

# Outer Dowsing Offshore Wind

## The Applicant's Response to the Rule 17 Request 17 March 2025

### Deadline 6

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## Acronyms & Definitions

### Abbreviations / Acronyms

Abbreviation / Acronym	Description
<b>AEol</b>	Adverse Effect on Integrity
<b>ANS</b>	Artificial Nesting Structures
<b>CEA</b>	Cumulative Effects Assessment
<b>CGR</b>	Counterfactual of Growth Rate
<b>CI</b>	Confidence Interval
<b>DAS</b>	Digital Aerial Survey
<b>DCO</b>	Development Consent Order
<b>dML</b>	deemed Marine Licence
<b>ECC</b>	Export Cable Corridor
<b>EIA</b>	Environmental Impact Assessment
<b>EPP</b>	European Protected Species
<b>ES</b>	Environmental Statement
<b>ExA</b>	Examining Authority
<b>FFC</b>	Flamborough and Filey Coast
<b>HDD</b>	Horizontal Directional Drilling
<b>HRA</b>	Habitats Regulations Assessment
<b>IDRBNR</b>	Inner Dowsing Race Bank and North Ridge
<b>iPCoD</b>	Interim Population Consequences of Disturbance
<b>JNCC</b>	Joint Nature Conservation Committee
<b>LGS</b>	Local Geological Site
<b>MA</b>	Mitigation Area
<b>MMO</b>	Marine Management Organisation
<b>MMMP</b>	Marine Mammal Mitigation Protocol
<b>MPA</b>	Marine Protected Area
<b>MPCP</b>	Marine Pollution Contingency Plan
<b>NaFRA</b>	National Flood Risk
<b>NAS</b>	Noise Abatement Systems
<b>NE</b>	Natural England
<b>ODOW</b>	Outer Dowsing Offshore Wind
<b>O&amp;M</b>	Operations and Maintenance
<b>PAM</b>	Passive Acoustic Monitoring
<b>PVA</b>	Population viability analysis
<b>RIAA</b>	Report to Inform Appropriate Assessment
<b>RIES</b>	Report on the Implications for European Sites
<b>RoFRS</b>	Risk of Flooding from Rivers and Sea
<b>RoFSW</b>	Risk of Flooding from Surface Water
<b>RSPB</b>	Royal Society for the Protection of Birds
<b>SAC</b>	Special Area of Conservation
<b>SNCB</b>	Statutory Nature Conservation Bodies
<b>SNS</b>	Southern North Sea
<b>SPA</b>	Special Protection Area
<b>UCL</b>	Upper Confidence Limit
<b>UK</b>	United Kingdom

## Terminology

Term	Definition
<b>The Applicant</b>	GT R4 Limited (a joint venture between Corio Generation (and its affiliates), TotalEnergies and Gulf Energy Development), trading as Outer Dowsing Offshore Wind
<b>Baseline</b>	The status of the environment at the time of assessment without the development in place.
<b>Cumulative Impact</b>	Impacts that result from changes caused by other present or reasonably foreseeable actions together with the Project.
<b>Development Consent Order (DCO)</b>	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
<b>Deemed Marine License (dML)</b>	A marine licence set out in a Schedule to the Development Consent Order and deemed to have been granted under Part 4 (marine licensing) of the Marine and Coastal Access Act 2009.
<b>Effect</b>	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the sensitivity of the receptor, in accordance with defined significance criteria.
<b>Environmental Impact Assessment (EIA)</b>	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Regulations, including the publication of an Environmental Statement (ES).
<b>Environmental Statement (ES)</b>	The suite of documents that detail the processes and results of the Environmental Impact Assessment (EIA).
<b>Habitats Regulations Assessment (HRA)</b>	A process which helps determine likely significant effects and (where appropriate) assesses adverse impacts on the integrity of European conservation sites and Ramsar sites. The process consists of up to four stages of assessment: screening, appropriate assessment, assessment of alternative solutions and assessment of imperative reasons of over-riding public interest (IROPI) and compensatory measures.
<b>Impact</b>	An impact to the receiving environment is defined as any change to its baseline condition, either adverse or beneficial.
<b>Landfall</b>	The location at the land-sea interface where the offshore export cables and fibre optic cables will come ashore.
<b>Mitigation</b>	Mitigation measures are commitments made by the Project to reduce and/or eliminate the potential for significant effects to arise as a result of the Project. Mitigation measures can be embedded (part of the project design) or secondarily added to reduce impacts in the case of potentially significant effects.
<b>Offshore Export Cable Corridor (ECC)</b>	The Offshore Export Cable Corridor (Offshore ECC) is the area within the Order Limits within which the export cables running from the array to landfall will be situated.

Term	Definition
<b>Outer Dowsing Offshore Wind (ODOW)</b>	The Project
<b>Order Limits</b>	The area subject to the application for development consent, The limits shown on the works plans within which the Project may be carried out.
<b>The Project</b>	Outer Dowsing Offshore Wind, an offshore wind generating station together with associated onshore and offshore infrastructure.
<b>Receptor</b>	A distinct part of the environment on which effects could occur and can be the subject of specific assessments. Examples of receptors include species (or groups) of animals or plants, people (often categorised further such as 'residential' or those using areas for amenity or recreation), watercourses etc.
<b>Strategic Compensation</b>	Collaborative approach by developers and/or government departments to secure compensation for adverse effects on the conservation objectives of a Marine Protected Area.

## **1 The Applicant's Response to the Rule 17 Request 17 March 2025**

1. This document has been prepared by GT R4 Limited, trading as Outer Dowsing Offshore Wind ("the Applicant"), to respond to the requests set out within the Examining Authority's ("ExA's") Rule 17 Letter dated 17th March 2025 (the "Rule 17 Letter").

## 1.1 The Applicant's Response to the Rule 17 Request 17<sup>th</sup> March 2015

Table 1: The Applicant's Response to the Rule 17 Request 17<sup>th</sup> March 2015

Ref No	Addressed to	Request	Applicant Response
Request for further information			
Q1: Risk & Issues Log	Natural England	<p>The ExA notes the latest version of the Risk and Issues Log that has been submitted by Natural England (NE) at deadline 5 [REP5-171]. In [REP5-171] there are a number of matters that are still colour coded as 'Amber'. Also, the ExA notes NE's definition of a matter with an amber colour coding is such that:</p> <p><i>" Natural England does not agree with the Applicant's position or approach and consider that this could make a material difference to the outcome of the decision-making process for this project.</i></p> <p><i>Natural England considers that these matters may be resolved through:</i></p> <ul style="list-style-type: none"> <li><i>provision of additional evidence or justification to support conclusions; and/or</i></li> <li><i>revisions to impact assessment methodology and/or assessment conclusions; and/or</i></li> <li><i>minor to moderate revisions to impact modelling; and/or</i></li> <li><i>well-designed mitigation measures that are adequately secured through the draft DCO/dML and/or</i></li> <li><i>amendments to draft plans</i></li> </ul> <p><i>If these issues are not addressed or resolved by the end of the Examination, then they may become a Red risk issue as set out above."</i></p> <p>Having regard to this can NE in conjunction with its Risk and Issues Log that is to be submitted at deadline 6 (4 April 2025) for all of the matters that still have an Amber colour coding explain:</p> <ul style="list-style-type: none"> <li>the implications of each of these matters in terms of the conclusions the applicant has reached in either environmental impact assessment (EIA) or Habitats Regulations assessment (HRA) terms.</li> <li>the weight NE considers should be afforded to each of these outstanding Amber matters for EIA and whether they are likely to materially affect the applicant's assessment of effects.</li> </ul>	<p>Whilst the Applicant notes that this question is addressed to Natural England, the Applicant respectfully makes the following observations.</p> <p>The Applicant noted the ExA's comments at Issue Specific Hearing 8 that the submission of any new information at Deadline 6, to which the Applicant should reasonably be given an opportunity to respond, risks not being accepted into the Examination.</p> <p>The Applicant suggests that to the extent that the response by Natural England to this question provides submissions on the implications for each matter in terms of a) the assessment conclusions or b) the weight that is to attach to them that has not been before the Examination to date, such evidence should be afforded limited weight in light of the absence of the ability of the ExA and the Applicant to test that position and the evidence that underpins it.</p> <p>The Applicant refers to its comments in The Applicant's Position on Natural England's Engagement in the Outer Dowsing Offshore Wind Examination (REP4a-121).</p>
Q2: Response to Annex 1 Table A.1 of the RIES	Natural England	<p>In its deadline 5 Response to the Report on the Implications for European Sites (RIES) [REP5-172] NE provided an update to the Annex 1, Table A.1 of the RIES [PD-022]. In this NE updated version there are a number of occasions where NE's response to the final column "Agreement with NE" has</p>	<p>Whilst the Applicant notes that this question is addressed to Natural England, the Applicant makes the following observations.</p>



