

THE INFRASTRUCTURE PLANNING (EXAMINATIONS PROCEDURE) RULES 2010

NORTH FALLS OFFSHORE WIND FARM DEVELOPMENT CONSENT ORDER

PINS REFERENCE EN010119

**DEADLINE 8: PORT OF LONDON
AUTHORITY'S CLOSING STATEMENT**

1 INTRODUCTION

- 1.1 This is a closing statement made on behalf of the Port of London Authority ("**PLA**") in respect of the North Falls Offshore Wind Farm Development Consent Order and sets out the PLA's final position on matters raised during the Examination.
- 1.2 To aid the Examining Authority ("**ExA**") the PLA has set out in table 1 below the main themes raised by the PLA during the examination process and the status of the theme at the close of the Examination.
- 1.3 For ease of review, colour coding has been used with themes that have been resolved to the PLA's satisfaction shown in green and those which remain as outstanding shown in pink.
- 1.4 Whilst there are references to the draft Development Consent Order ("**dDCO**") and Schedule 9 deemed marine licence ("**dML**") in this closing statement, this is largely to highlight where matters have or have not been addressed to the PLA's satisfaction. The document "*PLA's Response to the dDCO and the Applicant's Response to the ExA's Proposed schedule of Changes to the dDCO*" submitted at deadline 8 provides an overview of the PLA's final position in relation to the dDCO including the Schedule 9 dML.
- 1.5 There are a number of matters which we have designated amber because the ExA's proposed changes to the dDCO would address the PLA's concern but the Applicant has pushed back against the change in its Deadline 7 submissions. Should the ExA continue to recommend the relevant changes and these are carried forward into the made DCO then the PLA's concern would be addressed in full.

Table 1: PLA's final position at close of examination

Theme	Summary of the PLA's Representations	How Resolved / What is outstanding
1. Safeguarding of current and future depths at the Sunk and Trinity Deep Water Routes	<p>The offshore cable corridor crosses the Sunk and Trinity DWR's</p> <p>The depth of the cables where they cross the DWR's is critical and must allow exit and entry from/to the port for vessels with a draught of 20m (plus 10% under keel clearance)</p> <p>There must be an agreed area shown on a certified plan that shows the safeguarded area for deeper cable burial</p> <p>The authorised development must be designed, installed, operated and maintained at a level that would not detrimentally impact the existing and future capacity and operation of the Port</p>	<p>Offshore Design Parameter – Requirement 2(3) included in the dDCO (REP7-008) agreed</p> <p>Deep Water Route Cable Installation Areas (Future Dredging Depths) Plan agreed (REP6-055)</p> <p>Confirmation from PLA area for deeper cable installation agreed see section 3 of REP7-094</p> <p>ExA Schedule of Changes – Schedule 9 - Part 2, Condition 10 included addition of sub-paragraph (4). The Applicant has pushed back on including a condition mirroring the Requirement 2(3). Including the requirement as a condition of the DML would mean that the MMO do not overlook this requirement when approving other conditions and can secure, monitor and enforce compliance with the requirement</p>
2. Safeguarding of depths at the Sunk pilot boarding and landing station	<p>The offshore cable corridor includes the Sunk Pilot Diamond this is an area rather than a specific point utilised for the boarding and landing of pilots</p> <p>The depth of the cable at the Sunk Pilot Diamond is critical and must allow vessels with a draught of 20m (plus 10% under keel clearance) to pass through the area so that pilots can board and land</p>	<p>Offshore Design Parameter – Requirement 2(3) included in the dDCO (REP7-008) agreed</p> <p>Deep Water Route Cable Installation Areas (Future Dredging Depths) Plan agreed (REP6-055)</p>

