East Anglia ONE North Offshore Windfarm

Chapter 5

Environmental Impact Assessment Methodology

Environmental Statement
Volume 1

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Glossary of Acronyms

AONB	Area of Natural Beauty
Cefas	Centre for Environment, Fisheries and Aquaculture Science
CIA	Cumulative Impact Assessment
DCO	Develpoment Consent Order
DECC	Deparment for Energy and Climate Change
EEA	European Economic Area
EIA	Environmental Impact Assessment
EPP	Evidence Plan Process
ES	Environmental Statement
EU	European Union
ETG	Expert Topic Group
HRA	Habitats Regulations Assessment
ICES	International Council for the Exploration of the Seas
IEMA	Institute of Environmental Management and Assessment
JNCC	Joint Nature Conservation Committee
MMO	Marine Management Organisation
NSIP	Nationally Significant Infrastructure Project
OSPAR	Convention for the Protection of the Marine Environment of the North-East Atlantic
PEIR	Preliminary Environmental Information Report
PID	Public Information Days
RSPB	Royal Society for the Protection of Birds
SoCC	Statement of Community Consultation
SoCG	Statement of Common ground
UK	United Kingdom
UNECE	United Nations Economic Comission for Europe

Glossary of Terminology

Applicant	East Anglia ONE North Limited.
Development area	The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order).
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.

5 Environmental Impact Assessment Methodology

5.1 Introduction

1. This chapter describes the methodology used throughout the Environmental Statement (ES) assessment chapters for the proposed East Anglia ONE North project.

2. The Environmental Impact Assessment (EIA) considers all relevant topics covered under the three general areas of physical environment, biological environment and human environment.

3. The EIA has been carried out in accordance with the Planning Act 2008 and the Infrastructure Planning (EIA) Regulations 2017 (the EIA Regulations) (see ***Chapter 3 Policy and Legislative Context***). Furthermore, the approach to the EIA and the production of this ES closely follows relevant guidance including:

    - Planning Inspectorate Advice Notes;
        - Advice Note Three: EIA consultation and notification (The Planning Inspectorate 2017);
        - Advice Note Seven: Environmental Impact Assessment, Preliminary Environmental Information, Screening and Scoping (The Planning Inspectorate 2017a);
        - Advice Note Nine: Rochdale Envelope (The Planning Inspectorate 2018)
        - Advice Note Ten: Habitat Regulations Assessment (The Planning Inspectorate 2017b);
        - Advice Note Twelve: Transboundary impacts and process (The Planning Inspectorate 2018a); and
        - Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects (The Planning Inspectorate 2015).
    - Overarching National Policy Statements for Energy EN-1, Renewable Energy Infrastructure EN-3, and Electricity Networks Infrastructure EN-5 (Department of Energy and Climate Change (DECC) 2011, 2011a, 2011b);
    - Assessment of the environmental impact of offshore wind-farms (OSPAR Commission, 2008).
    - Relevant guidance issued by other UK Government and non-governmental organisations; and
    - Receptor-specific guidance documents.

4. This ES also gives due regard to the requirements of the Marine and Coastal Access Act 2009 and the Habitats Regulations (i.e. the Habitats and Species Regulations 2017 and Conservation of Offshore Marine Habitats and Species Regulations 2017).

5. The proposed East Anglia ONE North project and proposed East Anglia TWO project are being developed in parallel but they will be submitted as two separate Development Consent Order (DCO) applications. The assessment presented in this ES assesses the impacts of the proposed East Anglia ONE North project alone and, through the use of appropriate assessment scenarios, cumulatively with the proposed East Anglia TWO project. Details of these scenarios are described in ***section 5.7.1.***

5.2 Requirement for EIA

6. The EIA framework is set out within European Union (EU) Directive 2011/92/EU (as amended by Directive 2014/52/EU) (the EIA Directive)). The EIA Directive is transposed into English law for Nationally Significant Infrastructure Projects (NSIPs) by the EIA Regulations which set out the requirements for EIA. The EIA process includes collation of data required to identify and assess the potential effects of a development and the identification of any significant adverse impacts and any measures envisaged to avoid, prevent or reduce and, if possible, offset, such impacts.

7. The primary objective of an EIA, as described in Article 2 of the Directive, is that "Member States shall adopt all measures necessary to ensure that, before development consent is given, projects likely to have significant effects on the environment by virtue, inter alia, of their nature, size or location are made subject to a requirement for development consent and an assessment with regard to their effects on the environment".

8. The EIA process and its preliminary findings were reported within a Preliminary Environmental Information Report (PEIR) (SPR 2019), which was produced to support consultation under Section 42 of the Planning Act 2008. Feedback from this consultation has been taken into consideration and where relevant, used to inform the final design and the impact assessment of the proposed East Anglia ONE North project detailed in this ES as part of the DCO application which has been submitted to the Planning Inspectorate.

9. The purpose of this ES is to inform the decision-maker, stakeholders and all interested parties of any significant effects that would result from the project during its construction, operation and (where relevant) decommissioning.

5.3 Consultation on Approach and Methodology

10. Consultation is a key feature of the EIA process, and continues throughout the lifecycle of a project, from its initial stages through to consent and post-consent. Consultation has been carried out in accordance with the Statement of Community Consultation (SoCC) which explains how the Applicant consults local communities about its plans to develop the proposed East Anglia ONE North project. Ongoing public consultation has been conducted through various means including (but not exclusively limited to):

- Public Information Days (PIDs) held at locations within and adjacent to the proposed onshore development area;
- Phase 1 consultation (October / November 2017) with statutory consultees and the public;
- Phase 2 consultation (March / April 2018) with statutory consultees and the public;
- Phase 3 consultation (May to August 2018) with statutory consultees and the public;
- Phase 3.5 consultation (September to November 2018 and including four community engagement events held in October 2018) with statutory consultees and the public;
- Phase 4 consultation (February / March 2019) with statutory consultees and the public (including publication of the PEIR) and Section 42 consultation with statutory consultees);
- Public Information Day summary reports shared with all registered participants, key local and community stakeholders, and on the proposed East Anglia ONE North project website for Phase 2, Phase 3, Phase 3.5 and Phase 4 community engagement events;
- Parish Council briefings;
- Direct discussions with landowners:
- Newsletters distributed throughout the onshore substation(s) site selection study area;
- Dedicated project e-mail address and freepost address to assist local communities in contacting the Applicant;
- Provision of a dedicated proposed East Anglia ONE North project website; and
- Regular and targeted discussion with regulators and other stakeholder bodies through various means including over 35 Expert Topic Group meetings (with others planned for early September 2019), where the siting of onshore and offshore infrastructure was discussed in detail, more information is detailed in ***section 5.3.4***.