Ref No	Addressed to	Request	Applicant Response
		<p>been a “No”. For example, in regard to the Southern North Sea Special Area of Conservation (SNS SAC) NE does not agree in relation to a number of potential impacts on the harbour porpoise feature.</p> <p>Also for The Wash Special Protection Area (SPA), NE does not agree in [REP5-172] over the issue of habitat loss for the qualifying features of curlew and golden plover and it is also noted that there is not agreement with NE in respect of non-breeding pink-footed goose and dark-bellied Brent goose.</p> <p>NE is requested to explain whether an answer of “No” in relation to any of the qualifying features for any of the designated sites (including the seabird assemblage of the Flamborough and Filey Coast SPA (FFC SPA)) would equate to there being a potential adverse effect on integrity (AEol) and therefore, in NE’s view, the need for further mitigation and/or a derogations case to be provided by the applicant. If this is not the case then NE is requested to explain in more detail its reasons for disagreeing with the applicant’s conclusions, or to signpost to where this has been explained in previous submissions. Furthermore, NE is requested to provide an indication as to the implications of this disagreement to the conclusions of the EIA and the HRA (where relevant).</p>	<p>The Applicant’s conclusions remain unchanged from that presented in the updated RIAA at Deadline 5 (REP5-101) and further updates provided by the Applicant at Deadline 6 (document reference 7.5, V3) to the in-combination assessments do not change the overall conclusions.</p> <p>The Applicant is mindful of NE’s response to the in-combination assessment of guillemot feature of the Farne Islands SPA in their submission Appendix F5 [REP5-166] at Deadline 5. The Applicant is confident that AEol can be ruled out for guillemot at the Farne Islands SPA alone, and that the Applicant’s contribution to an in-combination impact can be seen as immaterial, and can therefore AEol can also be ruled out.</p> <p>With regard to addressing in-combination impacts (if AEol cannot be ruled out by the SoS), the Applicant welcomes Natural England’s position that if accepted and suitably scaled, the Applicant’s proposed without prejudice measures for guillemot (at FFC SPA) would address compensation requirements for impacts on guillemot at the Farne Islands SPA (please see Table 27 of The Applicant's Comments on Deadline 5 Submissions (document reference 24.2)).</p> <p>The Applicant has committed to deploying primary and/or secondary noise reduction methods (Noise Abatement System) for pile driving as secured in Outline MMMP for piling activities (document reference 8.61., submitted at deadline 6). After discussion with Natural England on this matter, the Applicant considers no AEol can confidently be concluded on the SNS SAC and considers this matter resolved.</p>
<b>Marine Mammals</b>			
Q3: Potential effects on marine mammals at the EIA level	The Applicant	Section 11.5.1.1 of ES Chapter 11 [REP5-023] identifies 24 potential impacts on marine mammals that have been scoped in for assessment. However, in the subsequent assessment, and as summarised in Table 11.96 of [REP5-023], only 22 effects are considered. It appears that disturbance at seal haul-outs during the operation and decommissioning phases have not been assessed, although this has been referenced in Table 11.95. Can the applicant explain why it has only specifically considered disturbance at seal haul-outs during the construction phase, for example in Table 11.7 and Table 11.96 of [REP5-023]?	<p>The Applicant confirms that the impacts were assessed but not correctly reported in Chapter 11 Marine mammals (document reference 6.2.11) in errata. The Applicant had scoped in the impact of disturbance at seal-haul out sites in section 11.5 of Chapter 11 Marine Mammals previously submitted (APP-066) and it had been assessed but was omitted from Table 11.96. The Applicant has submitted an updated Chapter 11 Marine Mammals (document reference 6.1.11) at Deadline 6 with these errors addressed.</p> <p>The conclusion of the impact assessment for disturbance at seal haul-outs during the operation and decommissioning phases is Minor significance, which is not significant in EIA terms.</p>
Q4: Commitment to the use of noise abatement systems	The Applicant	In its deadline 5 submission Appendix E3 [REP5-165] NE has stated that it cannot rule out an in-combination AEol to the harbour porpoise feature of the SNS SAC, the grey seal feature of the Humber Estuary SAC and the harbour seal feature of the The Wash and North Norfolk Coast SAC. The reason for this is because NE still does not consider that a firm enough commitment has been made to the use of noise abatement systems, despite updates to the wording of relevant submitted documents such as the Outline Marine Mammal Mitigation Protocol for Piling Activities (MMMP for Piling) [REP4a098] and the submission of a Clarification Note on the use of ‘best endeavours’ in the context of Policy Paper: Reducing Marine Noise [REP4a-	<p>The Applicant is confident in the assessment conclusions and that they are robust. The Applicant concluded no AEol on the harbour porpoise feature of the SNS SAC, no AEol on the grey seal feature of the Humber Estuary SAC, and no AEol on the harbour seal feature of the Wash and North Norfolk Coast SAC within the RIAA (REP5-101). The conclusion of no AEol on these sites was reached at the point of submission of the RIAA (7.1), without the need for a commitment to NAS.</p> <p>The conclusions of no AEol in the RIAA (REP5-101) were reached through project alone and in-combination assessment on the sites, with consideration of the impacts in relation to the conservation objectives of each site. The Applicant highlights that the assessment for both Project alone and in-combination are quantitative assessments undertaken as per industry standard for HRA, are considered suitably precautionary and assessments were discussed with SNCBs through EPP.</p>

Ref No	Addressed to	Request	Applicant Response
		<p>188]. The Marine Management Organisation (MMO) notes in [REP5-174] that it is liaising with NE on this matter and comments that “...NAS is now considered to be a primary and expected mitigation.”</p> <p>Please provide any final comments you may wish to make on NE’s and the MMO’s stance on this matter and explain how the ExA can be confident that an in-combination AEol can be excluded for the European sites and species of marine mammals that NE has referenced in [REP5-165].</p>	<p>As per NE’s request in the Relevant Representations, the Applicant has undertaken a project alone iPCoD modelling and assessment, in order to further evidence the Project’s assessment conclusions..</p> <p>The Applicant’s project-alone iPCoD modelling confirms that piling at the Project will not have a population-level effect for harbour porpoise, grey seal or harbour seal. The iPCoD Modelling Report (REP4a-106) concludes that for harbour porpoise the impacted population size remains at 99.7%-99.9% of the unimpacted population size and the population continues on a stable trajectory, for harbour seal the population size remains at 100% of the unimpacted population size for both stable and declining populations, and for grey seal the population size remains at 100% of the unimpacted population size. The Applicant highlights that these iPCoD modelling results support and add further evidence to the conclusions of the RIAA i.e. that there is no potential for an AEol to the SNS SAC, Humber Estuary SAC or the Wash and North Norfolk Coast SAC from the Project alone.</p> <p>The Applicant maintains that due to the lack of piling schedules for other projects, cumulative iPCoD is limited in its usefulness due to the caveats of the assessment approach highlighted in the response to Q2 MM 1.1 (REP4-107). However, in response to Natural England’s request, the Applicant has submitted iPCoD Modelling Results (Cumulative) (document reference 24.8) at Deadline 6. The Applicant considers that the methodology used is robust and that the limitations of the model have been detailed in Section 3 of the iPCoD Modelling Report (REP4a-106) and Section 3 of the iPCoD Modelling Report (Cumulative) (document reference 24.8) submitted at D. The results of the iPCoD modelling support the conclusions set out in Chapter 11 Marine Mammals (document reference 6.11.1 submitted at deadline 6). Whilst the results of the cumulative iPCoD models are not directly applicable to the SAC populations, they do confirm that there are no population level effects alone or in-combination. This provides further justification to the conclusions of no AEol on SAC populations.</p> <p>The Applicant remains confident in the conclusions of the in-combination assessment presented in the RIAA and considers there will always be a significant amount of precaution and conservatism built into the in-combination assessment, which means that the realised impact will be much lower than what is presented in the assessment.</p> <p>Even though the Applicant has presented its robust conclusion of no AEol to the SACs listed, alone or in-combination, without needing further mitigation, the Applicant has still had due regard for policy developments regarding noise reduction that have arisen during the course of Examination. The Applicant has firmly committed to “primary and/or secondary noise reduction methods (Noise Abatement Systems) for pile driving”, as secured within the MMMP (document reference 8.6.2 submitted deadline 6) and SIP (document reference 8.7 submitted deadline 6). Based on recent discussion with Natural England, the Applicant considers the outstanding issues raised by Natural England should now be resolved and as such that an AEol can be confidently ruled out for these three sites.</p>
Q5: Use of passive acoustic monitoring during periods	The Applicant	<p>In its latest Risk and Issues Log [REP5-171] NE has maintained its view that it can only agree to piling activities during periods of reduced visibility or darkness if the applicant can demonstrate that passive acoustic monitoring (PAM) can cover the entire mitigation area (MA) and will cover animals that vocalise infrequently such as seals and baleen whales. NE is of the view that: “<i>The most frequently used PAM technologies for marine mammals rarely detect harbour porpoise beyond a distance of 300m.</i>”</p> <p>Comment on NE’s views on this matter and explain how this will be taken forward for consideration in the final version of the MMMP for Piling.</p>	<p>The Applicant highlights that the final mitigation procedures will be confirmed in the post-consent stage, once the final project design has been confirmed and updated underwater noise modelling has been undertaken which reflects this. This modelling will determine the size of the mitigation area that needs to be monitored during piling, and this will be presented in the Final MMMP. The Applicant will submit a Final MMMP for piling activities for approval by the MMO following consultation with Natural England prior to the commencement of the piling campaign, this will incorporate relevant guidance at the time of drafting.</p> <p>Natural England’s advice on this matter will be taken into account in the preparation of the Final MMMP in the post-consent stage alongside any further advice provided during consultation on the Final MMMP.</p> <p>The Applicant notes that JNCC (2025) guidelines includes a section on emerging technologies, therefore PAM may not be the only option for mitigation should piling be required to start in hours of darkness. The Final MMMP will consider all technologies available at the time, that could be used to robustly monitor the mitigation area.</p> <p>From discussions with Natural England, the Applicant does not consider this matter to be material to the conclusions of no AEol.</p>

