Date: 09 September 2025
Our ref: 523323
Your ref: EN010130

Department for Energy Security & Net Zero
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BY EMAIL ONLY

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Dear Sir/Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by Outer Dowsing Offshore Wind Farm Limited ("the Applicant") for an Order granting Development Consent for the proposed Outer Dowsing Offshore Wind Farm ("Project")

The following constitutes Natural England's formal statutory response to the Secretary of State's Request for Information (RFI) dated 12 August 2025.

Engagement with the Applicant since Examination close

Natural England wishes to highlight that since the close of examination, at the request of the Applicant, Natural England has engaged directly with them, under our Discretionary Advice Service (DAS) on outstanding issues which remained. We understand the Applicant intends to submit our DAS advice alongside updated documents at this RFI deadline.

To assist the Secretary of State in their determination, in addition to providing advice to each information request directed to Natural England, where applicable our advice also captures a summary of our updated position based on our understanding through our DAS engagement of the Applicant's intended updates/commitments at this RFI deadline, where this either resolves or progresses an outstanding issue. It should be noted that until relevant documentation is submitted, Natural England does not consider these commitments to be secured.

Natural England has been invited by the Secretary of State to comment upon:

Benthic ecology, intertidal, subtidal and coastal effects

*4. **Natural England** is invited to comment on D6 amendments to the Scour Protection and Cable Protection Management Plan ("SPCPMP") [REP6-076] and Outline Cable Specification and Installation Plan ("CSIP") [REP6-062], including:*

- *The addition of Table 3-2 in the SPCPMP [REP6-076] / Table 5-1 in the CSIP [REP6-062]; and*
- *Whether these amendments, alongside the inclusion of the proposed wording [REP6-145] for Condition 21 satisfy NE's concerns ([REP6-154], C – Benthic & Intertidal Ecology, pt 1&2) related to securing the Worst Case Scenario for the amount of Sabellaria spinulosa supporting habitat likely to be impacted by the Export Cable Corridor.*

Natural England's Comments:
Natural England has reviewed the Outline SPCPMP [REP6-076] and CSIP [REP6-062]. We welcome the inclusion of the Maximum Design Scenario (MDS)/Worst Case Scenario (WCS) for cable protection within Inner Dowsing, Race Bank and North Ridge (IDRBNR) Special Area of Conservation (SAC) in areas of Annex I Sandbank and supporting habitat for Annex I *Sabellaria spinulosa* reef. For clarity, Natural England advises the SPCPMP (Para 42 and Table 3-2 title) and CSIP (Para 22 final bullet point and Table 5-1 title) sets out that the width of cable protection within these features will not exceed 6m width. Further, we advise the documents describe in the explanatory paragraphs the percentage of the feature on which the WCS is based (currently for the supporting habitat for Annex I *Sabellaria spinulosa* reef feature, the Applicant's WCS commitment is 20% plus 20% contingency for the total length of the export cable route intersecting with this feature).

Natural England welcomes the proposed wording of condition 21 (i.e. "*No cable protection granted by this licence may be deployed within the IDRBNR SAC after the construction period has ended. Any cable protection to be installed outside of the IDRBNR SAC following completion of construction in locations where cable protection was not installed during construction must be deployed within 10 years of completion of construction, unless otherwise agreed by the MMO in writing"*).

However, whilst Natural England continues to agree with the Applicant's assessment on the amount of supporting habitat for Annex I biogenic reef which is likely to be impacted along the export cable corridor; we do not agree with the 20% WCS presented in terms of cable protection required across this feature within IDRBNR SAC and therefore the associated extent of lasting habitat loss. Therefore, NE's concerns in *[REP6-154, C – Benthic & Intertidal Ecology, pt 1&2 and D - Benthic compensation pts 1 and 2* remain unresolved. Our advice as set out at Deadline 6 [REP6-147] remains that: *'Natural England has concerns that given the inherent difficulty found by neighbouring cable installations with installing cables to a sufficient depth within the prevailing sediment type for this predominantly mixed sediment habitat, a 20% WCS is not realistic. We consider that the WCS of cable protection required across the supporting habitat for Annex I Sabellaria spinulosa reef, should be higher, somewhere between 20% (95,407m^2) and 100% (477,036m^2). As such, we advise that compensation will be required at a greater scale to allow for this contingency…..the details (area and volume) should be set out within a named document and secured within the DCO/DML in agreement with Natural England and the MMO.'*

Natural England notes the invitation to DEFRA (Point 5) to advise whether the Proposed Development and its impacts are of a type which could in-principle be compensated for by the MPA measure delivered through the Marine Recovery Fund (MRF). Natural England can confirm that while the scale of the impacts on supporting habitats are not agreed with the Applicant, we are agreed that strategic benthic compensation in the form of Marine Protected Area (MPA) Designation/Extension via the MRF has the greatest ecological merit to compensate for the impacts, and that through our communications with DEFRA are confident there would be sufficient feature within the MPA project to compensate for a higher WCS for Annex I *Sabellaria spinulosa* Reef for this project as set out above.