11. Full details of the proposed East Anglia ONE North project consultation process are presented in the Consultation Report (document reference 5.1), which forms part of the DCO application.

5.3.1 Scoping

12. A request for a scoping opinion was submitted to the Planning Inspectorate in November 2017 which outlined the proposed East Anglia ONE North project and described broadly the impacts to be assessed as part of the EIA and methodology for these assessments.

13. A formal Scoping Opinion (Planning Inspectorate 2017) was received in December 2017. The Scoping Opinion collated comments from consultees and highlights where there is agreement on what could be scoped in or out of the EIA. One topic was scoped out entirely, Offshore Air Quality, and particular impacts within topics have been scoped out as detailed in the Planning Inspectorate's Scoping Opinion and presented within each relevant technical chapter (***Chapters 7-30***). Topic specific points from the Scoping Opinion are referenced in the relevant consultation tables within the topic chapters (***Chapters 7-30***).

5.3.2 Preliminary Environmental Information Report

14. A PEIR was sent to stakeholders in February 2019 under section 42 of the Planning Act (2008) (SPR 2019). Comments received have been taken into consideration and where relevant, used to inform the final design and the impact assessment of the proposed East Anglia ONE North project detailed in this ES. Topic specific points from the PEIR are referenced in the relevant consultation tables within each of the topic chapters (***Chapters 7-30***).

15. Table A5.1 in Appendix 5.1 provides a summary of those consultation responses that have been received with regards to the approach to the EIA and Methodology.

5.3.3 Royal HaskoningDHV as Competent Experts

16. Royal HaskoningDHV has provided environmental, development and consenting support on over 14GW of renewable energy projects across 26 UK offshore windfarms. Their EIA activities and ESs are accredited by the Institute of Environmental Management and Assessment (IEMA) under the EIA Quality Mark Scheme. This demonstrates Royal HaskoningDHV's commitment to ensuring EIA is undertaken at high quality and in accordance with best practice.

17. Royal HaskoningDHV's lead authors are senior and chartered professionals with a significant track record in undertaking technical assessment and EIA in their discipline. The team undertaking the EIA for the proposed East Anglia ONE North project are predominantly Royal HaskoningDHV professional consultants.

The team is comprised of a dedicated core team of EIA professionals who take the lead role in the co-ordination and management of the EIA and the preparation of the ES. The core team is then supported by a wider team of technical specialists taking responsibility of the data collection, data analysis and technical impact assessment.

18. Some of the technical assessment and associated ES chapters have been undertaken by specialist consultancies outside Royal HaskoningDHV. These include ***Chapter 13 Commercial Fisheries, Chapter 14 Shipping and Navigation, Chapter 15 Civil and Military Aviation and Radar, Chapter 23 Onshore Ornithology, Chapter 28 Seascape, Landscape and Visual Impact Assessment*** and ***Chapter 29 Landscape and Visual Impact Assessment***. ***Appendix 5.2*** provides statements of competencies for all experts who have contributed to the EIA for the proposed East Anglia ONE North project.

19. In addition, technical consultation (such as through the Evidence Plan Process (EPP) discussed below) provides additional expert input into the assessment process. This has allowed a consensus to be reached on the scope and approach to the impacts included within the EIA, and the comprehensiveness and suitability of data used.

5.3.4 The Evidence Plan Process

20. The Applicant is committed to wide and open consultation with stakeholders and community. A key part of this consultation effort is targeted engagement with regulators and interested stakeholders through the EPP and its associated Expert Topic Groups (ETGs).

21. The EPP is a mechanism to help agree the information to be supplied to the Planning Inspectorate as part of the DCO application for the project to ensure compliance with the EIA Regulations and the Habitats Regulations.

22. The EPP aims to assist all parties in the process during the evolution of the proposed DCO application, by:

- Giving greater certainty to all parties on the amount and range of evidence to be presented within the application;
- Providing structure and efficiency to discussion and sequential identification of key environmental and consenting issues;
- Enabling time and resource requirements to be planned and optimised for all parties;
- Helping address and agree issues earlier in the pre-application stage where possible so that robust, streamlined decisions can be taken, and additional data can be collected as required; and

- Providing a platform to debate advice on one topic between multiple agencies / stakeholders.

23. The EPP is a non-statutory, voluntary process, and there are no legal obligations associated with it. It does not replace or duplicate existing requirements, the plans are formulated to fit with the Planning Act 2008 DCO application process, including the statutory pre-application consultation processes.

24. The EPP is a framework within which statutory consultees and the Applicant ensure that the Habitat Regulations Assessment (HRA) process and agreed elements of the EIA process are completed in a way that is satisfactory to all parties involved. A steering group is formed, chaired by the Planning Inspectorate and made up of representatives from the Applicant (and its advisors), Natural England and the MMO. The steering group is responsible for overseeing progress of the Evidence Plan, agreeing resolution of any issues that emerge during the Plan process, ensuring that progress is maintained and providing sign-off for decisions of ETGs.

25. As part of the EPP ETGs have been set up as displayed in ***Table 5.1*** below. These groups are designed to streamline the process and ensure that the most relevant technical experts from each organisation are represented on the ETGs, and attend ETG meetings.