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	<p>The authorised development must be designed, installed, operated and maintained at a level that would not detrimentally impact the existing and future capacity and operation of the Port due to the inability to board and land pilots at the Sunk pilot boarding and landing station</p>	<p>Confirmation from PLA area for deeper cable installation agreed see section 3 of REP7-094</p> <p>ExA Schedule of Changes Schedule 9 – Part 2, Condition10 included addition of sub-paragraph (4). The Applicant has pushed back on including a condition mirroring the Requirement 2(3). Including the requirement as a condition of the DML would mean that the MMO do not overlook this requirement when approving other conditions and can secure, monitor and enforce compliance with the requirement</p>
<p>3. Approach to cable laying and repair</p>	<p>Construction and maintenance vessels must not hinder access or egress into or out of the Port nor the ability to board or land pilots.</p> <p>The most effective cable laying in terms of speed and ability to achieve the required cable burial depth should be used</p>	<p>The outline Navigation and Installation Plan ("oNIP") prohibits concurrent activities and provides indicative details for project vessels activities</p> <p>ExA Schedule of Changes Schedule 9 – Part 2 condition 22(1)(n). The Applicant has not updated condition 22(1)(n) so that the Navigation and Installation Plan which is produced post consent would be substantially in accordance with the principles set out in the oNIP. As currently drafted REP7-008 only requires the Navigation and Installation Plan to accord with the principles set out on in the oNIP</p>

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4. Pre-construction activities:		
- Surveys and monitoring	<p>Pre-construction surveys and activities can have implications for vessels entering and exiting via the DWRs and for the boarding and landing of pilots.</p> <p>PLA would want to be consulted on any surveys or monitoring or pre-construction activities.</p> <p>Update to definition of commence in DML (REP7-008): means the first carrying out of any licensed marine activities authorised by this marine licence, save for any operations consisting of pre-construction surveys and monitoring approved under this marine licence.</p> <p>The Applicant included a new condition 37 in the Schedule 9 DML at deadline 7 with the drafting of condition 37(1)-(4) mirroring the wording in both the PLA's preferred form of protective provisions as set out in Appendix 1 of REP5-112 and the protective provisions included by VEOWFL in the draft DCO as set out in Appendix 2 of REP5-112</p> <p>The ExA's Schedule of Proposed Changes also seek to include protective provisions for the PLA in the form set out at [REP5-112, Appendix 2]</p>	<p>ExA Schedule of proposed changes Schedule 9 – Part 2 (New condition 30) has been adopted by the Applicant as Schedule 9 condition 37 in dDCO (REP7-008). This is acceptable in terms of ensuring that the PLA is consulted</p> <p>The definition of commence carves out pre-construction surveys and monitoring. As drafted this is ambiguous as it could be construed to mean that surveys would not amount to commencement.</p> <p>The DML covers licensed marine activities. The ExA has Proposed Changes to Schedule 14 to include Protective Provisions for the PLA. The Applicant has pushed back on these. Protective Provisions are required on this matter to ensure the PLA is consulted on all survey and monitoring</p>
- Relocation of boulders and archaeological finds	<p>Boulders, and archaeological finds cannot be relocated within or to the DWR's or Sunk Pilotage Area</p>	<p>Paras 20 and 22 oCSIP (REP7-040) prohibits relocation</p> <p>The Applicant has resisted the ExA Schedule of proposed changes to add requirement 2(4) and Schedule 9 Part 2 Condition 10(5).</p> <p>Reliance on the oCSIP alone is a much weaker than the Requirement 2(4) proposed by the ExA and gives the PLA no</p>

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- UXO	The PLA must be consulted on any application for marine licensing for the clearance of UXO within or which may affect the 'Areas of Interest' before such applications are submitted to the MMO. With regard being had to any request made by the PLA for reasonable amendment to the proposed application. The PLA must be notified of the final programme for any clearance of UXO within the Areas of Interest	<p>guarantee that no relocation of boulders and archaeological finds to or within the areas shown on Deep Water Route Cable Installation Area (Future Dredging Depths) Plan will in fact be secured, monitored and enforced by the MMO</p> <p>Addressed in paragraphs 12-15 oCSIP (REP7-040)</p> <p>UXO Clearance and UXO Protocol oNIP</p> <p>ExA Schedule of proposed changes Schedule 9 – Part 2 (New condition 30) adopted by the Applicant as Schedule 9 DML Condition 37(3) and (4).</p> <p>ExA Proposed Changes Schedule 14 which the Applicant has resisted would include protective provisions for the benefit of the PLA applicable to UXO</p>
5. Construction/ Maintenance:		
- Wet storage	No wet storage of materials and/or equipment should take place within the DWRs or Sunk Pilotage Area	<p>Para 40 of oCSIP (REP7-040) prohibits wet storage.</p> <p>The Applicant has resisted</p> <p>The ExA Schedule of proposed changes to add requirement 2(4) and Schedule 9 Part 2 Condition 10(5).</p> <p>Reliance on the oCSIP alone is a much weaker than the Requirement 2(4)</p>

