East Anglia ONE North Offshore Windfarm

Applicant's Comments on the Updated Report on Implications for European Sites

Applicant: East Anglia ONE North Limited
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Applicable to East Anglia ONE North

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Table of Contents

Glossary of Acronyms

AEoI	Adverse Effect on Integrity
APP	Application Document
AS	Additional Submission
CRM	Collision Risk Modelling
DCO	Development Consent Order
DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
EMP	Ecological Management Plan
ES	Environmental Statement
ESC	East Suffolk Council
FFC	Flamborough & Filey Coast
HRA	Habitats Regulation Assessment
IPMP	In-Principle Monitoring Plan
IPSIP	In-Principle Site Integrity Plan
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
NE	Natural England
OLEMS	Outline Landscape and Ecological Management Strategy
OTE	Outer Thames Estuary
OWF	Offshore Windfarm
PEIR	Preliminary Environmental Information Report
PTS	Permanent Threshold Shift / Permanent Auditory Injury
PVA	Population Viability Analysis
RSPB	Royal Society for the Protection of Birds
RTD	Red-Throated Diver
SAC	Special Area of Conservation
SIP	Site Integrity Plan
SNS	Southern North Sea
SPA	Special Protected Area
UXO	Unexploded Ordnance

Glossary of Terminology

Applicant	East Anglia TWO Limited / East Anglia ONE North Limited
Construction operation and maintenance platform	A fixed offshore structure required for construction, operation, and maintenance personnel and activities.
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
Generation Deemed Marine Licence (DML)	The deemed marine licence in respect of the generation assets set out within Schedule 13 of the draft DCO.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
Inter-array cables	Offshore cables which link the wind turbines to each other and the offshore electrical platforms, these cables will include fibre optic cables.
Jointing bay	Underground structures constructed at intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Link boxes	Underground chambers within the onshore cable route housing electrical earthing links.
Meteorological mast	An offshore structure which contains metrological instruments used for wind data acquisition.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.
Marking buoys	Buoys to delineate spatial features / restrictions within the offshore development area.

Monitoring buoys	Buoys to monitor *in situ* condition within the windfarm, for example wave and metocean conditions.
Natura 2000 site	A site forming part of the network of sites made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive.
Offshore cable corridor	This is the area which will contain the offshore export cables between offshore electrical platforms and landfall.
Offshore development area	The East Anglia TWO / East Anglia ONE North windfarm site and offshore cable corridor (up to Mean High Water Springs).
Offshore electrical infrastructure	The transmission assets required to export generated electricity to shore. This includes inter-array cables from the wind turbines to the offshore electrical platforms, offshore electrical platforms, platform link cables and export cables from the offshore electrical platforms to the landfall.
Offshore electrical platform	A fixed structure located within the windfarm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the offshore electrical platforms to the landfall. These cables will include fibre optic cables.
Offshore infrastructure	All of the offshore infrastructure including wind turbines, platforms, and cables.
Offshore platform	A collective term for the construction, operation and maintenance platform and the offshore electrical platforms.
Platform link cable	Electrical cable which links one or more offshore platforms. These cables will include fibre optic cables.
Safety zones	A marine area declared for the purposes of safety around a renewable energy installation or works / construction area under the Energy Act 2004.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.
Transmission DML	The deemed marine licence in respect of the transmission assets set out within Schedule 14 of the draft DCO.

1 Introduction

1. This document presents the Applicant's comments on the Updated Report on Implications for European Sites (RIES) (PD-051) for the East Anglia ONE North offshore windfarm project (the Project).

2. The Applicant has not reproduced all text and tables provided within PD-051. Where a response to specific text is deemed to be required this is provided in ***Table 1***. For all other text that has not been reproduced in ***Table 1***, the Applicant has no comment.

3. Where comments made by the Applicant within the ***Applicant's Comments on the Report on the Implications for European Sites*** [REP8-094] in respect of the original RIES published on 4 March 2021 [PD-033] are still valid these have been retained and highlighted.