Table 5.1 Group Structure for the East Anglia ONE North Evidence Plan Process

Expert Topic Group	Membership
Benthic Ecology	MMO Natural England Cefas
Fish and Shellfish Ecology	MMO Natural England Cefas
Marine Mammals	MMO Natural England The Wildlife Trust Whale and Dolphin Conservation
Ornithology	MMO Natural England RSPB
Physical Processes	Cefas MMO Natural England

26. The ETGs have the following functions:

- Agree the relevance, appropriateness and sufficiency of data for a specific assessment (including both site specific and contextual) and determine whether to continue or halt specific survey work and / or analysis);
- Agree the methods for data analysis;
- Agree realistic worst case parameters for the assessment(s);
- Agree methods for assessment(s) (including where possible interpretation of impact and levels of significance and potential mitigation or management measures); and
- Agree whether and when to change the evidence requirements and collect additional evidence, including how these should be collected and analysed, updating the plan and timetable as necessary.

27. The process is iterative and each group works through the above functions and agrees as much as they can during the pre-application period, with any outstanding areas of disagreement clearly documented.

28. Although the EPP is not part of the statutory consultation, it provides the audit trail for documents produced by the Applicant, which have been formally consulted upon. The minutes and agreements from meetings will help form the basis for Statements of Common Ground (SoCGs) and have informed relevant sections of the Consultation Report (document reference 5.1).

29. In addition to the EPP, onshore ETGs have been formed with the Local Planning Authorities and stakeholders with relevant expertise to the topic group, as shown in ***Table 5.2.***

Table 5.2 Group Structure for the East Anglia ONE North Onshore Expert Topic Groups

Onshore Topic Groups	Membership
Air Quality	Environment Agency East Suffolk Council* Suffolk County Council
Archaeology and Cultural Heritage	Historic England Suffolk Preservation Society East Suffolk Council Suffolk County Council
Ground Conditions and Contamination	Environment Agency East Suffolk Council Suffolk County Council
Landfall and Coastal Processes	East Suffolk Council Suffolk County Council

Onshore Topic Groups	Membership
	Environment Agency Natural England
Landscape and Visual Impact	Natural England Historic England Norfolk County Council Suffolk County Council East Suffolk Council Suffolk Preservation Society Suffolk Coast and Heaths AONB
Noise and Vibration	Environment Agency East Suffolk Council Suffolk County Council
Onshore Ecology and Ornithology	Natural England Environment Agency Suffolk Wildlife Trust RSPB Suffolk County Council East Suffolk Council
Site Selection	Natural England Historic England Environment Agency RSPB Suffolk County Council East Suffolk Council
Seascape, Landscape and Visual Impact	Historic England Natural England Norfolk County Council Suffolk Coast and Heaths AONB East Suffolk Council Suffolk County Council
Traffic and Transport	Highways England East Suffolk Council Suffolk County Council
Water Resources and Flood Risk	Anglian Water Environment Agency East Suffolk Council

Onshore Topic Groups	Membership
	Suffolk County Council
Socio-economics and Tourism	East Suffolk Council Suffolk County Council Norfolk County Council Suffolk Coast and Heaths AONB Suffolk Destination Management Organisation Visit East Anglia Visit Suffolk Great Yarmouth Tourism Business Improvement Area Limited New Anglia Local Enterprise Partnership

*Formerly known as Suffolk Coastal District and Waveney District Councils

5.4 The Project Design Envelope

30. The proposed East Anglia ONE North project is based on a project design envelope (or 'Rochdale Envelope') approach. It is recognised by the Planning Inspectorate (The Planning Inspectorate 2018) that, at the time of submitting an application, offshore wind developers may not know the precise nature and arrangement of infrastructure and associated infrastructure that make up the proposed development. This is due to a number of factors such as the evolution of technology and the need for further detailed surveys (especially geotechnical surveys) which are required before a final design and layout can be determined. This flexibility is important as it prevents consent being granted for specific infrastructure or a particular layout which is not possible or optimal by the time of construction, which may be several years after the DCO application was made.

31. The general principle of the assessment, under the project design envelope approach, is that for each receptor and potential impact, the impact assessment will be based on assessing project design parameters likely to result in the maximum adverse effect (i.e. the worst case scenario). If a combination of design parameters leads to a scenario that cannot realistically occur then the worst case scenario will be reconsidered and a realistic set of worst case parameters will be assessed. The end result will be an EIA based on clearly defined environmental parameters that will define the range of development possibilities and hence the likely environmental impacts that could result from the project.

32. Using the project design envelope approach means that receptor-specific potential impacts draw on the options from within the wider envelope that represent the most realistic worst-case-scenario. It is also worth noting that under this approach the combination of project options constituting the realistic worst

case scenario may differ from one receptor to another and from one impact to another.

33. In accordance with the accepted industry approach, the impact assessment has been undertaken based on a realistic worst case scenario of predicted impacts, which are set out within each topic chapter. The project design envelope for the proposed East Anglia ONE North project is detailed in ***Chapter 6 Project Description***.

5.5 Characterisation of the Existing Environment

34. Characterisation (a description) of the existing environment has been undertaken to determine the baseline conditions in the area covered by the project and relevant surrounding study areas. This characterisation has followed the steps listed below and are detailed in each technical chapter:

- Study areas defined for each receptor based on the relevant characteristics of the receptor (e.g. mobility/range);
- Review available information;
- Review likely or potential impacts that might be expected to arise from the project;
- Determine if sufficient data are available to make the EIA judgements with sufficient confidence;
- If further data required, ensure data gathered are targeted and directed at answering the key question and filling key data gaps; and
- Review of information gathered to ensure the environment can be sufficiently characterised in sufficient detail and the data are suitable to make the EIA judgements with sufficient confidence.

35. The applicant has collated a significant amount of existing data from a number of sources. These are detailed in each technical chapter.