Similarly, we also highlight that we are confident that there is sufficient strategic benthic compensation in the form of MPA Designation/Extension to compensate for the advised Adverse Effect on Integrity (AEOI) from habitat change/loss, as a result of placing 5,760m^2 of cable protection on Annex I sandbanks within IDRBNR SAC.

7. The Secretary of State notes that in response to the Examining Authority's Rule 17 question on 'use of a fall pipe' for the disposal of dredge sediment in the Inner Dowsing, Race Bank and North Ridge (IDRBNR) Special Area of Conservation (SAC), Natural England have advised [REP6-155] that without the use of a fall pipe/down pipe "sandwave levelling as a mitigation measure is likely to have HRA issues in its own right" and also that this measure has been adopted by the Five Estuary Offshore Wind Farm for sediment disposal in the Margate and Long Sands SAC:

- ***Natural England** is invited to provide further detail on the implications for an Adverse Effect on the Integrity of the IDRBNR SAC, if the Applicant is unable to use a fall pipe/down pipe.*

Natural England's Comments:
Natural England advises that in the event that a fall-pipe cannot be used to deposit sediments in specific locations within IDRBNR SAC, then there is risk that the magnitude of resulting pressures, as listed in Natural England's Advice on Operations (AoO) for the site (including physical changes to another sediment type, smothering and siltation rate changes) could hinder the recovery of the Annex I Sandbank feature. In the absence of the proposed mitigation, there is a risk that the HRA for construction activities has not appropriately considered the duration of any sediment deposition, spatial extent and therefore significance, of likely impacts on the Annex I Sandbank feature.

Through engagement with the Applicant since examination close, Natural England understands the Applicant intends to include a commitment within an update to the Outline Biogenic Reef Mitigation Plan and the Outline CSIP to the use of precise disposal method via discharge pipe(s), downpipe(s) or equivalent within the IDRBNR SAC via a sediment return methodology suitable to ensure that material is returned within the same sediment type/cell and upstream of the dredge location on the sandbanks. To resolve our concerns, Natural England advises the Applicant makes it clear within these documents and the schedule of mitigation, this measure is to be used throughout the IDRBNR SAC to aid recovery of the Annex I sandbank feature.

Natural England also understands the Applicant intends to include a commitment within the Outline Biogenic Reef Mitigation Plan and the Outline CSIP to introduce a working separation distance (50m buffer) from Annex I *Sabellaria spinulosa* reef features to limit the potential for impacts to arise from sediment deposition during construction activities. Natural England welcomes these commitments and providing these are secured and fully implemented, and not just where sediment deposition is predicted to be greatest, along with the above concerning use of a fall pipe and material returned within the same sediment type upstream, through the inclusion within both these documents and the Schedule of Mitigation, then Natural England's concerns are resolved regarding impacts to the Annex I *Sabellaria spinulosa* reef feature from sediment deposition and can advise that an AEoI from this impact pathway can be excluded.

While Natural England advises these mitigation measures are used throughout the IDRBNR SAC we further highlight use of this mitigation would also address many of our concerns raised in relation to NERC, 2006 Priority Habitats outside of designated sites.

9. The Secretary of State notes that in [REP6-159] Natural England advocated for more detailed bathymetric and modelling data to help understand the potential impacts to the Inner Dowsing, Race Bank and North Ridge ("IDRBNR") Special Area of Conservation ("SAC") from changes to marine physical processes caused by construction of the Offshore Reactive Compensation Platform's ("ORCPs") and that without this an Adverse Effect on the Integrity of IDRBNR SAC cannot be ruled out. Without prejudice to the Secretary of State's conclusions on impact, ***Natural England*** *is requested to advise how an appropriate compensation quantum could be calculated if this data is not available and the Adverse Effect cannot be excluded.*

Natural England's Comments:
Since the close of examination, Natural England has engaged with the Applicant via our Discretionary Advice Service (DAS). As Natural England understands, the Applicant intends to provide the Secretary of State with further technical clarification and a commitment to an Offshore Reactive Compensation Platform (ORCP) Restriction Area, providing a 500m buffer to the IDRBNR SAC, and therefore a minimum distance of over 1000m from the nearest Annex I Sandbank feature. Natural England is supportive of this commitment as a mitigation measure.

Should this commitment/mitigation measure be included within the Applicant's updated ORCP Design Principles Statement and/or secured by the DCO/DML and submitted to the Secretary of State, then Natural England advises that the risk of an AEoI on the IDRBNR SAC, due to changes in physical processes or suspended sediment/deposition from the presence of the ORCP infrastructure, would be mitigated as much as currently possible.

However, Natural England notes that the Applicant's evidence indicates that as the operational life of the project progresses, the likelihood of negative interactions occurring increases due to sandbank migration. Due to the potential significance of the impacts being poorly understood, and unpredictable over time, in part due to environmental factors and the impacts are only likely to occur some years in the future, we are content for the decision maker to exclude an AEoI from this impact pathway through undertaking a monitoring and adaptive management-based approach.