Ref No	Addressed to	Request	Applicant Response
Q6: Cumulative Interim Population Consequences of Disturbance (iPCoD) Rep	Natural England	<p>The ExA notes an outstanding matter of concern relating to the lack of iPCoD in-combination assessment. NE, in its comments on the RIES [REP5-172] remains of the view that this is required. However, the applicant in its Response to the RIES [REP5-149] considers that: <i>“Without reliable piling schedules for each project included in the cumulative modelling, there are too many uncertainties and a lack of data, and thus it is not realistically practicable to carry out such modelling.”</i> Furthermore, the applicant states that it is awaiting a response from NE following a meeting on 3 February 2025 in relation to whether this position has changed.</p> <p>NE is requested to provide an update on whether it deems in-combination iPCoD modelling as being required and furthermore, following response to this, its final views on the applicant’s assessment and the conclusions of no AEol for the project alone or incombination for marine mammal qualifying features.</p>	<p>The Applicant maintains that cumulative iPCoD would not provide a meaningful conclusion due to the caveats of the assessment approach highlighted in (REP4-107). In order to run a cumulative iPCoD model successfully, detailed piling schedules for every project included in the cumulative assessment would be required, which the Applicant does not have access to.</p> <p>The Applicant also maintains that Natural England’s advice on this matter is inconsistent across projects going through the examination phase, in particular on Five Estuaries OWF (REP4-107), and highlights the importance of SNCBs maintaining consistency on methodological approaches across projects. While the Applicant is aware Natural England provides advice on a case-by-case basis [REP4a-138], the Applicant considers that on similar/same issues across projects, Natural England should be consistent in their advice unless a rationale is provided for a different approach being taken on a specific project. No such rationale has been provided either in relation to the Project or Five Estuaries.</p> <p>However, to reach agreement with Natural England on this point the Applicant has submitted iPCoD Modelling Report (Cumulative) (document reference 28.4) at Deadline 6.</p> <p>The Applicant has been unable to meet with Natural England to agree a scope for this work. Therefore, in order to ensure the modelling is conducted in time to submit into examination the Applicant has assumed the following:</p> <ul style="list-style-type: none"> <li>▪ Modelling for 3 key species: harbour porpoise, harbour seal and grey seal</li> <li>▪ Screened in UK projects in the relevant MUs with a quantitative EIAR available for piling</li> <li>▪ Screened in ODOW piling years +- 1 year</li> </ul> <p>The Applicant maintains that cumulative iPCoD would not provide a meaningful conclusion due to the caveats of the assessment approach highlighted in (REP4-107). However, to reach agreement with Natural England on this point the Applicant have submitted iPCoD Modelling Results (Cumulative) (document reference 24.8) at Deadline 6. The key findings indicate that for all three species, the predicted impacts from cumulative pile driving activities do not result in population-level effects. For harbour porpoise, 18 years after the modelled piling ends, the mean impacted population size is 98.8% of the unimpacted population size. The population growth of the impacted population remains stable, at the level of population size just after piling stops. The modelled decline is, therefore, not considered to be evidence of a population-level effect. For both species of seal, the impacted population size remains the same as the unimpacted population size, and thus disturbance from piling at the Project cumulatively with the other OWFs is predicted to not result in a population level effect.</p> <p>These findings confirm that for the levels of cumulative disturbance modelled, there is no significant effect at population level. These results align with the Project’s Environmental Impact Assessment magnitude definition of “Low,” meaning that temporary behavioural effects may occur, but survival and reproductive rates are unlikely to be affected in a way that alters population trajectories. This analysis, based on the best available scientific data and methodologies, provides a robust basis for evaluating the possible cumulative impacts of the Project cumulatively with other OWFs.</p>
Offshore and Intertidal Ornithology			
Q7: Clarification regarding Appendix 2, Table 1 of the Response to Action Points [REP4a120]	The Applicant	<p>The applicant is requested to provide further explanation as to how the <i>“Effect in combination with other precaution applied (percentage increase in impact)”</i> figures in the sixth column of Table 1 of Appendix 2 of the Response to Action Points [REP4a-120] have been derived. Based on an initial figure of 18.2 predicted guillemot mortalities the ExA is struggling to understand how the final 1962% figure has been arrived at.</p>	<p>The figure presented (1962%) represents a typographical error. The sixth column of Table 1 of Appendix 2 of REP4a-120 aims to illustrate how the addition of each incidence of precaution increases the predicted impact. Where the error occurred, an impact that had already been increased by 932% was then subject to an increase in mortality from 1% to 2% - effectively a doubling of mortality and therefore a doubling of the increase in impact. As such, the increase in question should read 1862% rather than the 1962% presented in the table.</p>

Ref No	Addressed to	Request	Applicant Response
Q8: Clarification of errors and updates to submitted figures presented by the applicant	The Applicant	<p>In its deadline 5 submission Appendix F5 [REP5-166] NE has made reference to what it considers to be errors in some of the figures that have been provided. These have been set out in Appendix F5 [REP5-166] including in Table 1.</p> <p>Furthermore, NE has advised the applicant to refer to the project alone values presented for Dogger Bank South with the Dogger Bank South Report to Inform Appropriate Assessment (RIAA) ([AS-085] (in the Dogger Bank South Examination Library) and the most recently agreed total provided in the Sheringham and Dudgeon Extension Projects ([REP8-102] in that Examination Library) and update the totals for guillemot and razorbill of the FFC SPA accordingly.</p> <p>The ExA notes that in paragraph 1765 of the RIAA [REP5-101] the applicant has stated that: <i>"The total numbers presented in Table 10.3 are derived from in-combination tables presented for the natural England Offshore Ornithology Position for Sheringham Shoal and Dudgeon Offshore Windfarm Extension Projects Deadline 8 Submission"</i>. Furthermore, Table 10.28 of the RIAA [REP5-101] provides both standard and bespoke apportioning figures for guillemot attributed to the Flamborough and Filey Coast Special Protection Area (FFC SPA) based on the Dogger Bank South RIAA.</p> <p>Can the applicant please confirm whether the figures advised by NE in [REP5-166] in respect of Sheringham/Dudgeon and Dogger Bank South have been fully considered in its assessment of in-combination impacts. The applicant is also asked to provide any revised in-combination figures for guillemot and razorbill of the FFC SPA that might arise from any of the errors that NE has identified in [REP5-166]. Should revised figures be provided the applicant is also requested to clarify what, if any, impacts these revised figures would have on the conclusions the applicant has drawn regarding in-combination effects on these species and any resulting 'without prejudice' compensation requirements.</p>	<p>The Applicant has provided an updated RIAA (document reference 7.1, V4) at Deadline 6, within which any errors highlighted by natural England's Deadline 5 submission have been addressed.</p> <p>The in-combination assessment provided within the updated RIAA considers the most recently agreed project alone impacts as sourced from AS-085 for Dogger Bank South and with REP8-102 for the Sheringham and Dudgeon Extension Projects.</p> <p>The updated RIAA also includes additional 'in-combination scenarios' where impacts from Hornsea Four using a 2% mortality rate and a 5% mortality rate have been considered for auks, and impacts using a 1% mortality rate and a 10% mortality rate have been presented for gannet.</p> <p>These revisions have not led to any changes to the conclusions drawn by the Applicant.</p>
Q9: Presentation of in-combination totals for guillemot, razorbill and gannet at FFC SPA	Natural England	<p>In its deadline 5 response Appendix F5 [REP5-166] NE has recommended the use of a displacement rate of 70% and a mortality rate of 2% when considering the in-combination impacts of most other projects. However, NE has also recommended that the in-combination consideration of impacts of Hornsea 4 on guillemot and razorbill populations should be considered at a displacement rate of 70% and a mortality rate of 5% and that for gannet of FFC SPA the impacts from Hornsea 4 should be assessed at 60-80% displacement and 1-10% mortality.</p>	