36. The specific approach to establishing a robust baseline (upon which impacts can be assessed) is set out under each chapter within this ES. This approach is based on feedback in the Scoping Opinion (Planning Inspectorate 2017), feedback on the PEIR (SPR 2019), and consultation with stakeholders. The approach has also evolved and adapted as new data have been collected and the design of the project has advanced.

5.5.1 Study Area

37. Study areas have been defined for each topic at the relevant scale, and are stated within the topic chapters. These have been determined by a number of factors such as the distribution of receptors, footprint of potential impact, or

administrative / management boundaries (e.g. territorial waters, International Council for the Exploration of the Seas (ICES) rectangles) and where possible these have been agreed with regulators or advisors.

5.6 Assessment of Impacts

38. The approach to making balanced assessments for the project has been guided by the Royal HaskoningDHV EIA team and technical specialists using available data, new data, experience and expert judgement. In order to provide a consistent framework and system of common tools and terms, a matrix approach has been used to frame and present the judgements made. For each topic, the most relevant and latest guidance or best practice has been used and therefore definitions of sensitivity and magnitude of impact are tailored to each receptor. These definitions are detailed fully in each technical chapter. The impact assessment considers the potential for impacts during the construction, operation and maintenance, and decommissioning phases of the project.

39. Impacts can be classified as follows:

- Direct impacts: these may arise from impacts associated with the construction, operation and maintenance, or decommissioning of the project;
- Indirect impacts: these may be experienced by a receptor that is removed (e.g. in space or time) from the direct impact (e.g. noise impacts upon fish which are a prey resource for fish or mammals).
- Inter-relationships between impacts; or
- Cumulative impacts: these may occur as a result of the project in conjunction with other existing or planned projects within the study area for each receptor.

5.6.1 Impact Identification

40. The assessment will use the conceptual 'source-pathway-receptor' model. The model identifies potential impacts resulting from the proposed activities on the environment and sensitive receptors within it. This process provides an easy to follow assessment route between impact sources and potentially sensitive receptors ensuring a transparent impact assessment. The aspects of this model are defined as follows:

- Source – the origin of a potential impact (i.e. an activity such as cable installation and a resultant effect e.g. re-suspension of sediments);
- Pathway – the means by which the effect of the activity could impact a receptor (e.g. for the example above, re-suspended sediment could settle and smother sea bed); and
- Receptor – the element of the receiving environment that is impacted (this could either be a component of the physical, ecological or human environment

such as water quality or benthic habitat, e.g. for the above example, species living on or in the sea bed).

41. In general, the impact assessment for each topic will use this model when considering the potential impacts arising during the construction, operation and maintenance and decommissioning phases of the proposed East Anglia ONE North project. In some cases, it is appropriate to use other models for assessment, for example for the Shipping and Navigation assessment where a risk assessment approach is required instead.

5.6.2 Significance of the Impact

42. The significance of impacts is evaluated with reference to definitive standards, accepted criteria, technical guidance or legislation where these exist, for each topic. Where it is not possible to quantify impacts, and where a qualitative or semi-qualitative assessment is made, a reasoned framework for the assessment is provided.

43. Where guidance is available for defining sensitivity and magnitude (whether from professional guidance or UK Government publications or bespoke definitions agreed with stakeholders) this is referred to. If such sources are available but have not be been used then a justification for not using these are given.

44. Specific significance definitions for impacts have been developed, giving due regard to both sensitivity of the receptor and magnitude of the effect.

5.6.3 Determining Receptor Value and Sensitivity

45. The characterisation of the existing environment helps to determine the receptor sensitivity in order to assess the potential impacts upon it.

46. Receptor value considers whether, for example, the receptor is rare, has protected or threatened status, importance at local, regional, national or international scale, and in the case of biological receptors whether the receptor has a key role in the ecosystem function.

47. The ability of a receptor to adapt to change, tolerate, and/or recover from potential impacts will be key in assessing its sensitivity to the impact under consideration. For ecological receptors, tolerance could relate to short term changes in the physical environment; for human environment receptors, tolerance could relate to impacts upon socio-economics or safety. The time required for recovery will be an important consideration in determining receptor sensitivity.

48. The overall receptor sensitivity is determined by considering a combination of value, adaptability, tolerance and recoverability. This is achieved through applying known research and information on the status and sensitivity of the

feature under consideration coupled with professional judgement and past experience.

49. Expert judgement is particularly important when determining the sensitivity of receptors. For example, an Annex II species (under the Habitats Directive) would have a high inherent value, but may be tolerant to an impact or have high recoverability. In this case, sensitivity should reflect the ecological robustness of the species and not necessarily default to its protected status. Example definitions of the different sensitivity levels for a generic receptor are given in ***Table 5.3***.

Table 5.3 Example Definition of Different Sensitivity Levels for a Generic Receptor

Sensitivity	Definition
High	Individual receptor has very limited or no capacity to avoid, adapt to, accommodate or recover from the anticipated impact.
Medium	Individual receptor has limited capacity to avoid, adapt to, accommodate or recover from the anticipated impact.
Low	Individual receptor has some tolerance to accommodate, adapt or recover from the anticipated impact.
Negligible	Individual receptor is generally tolerant to and can accommodate or recover from the anticipated impact.

50. The definitions of sensitivity given within each chapter are relevant to that particular EIA topic and are clearly defined by the assessor within the context of that assessment.

51. In addition, for some assessment the value of a receptor may also be an element to add to the assessment where relevant, for instance if a receptor is designated or has economic value.

52. Example definitions of the value levels for a generic receptor are given in ***Table 5.4***.

Table 5.4 Example Definitions of the Value Levels for a Generic Receptor

Value	Definition
High	Internationally / nationally important (for example internationally or nationally protected site)
Medium	Regionally important / regionally protected site
Low	Locally important / rare but with high potential for mitigation
Negligible	Not considered to be important (for example common or widespread)

53. The terms 'high value' and 'high sensitivity' are not necessarily linked within a particular impact and it is important not to inflate impact significance specifically because a feature is valued'. For example, a receptor could be of high value (e.g. an Annex I habitat) but have a low or negligible physical / ecological sensitivity to an effect.