We believe this approach aligns with the Applicant's intention to incorporate a monitoring commitment at this RFI deadline which commits to comprehensive pre-construction/post construction monitoring. Though, we advise that this commitment must also include the requirement to undertake remediation where observations show the impacts to be greater than predicted.

Offshore and Intertidal Ornithology

27. ***Natural England*** *commented in [REP6-151] that it had commissioned a report by the British Trust of Ornithology, on behalf of the Collaboration on Offshore Wind Strategic Compensation, to critically review current compensation techniques. The Secretary of State invites Natural England to confirm whether the recently published Rhoades et al., (2025)[1], is the report that it discussed in its submission. If this is the paper in question, Natural England is invited to comment on the findings of paper, and any relevant conclusions which it considers apply to this Proposed Development.*

[1] Rhoades, J., Johnston, D.T., Humphreys, E.M. & Boersch-Supan, P.H. 2025. Review of methods used to calculate scale of artificial nesting structures proposed as a compensation measure for Kittiwake mortality at offshore wind farms. *BTO Research Report* **788**: British Trust for Ornithology, Thetford, UK Link: [redacted]

Natural England's Comments:
Natural England can confirm that Rhoades *et al*. (2025)[1] is the report referenced in our Deadline 6 submission [REP6-151]. This report has since been published and we have carefully reviewed the findings.

The report clearly sets out limitations associated with the various methods used by offshore wind projects to calculate the compensation requirement i.e. the number of breeding pairs needed to produce the required number of recruits to offset the predicted mortality, termed the 'compensation population' in the report. Amongst other things, the report concludes that the Hornsea 3 part 2 ('H3p2') method – the method we have advised ODOW and other developers should use for kittiwake [REP5-167] - is the most 'comprehensive' (in terms of demographic traits considered) of the methods used. This is in part because it considers the number of recruits likely to disperse into the wider meta-population (and thus potentially the National Site Network), whereas the Hornsea 4 ('H4') method does not. This gives further support to Natural England's view that the H3p2 method is not, as asserted by the Applicant, an overly precautionary approach.

Indeed, the report then goes on to demonstrate that while the H3p2 method attempts to take account of the need for the Artificial Nesting Structure (ANS) colony to be self-sustaining, it does not adequately consider the relationship between productivity and net dispersal rates. Specifically, the report outlines the difference between gross and net dispersal rates, and demonstrates that the assumed natal dispersal and productivity rates as taken from Horswill & Robinson 2015[2] (which are representative of gross rather than net dispersal – see Appendix 2 of the BTO report for further explanation) are ecologically implausible, with a productivity rate of 0.819 being unable to support the assumed dispersal rates of 0.77 or 0.89 as applied by Hornsea 3 and Outer Dowsing (see pages 32-33 and Figure b in Appendix 2 of the report). The report then goes on to recommend a new approach that is, in Natural England's view, more ecologically robust than previously used methods/formulae. This considers the maximum (net) dispersal rate that a colony can support at a given productivity rate and still be self-sustaining.

It is important to note that the above BTO recommendations apply only to kittiwake and not to other species such as auks. Further work is needed to determine whether this method can be applied to other species, and if so, what additional considerations might be required.

Notwithstanding our support of the method proposed by BTO from an ecological standpoint, Natural England are cognisant of the advanced stage at which Outer Dowsing and the other Round 4 Projects are currently, and the risk of causing delays to consent in the context of meeting the 2030 clean power objective. We therefore suggest the Secretary of State (SoS) consider whether it is appropriate or reasonable to request that Outer Dowsing update their calculations of the compensation requirement for kittiwake at this stage in the determination phase, particularly given the range of compensation 'scenarios' already presented by Outer Dowsing (including presentation of different ratios).

To provide the SoS an indication of what likely influence the use of the BTO method will have on the compensation requirement for kittiwake, we have applied the method to the project's mean annual impacts of 15.5 and a 95% upper confidence limit annual impact of 41, using a productivity rate of 0.819 and corresponding sustainable dispersal rate of 0.28. The BTO method generates a requirement of approximately 140 and 360 breeding pairs respectively (prior to applying any ratios), compared to the requirement of 120 and 271 breeding pairs respectively using the H3p2 method as presented by Outer Dowsing in REP6-043.

However, as outlined within our Deadline 3 submission [REP3-071], a higher degree of confidence in the compensation requirement, as a result of the application of a more robust method that

considers all relevant demographic features, may justify the use of a less precautionary compensation ratio which, as Rhoades *et al* notes, has previously been used to account for such uncertainties. This would particularly be the case where the other uncertainties under consideration are taken into account in the calculations used by an Applicant e.g. use of the 95% Upper Confidence Interval (UCI) impact value to account for the potential for impacts to be greater than the Central Impact Value (CIV).

Finally, it should be noted that whilst reviewing the report, Natural England identified a minor issue with the usability of the R code supplied in Appendix 2, which in no way detracts from the robustness of the proposed methodology but which may cause some uncertainty around how to apply the method to alternative productivity rates. If the Secretary of State requires that Outer Dowsing update their calculations of the kittiwake compensation requirement using the BTO method outlined in Rhoades *et al*. 2025, Natural England would be pleased to work with Outer Dowsing to support them with the application of the BTO method to their calculation of the compensation requirement for kittiwake.

