



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Outer Dowsing Offshore Wind Farm

Appendix K4 to the Natural England Deadline Submission

**Natural England's Response to The Infrastructure Planning (Examination Procedure)
Rules 2010 Rule 17 Letter 21 March 2025**

For:

The construction and operation of Outer Dowsing Offshore Wind Farm located
approximately 54 km from the Lincolnshire Coast in the Southern North Sea.

Planning Inspectorate Reference EN010130

4th April 2025

Appendix K4 - Natural England's Response to The Infrastructure Planning (Examination Procedure) Rules 2010 Rule 17 Letter 21 March 2025

Introduction

At Deadline 6, Natural England provides the following response to the information requested by the Examining Authority in their Rule 17 letter dated 21 March 2025: [Request for Information](#).

Natural England's detailed advice on the information requests is presented in Tables 1 and 2 below.

Table 1 – Natural England’s advice to the Rule 17 Information Requests Dated 21 March 2025

Rule 17 Question	Natural England Response
<p><i>Q1: Risk and Issues Log</i></p> <p>To Natural England: 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>“ 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. Natural England considers that these matters may be resolved through:</p> <ul style="list-style-type: none"> • provision of additional evidence or justification to support conclusions; and/or • revisions to impact assessment methodology and/or assessment conclusions; and/or • minor to moderate revisions to impact modelling; and/or • well-designed mitigation measures that are adequately secured through the draft DCO/dML and/or • amendments to draft plans <p>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.”</p> <p>Having regard to this can NE in conjunction with its Risk</p>	<p>Please see NE R&I Log at D6 where Natural England has provided our final position for each thematic area and within the Principal Areas of Disagreement Summary Statement (PADSS). Where applicable a steer as to the implications for outstanding issues is also provided.</p>

Rule 17 Question	Natural England Response
<p>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"> ▪ 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. ▪ 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. 	
<p><i>Q2: Response to Annex 1 Table A.1 of the RIES</i></p> <p>To Natural England: 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 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</p>	<p>Please refer to Table 2 below for further explanation where an answer of No was provided in our response to the RIES [REP5-172].</p> <p>This table supersedes the table included previously at Deadline 5 within [REP5-172].</p>

Rule 17 Question	Natural England Response
<p>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>Marine Mammals</p> <p><i>Q6: Cumulative Interim Population Consequences of Disturbance (iPCoD) Report</i></p> <p>To Natural England: 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: "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." 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</p>	<p>Please Refer to Appendix E4 at Deadline 6.</p> <p>Please refer to Appendix E4 (Annex 1) at Deadline 6 for Natural England's advice on iPCoD [REP4a-107], which was provided to ODOW through our discretionary advice service (DAS) on 28 March 2025, in addition to our final position regarding the Applicant's assessment and the conclusions of no AEol for the project alone or in- combination for marine mammal qualifying features.</p>

Rule 17 Question	Natural England Response
<p>furthermore, following response to this, its final views on the applicant's assessment and the conclusions of no AEol for the project alone or in- combination for marine mammal qualifying features.</p>	
<p><i>Q9: Presentation of in-combination totals for guillemot, razorbill and gannet at FFC SPA</i></p> <p>To Natural England: 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> <ul style="list-style-type: none"> ▪ 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? ▪ 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? 	<p>Please Refer to Appendix F6 at Deadline 6.</p> <p>The advised rate of 70% displacement and 5% mortality for guillemot and razorbill for Hornsea 4's contribution to the in-combination total relates to two factors: the large number of guillemot and razorbill recorded during their baseline surveys, in particularly during the chick-rearing and moult phase, and the proximity of the Hornsea 4 array area to FFC SPA. We do not consider that it is necessary to use a 5% mortality rate for other projects, given they are at an increased distance from the FFC SPA (such as Outer Dowsing) and/or support lower densities of auks than Hornsea 4 during this sensitive period.</p> <p>This bespoke approach to displacement for guillemot and razorbill at Hornsea 4 and the justification for it are outlined within NE's Deadline 5 and 6 submissions [REP5-115, REP6-056] for the Hornsea 4 examination. Similarly for gannet, it was considered appropriate to employ a range of mortality from 1-10% due to the proximity of Hornsea 4 to FFC SPA, as stated within Appendix B to our Relevant Representations for Hornsea 4 [RR-029], whilst in previous cases Natural England have accepted a mortality rate of 1% as those projects, whilst still in foraging range, are at some distance from the colony, as is Outer Dowsing.</p> <p>NE can confirm 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. However, we do consider they should be applied to the consideration of the range of potential cumulative impacts at the EIA level.</p>