5.6.4 Predicting the Magnitude of Impacts

54. In order to predict the significance of an impact, it is fundamental to establish the magnitude and probability of an impact occurring through a consideration of:

- Scale or spatial extent (small scale to large scale or most of the population or a few individuals);
- Duration (short term to long term);
- Likelihood of impact occurring;
- Frequency; and
- Nature of change relative to the baseline.

55. Example definitions of the magnitude levels for a generic receptor are given in ***Table 5.5.***

Table 5.5 Example of Definitions of the Magnitude Levels for a Generic Receptor

Value	Definition
High	Fundamental, permanent / irreversible changes, over the whole receptor, and / or fundamental alteration to key characteristics or features of the particular receptor's character or distinctiveness.
Medium	Considerable, permanent / irreversible changes, over the majority of the receptor, and / or discernible alteration to key characteristics or features of the particular receptor's character or distinctiveness.
Low	Discernible, temporary (throughout project duration) change, over a minority of the receptor, and / or limited but discernible alteration to key characteristics or features of the particular receptor's character or distinctiveness.
Negligible	Discernible, temporary (for part of the project duration) change, or barely discernible change for any length of time, over a small area of the receptor, and/or slight alteration to key characteristics or features of the particular receptor's character or distinctiveness.

5.6.5 Evaluation of Significance

56. Subsequent to establishing the sensitivity and magnitude, the impact significance has been predicted by using quantitative or qualitative criteria, as appropriate, to ensure a robust assessment. Where possible the matrix presented in ***Table 5.6*** has been used to aid assessment of impact significance, based on expert

judgement, to facilitate a consistent approach throughout the EIA. For each section of the ES, however, best practice methodology (based on the latest available guidance) is followed and, when more appropriate, an alternative approach to the use of a matrix may be used. Where an alternative approach is used, this is fully explained and justified within the relevant chapter.

Table 5.6 Significance of Impacts

		Negative Magnitude				Beneficial Magnitude			
		High	Medium	Low	Negligible	Negligible	Low	Medium	High
Sensitivity	High	*Major*	*Major*	*Moderate*	*Minor*	*Minor*	*Moderate*	*Major*	*Major*
	Medium	*Major*	*Moderate*	*Minor*	*Minor*	*Minor*	*Minor*	*Moderate*	*Major*
	Low	*Moderate*	*Minor*	*Minor*	*Negligible*	*Negligible*	*Minor*	*Minor*	*Moderate*
	Negligible	*Minor*	*Negligible*	*Negligible*	*Negligible*	*Negligible*	*Negligible*	*Negligible*	*Minor*

57. ***Table 5.6*** provides an indication of the significance of impacts used in the assessment process for the majority of parameters. In general, impacts which are of major or moderate significance are considered to be significant. It is possible that a moderate impact may not be considered significant however; in these cases, a justification and rationale is provided in the impact assessment text.

58. A description of the approach to impact assessment and the interpretation of significance levels is provided within each chapter of this ES. This approach ensures that the definition of impacts is transparent and relevant to each topic under consideration.

5.6.6 Confidence

59. Once an assessment of a potential impact has been made, it is necessary to assign a confidence value to the assessment to assist in the understanding of the judgement. This is undertaken on a simple scale of high-medium-low, where high confidence assessments are made on the basis of robust evidence, medium confidence assessment being based, for example, on academic or scientific studies / papers, with lower confidence assessments being based, for example, on extrapolation and use of proxies.

5.6.7 Mitigation

60. Where an impact assessment identifies that an aspect of the development is likely to give rise to significant environmental impacts, mitigation measures have

been considered and discussed with the statutory consultees in order to avoid impacts or reduce them to acceptable levels and, if possible, to enhance the environment.

61. For the purposes of the EIA, two types of mitigation have been defined:

- Embedded mitigation: consisting of mitigation measures that are identified and adopted as part of the evolution of the project design, and are included and assessed in the EIA; and
- Additional mitigation: consisting of mitigation measures that are identified during the EIA process specifically to reduce or eliminate any predicted significant impacts. Additional mitigation is therefore subsequently adopted as a project commitment.

62. All mitigation associated with the proposed East Anglia ONE North project is identified and described in more detail in the relevant chapters of the ES (***Chapters 7-30***).

5.6.8 Assessing Residual Impacts

63. Following initial assessment, if the impact does not require additional mitigation (or none is possible) the residual impact will remain the same. If, however, additional mitigation is required there will be an assessment of the post-mitigation residual impact. Inter-relationships

5.6.9 Inter-relationships

64. The impact assessment also considers the inter-relationship of impacts on individual receptors. For example, a landscape and visual effect and noise impact may cumulatively impact on a single receptor. This has been covered within each technical chapter in the inter-relationship section.

5.6.10 Interactions

65. The impacts identified and assessed for each topic have the potential to interact with each other, which could give rise to synergistic impacts as a result of that interaction. The areas of interaction between impacts are presented in each chapter, along with an indication as to whether the interaction may give rise to synergistic impacts. This provides a screening tool for which impacts have the potential to interact. There is then an assessment for each receptor (or receptor group) related to these impacts in two ways. Firstly, the impacts are considered within a development phase (i.e. construction, operation or decommissioning) to see if, for example, multiple construction impacts could combine. Secondly, a lifetime assessment is undertaken which considers the potential for impacts to affect receptors across development phases.

5.7 Cumulative Impact Assessment

5.7.1 Cumulative Impacts with the Proposed East Anglia TWO Project

66. The proposed East Anglia ONE North project and proposed East Anglia TWO project are currently being developed in parallel but they will be submitted as two separate DCO applications. The assessment presented in this ES assesses the impacts of the proposed East Anglia ONE North project alone and, through the use of appropriate assessment scenarios, cumulatively with the proposed East Anglia TWO project.