[1]Rhoades, J., Johnston, D.T., Humphreys, E.M. & Boersch-Supan, P.H. 2025. Review of methods used to calculate scale of artificial nesting structures proposed as a compensation measure for Kittiwake mortality at offshore wind farms. BTO Research Report 778, BTO, Thetford, UK.

[2]Horswill, C. & Robinson, R.A. (2015) Review of Seabird Demographic Rates and Density Dependence. JNCC Report No. 552. JNCC, Peterborough.

[3]Coulson 2017 Productivity of the Black-legged Kittiwake Rissa tridactyla required to maintain numbers. Bird Study, Vol. 64, No. 1, 84–89.

Marine Mammals

*32. **Natural England** is invited to provide comment on the cumulative iPCoD modelling report submitted by the Applicant at D6 [REP6-026], particularly in relation to the in-combination impacts on the:*

- *Harbour seal qualifying feature of the Wash and North Norfolk Coast SAC*
- *Grey seal qualifying feature of the Humber Estuary SAC and Berwickshire and North Northumberland Coast SAC*
- *Harbour porpoise qualifying feature of the Southern North Sea SAC*

Natural England's Comments:

Natural England has reviewed the cumulative iPCoD modelling report submitted by the Applicant at Deadline 6 [REP6-026] and welcomes the additional evidence that has been provided by undertaking this piece of work. We particularly welcome the inclusion of harbour seal being modelled as a declining population. With regard to both harbour seal and grey seal, we are satisfied that the cumulative impact of offshore wind construction will not have a long-term detrimental impact on the species populations and that with appropriate mitigation in place, there will be no adverse effect on the integrity of the Wash and North Norfolk Coast SAC and Humber Estuary SAC, respectively.

With regard to harbour porpoise, the project alone iPCoD assessment predicted the impacted population to be 99.83% of the unimpacted population and our concern was that this would increase if a cumulative assessment was undertaken with the impacted population potentially

being less than 99% of the unimpacted population. Indeed, the cumulative iPCoD assessment has predicted that the impacted population will be 98.8% of the unimpacted population 18 years after the end of piling, indicating a 1.2% decline. As we have previously advised, Natural England consider that a decrease of over 1% could potentially lead to a significant impact to the population. It should also be noted that iPCoD does not take into account other factors that can affect the population over time (e.g. bycatch, prey availability, shipping) and there is limited understanding of how disturbance leads to health, reproduction and consequently population level impacts in marine mammals.

However, we recognise that the impacted population does show recovery over the same time period, indicating the population would recover to non-disturbed levels over time and that there are high levels of conservatism in the assessment that arise from combining multiple conservative assessments from multiple projects. We also recognise that the in-combination assessment does not take into account that noise abatement systems and/or noise reduction measures will be in place during construction for all projects in English waters in line with the Defra noise policy (2025), which will significantly reduce the noise levels at source of each individual project and subsequently, the disturbance impacts of underwater noise from projects and plans in-combination.

Therefore, we are content that on balance, and with appropriate mitigation in place, there will be no adverse effect on the integrity of the Southern North Sea SAC.

*33. To reduce the level of underwater noise generated and its propagation through the marine environment, the **Applicant** is requested to revise Chapter 11 Marine Mammals [REP6-020], the Outline Marine Mammal Mitigation Protocols ("MMMPs") [REP6-064] & [REP6-066], and the In-Principle Southern North Sea SAC Integrity Plan [REP6-068] to commit to a specific Noise Abatement Systems ("NAS"), or package of NAS, in the event that driven or part-driven piles are used during the construction of the Proposed Development*

Despite Natural England not being asked to directly comment on Question 33, Natural England wishes to clarify that throughout the Examination, Natural England advised that the Applicant should commit to the use of noise abatement systems (NAS) and/or noise reduction methods prior to consent. It should be noted that at no point have we requested that the Applicant commit to a *specific* type of noise reduction or abatement at this stage, simply that a general commitment to utilise a system or method to reduce the level of noise at source should be made. We welcome the use of Best Endeavours by the Applicant post-consent to identify the most appropriate system or method for the Project. Please refer to our advice submitted at Deadline 6 in REP6-148.

Through direct engagement with the Applicant since examination close, Natural England has also advised on clarifications provided within the Outer Dowsing Noise Abatement Systems Commitment Clarification Note (Rev 1) submitted by the Applicant to Natural England via DAS on 29 May 2025. Following our comments, a revised version was received on 26 August 2025 and we understand this is to be submitted by the Applicant as part of their RFI deadline response. Natural England welcomes the additional evidence that has been provided within the clarification note and are satisfied that the note accurately captures the ongoing discussions between Natural England and the Applicant since the end of Examination. We are satisfied that the Applicant has updated the commitment to use NAS to read:

"The Applicant has committed to deploy primary and/or secondary noise reduction methods (Noise

Abatement Systems) for pile driving."