Rule 17 Question	Natural England Response
<p><i>Q10: In-combination AEol on the guillemot feature of the Farne Islands SPA</i></p> <p>To Natural England: 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"> Has this matter been raised previously in discussions with the applicant prior to deadline 5? If not, then NE is 	<p>Firstly, Natural England is keen to highlight that we advised that Applicant's guillemot compensation would also meet the required compensation 'once <u>fully agreed and if suitably scaled</u>' (our emphasis). It is therefore not the case, as the question states, that <i>'NE has gone on to state that the applicant's proposed compensation measures for guillemot of the Flamborough and Filey Coast SPA... would be sufficient to also compensate for the guillemot qualifying feature of the Farne Islands SPA.'</i> Given the scale of predicted impacts on FFC SPA compared to the much lower ones on Farne Islands SPA, our point was that <u>if</u> suitable measures can be secured, there would be a strong likelihood that impacts on Farne Islands SPA could also be accommodated. We apologise if our drafting was not sufficiently clear.</p> <ul style="list-style-type: none"> Natural England included Farne Islands SPA guillemot in Table 5.1 of our Relevant Representations as a site with outstanding concerns (RR-045). Until the Applicant's assessment had been properly conducted, it was not possible to advise on whether the impacts on Farne Islands SPA would be of sufficient scale to make a meaningful contribution to the in-combination total for guillemot, though we recognise that Natural England did not provide advice on this SPA in our post-ORBA ornithology submission (REP3-070). Nevertheless we have concluded that, whilst the contribution of ODOV to impacts on Farne Islands SPA is undeniably small, it is not possible to rule out adverse effects in-combination given i) the predicted impacts of the Berwick Bank OWF being of a level where AEOL cannot be ruled out and ii) the likely need for DESNZ to carry out a simultaneous consideration of other projects also having impacts on Farne Islands SPA guillemot – Rampion 2, Five Estuaries, North Falls, Dogger Bank South. We agree that breeding season effects on Farne Islands SPA

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<p>encouraged to discuss its specific concerns in relation to the Farne Islands SPA with the applicant as a matter of some urgency.</p> <ul style="list-style-type: none"> ▪ Does NE agree that effects on guillemot of the Farne Islands SPA can be screened out of assessment for the breeding season? ▪ Would NE still consider there to be an in-combination AEoI 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? ▪ 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? 	<p>guillemot can be screened out.</p> <ul style="list-style-type: none"> • For the reasons set out in Appendix F3 of our Deadline 4 response [REP4-139], we do not recommend that displacement matrix outputs of 50% displacement and 1% mortality are used. • The Applicant's mortality impacts on Farne Islands SPA are less than 1% of those predicted for FFC SPA. It follows that if the Applicant can deliver the scale of compensation needed for FFC SPA through its package of measures (Plémont, South West England, ANS nest spaces), delivering sufficient compensation for Farne Islands SPA should also be achievable. The key issue here is that, at present, the proposed compensation measures do not inspire sufficient confidence that they will likely deliver sufficient benefit to FFC SPA.
<p><i>Q11: Use of the 'Hornsea Four' method for calculating the quantum of compensation required</i></p> <p>To 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</p>	<p>The Applicant has presented compensation calculations using the 95% UCL, the Hornsea 4 method and ratios between 1:1 and 3:1. This is in line with the approach taken with other OWF projects. As such, these values have already been presented into the Examination and are available for the SoS to set the ratio that they deem appropriate.</p> <p>It should be recognised that the Applicant has brought forward three</p>

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<p>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>	<p>distinct measures in three geographic locations (four if Berry Head is considered separately to the north coast of Cornwall/Devon), which provides resilience to the overall package by potentially buffering against one measure being unsuccessful or underperforming. However, we noted that the Applicant's assessment of the potential scale of compensation that could be provided states that ratios of 2.5:1 and 1.4:1 are achievable for guillemot and razorbill respectively, when considered in light of Natural England's advised impacts and calculations methods ([REP5-144]). It is of some concern that even by the Applicant's reckoning the proposals for razorbill are not able to achieve a 2:1 compensation to impact ratio.</p> <p>Furthermore, given our reservations regarding the proposals, we consider that these ratios, or indeed greater ones, will likely be challenging to achieve without significant further development of the measures, and/or recourse to any measures that might be available through the Marine Recovery Fund. To assist the Applicant in their ongoing efforts to strengthen and secure their compensatory proposals, we have set out a number of aspects that can and should be improved in Appendix G4 at Deadline 6 drawing together our advice during the Examination on these matters. If these recommendations are fully adopted, this would increase the level of confidence the SoS could have that appropriate compensation can be secured.</p>
<p><i>Q12: Seabird assemblage of the FFC SPA</i></p> <p>To Natural England and the applicant: In its deadline 5 submission [REP5-160] the RSPB considers that "... 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</p>	<p>Natural England considers mortality impacts to the FFC SPA seabird assemblage in the context of two attributes in the Supplementary Advice on Conservation Objectives:</p> <p><u>'Assemblage of species: abundance'</u></p> <p>Due to the predicted impact on the more numerous species comprising the assemblage, particularly guillemot, it cannot be concluded that the overall abundance of the assemblage will be maintained, and AEOI in-combination avoided.</p>