67. The offshore topic assessments (***Chapters 7-17***) assess the interaction of the proposed East Anglia ONE North and East Anglia TWO projects following the standard cumulative impact assessment approach as described in ***section 5.7.2.***

68. The proposed onshore development area, which includes landfall area, cable corridor and substation site, has been developed to allow for the construction of both the proposed East Anglia ONE North and East Anglia TWO projects. At this stage it is not known whether both projects would be constructed simultaneously or with a construction gap. Therefore the onshore topic assessments (***Chapters 18-27***) include two cumulative assessment scenarios which are considered to represent the two worst case scenarios for construction of the onshore infrastructure. These are:

- Scenario 1 assesses the impacts of the proposed East Anglia TWO and East Anglia ONE North projects being built simultaneously (at the same time); and
- Scenario 2 assesses the impacts of the proposed East Anglia TWO and East Anglia ONE North projects being built with a construction gap. For the onshore infrastructure, this scenario assumes construction of the first project and full re-instatement, followed by the construction of the second project.

69. Under scenario 2, either the proposed East Anglia TWO project or the proposed East Anglia ONE North project could be constructed first. However, there will be no difference in impact regardless of which project is constructed first. The Cumulative Impact Assessment (CIA) presented in this ES is presented using the intended development strategy of the proposed East Anglia TWO project being constructed first. However, in the eventuality that the proposed East Anglia ONE North project is constructed first, the impacts presented would be the same.

70. Following this assessment, for each onshore topic, the scenario which is considered to give rise to the most significant impacts is taken forward for further cumulative impact assessment with other developments as described ***section 5.7.2.***

71. Details of the infrastructure requirements and construction methodology relevant to each scenario can be found in ***Chapter 6 Project Description.***

5.7.1.1 Onshore Substations Location

72. There are two co-located onshore substation locations for the proposed East Anglia TWO project and the proposed East Anglia ONE North project. The draft DCOs for the proposed East Anglia TWO and East Anglia ONE North projects have the flexibility to use either onshore substation location, as displayed in Figure 4.15. The intended development strategy is for the proposed East Anglia TWO project to use the eastern location and the proposed East Anglia ONE North project to use the western location. Therefore, this is how the 'project alone' assessments in the onshore technical chapters (***Chapters 18-27***) are presented, however the draft DCO for each project retains the flexibility to use either onshore substation location.

73. For the majority of onshore technical chapters there is no difference in the scoped in and assessed impacts between the eastern and western onshore substation locations. Therefore, the proposed East Anglia ONE North project alone assessment is presented on the western location (and the proposed East Anglia TWO project alone assessment is presented on the eastern location, as detailed in the East Anglia TWO ES). In the event that either project uses the alternative onshore substation location, the impacts presented would be the same.

74. For two onshore technical chapters the impacts do differ between the two onshore substation locations. These are ***Chapter 25 Noise and Vibration*** and ***Chapter 29 Landscape and Visual Impact Assessment***. In these two chapters, the project alone assessment is based on the intended development strategy of the proposed East Anglia ONE North project using the western onshore substation location (and the proposed East Anglia TWO project using the eastern onshore substation location, as detailed in the East Anglia TWO ES). However, within these two chapters, an additional section is provided that presents the project alone impacts for the alternative onshore substation location.

5.7.2 Cumulative Impact with other Developments

75. CIA is undertaken as part of each topic impact assessment. The scope of the CIA (in terms of relevant issues and projects) has been established with consultees (including other developers) as the EIA has progressed. In addition, experience from previous projects such as East Anglia ONE and East Anglia THREE, the wider Southern North Sea, and other UK projects has been considered as well as continuing work from industry-wide initiatives with regard to cumulative impact.

76. The Planning Inspectorate Advice Note Nine and its complementary guidance in Advice Note 17 (Planning Inspectorate 2018; 2015) advise that the following plans and projects should be considered in the CIA:

- Projects that are under construction;
- Permitted applications, not yet implemented;
- Submitted applications not yet determined;
- Projects on the Planning Inspectorate's Programme of Projects;
- Development identified in relevant Development Plans, with weight being given as they move closer to adoption and recognising that much information on any relevant proposals will be limited; and
- Projects identified in other policy documents as development reasonably likely to come forward.

77. Where it is helpful to do so 'Tiers' of these other projects' development statuses have been defined as well as the availability of information to be used within the CIA. This approach is based on the three tier system proposed in Planning Inspectorate Advice Note 17. In some technical chapters, a more refined tiering system based on the guidance issued by JNCC and Natural England in September 2013 is employed and involves six tiers as presented below (East Anglia THREE Limited 2013):

- Tier 1: built and operational projects;
- Tier 2: projects under construction plus Tier 1 projects;
- Tier 3: projects that have been consented (but construction has not yet commenced) plus Tiers 1 and 2;
- Tier 4: projects that have an application submitted to the appropriate regulatory body that have not yet been determined, plus Tiers 1-3;
- Tier 5: projects that the regulatory body are expecting to be submitted for determination (e.g. projects listed under the Planning Inspectorate programme of projects), plus Tiers 1-4; and
- Tier 6: projects that have been identified in relevant strategic plans or programmes plus Tiers 1-5.

78. The CIA is a two part process in which an initial list of projects with the potential to interact with the proposed East Anglia ONE North project is identified, based on the potential mechanism of interaction. The tiered approach is then adopted to enable further assessment based on the availability of information for each project.

79. In line with the RenewableUK CIA Guidelines for offshore windfarms (RenewableUK 2013), the approach to CIA attempts to incorporate an appropriate level of pragmatism. This is demonstrated in the confidence levels applied to the understanding of other projects (either their design or their likely impacts), particularly those that are known but currently lack detailed design documentation, such as those projects at the scoping stage only. Projects can be considered in the CIA only where it is considered that there is sufficient detail with which to undertake a meaningful assessment. Where there is a lack of specific information in the public domain, such as how and when (or if) projects will be built, it is not always possible to undertake a meaningful CIA.

80. Where projects which were sufficiently implemented during baseline survey these are considered as part of the baseline for the EIA in line with Advice Note seventeen (the Planning Inspectorate 2015).