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		<p>proposed by the ExA and gives the PLA no guarantee that the clear requirement not to undertake wet storage in the areas shown on Deep Water Route Cable Installation Area (Future Dredging Depths) Plan will in fact be secured, monitored and enforced by the MMO</p> <p>ExA Schedule of proposed changes requirement 2(4) and Schedule 9 Part 2 Condition 10(5)</p>
<ul style="list-style-type: none"> - Field joints - Freespan clearance - Dredging 	<p>Planned field joints should not be located in the DWR's or the Sunk Pilotage Area</p> <p>Applicant has not provided a clear commitment. Applicant states in response to deadline 6 submissions (REP7-053): "it is not anticipated" there will be any freespans to clear over the DWRs. Furthermore, the burial depths proposed in Requirement 2(3) should be sufficient, and any further works required due to installation issues will be captured as part of the remediation works</p> <p>Dredging undertaken for the construction or maintenance of the proposed development cannot lead to a reduction in navigable depth at the DWR's or pilot station as a result of dredged material being placed directly into these areas or migrating into these areas from disposal sites</p> <p>The PLA is content that the various scenarios have been appropriately modelled and assessed within the Hydrodynamic and Dispersion Modelling Report [REP6-054]. With Requirement 2(3) and the ExA Schedule of Proposed Changes (Schedule 9, condition 10), the size of the safeguarded areas provides sufficient protection to deal with any modelling/assessment uncertainty.</p>	<p>Para 39 of oCSIP (REP7-040) addresses this matter.</p> <p>The PLA is content that Requirement 2(3) would address this matter</p> <p>Offshore Design Parameter – Requirement 2(3) included in the dDCO agreed</p> <p>Deep Water Route Cable Installation Areas (Future Dredging Depths) Plan (REP6-055) agreed</p> <p>Addressed in oSDMP (subject to minor amendments (see entry 7 below)</p> <p>Hydrodynamic and Dispersion Modelling Report (REP6-054)</p>

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<ul style="list-style-type: none"> - Use of cable protection 	<p>Whilst the Applicant has not provided a specific commitment not to use cable protection within the DWR's or the Sunk Pilot Diamond Buffer, cable protection would, as a result of the ExA's schedule of proposed changes to the dDCO, be subject to Requirement (2)(3) due to the Requirement applying to any part of the authorised development located within the areas shown on the Deep Water Route Cable Installation Area (Future Dredging Depths) Plan, the PLA is satisfied that even if cable protection was placed within the DWR's or the Sunk Pilot Diamond Buffer it could not be placed at a level that would preclude or impede dredging to the relevant depths as set out in the Requirement</p>	<p>ExA Schedule of Changes – Schedule 9 - Part 2, Condition 10 addition of (sub-paragraph 4): The Applicant has pushed back on including a condition mirroring the Requirement 2(3). Including the requirement as a condition of the DML would mean that the MMO do not overlook this requirement when approving other conditions and can secure, monitor and enforce compliance with the requirement</p>
		<p>Offshore Design Parameter – Requirement 2(3) included in the dDCO agreed</p> <p>Confirmation that this point agreed see para 3.5 of PLA response REP7-094</p>
<ul style="list-style-type: none"> - Cable crossings 	<p>Parties need to work together wherever possible to minimise impacts and to maximise the potential for other projects to come forward in the future.</p> <p>Cable crossings should not take place in the DWR's or Pilot Diamond</p>	<p>ExA Schedule of Changes Schedule 9 – Part 2, Condition 10 addition of sub-paragraph (4): The Applicant has pushed back on including a condition mirroring the Requirement 2(3). Including the requirement as a condition of the DML would mean that the MMO do not overlook this requirement when approving other conditions and can secure, monitor and enforce compliance with the requirement</p> <p>The ExA Schedule of Proposed Changes Schedule 9 – Part 2, Condition 22(1)(a)(iii) would have the undertaker informing the PLA of cable crossings as part of the design but the Applicant has pushed back on this, noting the cable crossings are covered in the oCSIP, which is secured in the DMLs. It</p>