Rule 17 Question	Natural England Response
<p>0.997." 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>However, whilst in-combination displacement effects from multiple OWF will exert a degree of pressure on the FFC SPA puffin population, at present we do not consider this would be sufficient to trigger an adverse effect on the seabird assemblage abundance attribute due to puffin impacts. This reflects the fairly modest level of the in-combination impact, and recognizes that the species is not a qualifying feature in its own right, or a named component of the assemblage.</p> <p><u>Assemblage of species: diversity</u></p> <p>There are 9 seabird species in the assemblage. It is not expected that the in-combination impacts predicted by the Applicant will result in any one species, including puffin, being lost to the assemblage, nor that the relative proportion of any one species within the assemblage diversity will be diminished, and so the diversity of the seabird assemblage will be maintained.</p>
<p>Benthic Ecology and Marine Processes</p> <p><i>Q13: Sabellaria Spinulosa</i></p> <p>To Natural England and the applicant: 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>Natural England can confirm that following D5, our advice to the <i>Sabellaria Spinulosa</i> reef supporting habitat technical note [REP4a-122] has been provided to the Applicant under our Discretionary Advice Service (DAS). Through correspondence we confirm agreement with the Applicant that the spatial extent of supporting habitat for Annex I <i>Sabellaria Spinulosa</i> reef within IDRBNR SAC overlapping with the ODOW export cable corridor is 31.23km².</p> <p>The Applicant in response (see Appendix C7 at Deadline 6), has provided their realistic worst-case scenario for the total area of cable protection predicted within supporting habitat for Annex I <i>Sabellaria spinulosa</i> reef. This is based on a worst case scenario of 20% of the cables requiring cable protection with an additional contingency of 20% for installation and slippage. Figures provided by the Applicant predict the WCS impact footprint to be 95,407.2m² with a volume of 33,292,52m³.</p>

Rule 17 Question	Natural England Response
	<p>Due to the lasting habitat change/loss from the placement of cable protection, the WCS footprint will be used to inform compensation requirements for Adverse Effects on Integrity (AEol) of IDRBNR SAC Annex I reef features.</p> <p>However, Natural England has concerns that given the inherent difficulty in installing cables to a sufficient depth within the prevailing sediment type for this predominantly mixed sediment habitat, a 20% WCS is not realistic and therefore not an appropriate scale to be used for compensation. We consider that the WCS of cable protection required across the supporting habitat for Annex I <i>Sabellaria spinulosa</i> reef, should be higher. As such we advise that compensation will likely be required at a greater scale, somewhere between 20% and 100%. However, without further site specific evidence to support the cable burial risk assessment we are unable to be more precise in our advice at this stage.</p> <p>Our final advice is provided in Appendix C7 at Deadline 6. Our advice provided in our relevant representations and throughout examination “<i>an Adverse Effect on Integrity (AEol) to the IDRBNR SAC cannot be excluded Alone or in-combination (with other plans or projects) from the placement of cable protection</i>” within areas delineated as supporting habitat for Annex I <i>Sabellaria spinulosa</i> reef and Sandbank features remains unchanged.</p>
<p>Q14: Lincolnshire Coast Submerged Forest Local Geological Site (LGS)</p> <p>To Natural England and the applicant: 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</p>	<p>There has been no further update from the Applicant, Natural England’s position remains unchanged and this irreplaceable submerged prehistoric forest along the English East Coast, both at the seabed and sub-surface, should be avoided</p>

Rule 17 Question	Natural England Response
<p>implications of this disagreement to the conclusions of the EIA and/or the HRA.</p>	
<p><i>Q15: Use of a fall pipe</i></p> <p>To Natural England and the applicant: 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 RIESQU32. 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>	<p>Natural England's position remains unchanged and highlights that the Applicant for the Five Estuaries OWF, for which examination has recently concluded, has committed to the use of a fallpipe/down pipe when depositing sediment with Margate and Long Sands SAC Section 3.21 and 7.1.1 [REP8A-011]. Therefore, we do not agree with the Applicant, and our advice remains unchanged as this mitigation measure ensures that the sediment can be deposited in specific locations to aid the recovery of the Annex I Sandbank. This is further supported by a commitment to deposit material removed from the SAC being deposited updrift of levelling / seabed preparation and cable trenching operations to encourage natural backfill and reworking of material. Without this commitment Natural England advises that sandwave levelling as a mitigation measure is likely to have HRA issues in its own right.</p>
<p><i>Q17: Operation and Maintenance plan (tracked) [REP4a-093]</i></p> <p>To Natural England and the applicant: 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>	<p>Natural England continues to advise that mitigation commitments, including scour and cable protection, are differentiated within the RIAA, the Outline Scour Protection and Cable Protection Management Plan and Operations and Maintenance plan both within and outside the IDRBNR SAC as applicable, and that this is secured by an appropriate condition within the DCO.</p> <p>Please refer to our advice in Appendix A1 and C7.</p>
<p><i>Q18: Potential HRA matter</i></p> <p>To Natural England and the applicant: The ExA notes in</p>	<p>Whilst we continue to consider that the impacts of scour/secondary scour have not been fully assessed, we welcome the Applicant's commitment to monitor scour in the updated IPMP [REP4a-074].</p>