81. Offshore cumulative impacts may arise from interactions with the following activities and industries:

- Other offshore windfarms;
- Aggregate extraction and dredging;
- Licensed disposal sites;
- Sub-sea cables and pipelines;
- Potential port/harbour development; and
- Oil and gas activities.

82. Onshore plans or projects to be taken into consideration include (but are not limited to):

- Other energy generation or transmission infrastructure;
- Building/housing developments;
- Installation or upgrade of roads;
- Installation or upgrade of cables and pipelines;
- Coastal protection works; and
- National Grid works.

83. Sizewell C New Nuclear Power Station is a sensitive proposed development in the local area. The cumulative assessment presented in this ES assesses where possible the potential cumulative impacts of the proposed East Anglia ONE North project and Sizewell C New Nuclear Power Station. The cumulative impact assessments presented in this ES are based on the best available information

regarding Sizewell C New Nuclear Power Station at the time of writing (June 2019).

84. Subsequent to agreeing the CIA approach, EDF Energy have embarked upon a Stage 4 consultation exercise scheduled to run from 18th July to 27th September 2019. The Stage 4 consultation document contains further information on an updated freight management strategy but does not contain sufficient information to facilitate a quantitative assessment for ES ***Chapters 19 Air Quality, 25 Noise and Vibration*** and ***26 Traffic and Transport***.

85. Recognising that Stage 3 information released by EDF Energy is now out of date, a quantitative CIA cannot be provided at this stage as it would be based upon out of date and incorrect information. Therefore, the CIA presented these chapters are qualitative, examining the potential for cumulative impacts.

86. The Applicant recognises that there is the potential for future proposed National Grid Ventures projects in the local area. The Applicant is also aware that extensions to many Round 2 offshore windfarm sites have been announced and that preparation for a further round of development (Round 4) is underway. However, at this stage, in accordance with The Planning Inspectorate Advice Note 17 there is currently insufficient information within the public domain for any of these projects to be considered within the cumulative impact assessment presented in this ES.

87. The list of plans or projects included in the CIA is specific to each topic and is detailed in each technical chapter (***Chapters 7-30***) and has been developed as part of on-going consultation with technical consultees.

5.8 Transboundary Impact Assessment

88. The United Nations Economic Commission for Europe (UNECE) Convention on Environmental Impact Assessment in a Transboundary Context (referred to as the Espoo Convention) requires that assessments are extended across borders between Parties of the Convention when a planned activity may cause significant adverse transboundary impacts.

89. Regulation 32 of the EIA regulations sets procedures to address issues associated with a development that might have a significant impact on the environment in another European Member State.

90. The procedures involve providing information to the Member State and for the Planning Inspectorate to enter into consultation with that State regarding the significant impacts of the development and the associated mitigation measures. Further advice on transboundary issues, in particular with regard to consultation

is provided in the Planning Inspectorate Advice Note 12 (Planning Inspectorate 2018a).

91. In June 2018 the Planning Inspectorate issued a Transboundary Impacts Screening Matrix in accordance with Regulation 32 of the EIA Regulations and published a notification in the London Gazette inviting relevant European Economic Area (EEA) Member States to notify the Planning Inspectorate if they wish to be consulted on the proposed East Anglia ONE North project. Separate to this formal consultation process the Applicant has consulted transboundary commercial fisherman and other transboundary consultees (including Rijkswaterstaat (The Netherlands) and Scottish Natural Heritage) based on previous experience from developing East Anglia ONE and East Anglia THREE.

92. More details regarding this transboundary consultation are detailed in the relevant technical chapters (***Chapters 7 - 17***). Note that given that the geographical footprint of onshore construction impacts from this project are highly localised (see ***Chapters 18 - 30***) and that there are no emissions such as gases or waste fluids associated with operation which could cause indirect far-field impact there is no pathway for transboundary effects from the onshore sources.

93. Potential transboundary impacts have been approached in a similar way to other cumulative impacts, with a clear audit trail provided to demonstrate why projects have been included or excluded. In accordance with the advice detailed above, relevant EEA member states have been consulted through targeted consultation including meetings with transboundary commercial fishermen and statutory consultees; and through the consultation on the ES.

5.9 Summary of Compliance with 2017 EIA Regulations

94. Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 specifies the information to be included in the ESs for nationally Significant Infrastructure Projects, in addition, Regulation 14 also details information which must be included within the ES. ***Table 5.7*** summarises these requirements and signposts where these details can be found within this ES.

Table 5.7 2017 EIA Regulations: Information for Inclusion in Environmental Statements

Information for Inclusion in Environmental Statements	How has this information been provided within the East Anglia ONE North ES
A description of the development, including in particular— • a description of the location of the development; • a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-	***Chapter 6 Project Description*** provides a detailed description of the project including its location and physical characteristics onshore and offshore. This chapter also describes the main characteristics of the tasks required during the construction, operation and decommissioning phases of the project, setting out estimated durations of tasks, materials

Information for Inclusion in Environmental Statements	How has this information been provided within the East Anglia ONE North ES
use requirements during the construction and operational phases; • a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used; • an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.	required and equipment likely to be used. The chapter also considers approaches to waste management and use of natural resources. Further details of impacts such as potential impacts on noise (***Chapter 25 Noise and Vibration***), air quality (***Chapter 19 Air Quality***), landscape (***Chapter 29 Landscape and Visual Impact***), land use (***Chapter 21 Land Use***), water (***Chapter 20 Water Resources and Flood Risk***) and other natural resources (***Chapter 22 Onshore Ecology***) are provided in dedicated technical impact assessment chapters and their technical appendices.
A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	The reasonable alternatives considered in the development of the proposed project design are discussed and presented in ***Chapter 4 Site Selection and Assessment of Alternatives*** and its technical appendices. The process of the design development for the project, the consultation undertaken and how the views expressed during consultation have influenced the design development decisions and final project design are summarised within ***Chapter 4 Site Selection and Assessment of Alternatives***. The comparative environmental effects of key design decisions and options considered are also presented as part of ***Chapter 4 Site Selection and Assessment of Alternatives***.
A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.	For each of the technical assessment chapters within the ES, a detailed baseline environment is described, as agreed through the scoping and EPP processes. In many cases this uses survey information gathered specifically to support the robust EIA for the proposed East Anglia ONE North project. In all relevant technical assessment chapters, the likely evolution of the baseline without the implementation of the project is also presented.
A description of the factors specified in regulation 5(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including	This requirement is fulfilled in the following impact assessment chapters within the ES. <u>Population and Human Health</u> • ***Chapter 27 – Human Health*** <u>Biodiversity</u> • ***Chapter 9 Benthic Ecology***