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	Whilst the Applicant has not provided a specific commitment not to cross cables within the DWR's or the Sunk Pilot Diamond, Five Estuaries and Sealink's red line boundaries do not overlap with North Falls at the deep water route or the pilot station buffer	is not appropriate to leave this element of design just to the CSIP
6. Post Construction:		
- Post construction surveys and activities	<p>Post-construction surveys and activities can have implications for vessels entering and exiting via the DWRs and for the boarding and landing of pilots.</p> <p>The Applicant included a new condition 37 in the Schedule 9 DML at deadline 7 with the drafting of condition 37(1)-(4) mirroring the wording in both the PLA's Preferred Form of Protective Provisions as set out in Appendix 1 of REP5-112 and the Protective Provisions Included by VEOWFL in the draft DCO as set out in Appendix 2 of REP5-112</p> <p>The ExA's Schedule of Proposed Changes also seek to add protective provisions for the PLA (REP5-112, Appendix 2)</p>	<p>ExA Schedule of proposed changes Schedule 9 – Part 2 (New condition 30) adopted by the Applicant as Schedule 9 condition 37 (REP7-008)</p> <p>The DML covers licensed marine activities. The ExA has Proposed Changes to Schedule 14 to include Protective Provisions for the PLA. The Applicant has pushed back on these. Protective provisions are required on this matter to ensure the PLA is consulted on all survey and monitoring</p>
- Remediation	<p>It needs to be clear what will happen if cable burial depths are not achieved during installation or maintenance. Recent experience with other cable projects has been either the Applicant tries to leave the cable in its incorrectly installed position or the Applicant wishes to place material on top of the exposed cable rather than try to re-bury it because of the age of the cable. This would not be acceptable at the DWR's or Pilot Boarding Station Buffer</p> <p>The PLA note and welcome the ExA Schedule of Proposed Changes which include a remediation clause in the Schedule 9 dML (new condition 36) and proposed protective provisions for the PLA (REP5-112, Appendix 2). The PLA supports the ExA's approach. Moreover</p>	<p>Secured through the ExA's Schedule of proposed changes but Applicant has not reflected this in REP7-059 or REP7-008. The purpose of this condition is to put a process around such remediation to ensure that remediation is effective and would not give rise to any unacceptable temporary or permanent impacts on navigation to and from the Ports.</p>

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	it should be noted that the Applicant's Without Prejudice Ports Protective Provisions (REP7-059) do not include the remediation clause and neither does the dDCO (REP7-008)	
7. Documents:		
Offshore In-Principle Monitoring Plan (" IPMP ") (REP7-024)	As set out in paragraph 2 of the document (REP7-024) the IPMP provides a key mechanism through which the relevant regulatory authorities can be assured that required offshore monitoring activities associated with the construction and operation of the offshore infrastructure for the Project will be formally controlled and mitigated. Whilst the PLA has no comments on the document itself, the PLA has requested amendments to Schedule 9 condition 27(1), 27(3) and 27(4) to include reference to the PLA. These amendments remain outstanding	Amendments required to condition 27 of Schedule 9 to include reference to the PLA - See PLA response REP7-094
Outline Sediment Disposal Management Plan (" oSDMP ") (REP6-049)	<p>The oSDMP sets out the key constraints and measures proposed that will be included in the final SDMP.</p> <p>As set out in entry 5 above in relation to 'dredging', the PLA is content that the various scenarios have been appropriately modelled and assessed within the Hydrodynamic and Dispersion Modelling Report (REP6-054). With the amended Requirements and DML conditions, the size of the safeguarded areas provides sufficient protection to deal with any modelling/assessment uncertainty</p> <p>The PLA considers that the sediment disposal management plan should be substantially in accordance with the principles set out in the oSDMP. This amendment was made by the Applicant at deadline 7 (REP7-008)</p> <p>At deadline 7 the PLA set out minor drafting amendments that are required to the oSDMP to reflect the wording used in the Deep Water</p>	Minor amendments required to wording of oSDMP see - PLA response REP7-094