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<p>response to REISQU 50 that NE [REP5-172] states “however, secondary scour impacts and any associated remedial actions could affect Annex I benthic ecological receptors which would make this an HRA matter also”. 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>However, we advise that the Applicant should consider the need for adaptive monitoring if observations of scour (or secondary scour) are found to be significantly greater than predicted. This monitoring should also be adequately captured in the OOOMP [REP4-093] to ensure that post-construction geophysical surveys are used to validate the Applicant’s position.</p>
<p><i>Q19: HRA assessment of physical habitat loss/change and removal or rock armour</i></p> <p>To Natural England and the applicant: 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. 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>Please refer to our final position as set out in Appendix C7 at Deadline 6.</p> <p>For clarification Natural England highlights that habitat disturbance will occur during cable installation. However, due to recoverability this is unlikely to result in a significant impact or an AEoI, unless the installation is within existing Annex I reef. By way of a case example, we refer to the Norfolk Boreas and Norfolk Vanguard OWF where compensation is required for cable installation in Annex I <i>Sabellaria</i> Reef. Habitat change/loss occurs where infrastructure is placed on the habitat feature causing a lasting change/loss. Hence, our advice is for these impacts to be differentiated. Natural England advises that our response to Q13 is also relevant here.</p> <p>We also refer the ExA to our advice in [REP4a-136]. Whilst Natural England welcomes the commitment to use only removable cable protection, <i>we highlight that any removability shouldn’t be to the wider detriment of the Annex I features, which would be the case currently in relation to rock protection</i> (our emphasis). In addition, and as highlighted by the Secretary of State Decision for Norfolk Boreas, that even with the commitment to using removable cable protection and committing to removing said protection at the time of</p>

Rule 17 Question	Natural England Response
	decommissioning, the impacts over the lifetime of the project, while the protection is <i>in situ</i> , were considered by the SoS to hinder the conservation objectives and have an adverse effect on integrity. Therefore, further consideration of the implications are required by the Applicant to the Annex I reef feature of the IDRBNR SAC.
<p><i>Q20: Cumulative Impact Assessment/ In-combination assessment</i></p> <p>To Natural England and the applicant: The ExA notes that disagreement remains in relation to the use of tiers in the cumulative impact assessment. NE, in its response to RIESQU 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>	<p>Natural England continues to advise that the Applicant should adopt the seven-tier system for all receptors to inform the level of data available to use within the cumulative effect assessment (CEA) and/or in-combination assessments. This is best practice and is standard advice for all projects including those which have been recently consented. We are unable to agree with the conclusions drawn for IDRBNR SAC within this report. Please refer to Appendix C7 and/or new issue at Deadline 6. The Galahad gas platform topsides and monopod (located within the ODOW array area) is due to take place in 2026 and this may overlap with ODOW construction (2026-7). This has not been considered in the Cumulative Impact Assessment for marine physical processes, marine water and sediment quality, and/or benthic ecology chapters and therefore these chapters require updating.</p>
<p>Closing statements and deadline 6 submissions</p> <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>Natural England's Risk & Issues log and PADSS submitted on 04 April 2025 at Deadline 6 represents Natural England's position at the close of the Examination. Further clarification of our final positions are also included within Appendices C7, E4, F6, G4 and I4 submitted at Deadline 6.</p>

Rule 17 Question	Natural England Response
<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>	

Table 2 Table A.1 from Annex 1 of the RIES: European sites and qualifying features for which the Applicant concluded LSE could not be excluded (alone or in combination with other plans or projects) and position on conclusions of AEol [REP5-172]

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
North Norfolk Sandbanks and Saturn Reef SAC	Reefs Sandbanks which are slightly covered by seawater all of the time	Suspended sediment / deposition	Suspended sediment / deposition	Suspended sediment / deposition	N	N	N	Y	No AEol
		Indirect pollution	Indirect pollution	Indirect pollution	N	N	N	Y	
		Accidental pollution	Accidental pollution	Accidental pollution	N	N	N	Y	
		INNS	INNS	INNS	N	N	N	Y	
		Changes to physical processes	Changes to physical processes	Changes to physical processes	N	N	N	Y	
Inner Dowsing, Race Bank, and North Ridge SAC	Reefs Sandbanks which are slightly covered by seawater all of the time	Physical Habitat loss/ disturbance	Physical Habitat loss/ disturbance	Physical Habitat loss/ disturbance	N	N	N	N	Natural England advises an AEol alone for the Annex I Sandbank and Reef features cannot be ruled out due to lasting habitat change/loss including supporting habitat for reef from any placement of cable protection and disturbance during installation of the export cable. See our

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
									final advice in Appendix C7 and Q.13 and Q.19 above.
		Suspended sediment / deposition	Suspended sediment / deposition	Suspended sediment / deposition	N	N	N	N	Natural England is unable to advise beyond reasonable scientific doubt that AEol can be ruled out alone and in-combination. See NE Advice at Deadline 5 [REP5-164, REP5-171]. Uncertainties remain regarding sediment transport gradients across the site.
		Indirect pollution	Indirect pollution	Indirect pollution	N	N	N	Y	
		Accidental pollution	Accidental pollution	Accidental pollution	N	N	N	Y	
		INNS	INNS	INNS	N	N	N	Y	
		Changes to physical processes	Changes to physical processes	Changes to physical processes	N	N	N	N	Natural England is unable to rule out AEol alone and in-combination. Features of the IDRBNR SAC and other Annex I sandbanks within the array and ECC may be impacted by modifications to seabed