Information for Inclusion in Environmental Statements	How has this information been provided within the East Anglia ONE North ES
architectural and archaeological aspects, and landscape.	• ***Chapter 10 Fish and Shellfish Ecology*** • ***Chapter 11 Marine Mammals*** • ***Chapter 12 Ornithology*** • ***Chapter 22 Onshore Ecology*** • ***Chapter 23 Onshore Ornithology*** <u>Land</u> • ***Chapter 20 Water Resources and Flood Risk*** • ***Chapter 21 Land Use and Agriculture*** <u>Water</u> • ***Chapter 20 Water Resources and Flood Risk*** <u>Soil</u> • ***Chapter 18 Ground Conditions and Contamination*** • ***Chapter 21 Land Use*** <u>Air</u> • ***Chapter 19 Air Quality*** <u>Climate</u> • ***Chapter 2 Need for the Project*** • ***Chapter 3 Policy and Legislative Context*** Climate change effects are also considered in a number of technical chapters including: • ***Chapter 7 Marine Geology, Oceanography and Physical Processes*** • ***Chapter 20 Water Resources and Flood Risk*** <u>Material assets</u> • ***Chapter 7 Marine Geology, Oceanography and Physical Processes*** • ***Chapter 17 Infrastructure and Other Users*** • ***Chapter 18 Ground Conditions and Contamination*** • ***Chapter 20 Water Resources and Flood Risk*** • ***Chapter 21 Land Use*** • ***Chapter 26 Traffic and Transport*** • ***Chapter 30 Socio-Economics and Tourism and Recreation*** <u>Cultural heritage, including architectural and archaeological aspects</u> • ***Chapter 16 Marine Archaeology and Cultural Heritage*** • ***Chapter 24 Archaeology and Cultural Heritage*** <u>Landscape</u>

Information for Inclusion in Environmental Statements	How has this information been provided within the East Anglia ONE North ES
	• ***Chapter 28 Offshore Seascape, Landscape and Visual Amenity*** • ***Chapter 29 Landscape and Visual Impact***
A description of the likely significant effects of the development on the environment resulting from, inter alia— a. the construction and existence of the development, including, where relevant, demolition works; b. the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources; c. the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste; d. the risks to human health, cultural heritage or the environment (for example due to accidents or disasters); e. the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources; f. the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change; g. the technologies and the substances used. The description of the likely significant effects on the factors specified in regulation 5(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project, including in particular those established under Council Directive 92/43/EEC and Directive 2009/147/EC.	The significant effects arising from the proposed development alone and cumulatively with other relevant developments have been comprehensively assessed within each technical assessment within this ES (***Chapters 7 – 30***). Potential impacts from major accidents or disasters are discussed in ***Chapter 6 Project Description.*** Potential implications of climate change are discussed within relevant technical chapters and are addressed specifically in ***Chapter 2 Need for the Project.*** Technologies and materials likely to be deployed in the project are discussed in ***Chapter 6 Project Description*** and throughout the technical assessment chapters. ***Chapter 5 EIA Methodology*** sets out the generalised EIA methodology including cumulative impact assessment and interrelationships used in this ES to ensure a consistency of approach. Each technical chapter presents the detailed and specific assessment data analysis, and impact assessment methodologies applied to assess each potential impact identified. Each technical chapter also considers the potential cumulative impacts of the project taken together with other relevant projects and the potential interrelationships between impacts.
A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	Forecasting methods used to identify and assess significant effects on the environment are discussed in the overall EIA methodology in ***Chapter 5 EIA Methodology*** and are also covered in more specific detail in each technical chapter EIA methodology and impact assessment.

Information for Inclusion in Environmental Statements	How has this information been provided within the East Anglia ONE North ES
A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.	Mitigation measures include embedded mitigation, which are design decisions taken to reduce environmental impact of the project as part of the design development and additional mitigation measures which are proposed as ways of further reducing the assessed likely significant environmental impacts. Each technical assessment chapter includes an explanation of the embedded mitigation measures and where appropriate additional mitigations proposed. Any proposed monitoring has been presented in the ES which has been submitted as part of the DCO application.
A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to EU legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or UK environmental assessments may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.	Potential impacts from major accidents or disasters are discussed in ***Chapter 6 Project Description***. A Navigational Risk Assessment has also been prepared and is included as ***Appendix 14.1*** to ***Chapter 14 Shipping and Navigation.***
A non-technical summary of the information provided in respect of the above requirements.	A suitable non-technical summary is provided as part of the DCO application (document reference 3.1)
A reference list detailing the sources used for the descriptions and assessments included in the environmental statement.	A suitable reference list is provided at the end of each chapter. Where important documents are cited or are not available as references they are provided as technical appendices to each chapter.
Competent Expert Regulation 14(4): In order to ensure the completeness and quality of the environmental statement— (a) the applicant must ensure that the environmental statement is prepared by competent experts; and (b) the environmental statement must be accompanied by a statement from the	The competency of the EIA team and experts is discussed in (***section 5.3.3*** and ***Appendix 5.2***).

Information for Inclusion in Environmental Statements	How has this information been provided within the East Anglia ONE North ES
applicant outlining the relevant expertise or qualifications of such experts	

5.10 References

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