Ref No	Addressed to	Request	Applicant Response
		<ul style="list-style-type: none"> <li>Can NE provide further explanation as to why it considers these bespoke rates for Hornsea 4 are necessary for the in-combination consideration of impacts, when they have not been recommended for impacts from other projects?</li> <li>Is it NE's view that these bespoke rates should only be applied to the in-combination assessment of effects on guillemot, razorbill and gannet of the FFC SPA and not applied to any other European sites or to the consideration of cumulative impacts at the EIA level?</li> </ul>	
Q9: Presentation of in-combination totals for guillemot, razorbill and gannet at FFC SPA	The Applicant	Can the applicant confirm whether it has taken account of NE's recommended rates for Hornsea 4 for guillemot and razorbill (5% mortality rate) and gannet (60-80% displacement rate and 1-10% mortality rate) for the FFC SPA in its incombination calculations? If not, then the applicant is requested to provide this calculation and state whether or not the use of these bespoke rates for these species of the FFC SPA would affect any of the conclusions it has drawn in regard to in-combination effects.	<p>To date the Applicant has not taken Natural England's recommended Hornsea 4 rates into consideration when deriving totals for in-combination assessment for guillemot, razorbill and gannet. This is because within the Hornsea Four HRA the Secretary of State disagreed with Natural England's position on Hornsea Four and considered a displacement mortality 2% to be appropriately precautionary.</p> <p>At Deadline 5 (REP5-166) Natural England requested that additional scenarios that consider these bespoke rates are added to an updated RIAA, which the Applicant has provided at Deadline 6.</p> <p>These revisions did not lead to any changes to the conclusions drawn by the Applicant.</p>
Q10: In-combination AEol on the guillemot feature of the Farne Islands SPA	Natural England	<p>In its deadline 5 response Appendix K3 [REP5-172] NE has stated that it considers the proposed development would give rise to an in-combination AEol on the guillemot feature of the Farne Islands SPA. However, NE also notes that: "... the Applicant's proposed without-prejudice measures for guillemot, once fully agreed and if suitably scaled, would also meet the required compensation for guillemot at Farne Islands SPA."</p> <p>The ExA notes that using a 50% displacement and 1% mortality rate the applicant has assessed the predicted mean guillemot mortalities attributed to the project alone during the non-breeding bioseason for the operational phase would be 1.69 using model-based abundance estimates and it would be 1.72 mortalities using design-based abundance estimates (Table 9.22 and Table 9.23 of the RIAA [REP5-101]). However, using NE's preferred approach of 70% displacement and 2% mortality it would be 2.2 bird mortalities for the project alone. NE has gone on to state that the applicant's proposed compensation measures for guillemot of the Flamborough and Filey Coast SPA, which includes predator control at the Plémont nature reserve, would be sufficient to also compensate for the guillemot qualifying feature of the Farne Islands SPA. Having regard to this, and to the applicant's assessment of this in the RIAA [REP5-101] please answer the following:</p> <ul style="list-style-type: none"> <li>Has this matter been raised previously in discussions with the applicant prior to deadline 5? If not, then NE is encouraged to discuss its specific</li> </ul>	<p>The Applicant has responded to Appendix K3 in Table XXX of The Applicant's Comments on Deadline 5 Submissions (document reference 23.2, submitted at Deadline 6).</p> <p>The Applicant welcomes Natural England's position with regard to the conclusion of no Project alone AEol for guillemot and puffin at the Farne Islands SPA.</p> <p>The impact predicted for the Farne Islands SPA using Natural England's precautionary approach is 2.2 birds per year, which equates to an increase in baseline mortality of 0.079% in relation to the latest count at the SPA (2019) and 0.056% in relation to the citation count. Given that the Applicant considers impacts predicted using Natural England's approach to be highly precautionary, actual impacts are likely to be lower than those predicted using Natural England's preferred approach.</p> <p>As such, the Applicant is confident that AEol can be ruled out for guillemot at the Farne Islands SPA, and that the Applicant's contribution to an in-combination impact can be seen as immaterial. Notwithstanding this position, the Applicant has updated the following documents at Deadline 6 to present a without prejudice derogation case for the guillemot feature of the Farne Islands SPA:</p> <ul style="list-style-type: none"> <li>Derogation case (document reference 7.5, updated at Deadline 6)</li> <li>Guillemot Compensation Plan (document reference 7.7.2, updated at Deadline 6)</li> <li>Offshore Artificial Nesting Structure Evidence Base and Road Map (document reference 7.7.4, updated at Deadline 6)</li> <li>Without Prejudice Predator Control Evidence Base and Road Map (document reference 7.7.5, updated at Deadline 6)</li> <li>Without Prejudice Additional Measures for Compensation of Guillemot and Razorbill (document reference 7.7.6, updated at Deadline 6).</li> </ul> <p>With regard to addressing in-combination impacts, the Applicant welcomes Natural England's position that if accepted and suitably scaled, the Applicant's proposed without prejudice measures for guillemot (at FFC SPA) would address compensation requirements for impacts on guillemot at the Farne Islands SPA.</p>



Ref No	Addressed to	Request	Applicant Response
		<p>concerns in relation to the Farne Islands SPA with the applicant as a matter of some urgency.</p> <ul style="list-style-type: none"> <li>Does NE agree that effects on guillemot of the Farne Islands SPA can be screened out of assessment for the breeding season?</li> <li>Would NE still consider there to be an in-combination AEol on the guillemot feature of the Farne Islands SPA if the applicant's assessment of 1.69 predicted mortalities arising from the proposed development was used, as taken from the latest version of the applicant's Report to Inform Appropriate Assessment [REP5-101], rather than NE's preferred figure of 2.2 mortalities for the project alone?</li> <li>As the applicant's suite of 'without prejudice' compensation measures that have been proposed for guillemot of the FFC SPA have not been proposed by the applicant for the compensation for guillemot of the Farne Islands SPA, what does "suitably scaled" mean in the context of compensation requirements and what level of compensation would NE be seeking? For example, would the applicant's proposed primary compensation measure of predator control at Plémont nature reserve be sufficient to provide the entirety of this?</li> </ul>	
Q10: In-combination AEol on the guillemot feature of the Farne Islands SPA	RSPB	<p>In its deadline 5 submission [REP5-160] the RSPB has stated that it is:</p> <p><i>"...unable to rule out AEol from disturbance and displacement effects on the Guillemot qualifying feature of the Farne Islands SPA in-combination with other plans or projects."</i></p> <p>Also, in its deadline 5 response Appendix K3 [REP5-172] NE has stated that it considers the proposed development would give rise to an in-combination AEol on the guillemot feature of the Farne Islands SPA, due to the substantial impacts of the Berwick Bank Offshore Wind Farm. However, NE has gone on to state that: <i>"We note that the Applicant's proposed without-prejudice measures for guillemot, once fully agreed and if suitably scaled, would also meet the required compensation for guillemot at Farne Islands SPA"</i>.</p> <p>Having regard to the applicant's assessment in the latest RIAA [REP5-101] and the views expressed by NE, does the RSPB agree with NE's view that the current proposed 'without prejudice' compensation measures for guillemot would meet any compensation requirement for the guillemot of the Farne Islands SPA?</p>	