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		C	O&M	D	C	O&M	D		
									morphology due to construction-related activities and ongoing operation impacts from plans or projects within the site. Uncertainties remain regarding seabed mobility, recovery of bedforms, and sediment transport gradients across the site. Please see our advice regarding the ORCP in Appendix B5 at Deadline 6.
		EMF	EMF	EMF	N	N	N	Y	
The Wash and North Norfolk Coast SAC	Sandbanks which are slightly covered by sea water all of the time Mudflats and sandflats not covered by seawater at low tide Large shallow inlets and bays	Suspended sediment / deposition	Suspended sediment / deposition	Suspended sediment / deposition	N	N	N	Y	
		Indirect pollution	Indirect pollution	Indirect pollution	N	N	N	Y	
		Accidental pollution	Accidental pollution	Accidental pollution	N	N	N	Y	
		INNS	INNS	INNS	N	N	N	Y	
		Changes to physical	Changes to physical	Changes to physical	N	N	N	N	Natural England is unable to rule out AEol in combination

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		C	O&M	D	C	O&M	D		
	Reefs <i>Salicornia</i> and other annuals colonizing mud and sand Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>)	processes	processes	processes					with other plans or projects. Please refer to advice within the RIES Q.47 [REP5-172] regarding nearshore cable protection.
		Loss of habitats within the SAC	Loss of habitats within the SAC	Loss of habitats within the SAC	N	N	N	Y	
		Disturbance to otter	Disturbance to otter	Disturbance to otter	N	N	N	Y	
		Habitat loss for otter	Habitat loss for otter	Habitat loss for otter	N	N	N	Y	
	Harbour seal (<i>Phoca vitulina</i>)	Underwater noise	Underwater noise	Underwater noise	N	N	N	N	Natural England is not confident that the levels of underwater noise disturbance caused by piling and UXO clearance from the project alone and in-combination with other activities can be concluded as no AEol to the mobile interest features of the Wash and North Norfolk Coast SAC. The implementation of noise abatement or noise reduction

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		C	O&M	D	C	O&M	D		
									technology would resolve this issue (see Appendix E4 at Deadline 6).
		Vessel disturbance	Vessel disturbance	Vessel disturbance	N	N	N	Y	
		Collision risk	Collision risk	Collision risk	N	N	N	Y	
		Changes to prey	Changes to prey	Changes to prey	N	N	N	Y	
		Disturbance to haul out sites	Disturbance to haul out sites	Disturbance to haul out sites	N	N	N	Y	
Humber Estuary SPA	Great Bittern (non-breeding and breeding) Shelduck (non-breeding) Marsh harrier; (breeding) Hen harrier (non-breeding) Avocet (non-	Habitat loss	Habitat loss	Habitat loss	N	N	N	Y	No AEol

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		C	O&M	D	C	O&M	D		
	breeding and breeding)	Disturbance of birds outside the SPA	Disturbance of birds outside the SPA	Disturbance of birds outside the SPA	N	N	N	Y	
	Golden plover (non-breeding)								
	Knot (non-breeding)								
	Dunlin (non-breeding)								
	Ruff (non-breeding)								
	Black-tailed godwit (<i>L. limosa</i>) (non-breeding)	Pollution	Pollution	Pollution	N	N	N	Y	
	Bar-tailed godwit (non-breeding)								
	Redshank (non-breeding)								
	Little tern (breeding)								
	Waterbird assemblage	Air quality impacts	Air quality impacts	Air quality impacts	N	N	N	Y	
	Dune systems with	Suspended sediment /	Suspended sediment /	Suspended sediment /	N	N	N	Y	

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
Humber Estuary Ramsar site	humid dune slacks	deposition	deposition	deposition					
		Indirect pollution	Indirect pollution	Indirect pollution	N	N	N	Y	
		Accidental pollution	Accidental pollution	Accidental pollution	N	N	N	Y	
		INNS	INNS	INNS	N	N	N	Y	
		Changes to physical processes	Changes to physical processes	Changes to physical processes	N	N	N	Y	
	Grey seal (<i>Halichoerus grypus</i>)	Underwater noise	Underwater noise	Underwater noise	N	N	N	N	Natural England is not confident that the levels of from underwater noise disturbance caused by piling and UXO clearance from the project in-combination with other activities can be concluded as no AEol on the grey seal feature of the Humber Estuary Ramsar Site. The implementation of noise abatement or noise reduction technology would resolve this issue (see Appendix E4 at Deadline 6).