Table 1 Applicant's Comments on the RIES

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
001	1 Introduction	Whole section	n/a	No comment
002	2.1 European Sites Considered	Whole section	n/a	No comment
003	2.2 HRA matters considered during examination	2.2.2 bullet points 2 and 4	Other significant points which have been discussed in the Examination include: • Collision Risk Modelling (CRM) (particularly in relation to the gannet and kittiwake features of the Flamborough and Filey Coast SPA and the lesser black-backed gull (LBBG) feature of Alde-Ore Estuary SPA and Ramsar) – choice of Band model and evidence supporting the Applicant's parameterisation of the model; • The scope of the screening assessment and clarification of discrepancies in the reporting of the screening exercise and the screening matrices submitted by the Applicant;	The following points were made on the original RIES and are still valid. The Applicant considers that the choice of Band Model is not a significant point. The use of Option 2 was agreed in consultation with Natural England (NE) and the RSPB through the Evidence Plan Process (see ***Appendix 12.1*** of ***Chapter 12 Offshore Ornithology*** (APP-060)) and followed advice from the digital aerial surveyor that their method to estimate seabird flight height was insufficiently robust to be relied upon for use in the site specific (i.e. option 1) version of the Band model. This was acknowledged by NE at Point 13 of REP1-171 and reduced to a green risk level which closed out the issue. The Applicants note that NE maintains an amber score for CRM parameters within their Risk and Issues log (REP10-053), however the Applicant considers that this relates to comments from REP9-066 which were addressed by the Applicant in REP10-017 and accounted for in the changes to the Offshore Ornithology Cumulative and In Combination

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
				Collision Risk and Displacement Update (ExA.AS-8.D12.V1) In addition, the adoption by the Applicant of the Boreas Deadline 8 figures (with amendments for changes in some of the projects in the in-combination suite, such as removal of the Thanet Extension mortalities) means that there is no dispute over the in-combination totals presented. Regarding the scope of the screening assessment and clarification of discrepancies in the reporting of the screening exercise and the screening matrices, the Applicant does also not consider this to be a significant point. The Applicant considers these to be minor points of detail only, which had no effect on the sites that were progressed through screening. This is correctly identified by the ExA in paragraph 3.1.7 *The Applicant's conclusion of likely significant effects on those European sites and their qualifying features identified in Table 3.2 were not disputed by any Interested Parties during the Examination.*
004	3.0 Assessment Approach	Whole section	n/a	No comment
005	3.1 Summary of HRA	3.1.7	The Applicant's conclusion of likely significant effects on those European sites and their qualifying features identified	The following point was made on the original RIES and remains valid

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
	screening outcomes during the Examination		in Table 3.2 **were not disputed** by any Interested Parties during the Examination. No concerns were raised by NE in their relevant representation [RR-057] regarding the sites and features for which no LSE was concluded, however as noted above, NE did provide comments on the updated screening exercise [REP1-018] at Deadline 2 [REP2-057]. No other party raised concerns about the screening assessment.	The Applicant references their response at 003 and also wishes to draw attention to and welcome the fact that the screening exercise undertaken by the Applicant is fully agreed with NE.
006	4.0 Conservation Objectives	Whole section	n/a	No comment
007	4.1 The Integrity Test	4.1.7	In [REP8-168], NE's Risk and Issues Log, it is noted that NE raised concerns around the screening out of sandwave levelling during cable-laying and the potential for AEOI for the OTE SPA in relation to effects on supporting habitats. The document confirms agreement that no AEOI would occur from this impact pathway following submission of information by the Applicant at Deadline 3 [REP3-059]. This matter was raised by NE in [REP1-158] separately from other submissions from NE regarding the OTE SPA, and was not addressed in the March 2021 publication of the RIES nor raised in NE's comments on it. For completeness it is included here now.	The Applicants welcome this position by NE
008		4.2.9	**Offshore cable laying activities:** The Applicant's Information to Support Appropriate Assessment Report [APP-043] identified the potential for disturbance and	The Applicant notes the amendments to the text based on the Applicant's comments on the original RIES. The

