APP-248] provides outline details. Figures 3.5 and 3.6 identify the SAC extensions and other seabed users.</p> <ul style="list-style-type: none"> Can the Applicant confirm what the "Subsea power cable (active)" as identified in paragraph 80 and on Figure 3.6 of the benthic compensation document connects to and the body that is responsible for it? Figure 3.6 also appears to show a second active power cable that is not listed in paragraph 80. Please confirm the status of this cable, what it connects to and the body responsible for it. 	<p>Q1 OG 1.3 Natural England advises the following in relation to this matter -</p> <p>The extension and/or designation of MPAs is a DEFRA led project and all queries on strategic compensation should be directed to Mike Rowe, Director of Marine and Fisheries, DEFRA, email address Mike.Rowe@defra.gov.uk.</p> <p>NE will be working closely with JNCC to support DEFRA on the MPA designation project by considering the evidential strength and ecological merits of potential areas. At this stage it is too early to say where the new or extended MPAs will be, nor the amount or type of habitat which will be designated. However, DEFRA will need to investigate a number of options to ensure the right types of habitat can be designated.</p> <p>Once areas have been identified, DEFRA will be leading on the formal</p>

ExQ1	Question to:	Question:	Natural England Response
		<ul style="list-style-type: none"> Interested Parties, please elaborate on concerns raised in Relevant Representations and outline what action would be necessary to address them by the Applicant. 	<p>consultation with stakeholders (with support from the SNCBs where required). Defra led stakeholder meetings, and the Defra consultation, will be the place where any stakeholder concerns can and should be raised.</p> <p>We hope this is useful background information for the Examining Authority and IPs.</p>
SV Seascape and Visual			
Q1 SV 1.1	The Applicant Natural England (NE) Local Authorities	<p>Duty to further the purposes of National Landscapes</p> <p>Paragraph 5.10.7 of National Policy Statement (NPS) EN-1 states that <i>“For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.”</i> Paragraph 5.10.8 of NPS EN-1 goes on to clarify that the <i>“duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them.”</i></p> <ul style="list-style-type: none"> Can the Applicant explain how it has considered this duty? Do NE and the Local Authorities have any comments to make in relation to the duty and the Proposed Development? Is the duty applicable? If so, has it been met? 	<p>Q1 SV 1.1 As noted in our Relevant Representations [RR-045], Natural England’s concerns regarding potential seascape impacts on the Lincolnshire Wolds National Landscape were addressed at the pre-application phase. Therefore, as the proposal will not be having significant impacts on the setting of the designated landscape, we do not consider it a project <i>‘outside the boundaries of these areas which may have impacts within them.’</i> Accordingly, we do not see how the Levelling Up and Regeneration Act (‘LURA’) duty applies to the seascape impacts of this particular project.</p>
Q1 SV 1.2	The Applicant NE Local Authorities	<p>Proposed Lincolnshire Heritage Coast</p> <p>Table 17.2 of Environmental Statement (ES) Chapter 17 [AS1-044] identifies that <i>“Natural England and the local planning authority have ambitions for a Lincolnshire Heritage Coast”</i>. However, as the proposal was considered at the time to be at an early stage with little detail available, it is not assessed in the ES.</p>	<p>Q1 SV 1.2 Natural England’s current understanding is that there is no further progress regarding the ambition for a Lincolnshire Heritage Coast. However, as this is a partnership initiative, we would like to seek further updates and</p>

ExQ1	Question to:	Question:	Natural England Response
		<ul style="list-style-type: none"> • What is the current status of the proposed Heritage Coast? If available, what are timescales for its designation? • Is any further consideration of the proposed Heritage Coast required in relation to the Proposed Development? 	will aim to report back on this matter at Deadline 3.
Q1 SV 1.9	The Applicant NE Local Authorities	<p>Offshore design considerations</p> <p>A Design Approach Document [APP-292] and Design Principles Statement [APP-293] are provided by the Applicant to inform the project at the detailed design stage. However, the documents focus on design matters at the proposed onshore substation.</p> <ul style="list-style-type: none"> • The Applicant is invited to explain why offshore elements of the project, including the ORCPs, are not considered in the Design Approach Document and Design Principles Statement. • Can the Applicant, Natural England and the Local Authorities provide comments on whether there would be any merit in the consideration of offshore infrastructure, particularly the ORCPs, in these documents to facilitate good design? 	Q1 SV 1.9 Natural England is supportive of good design principles being applied to offshore infrastructure, particularly where they will be highly visible from the coast. However, given the low risk of impacts to designated landscapes, in the context of Natural England’s statutory remit the design of the Offshore Reactive Compensation Platform (ORCP) is not of particular concern, other than the extent to which the design might have a role in mitigating the potential displacement effects of the ORCP within the Greater Wash SPA e.g. through reducing its height. This in turn could provide benefits with respect to views out to sea.
Q1 SV 1.10	NE Local Authorities	<p>Seascape viewpoints</p> <p>Table 17.2 of Chapter 17 of the ES [AS1-044] states that NE suggested Gibraltar Point as a suggested additional viewpoint. The Applicant responds by stating that this was considered but “discounted due to the distance to the elements of the Project and the range of other viewpoints included in the SLVIA”.</p> <ul style="list-style-type: none"> • Is Natural England satisfied with the Applicant’s response? If not, why not? 	Q1 SV 1.10 Natural England considers that the viewpoints in the SLVIA were sufficient to provide our advice regarding the impacts of the proposal on designated landscapes.

ExQ1	Question to:	Question:	Natural England Response
		<ul style="list-style-type: none">• Do Natural England and the Local Authorities have any comments to make on the selection of viewpoints as identified in Table 17.6 of the ES?	