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
		Vessel disturbance	Vessel disturbance	Vessel disturbance	N	N	N	Y	
		Collision risk	Collision risk	Collision risk	N	N	N	Y	
	Criterion 5 – assemblages of international importance (waterfowl, non-breeding season); Criterion 6 – species/populations occurring at levels of international importance Shelduck Golden plover Knot Dunlin Black-tailed godwit (<i>L. limosa</i>) Bar-tailed godwit; and Redshank	Habitat loss	Habitat loss	Habitat loss	N	N	N	Y	
		Disturbance of birds outside the SPA	Disturbance of birds outside the SPA	Disturbance of birds outside the SPA	N	N	N	Y	
		Pollution	Pollution	Pollution	N	N	N	Y	
		Air quality impacts	Air quality impacts	Air quality impacts	N	N	N	Y	

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
Humber Estuary SAC	Estuaries Mudflats and sandflats not covered by seawater at low tide	Suspended sediment / deposition	Suspended sediment / deposition	Suspended sediment / deposition	N	N	N	Y	
		Indirect pollution	Indirect pollution	Indirect pollution	N	N	N	Y	
	Sandbanks which are slightly covered by sea water all the time	Accidental pollution	Accidental pollution	Accidental pollution	N	N	N	Y	
		INNS	INNS	INNS	N	N	N	Y	
	<i>Salicornia</i> and other annuals colonizing mud and sand	Changes to physical processes	Changes to physical processes	Changes to physical processes	N	N	N	Y	
	Atlantic salt meadows								
	Sea lamprey (<i>Petromyzon marinus</i>) River lamprey (<i>Lampetra fluviatilis</i>)	Underwater noise	Underwater noise	Underwater noise	N	N	N	Y	
	Grey seal (<i>Halichoerus grypus</i>)	Underwater noise	Underwater noise	Underwater noise	N	N	N	N	Natural England is not confident that the levels of underwater noise disturbance caused by piling and UXO

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
									clearance from the project in-combination with other activities can be concluded as no AEol on the grey seal feature of the Humber Estuary SAC. The implementation of noise abatement or noise reduction technology would resolve this issue (see Appendix E4).
		Vessel disturbance	Vessel disturbance	Vessel Disturbance	N	N	N	Y	
		Collision risk	Collision risk	Collision risk	N	N	N	Y	
Gibraltar Point SPA	Grey plover (Non-breeding)	Habitat loss	Habitat loss	Habitat loss	N	N	N	Y	
	Sanderling (Non-breeding)	Disturbance of birds outside the SPA	Disturbance of birds outside the SPA	Disturbance of birds outside the SPA	N	N	N	Y	
	Bar-tailed godwit (Non-breeding)	Pollution	Pollution	Pollution	N	N	N	Y	
	Little tern (Breeding)	Air quality impacts	Air quality impacts	Air quality impacts	N	N	N	Y	

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
Gibraltar Point Ramsar site	Red Data book invertebrates – including: <i>Haliphus mucronatus</i> (a water beetle, aquatic) <i>Brachytron pratense</i> (hairy dragonfly, aquatic)	Habitat loss	Habitat loss	Habitat loss	N	N	N	Y	
		Pollution	Pollution	Pollution	N	N	N	Y	

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
		Air quality impacts	Air quality impacts	Air quality impacts	N	N	N	Y	
	Criterion 5: Waterfowl Criterion 6: Grey plover, sanderling, bar-tailed godwit, dark-bellied brent goose	Disturbance of birds outside the Ramsar site	Disturbance of birds outside the Ramsar site	Disturbance of birds outside the Ramsar site	N	N	N	Y	
The Wash SPA	Bewick's swan (non-breeding) Shelduck (non-breeding) Wigeon (non-breeding) Gadwall (non-	Habitat loss	Habitat loss	Habitat loss	N	N	N	N (curlew, Waterbird Assemblage (golden plover, lapwing))	Natural England believes that considerable progress has been made in relation to mitigation measures for the designated bird features of the Wash SPA within functionally linked land. We understand the Applicant will be providing further update to
		Disturbance of birds within and outside the SPA	Disturbance of birds within and outside the SPA	Disturbance of birds within and outside the SPA					
		Pollution	Pollution	Pollution					
		Air quality	Air quality	Air quality					

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
	breeding) Pintail (non-breeding) Common scoter (non-breeding) Goldeneye (non-breeding) Oystercatcher (non-breeding) Grey plover (non-breeding) Knot (non-breeding) Sanderling (non-breeding) Dunlin (non-breeding) Black-tailed godwit (breeding) Bar-tailed godwit (Non breeding) Curlew (Non-breeding) Redshank (Non-	impacts	impacts	impacts					their mitigation measures into the OLEMS at Deadline 6. We have provided advice directly to ODOW prior to Deadline 6 regarding these proposed updates to the mitigation measures. While we expect to reach an agreement of no AEol to the curlew feature and to golden plover and lapwing as part of the waterbird assemblage of the Wash SPA using functionally linked land (FLL), these measures will require further review to resolve this issue.