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
	4.2 Effects on Offshore Ornithology		displacement of non-breeding RTD resulting from the presence of up to two cable laying vessels installing the export cable through the OTE SPA. The Applicant sets out its approach to the assessment of displacement of RTD by offshore cable laying activity in Paragraph 4.3.1.2.2 of [APP-043]. NE confirms that the Applicant's assumption of a 100% RTD displacement within a 2km buffer around each cable laying vessel is a reasonable approach and that whilst the level of displacement (which the Applicant calculates could affect approximately 0.6% of the total OTE SPA area) would be significant, NE acknowledges that the displacement would be short-term [RR-059].	Applicant is content that the percentage of the SPA subject to displacement (0.6%) is now correct,
009		4.2.14	At Deadline 3 [REP3-049], the Applicant submitted an updated assessment and analysis of RTD displacement that considered a 10km buffer from the Proposed Development to the OTE SPA. [REP3-049] states that results of this updated assessment were presented to NE, the RSPB, and the Marine Management Organisation (MMO) at a workshop held on the 28 July 2020. The Applicant states that it was agreed at that workshop that the Applicant would further revise the assessment to consider displacement out to 15km using 1km increments. Furthermore, NE requested modelling of the distribution of RTD from the available survey data for the OTE SPA to investigate how existing wind farms have affected these distributions [REP3-049].	The Applicant notes the amendments to the text based on the Applicant's comments on the original RIES. The Applicant is content that the text now accurately reflects discussions held on the multi-party workshop in July 2020.

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
010		4.2.16	At Deadline 5, the Applicant provided an updated assessment of its Deadline 3 submission regarding RTD displacement in the OTE in response to NE's Deadline 4 comments [REP5-025]. The Applicant's response to [REP4-087] in [REP5-015] drew from its updated RTD assessment and responds to NE's comments about the methodology and modelling approach for the assessment of displacement.	The following points were made on the original RIES and are still valid. The updates at Deadline 5 covered two aspects. Firstly, the methodology section (section 2.1) was updated to reflect NE's methodological comments. It was considered by the Applicant more helpful for all parties to incorporate these in an updated report rather than necessitate the reader to cross-reference between the Report (REP5-025) and the Applicant's responses (REP5-015). Secondly, the Applicant also updated ***Tables 5 – 9*** by presenting the Natural England's preferred displacement rate (based on 100% displacement within the windfarm) alongside the Applicant's modelled displacement rate. This also extended the displacement beyond the modelled maximum displacement distance to the distance advised by NE (11.5km). This allows for the results of both approaches to be compared side by side.
011		4.2.22	There is ongoing dispute between the Applicant and NE regarding the existing operational wind farms identified in 4.2.28 and whether it is appropriate for these projects to be excluded from the Applicant's in-combination assessment of operational displacement of RTD.	The Applicant notes the amendments based on comments on the original RIES have now been incorporated into the **RIES Amendments and Consultation** section (paragraph 4.2.39)

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
012		4.2.25	Since NE does not agree with the Applicant's position on the magnitude and extent of the displacement effects, the effect on the abundance of RTD is disputed. In light of this uncertainty, NE cannot agree that the effects on conservation objective (d) do not amount to an AEOI.	The following point was made on the original RIES and is still valid. The Applicant has presented both their preferred and NE's preferred numbers for displacement. Irrespective of the method used, the numbers are low. In REP6-113 NE state: *We note that the displacement within the East Anglia ONE North buffers from 2km to 8km estimated using the spatial models provided by the Applicant equated to a total 34 individuals, and that using the NE advised outputs, across the 2km to 12km buffers, the estimate is of 127 displaced individuals.* In REP4-087 NE state Para 26. *We acknowledge that the likely consequences (lethal or otherwise) of displacement that results from the concentration of more birds into a smaller area of sea distant from all windfarms is not known and may indeed be small.* Para 29. *It may be that no birds at all die as a result of the displacement, but it is in the light of these Conservation Objectives it is still possible that an AEoI on the SPA will result from one or more of the other conservation objectives not being fulfilled.* Therefore, the Applicant does not consider that the disagreement with NE is about the effect on the