Natural England is also content that this commitment is captured by the Applicants proposed updated condition wording (post examination) presented within Rev1a of the clarification note to read:

"The marine mammal mitigation protocol must include deployment of noise mitigation systems or noise abatement systems that will be utilised to manage sounds from those piling activities. The marine mammal mitigation protocol must include full details and justification for the mitigation chosen or excluded for deployment."

Providing this amendment to the DCO/DML is secured and submitted by the Applicant to the SoS, Natural England considers this issue to be resolved.

Onshore Ecology and Ornithology

*42. **Natural England** is invited to comment on the updated wording within the Applicant's final Outline Landscape and Ecological Management Strategy ("OLEMS") submitted at D6 [REP6-070] and Schedule of Mitigation [REP6-074], particularly regarding matters affecting the North Norfolk Coast SPA and Ramsar site, Greater Wash SPA, and The Wash SPA and Ramsar site.*

Natural England's Comments:

Subsequent, to the examination, at the Applicant's request (through our DAS), Natural England has reviewed the mitigation/commitment updates included within their Deadline 6 OLEMS [REP6-70], to address impacts on over wintering bird features of the Wash SPA and Ramsar and North Norfolk Coast SPA.

As confirmed to the Applicant in our response to them dated 21 July 2025, Natural England is content with the mitigation measures as set out within the OLEMS [REP6-070] and Schedule of Mitigation [REP6-074] and therefore we are able to agree with the Applicant's conclusion of no AEoI to the Wash SPA and Ramsar and North Norfolk Coast SPA and Ramsar or the respective pink footed geese, dark bellied geese, golden plover, lapwing and curlew features of these sites.

Regarding the Greater Wash SPA, Natural England has no outstanding concerns in relation to onshore ecology and ornithology. Natural England confirmed at Deadline 6 [REP6-149] that with the Applicant's commitment to design changes and mitigation for the over wintering red-throated diver, we can agree with the conclusion of no AEoI in respect of the Greater Wash SPA. However, we note the SoS request in Point 28 for the Schedule of Mitigation to be updated to include the 2km SPA buffer to ensure the mitigation for the red-throated diver feature of the Greater Wash SPA is secured.

Other HRA Matters

*43. Noting that a substantial amount of HRA-related information was submitted at Deadline 6 which Natural England, as the appropriate nature conservation body, may not have had the opportunity to comment on, **Natural England** is invited to provide any final comments on any outstanding HRA-related issues.*

Natural England's Comments:

Please see Annex 1 where Table 1 provides Natural England's update to our position provided at Deadline 6 [REP6-155] on outstanding HRA matters.

Please note that where Natural England has provided an update to our position following review of Deadline 6 documents and can now agree to a conclusion of no AEoI, these features and impact pathways are now shaded grey i.e., no further action required.

Following direct engagement with the Applicant, where Natural England expects the Applicant's intended updates/commitments to be published as part of this RFI deadline and therefore available in the public domain, we have reflected our position based on this to assist the SoS with their determination. However, these features/impact pathways remain unshaded, as our advice remains subject to change.

For any queries relating to the content of this letter please contact us using the details provided below.

Yours faithfully,

Polly Mills and Ellie Casey
Norfolk and Suffolk / Sussex and Kent
E-mail: [redacted]
Telephone: [redacted]

Annex 1 Natural England's current position on outstanding HRA matters

Table 1 Updated table from Natural England's Deadline 6 Submission [REP6-155], with Natural England's current position on outstanding HRA matters (Note – No shading is for sites, feature(s), pathway(s) and conclusion where AEoI cannot be ruled out or Natural England awaits sight of the Applicant's updated documentation at this RFI and in the public domain.)

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEoI (alone or in-combination)			Agreement with NE	NE Final advice on AEoI Conclusion at Examination Close 10 April 2025	NE's Updated position at SoS RFI dated 09 Sep 2025
		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 AEoI	
		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 AEoI 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	Natural England's position remains unchanged. Please see advice above relating to RFI Point 4.

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEoI (alone or in-combination)			Agreement with NE	NE Final advice on AEoI Conclusion at Examination Close 10 April 2025	NE's Updated position at SoS RFI dated 09 Sep 2025
		C	O&M	D	C	O&M	D			
									placement of cable protection and disturbance during installation of the export cable. See our final advice in Appendix C7 [REP6-147] 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 AEoI 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	Please see advice to RFI Points 7 and 9 above. Providing the Applicant's expected commitment at this RFI deadline to the use of a fall pipe, material retuned upstream and in similar sediment type throughout the IDRBNR SAC along with the

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEoI (alone or in-combination)			Agreement with NE	NE Final advice on AEoI Conclusion at Examination Close 10 April 2025	NE's Updated position at SoS RFI dated 09 Sep 2025
		C	O&M	D	C	O&M	D			
									the site.	introduction of the ORCP Restricted Build Area (500m buffer from IDRBNR SAC), and a 50m buffer working distance from Annex I *S. spinulosa* reef features within the SAC then Natural England can agree to a conclusion of no AEoI to from suspended sediment/ 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	N	Natural England is unable to rule out AEoI alone	See our response to Point 9 above.