Ref No	Addressed to	Request	Applicant Response
Q10: In-combination AEol on the guillemot feature of the Farne Islands SPA	The Applicant	Please comment on the views expressed by the RSPB in [REP5-160] and NE in [REP5-172] that an in-combination AEol on the guillemot qualifying feature of the Farne Islands SPA cannot be ruled out.	<p>The Applicant considers that both the Project alone impacts, and the in-combination impacts, are highly precautionary and are likely to represent an over-estimation of both Project alone and in-combination impacts. Given that the Applicant considers impacts predicted using Natural England's approach to be highly precautionary, actual impacts are likely to be lower than those predicted using Natural England's preferred approach. The impact predicted for the Farne Islands SPA using Natural England's precautionary approach is 2.2 birds per year, which equates to an increase in baseline mortality of 0.079% in relation to the latest count at the SPA (2019) and 0.056% in relation to the citation count.</p> <p>In addition, PVA predicts Counterfactual Growth Rate (CGR) of 0.995 to 0.998. Where CGR is 0.995 or higher (as is the case in this situation) when compared to the unimpacted population growth, it is standard practice to interpret these results as there being no material impact on the population. As such, the Applicant is confident that AEol can be ruled out for guillemot at the Farne Islands SPA, and that the Applicant's contribution to an in-combination impact can be seen as immaterial.</p>
Q11: Use of the 'Hornsea Four' method for calculating the quantum of compensation required	The Applicant	<p>In its deadline 5 submission 'Natural England's Updated Advice on Seabird Compensation Calculations' [REP5-167] NE made the following comments:</p> <p><i>"In such cases and pending further refinement to best practice advice, Natural England consider that, given the current absence of a robust alternative for guillemot and razorbill, it is appropriate for the Hornsea 4 ("H4") method to be used. This should be carried out in conjunction with the use of the 95% upper confidence limit (UCL) predicted impact value and the application of a suitable ratio to address the uncertainty of success, set on a caseby-case basis. The mean or central impact value should be used to inform and define success criteria, if appropriate."</i></p> <p>Has the applicant had any discussions with NE regarding this matter and, if so, is the applicant aware of the "suitable ratio to address the uncertainty of success" that NE is seeking? If that is the case, then please can the applicant provide figures for what the guillemot and razorbill compensation requirements would be based on this new preferred approach that NE has set out at deadline 5 in [REP5-167] or justify its position in terms of the figures it has provided. This should include confirmation of whether or not the figures provided in Table 3 to 6 of the Guillemot and Razorbill Compensation Quanta [REP5-143] use the 95% UCL.</p> <p>In addition, comment on whether the quantum of required compensation based on the approach advocated by NE in [REP5-167] could be provided in the context of the suite of 'without prejudice' compensation measures for guillemot and razorbill that have been proposed.</p>	<p>The Applicant has had no formal discussion with Natural England regarding the matter and as such the Applicant is not aware of the suitable ratio that Natural England is seeking.</p> <p>In lieu of being provided with a suitable ratio, the Applicant has provided compensation requirements derived using Natural England's revised approach at ratios of 1:1, 2:1 and 3:1 in its response to REP5-167.</p> <p>Using the current predicted outputs across the suite of measures for guillemot and razorbill (these are subject to change should space on the Applicant's ANS need to be re-distributed to accommodate a greater requirement for a given species), the Applicant's measures can meet the success criteria required for each species.</p> <p>The Applicant notes that Natural England will provide updates at Deadline 6, once the documentation received at Deadline 4 and 4a has been reviewed fully.</p> <p>The Applicant echoes the ExA's comments at Issue Specific Hearing 8 that the submission of any new information at Deadline 6, to which the Applicant should reasonably be given an opportunity to respond, risks not being accepted into the Examination. The Applicant suggests that such evidence should be afforded limited weight.</p> <p>The Applicant has provided updated versions of Guillemot and Razorbill Compensation Quanta (document reference 20.17, V4), Without Prejudice Guillemot Compensation Plan (document reference 7.7.2, V3) and Without Prejudice Razorbill Compensation Plan (document reference 7.7.3, V3) at Deadline 6 that acknowledge Natural England's updated position on compensation calculation for guillemot and razorbill. Specifically, Natural England's updated position is that when considering the design of measures, the UCL impact, the Hornsea Four method and an appropriate compensation ratio should be used for guillemot and razorbill. For kittiwake, Natural England's advice remains that use of the Hornsea 3 stage 2 method is appropriate. A fuller response is provided in the Applicant's response to Appendix G3 to Natural England's Deadline 5 submission (document reference 24.2).</p> <p>The Applicant understands the Deadline 5 advice from Natural England in Appendix G3 to be as follows.</p> <p><u>Success criteria</u></p> <p>Success criteria are calculated with the mean impact value, using the Hornsea Four method and at a 1:1 ratio.</p> <p>For guillemot at the Flamborough and Filey Coast SPA, the potential compensation achievable across the three proposed measures developed by the Applicant (including collaborative measures in the South West of England) is substantially larger than the success requirement calculated, with the Applicant's potential compensation at a ratio of 41.3:1 using the Applicant's approach to impact assessment and 3.0:1 using Natural England's approach to impact assessment. The Applicant notes that this ratio is conservative given quantification of available compensation</p>

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			<p>through predator eradication on the Isles of Scilly is not yet included, but the Task and Finish Group (comprising Defra, DESNZ, Natural England, The Wildlife Trusts, OWIC, The Crown Estate, and RSPB) state that:</p> <p><i>‘All parties agree that predator eradication on the Isles of Scilly has great potential to provide compensation for the impacts of offshore wind projects and would support its inclusion in project specific compensation plans. Offshore wind projects currently seeking consent might wish to submit this statement to the examining authority to demonstrate progress with this scheme, if they seek to use it as strategic compensation for unavoidable impacts to protected species likely to be impacted by their projects.’</i></p> <p>The Applicant understands that the Task and Finish Group is currently quantifying the potential compensation for guillemot and razorbill and that this information will be shared with the relevant developers as soon as it is available.</p> <p>In the meantime, the Applicant has provided RWE Dogger Bank South with its updated compensation quanta based on Natural England’s preferred approach identified in REP5-167. Following discussion with RWE Dogger Bank South regarding Natural England’s revised compensation quanta, the Applicant has received the following statement from RWE Dogger Bank South:</p> <p><i>‘Based on the amount of available habitat suitable for the guillemot and razorbill to ‘nest’ at the Isles of Scilly as documented by the DBS Projects’ colony count and habitat surveys undertaken in July 2024<sup>1</sup>, it is predicted that an eradication at the Isles of Scilly could provide enough rat free nesting spaces for both ODOV’s and the DBS Project’s guillemot and razorbill compensation needs, based on the compensation numbers for each species as derived from the HOW4 method using the 95% UCL at a 3:1 ratio’.</i></p> <p><u>Design criteria</u></p> <p>The design criteria are calculated with the UCL impact, using the Hornsea Four method, with an appropriate ratio applied.</p> <p>Assuming that a ratio of 2:1 is applied for kittiwake (thus allowing further space for auks on the ANS), the following scenarios arise:</p> <ul style="list-style-type: none"> <li>For guillemot at the FFC SPA, the Applicant’s suite of measures meets Natural England’s design criteria at a ratio of 2:1</li> <li>For guillemot at the FFC SPA and the Farne Islands SPA, the Applicant’s suite of measures meets Natural England’s design criteria at a ratio of 2:1</li> <li>For razorbill at the FFC SPA, the Applicant’s suite of measures meets Natural England’s design criteria at a ratio of 2:1 (1.99:1)</li> </ul> <p>The Applicant’s position is that its preferred approach, ie the use of the mean impact prediction with the Hornsea Four method and a 1:1 ratio, should be suitable to meet the compensation design requirements as well as the success requirements.</p> <p>However, should the UCI be applied then the Applicants position is that the additional built in precaution (e.g. an additional layer of precaution to that already present in the Hornsea 4 method) that results negates the need for the Application of any ratio. That is that using the UCI without a ratio is more than adequately precautionary.</p>

<sup>1</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010125/EN010125-001364-Guillemot%20and%20Razorbill%20Compensation%20Site%20Shortlist%20Refinement%20Report%20Revision%202%20Clean.pdf>

Ref No	Addressed to	Request	Applicant Response
			<p>Should there be disagreement with this position, then the Applicant notes that, even with the inclusion of the additional impacts at the Farne Islands SPA, a design requirement that utilises a ratio very close to 2:1 for both razorbill and guillemot could be delivered across all measures proposed by Applicant. This is detailed further in document 24.2</p> <p>In summary, the Applicant maintains that compensation is not necessary for either the guillemot or razorbill feature of the FFC SPA. Should compensation be necessary then the Applicants firm position is that the use of the mean impact value and a 1:1 ratio is appropriate for defining compensation quanta, given the precaution inherent in the assessments and relevant precedent. However, the Applicant has developed compensation measures which when considered collectively, the required compensation could be delivered under any of the following scenarios for guillemot and razorbill dependent on which method of quantification is deemed appropriate by the SoS:</p> <ul style="list-style-type: none"> <li>Applicants preferred approach at ratios beyond 1:1</li> <li>Natural England's Preferred Approach using the UCI, no ratio applied</li> <li>Natural England's preferred approach using the UCI up to a ratio of close to 2:1 (1.99:1).</li> </ul> <p>The full suite of compensation numbers using Natural England's preferred method are provided in Appendix 1.</p>
Q11: Use of the 'Hornsea Four' method for calculating the quantum of compensation required	Natural England	In its deadline 5 submission [REP5-167] NE has agreed to the use of the Hornsea 4 method for calculating compensation requirements for guillemot and razorbill but with the use of the 95% UCL and the application of a suitable ratio to address the uncertainty of success. NE is requested to discuss with the applicant what a suitable ratio might be, as soon as possible, so that the applicant can have the opportunity to take this into account and present these figures at deadline 6.	<p>The Applicant welcomes Natural England's confirmation that the Hornsea 4 method of calculating compensation is appropriate. At the time of writing the Applicant has not received any further advice from Natural England on ratios to be used.</p> <p>The Applicant considers that with the precaution inherent within the assessment, and the use of the UCI impact to inform compensation calculation, there is sufficient precaution built in at the point of compensation calculation to negate the need for a compensation ratio to be applied (see 21.8 The Applicant's Comments on Natural England's Risk and Issues Log).</p> <p>Please see responses to Q10 and Q11 above for information defining the Applicant's position regarding compensation requirements.</p>
Q12: Seabird assemblage of the FFC SPA	The Applicant & Natural England	<p>: In its deadline 5 submission [REP5-160] the RSPB considers that</p> <p><i>"... the impacts arising from distributional change associated with the development in combination with other wind farms are predicted to result in the annual population growth rate of Puffin at the FFC SPA declining with a ratio of impacted to unimpacted population growth rate of between 0.993 to 0.997."</i></p> <p>The RSPB therefore considers that it is unable to rule out in-combination AEol from collision risk, disturbance and displacement effects on the seabird assemblage qualifying feature of the FFC SPA.</p> <p>Please comment on the RSPB's conclusion or signpost to where you have already commented on this.</p>	<p>The Applicant notes that impacts to the puffin population are extremely low, with 2.05 birds per year impacted using Natural England's preferred approach and 0.42 birds per year impacted using the Applicant's approach. These levels of impact will lead to increases to baseline mortality of 0.707% and 0.144% for Natural England's and the Applicant's approaches respectively.</p> <p>Given that the Applicant considers impacts predicted using Natural England's approach to be highly precautionary, and that the Applicant's assessment is suitably precautionary, the Applicant considers that the impact on puffin of 0.42 birds, with an addition to baseline mortality of 0.144%, will not have an AEol puffin population or the seabird assemblage feature at the FFC SPA.</p> <p>In addition, PVA predicts Counterfactual Growth Rate (CGR) of 0.993 to 0.997. Where CGR is 0.995 or higher (as may be the case in this situation) when compared to the unimpacted population growth, it is standard practice to interpret these results as there being no material impact on the population.</p> <p>Therefore, given that the impacts predicted using Natural England's highly precautionary preferred approach do not give a conclusive material reduction in growth (i.e. a counterfactual growth rate lower than 0.995), the Applicant considers that impacts on puffin are unlikely to be sufficient for AEol on the assemblage at FFC SPA.</p>