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
				abundance of RTD, but rather their distribution within the SPA.
013		4.2.30	At the ISH3 held on 19 January 2021, as summarised at Deadline 5 [REP5-089], NE was asked about the 2km buffer introduced at Deadline 3. NE confirmed that whilst it welcomed the commitment to a buffer, NE does not agree that a 2km buffer is sufficient to mitigate the impact of displacement to an acceptable level, and therefore, remains unable to rule out an AEOI from the Proposed Development alone on that basis. NE's advice is that the buffer between EA1N and the OTE SPA boundary must be greater than 2km in order to avoid AEOI.	The following point was made on the original RIES and is still valid. The Applicant wishes to clarify that they believe that NE's position is that the boundary between EA1N and the OTE SPA must be greater than ***10km*** in order to avoid an AEoI.
014		4.2.42	At Deadline 9 [REP9-067], however, NE's position remains as it did at [REP4-087] that there is already an AEOI from displacement effects of RTD in-combination from existing wind farms within the OTE SPA. Whether the total area of the OTE SPA that is subjected to some level of displacement is 31% (based on the Applicant's modelling outputs), or 47% of the OTE SPA (assuming that the extent of displacement extends to 10km), NE states that it is clear that a significant proportion of the OTE SPA by area is already subjected to displacement. NE therefore disagrees with the Applicant's conclusions as set out in Table 11 of [REP8-033] and sets out its own conclusions in Table 1 of [REP9-067]. In its 'Risk and Issues Log' submitted at Deadline 10 [REP10-053], NE's position on this matter	The Applicants wish to highlight that 31% and 47% figures quoted take no account of any attempt to quantify the magnitude of effect either by using the Applicant's modelling or NE's simple approach (i.e. assuming a linear decrease in displacement from 100% in the windfarms to 0% at 10km). The Applicant highlights that it was agreed with NE at the first workshop (28th July 2020) that there was a gradient of effect and this was why the modelling was requested by NE. In ***Tables 5 – 9*** of ***Displacement of red-throated divers in the Outer Thames Estuary (Clean) - Version 05*** (REP11-026) the Applicant has presented both Natural England's preferred displacement rate

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
			remains unchanged from [REP9-067]. On this basis, NE does not agree to conclude no AEOI (in-combination with other plans and projects) on the RTD qualifying feature of the OTE SPA and this continues to be a matter of ongoing disagreement.	(based on 100% within the windfarm) alongside the Applicant's modelled displacement rate. Therefore, the in-combination area figures being discussed should be those for the effective area of in-combination displacement which lies between 5% (Applicant's model) and 23.5% (NE simple approach). The text "*31% (based on the Applicant's modelling outputs)*" suggests that 31% is a figure that the Applicant considers valid. The only figures that the Applicant considers valid from their modelling are 5.0% - 5.2% (existing projects), to which East Anglia ONE North will add 0.4% to 0.5% (and East Anglia TWO adds nothing based on the modelling)
015		4.2.80	NE stated [REP5-083] that it is still considering the implications of the Hornsea Project Three decision and in-combination collision totals and is therefore unable to conclude no AEOI in relation to in-combination collision impacts for the gannet qualifying feature of FFC SPA and LBBG feature of the Alde-Ore Estuary SPA. However, Hornsea Project Three totals do not change NE's conclusions that AEOI cannot be ruled out in relation to in-combination collision effects for FFC SPA kittiwakes. Specific conclusions drawn in relation to these features are discussed in the following sections.	The following point was made on the original RIES and is still valid. The Applicant wishes to clarify that Hornsea Project Three has no LBBG collisions apportioned to the Alde-Ore Estuary SPA and therefore should not be considered in relation to this site (as acknowledged by NE in [REP7-071]).
016		4.2.94	In addition to the remaining concerns of NE and the RSPB on the approaches taken to collision risk modelling, there	The following point was made on the original RIES and is still valid.