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEoI (alone or in-combination)			Agreement with NE	NE Final advice on AEoI Conclusion at Examination Close 10 April 2025	NE's Updated position at SoS RFI dated 09 Sep 2025
		C	O&M	D	C	O&M	D			
									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 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	Natural England advises that providing the Applicant commits at this RFI deadline to an Offshore Reactive Compensation Platform Restriction Area providing a 500m buffer to the IDRBNR SAC, and pre-construction and post construction monitoring requirements including adaptive management/remediation are incorporated within the In-Principle Monitoring Plan, secured

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEoI (alone or in-combination)			Agreement with NE	NE Final advice on AEoI Conclusion at Examination Close 10 April 2025	NE's Updated position at SoS RFI dated 09 Sep 2025
		C	O&M	D	C	O&M	D			
									ORCP in Appendix B5 at Deadline 6 [REP6-159].	by the DCO/DML and submitted to the SoS, then Natural England would be content, should the decision maker choose to conclude, that the risk of an AEoI on the IDRBNR SAC due to changes in physical processes be excluded.
		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 processes	Changes to physical processes	Changes to physical processes	N	N	N	N	Natural England is unable to rule out AEoI in combination	Natural England has engaged with the Applicant

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEoI (alone or in-combination)			Agreement with NE	NE Final advice on AEoI Conclusion at Examination Close 10 April 2025	NE's Updated position at SoS RFI dated 09 Sep 2025
		C	O&M	D	C	O&M	D			
	Reefs *Salicornia* and other annuals colonizing mud and sand Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)								with other plans or projects. Please refer to advice within the RIES Q.47 [REP5-172] regarding nearshore cable protection.	on this matter through our discretionary advice service. While further technical clarification provided by the Applicant directly to Natural England has addressed our main concerns, residual uncertainties remain which need to be addressed regarding the extent and significance of the predicted small-scale, localised changes to bedload transport, bypassing timescale,

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		C	O&M	D	C	O&M	D			
										potential for scour and the stability of the concrete mattresses in shallow nearshore waters. As Natural England understands, ODOW intends to commit (at this RFI deadline) to monitoring of the coastal frontage along with post-construction monitoring (repeat bathymetric surveys). Providing these pre-construction and post-construction

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		C	O&M	D	C	O&M	D			
										monitoring surveys with adaptive management/remediation are secured in the DCO/IPMP, Natural England is content, should the decision maker choose to conclude that the risk of an AEoI on The WNNC SAC due to changes in physical processes can be excluded.
		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 (*Phoca vitulina*)	Underwater noise	Underwater noise	Underwater noise	N	N	N	N	Natural England is not confident	As set out in our advice

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		C	O&M	D	C	O&M	D			
									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 AEoI to the mobile interest features of the Wash and North Norfolk Coast SAC. The implementation of noise abatement or noise reduction technology would resolve this issue (see Appendix E4 at Deadline 6 [REP6-148]).	above to RFI Questions 32 and 33. Natural England welcomes the further evidence and clarification provided by the Applicant. Providing this evidence and the Applicant's commitments to deploy primary and/or secondary noise reduction methods (Noise Abatement Systems) and the proposed amended condition wording are appropriately included within the relevant documents and

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		C	O&M	D	C	O&M	D			
										plans and secured within the DCO/DML then Natural England can agree to no AEoI to harbour seal from underwater noise disturbance.
		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		

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		C	O&M	D	C	O&M	D			
Humber Estuary SPA	Great Bittern (non-breeding and breeding) Shelduck (non-breeding) Marsh harrier; (breeding) Hen harrier (non-breeding) Avocet (non-breeding and breeding) Golden plover (non-breeding) Knot (non-breeding) Dunlin (non-breeding) Ruff (non-breeding) Black-tailed godwit (*L. limosa*) (non-breeding)	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		

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		C	O&M	D	C	O&M	D			
	Bar-tailed godwit (non-breeding) Redshank (non-breeding) Little tern (breeding) Waterbird assemblage	Pollution	Pollution	Pollution	N	N	N	Y		
		Air quality impacts	Air quality impacts	Air quality impacts	N	N	N	Y		
Humber Estuary Ramsar site	Dune systems with humid dune slacks	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 processes	Changes to physical processes	Changes to physical processes	N	N	N	Y		
	Grey seal (*Halichoerus grypus*)	Underwater noise	Underwater noise	Underwater noise	N	N	N	N	Natural England is not confident that the levels of from underwater noise disturbance	As set out in our advice above to RFI Questions 32 and 33. Natural England

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		C	O&M	D	C	O&M	D			
									caused by piling and UXO clearance from the project in-combination with other activities can be concluded as no AEoI 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 [REP6-148]).	welcomes the further evidence and clarification provided by the Applicant. Providing this evidence and the Applicant's commitments to deploy primary and/or secondary noise reduction methods (Noise Abatement Systems) and proposed amended condition wording are appropriately included within the relevant documents and plans and secured within the DCO/DML then Natural