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
	breeding) Turnstone (Non-breeding) Common tern (Breeding) Little tern (Breeding) Waterbird assemblage								

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		C	O&M	D	C	O&M	D		
The Wash SPA	Pink-footed goose (non-breeding) Dark-bellied brent goose (non-breeding)	Habitat loss Disturbance of birds within and outside the SPA Pollution Air quality impacts	Habitat loss Disturbance of birds within and outside the SPA Pollution Air quality impacts	Habitat loss Disturbance of birds within and outside the SPA Pollution Air quality impacts	N	N	N	N (Disturbance)	Natural England has met with the Applicant to discuss further mitigation for Pink-footed goose Dark-bellied brent goose (DBBG). Providing our outstanding concerns re. the additional pink footed geese mitigation measures presented by the Applicant in [REP4a-086] and [REP4a-144] are addressed and following discussion with the Applicant further consideration is provided in an update to the OLEMS and schedule of mitigation at Deadline 6 for additional screening to minimise disturbance to DBBG. Natural England expects to be able to agree a conclusion of no AEol to these over wintering features of the Wash SPA.
	Saltmarshes	Suspended sediment /	Suspended sediment /	Suspended sediment /	N	N	N	Y	

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		C	O&M	D	C	O&M	D		
The Wash Ramsar site	Estuaries Major intertidal banks of sand and mud Shallow water Deep channels	deposition	deposition	deposition					
		Indirect pollution	Indirect pollution	Indirect pollution	N	N	N	Y	
		Accidental pollution	Accidental pollution	Accidental pollution	N	N	N	Y	
		INNS	INNS	INNS	N	N	N	Y	
		Changes to physical processes	Changes to physical processes	Changes to physical processes	N	N	N	Y	
	Criterion 5 – bird assemblages of international importance Criterion 6 – bird species/ populations occurring at levels of international importance Species with peak counts in spring/autumn:	Habitat loss	Habitat loss	Habitat loss	N	N	N	N for FLL disturbance to curlew, lapwing, pink-footed goose, golden plover and dark-bellied brent goose	Natural England has met with the Applicant to discuss further mitigation for Pink-footed goose Dark-bellied brent goose (DBBG). Providing our outstanding concerns re. the additional pink footed geese mitigation measures presented by the Applicant in [REP4a-086] and [REP4a-144] are addressed and following discussion with the Applicant further consideration is provided in an update to the OLEMS and
		Disturbance of birds within and outside the SPA	Disturbance of birds within and outside the SPA	Disturbance of birds within and outside the SPA					
		Pollution	Pollution	Pollution					
		Air quality impacts	Air quality impacts	Air quality impacts					

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
	Redshank Curlew Oystercatcher (wintering) Grey plover (wintering) Knot Sanderling Species with peak counts in winter: Black-headed gull Eider Bar-tailed godwit Shelduck Dark-bellied brent goose Dunlin Pink-footed goose Golden plover Lapwing Species with peak								<p>schedule of mitigation at Deadline 6 for additional screening to minimise disturbance to DBBG, Natural England expects to be able to agree to a conclusion of no AEol to these over wintering features of the Wash SPA.</p> <p>Natural England believes that considerable progress has been made in relation to mitigation measures for the golden plover, curlew and lapwing designated bird features of the Wash Ramsar. We understand the Applicant will be providing further update to their mitigation measures into the OLEMS at Deadline 6. We have provided advice directly to ODOW prior to Deadline 6 regarding these proposed updates to the mitigation measures. While we expect to reach an agreement of no</p>

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
	counts in spring/autumn: Black-tailed godwit and ringed plover								AEol to these features of the Wash Ramsar using functionally linked land (FLL), these measures will require further review to resolve this issue.
Southern North Sea SAC	Harbour porpoise	Underwater noise	Underwater noise	Underwater noise	N	N	N	N	Natural England is not confident that the levels of disturbance from underwater noise from the project in-combination with other activities can be concluded as no AEol on the harbour porpoise feature of the Southern North Sea SAC The implementation of noise abatement or noise reduction technology would resolve this issue (see Appendix E4 of our Deadline 6 submission).
		Vessel disturbance	Vessel disturbance	Vessel disturbance	N	N	N	Y	
		Collision risk	Collision risk	Collision risk	N	N	N	Y	
		Indirect pollution	Indirect pollution	Indirect pollution	N	N	N	Y	

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
		Accidental pollution	Accidental pollution	Accidental pollution	N	N	N	Y	
		Changes to prey	Changes to prey	Changes to prey	N	N	N	Y	
		Habitat loss	Habitat loss	Habitat loss	N	N	N	Y	
Berwickshire and North Northumberland Coast SAC	Grey seal	Changes to prey	Changes to prey	Changes to prey	N	N	N	Y	No AEol
		Vessel Disturbance	Vessel Disturbance	Vessel Disturbance					
		Collision risk	Collision risk	Collision risk	N	N	N	Y	
		In-combination	In-combination	In-combination	N	N	N	Y	
		Underwater noise	Underwater noise	Underwater noise	N	N	N	Y	
Alde-Ore Estuary SPA	Lesser black-backed gull	Collision risk	Collision risk	Collision risk	N	N	N	Y	No AEol
Greater Wash	Red-throated diver	Disturbance and	Disturbance and	Disturbance and	N	N	N	Y – subject to an	No AEol