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			<p>The Applicant also notes that in their REIS provided at Deadline 5, Natural England agreed with the Applicants conclusion in the updated RIAA [4-030] that the predicted mortality from the Project alone would not result in an adverse effect on the breeding seabird assemblage qualifying feature of the FFC SPA, and that for in-combination impacts, species specific compensation for kittiwake, guillemot and razorbill, should those be agreed, would also meet the required compensation for the seabird assemblage as a whole, and no stand-alone compensation proposal is required.</p>																																												
Benthic Ecology and Marine Processes																																															
Q13: Sabellaria Spinulosa	The Applicant & Natural England	<p>In its deadline 5 Risk and Issues Log [REP5-171] and Appendix C6 - Comments on Benthic Ecology [REP5-164], NE states that it will provide further advice to the updated <i>Sabellaria spinulosa</i> reef supporting habitat technical note [REP4a-122] expected to be submitted by the applicant at deadline 6. It is not clear from the text whether there is ongoing engagement between NE and the applicant to feed into the applicant's deadline 6 submission. The ExA encourages NE and the applicant to work together to provide final positions on this issue by deadline 6</p>	<p>The Applicant has conducted an assessment of the supporting habitat for <i>S. spinulosa</i> reef within the Offshore ECC, which intersects with the IDNRRB SAC. The findings are detailed in the <i>S. spinulosa</i> Reef Supporting Habitat Technical Note (document reference 22.11, updated at Deadline 6). Natural England approved the Applicant's interpretation of the methodologies and the quantification of the supporting habitat area for <i>S. spinulosa</i> reef via email through DAS on 25<sup>th</sup> March 2025.</p> <p>The Applicant also provided the realistic worst-case figure for the total area of cable protection predicted within Annex I supporting habitat to Natural England via DAS on the 27<sup>th</sup> March 2025. The information is also presented in the table below.</p> <table border="1"> <thead> <tr> <th>Calculation Step</th><th>Description</th><th>Value</th><th>Unit</th></tr> </thead> <tbody> <tr> <td></td><td>Number of Cables</td><td>4</td><td>each</td></tr> <tr> <td></td><td>Length of transit for each cable through Supporting Habitat</td><td>16562.5</td><td>m</td></tr> <tr> <td></td><td>Length of transit for all cables through Supporting Habitat</td><td>66250</td><td>m</td></tr> <tr> <td></td><td>20% of total length</td><td>13250</td><td>m</td></tr> <tr> <td></td><td>Number of mattresses required (rounded up)</td><td>4417</td><td>each</td></tr> <tr> <td></td><td>Each mattress footprint</td><td>18</td><td>m<sup>2</sup></td></tr> <tr> <td></td><td>Footprint within Supporting Habitat</td><td>79506</td><td>m<sup>2</sup></td></tr> <tr> <td></td><td>20% allowance for installation accuracy and slippage</td><td>15901.2</td><td>m<sup>2</sup></td></tr> <tr> <td></td><td>Total Footprint for Supporting Habitat</td><td>95407.2</td><td>m<sup>2</sup></td></tr> <tr> <td></td><td>Total volume for Supporting Habitat (0.35m high)</td><td>33392.52</td><td>m<sup>3</sup></td></tr> </tbody> </table> <p>The Applicant awaits Natural England's final position at Deadline 6. However, the Applicant has updated the without prejudice compensation case to include the quantification of impact to Annex I supporting habitat. The following documents have therefore been updated and submitted at Deadline 6.</p> <ul style="list-style-type: none"> <li>Without Prejudice Benthic Compensation Evidence Base and Roadmap (document reference 7.6.3, V4 updated at Deadline 6); and</li> <li>Without Prejudice Biogenic Reef Compensation Plan (document reference 7.6.2, V4 updated at Deadline 6).</li> </ul>	Calculation Step	Description	Value	Unit		Number of Cables	4	each		Length of transit for each cable through Supporting Habitat	16562.5	m		Length of transit for all cables through Supporting Habitat	66250	m		20% of total length	13250	m		Number of mattresses required (rounded up)	4417	each		Each mattress footprint	18	m <sup>2</sup>		Footprint within Supporting Habitat	79506	m <sup>2</sup>		20% allowance for installation accuracy and slippage	15901.2	m <sup>2</sup>		Total Footprint for Supporting Habitat	95407.2	m <sup>2</sup>		Total volume for Supporting Habitat (0.35m high)	33392.52	m <sup>3</sup>
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Q14: Lincolnshire Coast Submerged Forest Local Geological Site (LGS)	The Applicant & Natural England	<p>In its deadline 5 Risk and Issues Log [REP5-171], NE state that to resolve this issue the applicant would need to commit to avoiding the LGS submerged feature in a named document. The ExA encourages NE and the applicant to work together to resolve this issue. If agreement cannot be reached all parties are requested to provide an indication as to the implications of this disagreement to the conclusions of the EIA and/or the HRA.</p>	<p>The Applicant maintain their position regarding the interaction with the non-statutory designated site, Lincolnshire Coast Submerged Forest LGS. The use of HDD means that interaction with surface features is avoided and in addition to the relative size of the HDD ducts (1.2 m) means that the Applicant does not consider that the secured avoidance of this feature is practicable or necessary. The Applicant considers that this would have no implications for the conclusions of the EIA or HRA assessment.</p> <p>The Applicant highlights the provisions of paragraph 5.4.52 of NPS EN-1, which relates to the Secretary of State's decision making for regional and local sites designated for biological and geological conservation. Para 5.4.52 states: "The Secretary of State should give due consideration to regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent."</p>																																												



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			Paragraph 4.1.16 of NPS EN-1 states that requirements should only be imposed where, amongst other things, they are necessary to make the development acceptable. Paragraph 5.4.52 makes clear that a commitment to total avoidance of the Lincolnshire Coast Submerged Forest LGC is not necessary to make the Project acceptable and therefore such a commitment would fail the test of necessity.
Q15: Use of a fall pipe	The Applicant & Natural England	NE requested [REP1-059] that the applicant commit to the use of a fall pipe in disposing of dredged materials in the Inner Dowsing Race Bank North Ridge (IDRBNR) SAC. This was put to the applicant through RIESQU 32. The applicant has set out its views as to why this is not possible. The ExA requests that NE and the applicant discuss options to secure the consideration of the use of a fall pipe in a post-consent management plan, securing its consideration in consultation with NE whilst enabling other options to be considered should its use be constrained upon implementation	<p>The Applicant is not able to commit to the use of a fallpipe as the sandwave clearance operations that may occur on the applicable areas will fall under the final detailed design of the competent contractor in accordance with approval by the client (The Applicant) and in accordance with the DCO (including dMLS) and all other relevant obligations. The Project cannot confirm at this stage of the development process which contractor, vessel or final methodology will be used; this flexibility needs to be retained in order to ensure that any procurement process remains competitive. It is not common that many dredger vessels utilise rigid pipe solutions for dredging and disposal.</p> <p>Environmental constraints, such as shallow water depth and high currents, may necessitate other methods such as ROV operable dredging spreads, mass flow pumps, or shore/platform based suction dredging.</p> <p>The constraint to only use a rigid fall pipe dredging vessel (e.g. trailer hopper suction dredger) may also have a number of negative effects that will be considered in the engineering of the final solution. This includes the lower operating weather limits for a dredging vessel operating in shallow water with high currents, which in turn may adversely affect the overall construction schedule. Secondly, fall pipes are limited to their disposal rates, lengthening the offshore working time.</p> <p>The use of a fallpipe has not been ruled out and remains a potential option for disposal operations however the Applicant is unable to commit to the use of a fallpipe for the reasons outlined above.</p>
Q16: Plan Level HRA	The Crown Estate	NE [RR-045,C45] queried whether the information presented by the applicant met the requirement of the Round 4 plan level HRA which requires developers to demonstrate that irreparable damage to qualifying features has been avoided. Discussion through the examination is documented in paragraphs 3.2.36 – 3.2.40 of the ExA's RIES [PD-022]. NE note that the conclusions of no AEoI for IDRBNR SAC at the plan level was due to avoidance of the site. NE have requested [REP5-172] engagement from the Crown Estate on this matter relating to potential seabed lease requirements for ODOW and implications of the current predicted AEoI of IDRBNR SAC. The ExA requests that the Crown Estate provide its views on the conclusions of the plan level assessment and its applicability to this project and where possible for the applicant, NE and the Crown Estate to seek to progress this matter by deadline 6.	<p>The Applicant wishes to highlight that it is not correct for Natural England to state “<i>We note that an AEoI was not predicted for IDRBNR SAC at the plan level due to avoidance of the site.</i>” as this was not the case. The plan-level HRA undertaken by The Crown Estate for Offshore Wind Leasing Round 4 did not undertake a project-specific assessment of the Project's ECC as the cable route was not known at the time the plan-level HRA was undertaken, rather it undertook a high-level risk-based approach based on broad cable regions. This is clearly set out in section 6.2.1 of The Crown Estate's Record of Appropriate Assessment which states (our emphasis added):</p> <p><i>“NIRAS (2022) undertook an Export Cable Region Assessment (“ECRA”) for European Sites and features for which the Screening Report (NIRAS, 2021) identified a risk of LSE from an Export Cable Region. Due to the considerable uncertainty associated with cable routes for the Preferred Projects (not yet defined) the ECRA has taken a risk-based approach (consideration of both the vulnerability of features and the vulnerability of the Protected Sites) to the potential impacts arising from the installation of offshore wind farm export cables and their associated infrastructure. <b>The Crown Estate has concluded that it is not possible to undertake a reasonable and meaningful assessment of cable route impacts due to this uncertainty.</b>”</i></p> <p>The Crown Estate Record of Appropriate Assessment goes on to confirm that this risk based assessment does not replace the need for, or prejudice the outcome of, project level assessments undertaken as part of the DCO process at section 6.2.4 (our emphasis added):</p> <p><i>“The ECRA has been used to evaluate the overall risk of an AEOSI from each Export Cable Region (and the Export Cable Regions collectively), alone and in-combination with other plans and projects. <b>The assessment does not replace the information requirements of project level HRAs and does not attempt to pre-empt their conclusions.</b>”</i></p> <p>The Crown Estate Record of Appropriate Assessment then goes on to explain the plan-level mitigation measures that apply at initial route selection stage (i.e. not at the Project level stage), and state at paragraph 6.2.7 (our emphasis added):</p>