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEoI (alone or in-combination)			Agreement with NE	NE Final advice on AEoI Conclusion at Examination Close 10 April 2025	NE's Updated position at SoS RFI dated 09 Sep 2025
		C	O&M	D	C	O&M	D			
										England can agree to no AEoI to grey seal from underwater noise disturbance.
		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 (*L. limosa*) Bar-tailed godwit;	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		

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		C	O&M	D	C	O&M	D			
	and Redshank	Air quality impacts	Air quality impacts	Air quality impacts	N	N	N	Y		
Humber Estuary SAC	Estuaries Mudflats and sandflats not covered by seawater at low tide Sandbanks which are slightly covered by sea water all the time *Salicornia* and other annuals colonizing mud and sand Atlantic salt meadows	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 processes	Changes to physical processes	Changes to physical processes	N	N	N	Y		
	Sea lamprey (*Petromyzon marinus*) River lamprey *(Lampetra fluviatilis*)	Underwater noise	Underwater noise	Underwater noise	N	N	N	Y		
	Grey seal (*Halichoerus grypus*)	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	As set out in our advice above to RFI Questions 32 and 33. Natural England welcomes the

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		C	O&M	D	C	O&M	D			
									and UXO clearance from the project in-combination with other activities can be concluded as no AEoI 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 [REP6-148]).	further evidence and clarification provided by the Applicant. Providing this evidence and the Applicant's commitments to deploy primary and/or secondary noise reduction methods (Noise Abatement Systems) and proposed amended condition wording are appropriately included within the relevant documents and plans and secured within the DCO/DML then Natural England can

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEoI (alone or in-combination)			Agreement with NE	NE Final advice on AEoI Conclusion at Examination Close 10 April 2025	NE's Updated position at SoS RFI dated 09 Sep 2025
		C	O&M	D	C	O&M	D			
										agree to no AEoI to grey seal from underwater noise disturbance.
		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) Sanderling (Non-breeding) Bar-tailed godwit (Non-breeding) Little tern (Breeding)	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		
Gibraltar Point Ramsar site	Red Data book invertebrates – including: *Haliplus mucronatus* (a water beetle, aquatic) *Brachytron pratense* (hairy dragonfly,	Habitat loss	Habitat loss	Habitat loss	N	N	N	Y		

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		C	O&M	D	C	O&M	D			
	aquatic)	Pollution	Pollution	Pollution	N	N	N	Y		
		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)	Habitat loss Disturbance of birds within and	Habitat loss Disturbance of birds within and	Habitat loss Disturbance of birds within and	N	N	N	N (curlew, Waterbird Assemblage (golden	Natural England believes that considerable progress has	See Point 42 above. Following the Applicant's

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEoI (alone or in-combination)			Agreement with NE	NE Final advice on AEoI Conclusion at Examination Close 10 April 2025	NE's Updated position at SoS RFI dated 09 Sep 2025
		C	O&M	D	C	O&M	D			
	Wigeon (non-breeding) Gadwall (non-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-breeding) Turnstone (Non-breeding) Common tern	outside the SPA Pollution Air quality impacts	outside the SPA Pollution Air quality impacts	outside the SPA Pollution Air quality impacts				plover, lapwing))	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 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 AEoI to the	updates to the OLEMS at Deadline 6, Natural England is content to agree to the conclusion of no AEoI in respect of the Wash SPA for Waterbird Assemblage (Golden Plover, Lapwing) and Curlew features.

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		C	O&M	D	C	O&M	D			
	(Breeding) Little tern (Breeding) Waterbird assemblage								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.	

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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	See Point 42 above. Following the Applicant's updates to the OLEMS at Deadline 6. Natural England is content to agree to the conclusion of no AEoI in respect of the Wash SPA for the Pink Footed Goose and Dark-bellied brent goose features.

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		C	O&M	D	C	O&M	D			
									mitigation at Deadline 6 for additional screening to minimise disturbance to DBBG. Natural England expects to be able to agree a conclusion of no AEoI to these over wintering features of the Wash SPA.	
The Wash Ramsar site	Saltmarshes Estuaries Major intertidal banks of sand and mud Shallow water Deep channels	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 processes	Changes to physical processes	Changes to physical processes	N	N	N	Y		

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		C	O&M	D	C	O&M	D			
	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: 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	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 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 schedule of	See Point 42 above. Following the Applicant's updates to the OLEMS at Deadline 6, Natural England is content to agree to the conclusion of no AEoI in respect of the Wash Ramsar site for Dark Bellied Brent Goose, Pink Footed Goose, Golden Plover, Lapwing and Curlew features.

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		C	O&M	D	C	O&M	D			
	Golden plover Lapwing Species with peak counts in spring/autumn: Black-tailed godwit and ringed plover								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 AEoI to these over wintering features of the Wash SPA. 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	

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		C	O&M	D	C	O&M	D			
									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 AEoI to these features of the Wash Ramsar using functionally linked land (FLL), these measures will require further review to resolve this issue.	