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
			are also specific concerns relating to in-combination displacement effects for its auk (ie razorbill and guillemot) features, which are described in Paragraph 4.2.32.	As noted in Row 003, the adoption by the Applicant of the Boreas Deadline 8 figures (with amendments for changes in some of the projects in the in-combination suite, such as removal of the Thanet Extension mortalities) means that there is no dispute between the Applicant and NE over the in-combination totals presented (noting that a final submission at Deadline 12 (document reference ExA.AS-8.D12.V1) has been made taking account of NE response to updated Hornsea 3 collision risk estimates, minor errors noted by NE and ensuring NE favoured approach to original consent vs. non-material changes). The Applicant would therefore question the relevance of the references to approaches to collision risk modelling. The Applicant notes that there is dispute with RSPB as they do not agree with the avoidance rates advised by NE.
017		4.2.96	In addition to in-combination collision impacts on the gannet of the FFC SPA, the RSPB does not agree to conclude no AEOI in relation to project alone collision impacts on gannet [REP4-097]. In its written representations (including [REP4-097]), and as noted in AS-054, the RSPB has expressed concern regarding the Applicant's assessment methodology, specifically in relation to the avoidance rate (AR) that has been applied to breeding gannet. The RSPB does not agree that the AR of 98.9% applied to non-breeding gannet is appropriate for	The following point was made on the original RIES and is still valid. The Applicant notes that the Avoidance Rate of 98.9% was agreed with NE and that evidence-based rates from Bowgen and Cook 2018 indicate Avoidance Rates of 99.5% for gannet and therefore the Applicant considers that 98.9% is precautionary.

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
			breeding gannet due to 'the lack of available evidence relating to breeding birds' [AS-054]. The RSPB has also raised concerns regarding 'as-built versus consented capacity of windfarms'; this matter is discussed in further detail in section 4.2.57 of this RIES.	The Applicant considers that it should be explicit that RSPB disagrees with NE advice not just the Applicant's assessment. Whilst the Applicant notes that RSPB did raise concerns with the 'as-built' position, any concerns on this are no longer relevant following the adoption by the Applicant of the Boreas Deadline 8 figures (which do not include consideration of as-built).
018		4.2.97	At [AS-054], the Applicant notes that at the time of writing (June 2020), the detail of the arguments presented by the RSPB about potential changes in behaviour and avoidance rate of gannet in the breeding season had not been investigated. The Applicant argued that NE has not recommended any such changes to its assessment methodology. In the Applicant's comments on the RSPB's Deadline 4 submission [REP5-016], the Applicant maintains its view that it has undertaken assessments for gannet and reached the conclusion that there will be no AEOI due to the project alone or in-combination with other plans and projects. Therefore, at the time of this RIES, the Applicant and the RSPB have not reached agreement to conclude no AEOI on the gannet feature of the FFC SPA from the project alone and this remains a point of ongoing dispute.	The following point was made on the original RIES and is still valid. The Applicant also notes that NE does not consider there to be an AEoI on the gannet feature of the FFC SPA at the project-alone level [REP7-071]. The Applicant considers that it should be explicit that RSPB disagrees with NE advice not just the Applicant's assessment.
019		4.2.100	At REP4-042, the Applicant states that, "for kittiwake the total is given on the assumption that the compensation	The Applicant notes that NE consider that Hornsea 3 has fully compensated for kittiwake – this is stated

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
			provided by Hornsea Project Three fully compensates for those collisions for the Flamborough and Filey Coast SPA and therefore zero collisions are attributed to the SPA from Hornsea Project Three". The Applicant therefore maintains its view that the contribution from the Hornsea Project Three wind farm should be removed from consideration as it considers that kittiwake mortality will be fully compensated for. At the time of this RIES, the Applicant and NE have not reached agreement on this matter and it remains a point of ongoing dispute.	within ***Appendix A16b - Comments on Cumulative and In-combination Collision Risk [REP8-035***] (REP9-066). This point is not explicitly clarified in the **RIES Amendments and Consultation** section
020		4.2.117	NE's reasoning for its sustained position of AEOI on gannet and LBBG at FFC SPA is also given in [REP9-066]. It confirms that although NE agree that there would be no AEOI for in-combination collision effects on gannet or LBBG at the FFC SPA if Hornsea Project Three, Hornsea Project Four and Norfolk Vanguard were removed from the total estimates, the ongoing uncertainties with those projects mean that once they are included in the estimates, NE cannot rule out AEOI on either feature.	The Applicant wishes to clarify that LBBG is not relevant to the FFC SPA
021		4.2.124	NE however raised concerns at Deadline 11 [REP11-121] about the approach of relying on reduced collision estimates for other consented projects, noting NE's representation to the East Anglia One non-material change. It remains concerned about the approach of using these figures in order to 'free up' headroom and confirmed	The Applicant highlights that in order to avoid disagreement with NE, the in-combination totals have been updated at Deadline 12 (document reference ExA.AS-8.D12.V1) using NE's favoured approach to original consent vs. non-material changes (NMC). The Applicant does not agree with this approach as set out in their response to ***Natural England's***