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	Route Plan (REP6-055). These amendments remain outstanding at deadline 8 and are the sole reason for this entry being shown in pink	
Outline Cable Specification and Installation Plan ("oCSIP") (REP7-040)	The PLA welcomes the updates that have been made to the oCSIP during the course of the examination. The PLA has no outstanding comments on the technical content of the document	PLA has no outstanding comments on the technical content of REP7-040
Outline Navigation and Installation Plan ("oNIP") (REP6-040)	<p>The PLA's outstanding comments on the oNIP relate to figure 2-1; freespan clearance and vessels working on other projects</p> <p>It is understood from the Applicant's response to Deadline 6 Submissions (REP7-053) that figure 2.1 will be amended. This is welcomed but without seeing the updated document the PLA cannot confirm its acceptance (or otherwise) of the update</p> <p>Comments on freespan clearance are provided in section 5 above and whilst the PLA would have preferred a clear commitment in the oNIP the PLA is content that Requirement 2(3) would address this matter. The ExA Schedule of Changes – Schedule 9 – Part 2 condition 10 addition of (4) is however still required for the reasons given above</p> <p>The PLA is content with the Applicant's response regarding vessels working on other projects. For any future projects in this area, the PLA would look for North Falls to be referenced in that future projects oNIP</p>	<p>Absent sight of an updated figure 2-1 the PLA is unable to agree the technical content of the document (but believes it will be addressed to the PLA's satisfaction)</p> <p>ExA Schedule of Changes Schedule 9 – Part 2, Condition10 addition of subparagraph (4): The Applicant has pushed back on including a condition mirroring the Requirement 2(3). Including the requirement as a condition of the DML would mean that the MMO do not overlook this requirement when approving other conditions and can secure, monitor and enforce compliance with the requirement</p>
Supporting Information on offshore additional mitigation (REP4-041)	This document includes information on the implications of mitigation commitments made by the Applicant regarding cable burial depths. At deadline 5 the PLA set out how the document needs to include commitments relating to both the DWR's and the Pilot Boarding Station buffers (REP5-111) and the PLA reiterated this comment at deadline 7 (REP7-093) and advised that the document also needed a general update to reflect the changes made to the oSDMP (REP6-050). The PLA expected amendments to the offshore additional mitigation report to be updated at either deadline 7 or deadline 8 to	Updated document to include commitments relating to both the DWR's and Pilot Boarding Station Buffers, reflecting the changes made to the oSDMP (REP6-050)

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	address the PLA's comments. As the document was not updated at deadline 7 the PLA cannot say that the required amendments have been made to the document	
Site Characterisation Report (REP7-034)	<p>The Site Characterisation Report provides information regarding disposal sites. The document was updated at deadline 7 (REP7-034) to amend the text to address the PLA's concerns regarding cable depths at the DWR's and the Sunk Pilot Diamond Buffer. The PLA is content with these updates</p> <p>One point remains outstanding from the PLA's deadline 5 response (REP5-111). Given the document has been updated the PLA has updated the PLA's previous comment with an updated paragraph number:</p> <p><i>The Site Characterisation Report is clear at paragraph 113 that disposal of dredged material will avoid the Sunk and Trinity DWRs however it is silent on the Pilot Boarding Station Buffer</i></p>	Update para 113 of Site Characterisation Report to include reference to the oSDMP secures that disposal of dredged material will avoid the Sunk and Trinity DWRs and Pilot Boarding Station
Cable Statement (REP4-016)	As a result of production of the oCSIP amendments were made to the Cable Statement [REP4-016] removing details from the Cable Statement on matters relating to seabed preparation and offshore cable installation and replacing them with references to the oCSIP. The PLA has no outstanding comments on the Cable Statement	The PLA has no outstanding comments on the Cable Statement. Confirmation on PLA's position see PLA response REP5-111
Schedule of Mitigation (REP7-005)	<p>The mitigation and monitoring in relation to shipping and navigation is set out in table 2.8. of the Schedule of Mitigation (REP7-005)</p> <p>At deadline 7 the references at 2.8.12 were updated in relation to the DWR to include reference to the Sunk Pilot Diamond Buffer. This change is supported</p> <p>A new reference was also inserted at 2.8.13 that all reasonable endeavours will be made to avoid the use of cable protection in the vicinity of the Sunk pilot boarding area so as to not reduce the</p>	<p>Clarify when a mitigation measure is included in the Schedule of Mitigation and when it is not</p> <p>Update entry 2.8.13 to align with Requirement 2(3) and the ExA Schedule of Changes Schedule 9 – Part 2, Condition10</p>