Ref No	Addressed to	Request	Applicant Response
			<p><b><i>“The mitigation measures identified will be secured through the Agreements for Lease and leaseholders will be required to demonstrate compliance with the mitigation measures in order to obtain an Agreement for Lease for any transmission assets.”</i></b></p> <p>The Crown Estate subsequently confirmed to the Applicant that the necessary requirements of the plan-level HRA had been satisfied to the satisfaction of The Crown Estate in June 2023 to enable an Agreement for Lease for the transmission assets to be entered into and this was completed on 17<sup>th</sup> October 2024.</p> <p>The ExA and the SoS can therefore be satisfied that there is no conflict between the Project and the plan-level HRA and that the Project complies with the policies set out at paragraphs 2.8.119 and 2.8.123 of NPS EN-3.</p>
Q17: Operation and Maintenance plan (tracked) [REP4a-093]	The Applicant & Natural England	NE requests the applicant to differentiate between activities being undertaken within the IDRBNR SAC and those in the remaining ECC. NE requests that this should include: total number of events; likely frequency of each activity; its duration; and the worst case scenario total area of impact per event. The applicant is requested to discuss this matter further with NE. NE are requested to review any progress and information supplied by the applicant and set out any further mitigation measures (if required) by deadline 6.	<p>The Applicant believes that updating the O&amp;M maintenance plan is unnecessary, as the worst-case scenario for O&amp;M impacts across the offshore ECC has already been presented. Furthermore, determining precise details at this stage is not feasible. The O&amp;M activities will depend on the exact infrastructure installed, including factors such as the locations and volume of cable protection. This matter is better addressed post-consent, as any estimate provided now would only be a basic, length-based determination of the split, offering limited value or meaningful insights to the assessment.</p> <p>Additionally, we do not consider this level of detail necessary for assessing the impacts on the IDRBNR SAC. The Applicant believes that sufficient information has already been provided to the Examination to rule out AEoI.</p> <p>At the time of writing, Natural England have not provided any further mitigation measures.</p>
Q18: Potential HRA matter	The Applicant & Natural England	<p>The ExA notes in response to REISQU 50 that NE [REP5-172] states <i>“however, secondary scour impacts and any associated remedial actions could affect Annex I benthic ecological receptors which would make this an HRA matter also”</i>.</p> <p>A similar response is also noted for RIESQU 41 and 46. Can NE confirm that these responses relate to HRA pathways which have been assessed? If NE are highlighting potential new impacts or pathways for the HRA, this should be discussed with the applicant and an update provided at deadline 6.</p>	<p>The Applicant has undertaken a robust assessment of the potential impact of seabed scouring on Marine Physical Processes receptors as presented within Section 7.12.2.2 Chapter 7 Marine Physical Processes (REP4a-029, Impact 5). Scour protection extents will be based on calculations carried out during the pre-construction phase, informed by detailed, site-specific geotechnical information. It is likely that any secondary scour effects associated scour protection would be confined to within a few meters of the direct footprint of that scour protection material and therefore the impact to benthic ecology receptors is de minimis. Furthermore, the Applicant reiterates that there is a commitment to avoiding construction across any recorded areas of <i>S. spinulosa</i> reef across the Offshore ECC, as informed by the pre-construction survey campaign. It is anticipated that where infrastructure is developed there will be a separation buffer from sensitive features, which is to be agreed during the post-consent process.</p>
Q19: HRA assessment of physical habitat loss/change and removal or rock armour	The Applicant & Natural England	<p>NE remains of the view that habitat loss should be considered separately from disturbance. The applicant has stated that it is confident in the assessment as presented in the RIAA. Representations on this matter and that of the use of removable rock armour have been provided by NE and the applicant throughout the examination. The ExA notes that NE have committed to providing an update at deadline 6 in relation to the scale and significance of impacts to supporting habitats. The ExA encourages NE to share this with the applicant ahead of deadline 6 to enable it to respond.</p> <p>The ExA also requests that NE set out how it wishes the applicant to use removable rock armour, noting that it has expressed a clear preference for this in some representations and a recognition of disbenefits in others.</p>	<p>The Applicant has assessed both physical habitat loss and disturbance and these have both been presented clearly within the RIAA (document reference 7.1, updated at Deadline 6), with consideration of the distinct sensitivities of each impact. The assessment details that <i>S. spinulosa</i> reef has a 'medium' sensitivity to disturbance (based on the MarESA sensitivity assessments), and the assessment notes that <i>S. spinulosa</i> has a sensitivity of 'high' from habitat loss. Assessments of the potential for an AEoI do not classify the sensitivity of a feature in the same way as for an EIA, however, the relative sensitivity of a feature is considered when determining the potential for an AEoI, in as far as it affects the conservation objectives of a site. It is therefore considered that the assessment provided does provide an adequate level of detail on the sensitivity of features to both disturbance and habitat loss separately and therefore each is fully assessed with respect to the appropriate sensitivity. The assessments conclude that no LSE and no AEoI are anticipated in all instances.</p> <p>The Applicant has separated these pressures within the detailed impact assessment presented within Section 9.8 of ES Chapter 9: Benthic and Intertidal Ecology (REP5-019), which informs the basis of the RIAA.</p> <p>The Applicant has conducted an assessment of the supporting habitat for <i>S. spinulosa</i> reef within the Offshore ECC, which intersects with the IDNRRB SAC. The findings are detailed in the <i>S. spinulosa</i> Reef Supporting Habitat Technical Note (document reference 22.11, updated at Deadline 6). Natural England approved the Applicant’s interpretation</p>