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
			NE has recommended that BEIS review this so that it is addressed in a legally robust manner.	***Representation to East Anglia ONE (EA1) Non-Material Change to DCO Application*** (REP11-121) (see ExA.AS-10.D12.V1). The Applicant is not 'relying' on reduced collision estimates as the Boreas Deadline 8 estimates have been used as the basis for the in-combination assessment (with relevant amendments) and the NMCs for East Anglia ONE and for East Anglia THREE (noting that this is now reflected within the 16 April 2021 made order) have not been used.
022		4.2.129	In its written summary of oral representations made at ISH 3 [REP5-089], NE confirmed that until updated in-combination and project-alone figures from the modelling had been provided it would not be in a position to update or change its conclusions. Therefore, NE's conclusions remain unchanged whilst it is still considering the implications of the Hornsea Project Three decision and in-combination collision totals when this project is included (see section 4.2.44 of this report).	The following point was made on the original RIES and is still valid. The Applicant wishes to clarify that Hornsea Project Three has no LBBG collisions apportioned to the Alde-Ore Estuary SPA and therefore should not be considered in relation to this site (as acknowledged by NE in [REP7-071]).
023		4.2.132	At [REP9-066], NE repeated similar concerns surrounding ongoing uncertainty with the figures associated with other plans and projects, detailed for the FFC SPA in 4.2.101 of this updated RIES and therefore not repeated here. In addition, using the mortality figures from the Norfolk Boreas Examination, and given the predicted growth rates and status of the gannet population, NE concludes that it is not	The Applicant is unsure of the purpose of the reference to gannet in the second part of this paragraph

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
			possible to rule out AEOI for EA1N in-combination with other plans and projects.	
024	4.3 Effects on marine mammals	Whole section	n/a	The Applicant notes that all comments made on the original RIES are superseded by updates made in the **RIES Amendments and Consultation** section
025	4.4 Effects on Onshore Ornithology / Terrestrial Ecology	Whole section	n/a	The Applicant notes that all comments made on the original RIES are superseded by updates made in the **RIES Amendments and Consultation** section
026	5 Alternatives and IROPI	Whole section	n/a	No comment
027	6 Compensatory Measures	Whole section	n/a	The Applicant notes that all comments made on the original RIES are superseded by updates made in the **RIES Amendments and Consultation** section
028	7 Summary	Whole section	n/a	The Applicant notes that all comments made on the original RIES are superseded by updates made in the **RIES Amendments and Consultation** section
029		Table 7.1	Table 7.1	The Applicant highlights that the positions stated are those of NE, the Applicant does not consider there to be AEOI on any site from either project-alone or in-combination effects on any feature.

Ref.	Section within PD-033	Paragraph	Text	Applicants' Comments
030	Annex 1	Whole section	n/a	No comment
031	Annex 2	Stage 2 Matrices Matrix 4: Outer Thames Estuary SPA (Project-alone and In-combination)	(c) The Applicant did not include an assessment of operational displacement/disturbance effects on red-throated diver [APP-043 and APP-046], however LSE had been identified from operational and maintenance vessels in its HRA screening [APP-044 and APP-045]. NE did not agree with the conclusions on displacement [REP1-058, REP3-117, REP5-083] on basis of a number of concerns around the assessment of construction displacement effects and the interpretation of the implications for the OTE conservation objectives. (d) The Applicant concluded that AEOI could be excluded in relation to barrier effects/collision risk and in relation to displacement/disturbance to RTD in-combination with other plans and projects. NE does not agree with the conclusions on disturbance/displacement [REP1-058, REP3-117, REP5-083].	(c) The Applicant did include an assessment of operational displacement/disturbance effects on red-throated diver (APP-043) for East Anglia ONE North (it was not included for East Anglia TWO) The Applicant questions the inclusion of barrier effects/collision risk in the notes for (d). These effects have never been considered by any party in terms of in-combination.