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		C	O&M	D	C	O&M	D		
SPA		displacement	displacement	displacement				appropriate condition in the DCO/dML and Schedule of Mitigation including a 2km surrounding the SPA.	
	(Offshore) Common scoter	Disturbance and displacement	Disturbance and displacement	Disturbance and displacement	N	N	N	Y	No AEol
	(Onshore) Sandwich tern Common tern Little gull	Habitat loss Disturbance of birds within the SPA Pollution	Habitat loss Disturbance of birds within the SPA Pollution	Habitat loss Disturbance of birds within the SPA Pollution	N	N	N	Y	No AEol
North Norfolk Coast SPA	Sandwich tern	Collision risk	Collision risk	Collision risk	N	N	N	Y	No AEol
	Pink-footed goose	Habitat loss	Habitat loss	Habitat loss	N	N	N	Y	Providing our outstanding concerns re the additional pink footed geese mitigation measures presented by the Applicant in [REP4a-086] and
	Dark-bellied Brent goose	Disturbance of birds outside the	Disturbance of birds outside the	Disturbance of birds outside the	N	N	N	N (Pink-footed Goose)	

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
		SPA	SPA	SPA					[REP4a-144] are addressed, Natural England expects to be able to agree to a conclusion of no AEol to this over wintering feature of the North Norfolk Coast SPA which also forages on the Northern edge/boundary of The Wash.
North Norfolk Ramsar site	Pink-footed goose Dark-bellied Brent goose	Habitat loss	Habitat loss	Habitat loss	N	N	N	Y	Providing our outstanding concerns to the additional pink footed geese mitigation measures presented by the Applicant in [REP4a-086] and [REP4a-144] are addressed Natural England expects to be able to agree to a conclusion of no AEol to the pink footed goose over wintering feature of the North Norfolk Coast SPA, which also forages on the northern edge/boundary of The Wash
		Disturbance of birds outside the SPA	Disturbance of birds outside the SPA	Disturbance of birds outside the SPA	N	N	N	N (Pink-footed Goose)	
Flamborough	Herring gull	Collision risk	Collision risk	Collision risk	N	N	N	Y	No AEol for herring gull

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		C	O&M	D	C	O&M	D		
and Filey Coast SPA	Gannet								(noting it is a component of the seabird assemblage and not a qualifying feature) No AEol for gannet.
	Kittiwake	Collision risk	Collision risk	Collision risk	N	Y	N	Y	AEol cannot be excluded in-combination.
	Guillemot Razorbill Gannet Seabird assemblage (Puffin)	Disturbance and displacement	Disturbance and displacement	Disturbance and displacement	N	N	N	Y (project alone for gannet, guillemot, razorbill and seabird assemblage (puffin)) N for project in-combination for razorbill, guillemot and seabird assemblage	AEol cannot be excluded in-combination for guillemot, razorbill and the seabird assemblage. Please refer to our Deadline 6 submission Natural England's End of Examination Position on Offshore Ornithology for further detail on why NE disagree with the Applicant's conclusions and the implications of this disagreement to the conclusions of the EIA and the HRA. No AEol for gannet.

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
Coquet Island SPA	Puffin	Disturbance and displacement	Disturbance and displacement	Disturbance and displacement	N	N	N	Y	No AEol.
Farne Islands SPA	Kittiwake	Collision risk	Collision risk	Collision risk	N	N	N	Y	No AEol, noting that kittiwake is a seabird assemblage component not a qualifying feature.

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
	Guillemot Seabird assemblage	Disturbance and displacement	Disturbance and displacement	Disturbance and displacement	N	N	N	Y for project alone guillemot and seabird assemblage, and for project in-combination seabird assemblage. N for project in-combination for guillemot.	AEol cannot be excluded in-combination for guillemot. Please refer to our Deadline 6 submission Natural England's End of Examination Position on Offshore Ornithology for further detail on why NE disagree with the Applicant's conclusions and the implications of this disagreement to the conclusions of the EIA and the HRA. No AEol for seabird assemblage.
Scottish SPAs	Gannet Kittiwake	Collision risk	Collision risk	Collision risk	N	N	N	Scottish SPAs are outside NE's remit	N/A
	Guillemot	Disturbance and	Disturbance and	Disturbance and	N	N	N	As above.	N/A

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEol (alone or in combination)			Agreement with NE	NE Final advice on AEol Conclusion (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEol cannot be ruled out at Deadline 6)
		C	O&M	D	C	O&M	D		
	Razorbill Puffin	displacement	displacement	displacement					
Saltfleetby-Theddlethorpe Dunes and Gibraltar Point SAC	Annex I habitats: Embryonic shifting dunes Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ('white dunes') Fixed coastal dunes with herbaceous vegetation ('grey dunes')" Priority feature Dunes with <i>Hippophae rhamnoides</i> , Humid dune slacks	Loss of habitats within the SAC or reduction in habitat quality	Loss of habitats within the SAC or reduction in habitat quality	Loss of habitats within the SAC or reduction in habitat quality	N	N	N	N	No AEol