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		C	O&M	D	C	O&M	D			
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 AEoI 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 [REP6-148]).	As set out in our advice above to RFI Questions 32 and 33. Natural England welcomes the further evidence and clarification provided by the Applicant. Providing this evidence and the Applicant's commitments to deploy primary and/or secondary noise reduction methods (Noise Abatement Systems) and the proposed amended condition wording are appropriately

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		C	O&M	D	C	O&M	D			
										included within the relevant documents and plans and secured within the DCO/DML then Natural England can agree to no AEoI to harbour porpoise from underwater noise disturbance.
		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		
		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 AEoI	
		Vessel Disturbance	Vessel Disturbance	Vessel Disturbance						
		Collision	Collision	Collision	N	N	N	Y		

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		C	O&M	D	C	O&M	D			
		risk	risk	risk						
		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 AEoI	
Greater Wash SPA	Red-throated diver	Disturbance and displacement	Disturbance and displacement	Disturbance and displacement	N	N	N	Y – subject to an appropriate condition in the DCO/dML and Schedule of Mitigation including a 2km surrounding the SPA.	No AEoI	Natural England advises an update to the Schedule of Mitigation to include a 2km buffer surrounding the SPA remains outstanding. We note this is requested by the SoS in Point 28 of the RFI.
	(Offshore) Common scoter	Disturbance and displacement	Disturbance and displacement	Disturbance and displacement	N	N	N	Y	No AEoI	
	(Onshore) Sandwich tern	Habitat loss Disturbance	Habitat loss Disturbance	Habitat loss Disturbance	N	N	N	Y	No AEoI	

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		C	O&M	D	C	O&M	D			
	Common tern Little gull	of birds within the SPA Pollution	of birds within the SPA Pollution	of birds within the SPA Pollution						
North Norfolk Coast SPA	Sandwich tern Pink-footed goose Dark-bellied Brent goose	Collision risk	Collision risk	Collision risk	N	N	N	Y	No AEoI	
		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 [REP4a-144] are addressed, Natural England expects to be able to agree to a conclusion of no AEoI to this over wintering feature of the North Norfolk Coast SPA which also forages on the Northern	
		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)		See Point 42 above. Following the Applicant's updates to the OLEMS at Deadline 6, Natural England is content to agree to the conclusion of no AEoI in respect of the pink-footed goose feature of the North Norfolk Coast SPA.

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		C	O&M	D	C	O&M	D			
									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 AEoI 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)		See Point 42 above. Following the Applicant's updates to the OLEMS at Deadline 6, Natural England is content to agree to the conclusion of no AEoI in respect of the pink-footed goose feature of the North Norfolk Coast SPA.
Flamborough	Herring gull	Collision	Collision	Collision	N	N	N	Y	No AEoI for	

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		C	O&M	D	C	O&M	D			
and Filey Coast SPA	Gannet	risk	risk	risk					herring gull (noting it is a component of the seabird assemblage and not a qualifying feature) No AEoI for gannet.	
	Kittiwake	Collision risk	Collision risk	Collision risk	N	Y	N	Y	AEoI cannot be excluded in-combination.	Natural England's Position remains unchanged.
	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	AEoI 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 [REP6-149] for	Natural England's Position remains unchanged.

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEoI (alone or in-combination)			Agreement with NE	NE Final advice on AEoI Conclusion at Examination Close 10 April 2025	NE's Updated position at SoS RFI dated 09 Sep 2025
		C	O&M	D	C	O&M	D			
									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 AEoI for gannet.	
Coquet Island SPA	Puffin	Disturbance and displacement	Disturbance and displacement	Disturbance and displacement	N	N	N	Y	No AEoI.	
Farne Islands SPA	Kittiwake	Collision risk	Collision risk	Collision risk	N	N	N	Y	No AEoI, 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 AEoI (alone or in-combination)			Agreement with NE	NE Final advice on AEoI Conclusion at Examination Close 10 April 2025	NE's Updated position at SoS RFI dated 09 Sep 2025
		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.	AEoI cannot be excluded in-combination for guillemot. Please refer to our Deadline 6 submission Natural England's End of Examination Position on Offshore Ornithology [REP6-149] 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 AEoI for seabird assemblage.	Natural England's Position remains unchanged.
Scottish SPAs	Gannet Kittiwake	Collision risk	Collision risk	Collision risk	N	N	N	Scottish SPAs are	N/A	

Designated site	Qualifying feature(s) screened in	Potential for likely significant effect (LSE)			Applicant's conclusion on AEoI (alone or in-combination)			Agreement with NE	NE Final advice on AEoI Conclusion at Examination Close 10 April 2025	NE's Updated position at SoS RFI dated 09 Sep 2025
		C	O&M	D	C	O&M	D			
								outside NE's remit		
	Guillemot Razorbill Puffin	Disturbance and displacement	Disturbance and displacement	Disturbance and displacement	N	N	N	As above.	N/A	
Saltfleetby-Theddlethorpe Dunes and Gibraltar Point SAC	Annex I habitats: Embryonic shifting dunes Shifting dunes along the shoreline with *Ammophila arenaria* ('white dunes'") Fixed coastal dunes with herbaceous vegetation ('grey dunes')" Priority feature Dunes with *Hippophae rhamnoides,* 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 AEoI	