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	<p>navigable depth in this area. The wording of this entry is at odds with Requirement 2(3) and the ExA's Schedule of Changes which requires any part of the authorised development located within the areas shown on the Deep Water Route Cable Installation Area (Future Dredge Depths) Plan to be designed, installed, operated and maintained at either -22m CD or -19m CD therefore even if cable protection was placed within the DWR's or the Sunk Pilot Diamond Buffer it could not be placed at a level that would preclude or impede dredging to the relevant depths as set out in the Requirement</p> <p>It is not clear to the PLA when a mitigation is included in the schedule of mitigation. As can be seen from this closing statement there are various commitments that have been made by the Applicant including for example in relation to boulder clearance, archaeological finds, wet storage etc but none of these commitments are in the Schedule of Mitigation</p>	
Without Prejudice Ports Protective Provisions (REP7-059)	<p>The PLA has set out in response to the ExA's third written questions (REP7-093) how the PLA's Preferred form of Protective Provisions differ from those included in the ExA's Schedule of Proposed Changes to the dDCO</p> <p>The PLA does not propose to repeat that here but rather to highlight how the Applicant's without prejudice Ports Protective Provisions (REP7-059) do not include all of the matters which the ExA consider should be in protective provisions for the PLA. In particular the Without Prejudice Ports Protective Provisions do not include a remediation clause or a disputes clause</p>	<p>The Applicant's without prejudice protective provisions are not acceptable and are not aligned with those for the Five Estuaries Offshore Wind Farm.</p> <p>The PLA has explained at length why the suite of other control measures do not give the PLA the certainty and protections it requires to ensure that Work No 3 and other works which could affect the DWRs and the Sunk Pilotage Area would not give rise to any unacceptable permanent or temporary impacts on navigation to and from the Port of London Authority.</p> <p>The dDCO should at least include the Protective Provisions included by Five Estuaries Offshore Wind Farm in the draft</p>

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		DCO with the necessary updates which were included in the PLA's response to Q9.3.3 (Appendix to REP7-093)
8. PLA's onshore navigation equipment	Vessels required to undertake horizontal directional drilling at landfall must not interfere with the PLA's radio link and lower its reliability	Technical Note on the Interaction of North Falls with the PLA onshore communication links REP6-067 PLA response REP7-094
9. Socio-Economics	<p>North Falls may cause economic disbenefits to the Port of London</p> <p>Consideration needs to be given to the socio economic impacts of North Falls on the Port of London. The PLA had considered this matter resolved at deadline 7 (see PLA response REP7-094) when the Cumulative Effects Assessment Summary was updated (REP6-048)</p> <p>The Applicant then produced Further Information on Socio-Economic Impacts on Vessels to from Tidal Thames Estuary (REP7-055). Given that this new document was introduced into the examination so late in the process the PLA does not intend to comment on it in detail but would just note the range of mitigations rely on the cable being installed and maintained at the depths set out in requirement 2(3). The document does not include any mention of remediation with is critical if for any reason cable installation or maintenance does not occur to the required depth</p> <p>As the ExA has included remediation in the schedule of proposed changes, the PLA considers that the ExA has secured this vital commitment and would ask the ExA to note, as set out in 7 above that the Applicant's Without Prejudice Ports Protective Provisions [REP7-059] do not include the remediation clause and neither does the dDCO (REP7-008)</p>	Remediation would be secured through the ExA's Schedule of proposed changes but Applicant has not reflected this in REP7-059 or REP7-008

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10. Cumulative Effects	There are multiple projects being advanced which either physically overlap (e.g. cables will cross) and or will overlap in terms of timings	Cumulative Effects Assessment Summary (REP6-048) PLA response REP7-094