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			<p>of the methodologies and the quantification of the supporting habitat area for <i>S. spinulosa</i> reef via email through DAS on 25<sup>th</sup> March 2025.</p> <p>The Applicant also provided the realistic worst-case figure for the total area of cable protection predicted within Annex I supporting habitat to Natural England via DAS on the 27<sup>th</sup> March 2025. The information is also presented in the table below.</p> <table> <tr> <th>Calculation Step</th><th>Description</th><th>Value</th><th>Unit</th></tr> <tr> <td></td><td>Number of Cables</td><td>4</td><td>each</td></tr> <tr> <td></td><td>Length of transit for each cable through Supporting Habitat</td><td>16562.5</td><td>m</td></tr> <tr> <td></td><td>Length of transit for all cables through Supporting Habitat</td><td>66250</td><td>m</td></tr> <tr> <td></td><td>20% of total length</td><td>13250</td><td>m</td></tr> <tr> <td></td><td>Number of mattresses required (rounded up)</td><td>4417</td><td>each</td></tr> <tr> <td></td><td>Each mattress footprint</td><td>18</td><td>m2</td></tr> <tr> <td></td><td>Footprint within Supporting Habitat</td><td>79506</td><td>m2</td></tr> <tr> <td></td><td>20% allowance for installation accuracy and slippage</td><td>15901.2</td><td>m2</td></tr> <tr> <td></td><td>Total Footprint for Supporting Habitat</td><td>95407.2</td><td>m2</td></tr> <tr> <td></td><td>Total volume for Supporting Habitat (0.35m high)</td><td>33392.52</td><td>m3</td></tr> </table> <p>The Applicant awaits Natural England’s final position at Deadline 6. However, the Applicant has updated the RIAA with this detail at Deadline 6 (document reference 7.1) and has updated the without prejudice compensation case to include the quantification of impact to Annex I supporting habitat. The following compensation documents have therefore been updated and submitted at Deadline 6. The Applicant maintains that this additional detail further confirms the conclusions of the assessment.</p> <ul style="list-style-type: none"> <li>Without Prejudice Benthic Compensation Evidence Base and Roadmap (document reference 7.6.3, V4 updated at Deadline 6) and,</li> <li>Without Prejudice Biogenic Reef Compensation Plan (document reference 7.6.2, V4 updated at Deadline 6)</li> </ul> <p>The Applicant echoes the ExA’s comments at Issue Specific Hearing 8 that the submission of any new information at Deadline 6, to which the Applicant should reasonably be given an opportunity to respond, risks not being accepted into the Examination. The Applicant suggests that such evidence should be afforded limited weight.</p>	Calculation Step	Description	Value	Unit		Number of Cables	4	each		Length of transit for each cable through Supporting Habitat	16562.5	m		Length of transit for all cables through Supporting Habitat	66250	m		20% of total length	13250	m		Number of mattresses required (rounded up)	4417	each		Each mattress footprint	18	m2		Footprint within Supporting Habitat	79506	m2		20% allowance for installation accuracy and slippage	15901.2	m2		Total Footprint for Supporting Habitat	95407.2	m2		Total volume for Supporting Habitat (0.35m high)	33392.52	m3
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Q20: Cumulative Impact Assessment/ In-combination assessment	The Applicant & Natural England	The ExA notes that disagreement remains in relation to the use of tiers in the cumulative impact assessment. NE, in its response to RIES QU 12 [REP5-172] states that this matter is unlikely to be resolved before the close of the examination. The ExA therefore requests a submission outlining whether, should this be the case, the ExA is able to rely on the conclusions provided by the applicant.	<p>The three-tier system employed in the CEA assessment, which the Applicant reaffirms includes all the categories outlined in the seven-tier system, ensures a comprehensive and precautionary evaluation of all relevant plans or projects using the best available data. Accordingly, the Applicant confirms and has robustly demonstrated that the information provided to inform the ExA CEA is adequate to support the conclusions presented within the RIAA.</p> <p>For the Annex I sandbank feature of IDRBNR SAC, which Natural England mentions as a particular concern all operational projects within the IDRBNR SAC were assessed within the CEA. With regard to the Greater Wash SPA, the Applicant has presented assessments of impacts to common scoter and red-throated diver within the RIAA. With mitigation in place for red-throated diver (i.e. a seasonal restriction during the construction phase, and reduced height of ORCP structures) Natural England have agreed that impacts on these species within the Greater Wash SPA are low enough not to be carried through to in-combination assessment.</p>																																												
Flood Risk																																															
Q21: Flood Risk Assessment	The Applicant & the Environment Agency	With reference to the Environment Agency’s (EA) response to the ExA’s Q2WE1.1 [REP4-128], the EA stated that on 28 January 2025, the Environment Agency published the Risk of Flooding from Rivers and Sea (RoFRS) and Risk of Flooding from Surface Water (RoFSW) documents. In its response the EA also notes that these updates should not materially affect the assessments already undertaken (and in	<p>The Applicant noted the Environment Agency’s (EA) position on the publication of new data for Risk of Flooding from Rivers and Sea (RoFRS) and Risk of Flooding from Surface Water (RoFSW) in its comments on responses to the ExA’s second written questions [REP4a-114].</p> <p>The data supporting the EA Flood Map for Planning was updated on 25 March 2025, using the new National Flood Risk Assessment (NaFRA) data. The data supporting the extent of Flood Zone 2 and Flood Zone 3 has been reviewed by the Applicant against the data used in the Flood Risk Assessments for the Onshore Export Cable Corridor and 400kV Cables [REP4-022 and REP4-024] and the Onshore Substation [REP4-027 and REP4-028]. There is no visible</p>																																												

Ref No	Addressed to	Request	Applicant Response
		<p>progress) in the Environmental Statement (ES) and Flood Risk Assessments.</p> <p>In addition, the EA stated [REP4-128] that on 25 March 2025 it will be publishing a revised version of the Flood Map for Planning to show updated Flood Zones using the new National Flood Risk Assessment (NaFRA) data.</p> <p>The ExA therefore requests a submission at deadline 6 outlining whether this update would have any implications on flood risk assessment, coastal change, or on the ES for this application.</p>	<p>difference between the two data sets in the extent of Flood Zone 2 or Flood Zone 3 within the Order Limits. It is also noted that bespoke hydraulic modelling has been undertaken by the Applicant to support the application for areas of sensitivity at the landfall [REP4-095 to REP4-098] and at the onshore substation location [Annex A to REP4-027 and REP4-028]. This modelling is specific to the application and as such is considered to be the more appropriate data to use for the assessment of flood risk.</p> <p>The Applicant can therefore confirm that the publication of updates to data relating to RoFRS and RoFSW and the revised version of the Flood Map for Planning does not materially affect the assessments already undertaken. There is no change to the assessment of flood risk or coastal change and there is no change to the assessment undertaken within the ES in relation to this technical area.</p>
Closing statements and deadline 6 submissions			
Closing statements and deadline 6 submissions	All Parties	<p>The ExA encourages NE, all interested parties and the applicant to work together to resolve all outstanding issues within the examination timeframe and for all parties to provide an indication as to the implications of any outstanding disagreement to the conclusions of the EIA and/or the HRA.</p> <p>The ExA has noted a number of requests from parties for the applicant to include additional information in documentation. The ExA has not, in this document, set out every outstanding matter in the examination and therefore requests all parties to ensure that an update on any outstanding matters is provided at deadline 6.</p> <p>Responses from the applicant and all named Interested Parties to the above questions are requested to be submitted no later than deadline 6 which is on Friday 4 April 2025. All parties are reminded that any submissions received after the close of the examination cannot be taken into account by the Examining Authority.</p>	<p>The Applicant has received additional advice on various outstanding items from Natural England and the MMO since Deadline 5 and held a meeting with the MMO (28 March 2025) and a meeting with Natural England (31 March 2025) to discuss and agree outstanding items, where possible to do so.</p> <p>The Applicant echoes the ExA's comments at Issue Specific Hearing 8 that the submission of any new information at Deadline 6, to which the Applicant should reasonably be given an opportunity to respond, risks not being accepted into the Examination. The Applicant suggests that such evidence should be afforded limited weight.</p>

## Appendix 1. Compensation requirements based on the Applicant and Natural England approaches to impact calculation and preferred predicted impacts

Table 2. Compensation requirements based on guillemot impacts to Flamborough and Filey Coast SPA with the updated Natural England Approach

Impact (individuals)	Method	NE design requirement 1:1 (pairs)	NE design requirement 2:1 (pairs)	NE design requirement 3:1 (pairs)	NE success requirement (pairs)	Compensation across three measures (pairs)	capability
18.2	Applicant (mean)	77.4	154.7	232.0	77.4	3,772	
25.8	Applicant (UCL)	109.7	219.3	328.9	77.4	3,772	
248.7	Natural England (mean)	1056.8	2113.6	3170.4	1056.8	3,772	
375.2	Natural England (UCL)	1594.3	3188.6	4782.9	1056.8	3,772	

Table 3. Compensation requirements based on guillemot impacts to Flamborough and Filey Coast SPA and the Farne Islands SPA with the updated Natural England Approach

Impact (individuals)	Method	NE design requirement 1:1 (pairs)	NE design requirement 2:1 (pairs)	NE design requirement 3:1 (pairs)	NE success requirement (pairs)	Compensation across three measures (pairs)	capability
19.9	Applicant (mean)	84.6	169.2	253.8	84.6	3,772	
28.8	Applicant (UCL)	122.4	244.8	367.2	84.6	3,772	
250.9	Natural England (mean)	1066.1	2132.2	3198.3	1066.1	3,772	
377.9	Natural England (UCL)	1605.8	3211.6	4817.4	1066.1	3,772	

Table 4. Compensation requirements based on razorbill impacts to Flamborough and Filey Coast SPA with the updated Natural England Approach

Impact (individuals)	Method	NE design requirement 1:1 (pairs)	NE design requirement 2:1 (pairs)	NE design requirement 3:1 (pairs)	NE success requirement (pairs)	Compensation across three measures (pairs)	capability
10.5	Applicant (mean)	92.0	184.0	276.0	92.0	855	
15.5	Applicant (UCL)	135.8	271.6	407.4	92.0	855	
68.9	Natural England (mean)	603.5	1,207.0	1,810.5	603.5	855	
108.1	Natural England (UCL)	946.9	1,893.8	2,840.7	603.5	855	