



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

East Anglia TWO Offshore Wind Farm

Appendix A14c to the Natural England Deadline 8 Submission

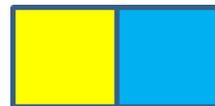
**Natural England's Comments on Updated Displacement of Red-throated Divers
in the Outer Thames Estuary SPA [REP8-034]**

For:

The construction and operation of East Anglia TWO Offshore Wind Farm, a 900MW wind farm which could consist of up to 75 turbines, generators and associated infrastructure, located 37km from Lowestoft and 32km from Southwold.

Planning Inspectorate Reference: EN010078

15th April 2021



Natural England's Comments on Updated Displacement of Red-throated Divers in the Outer Thames Estuary SPA [REP8-034]

This document is applicable to both the East Anglia ONE North (EA1N) and East Anglia TWO (EA2) applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA) procedural decisions on document management of 23rd December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again for the other project.

Introduction

This document provides an update on Natural England's position and advice to the following documents submitted by the Applicant at Deadline 8 in relation to Displacement of RTD in OTE:

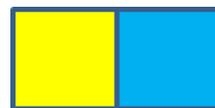
- EA1N&EA2 Displacement of Red-throated Divers in the Outer Thames Estuary (Tracked & Clean) v4 [REP8-033, REP8-034].

1. Summary

1. **The comments Natural England have made on previous versions of this document still stand** [REP4-087, REP6-113, REP7-070]. We note that the only changes in version 4 [REP8-034] relate to the EA2 project alone assessment and the in-combination assessment so we have restricted our comments to those sections.

2. Project Alone Assessment East Anglia TWO

2. Natural England welcomes the inclusion of additional text under 'Project Alone Assessment East Anglia TWO' section around the numbers of red throated divers and the area of the SPA that could be subject to displacement from EA2. However, we disagree with the Applicant that there will be no displacement effect and resultant change in distribution. Our position is based on the evidence from the recent London Array post-construction monitoring which has reported that the extent of displacement extends to 11.5km.



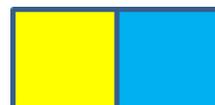
- Natural England notes that the Applicant suggests that the effective area of habitat loss from EA2 is 0.075% of the SPA area. We acknowledge that it is unlikely that this level of displacement will result in an Adverse Effect on Integrity (AEol) alone.

3. In-Combination Assessment

- Natural England has already stated its position that the assessment needs to consider a range of displacement scenarios (and not just the outputs from the Applicant’s modelling exercise). For the in-combination assessment it is critical that an appropriate and precautionary figure is used to assess the within windfarm displacement figure for the worst-case scenario. Similarly, a range in relation to the extent of the buffer and the gradient across it is required.
- We note with concern that the contribution from EA2 is not included in the in-combination assessment, based on the Applicant’s assertion that its contribution to area of displacement would not materially add to the in-combination effect. Natural England’s advice is that EA2’s contribution to the in-combination total is included. The small contribution EA2 makes to some of the totals for species subject to collision risk is included in those totals, and the principle is the same for displacement.
- Natural England’s position is that there is already an AEol from displacement effects of red-throated diver in-combination [REP4-087] from existing windfarms within the OTE SPA. Whether the total area of SPA that is subjected to some level of displacement is 31% (based on the Applicant’s modelling outputs), or 47% of the SPA (assuming that the extent of displacement extends to 10km), it is clear that a significant percentage of the SPA by area is already subjected to displacement. We therefore disagree with the Applicant’s conclusions set out in Table 11. Natural England’s conclusions are set out in the table below:

Table 1: Natural England’s advice regarding the implications of EA1N and EA2 for the OTE SPA high-level conservation objectives.

Conservation Objective	Summary of assessment	EA1N alone	EA2 alone	In-combination
a) the extent and distribution of the habitats of the qualifying features	Regardless of whether projects are outside of the SPA boundary, birds’ avoidance of them means that the presence of turbines is	AEol	No AEol	AEol



b) the structure and function of the habitats of the qualifying features	still able to affect the extent of supporting habitat and their function inside the SPA. Based on the Applicant's modelling outputs the area of habitat affected would be between 0 and 0.075% of the SPA for EA2; between 0.5% and 1.4% of the SPA for EA1N based on Table 9; and between 31% and 47% of the SPA affected to some degree by all projects in-combination.	AEol	No AEol	AEol
c) the supporting processes on which the habitats of the qualifying features rely		AEol	No AEol	AEol
d) the populations of each of the qualifying features	<p>We acknowledge that the current population estimate is considerably higher than was estimated at the time of the original notification in 2010. Although it is not possible to know what that previous abundance estimate would be had it be undertaken with digital aerial survey methods, we accept that the population is unlikely to have decreased since 2010, despite the presence of additional OWF during this period. Therefore, based on the latest survey data, there is sufficient likelihood that an AEol alone and in-combination through this conservation objective can be ruled out.</p> <p>We do however note that the associated attribute in our Supplementary Advice on the Conservation Objectives is to <i>'Maintain the size of the non-breeding population at a level which is at or above 18,079 individuals, whilst avoiding its deterioration from its current level'</i> [our emphasis]. It should therefore not be assumed from our conclusions on EA1N/EA2 that increased pressure from further OWFs in or adjacent to the SPA could not compromise this attribute in the future.</p>	No AEol	No AEol	No AEol
e) the distribution of qualifying features within the site	Based on the Applicant's modelling assumptions the displacement effects extend to 7-8km from the windfarm footprint,	AEol	No AEol	AEol



	<p>and on that basis there will be a change in distribution as a result of EA1N and therefore an AEol alone cannot be ruled out.</p> <p>Our position is that whilst some displacement from EA2 cannot be ruled out, it is not likely to result in AEol alone.</p> <p>In-combination it is clear from the current distribution that RTD density is lower in the windfarm boundaries, and the greatest density is equi-distant from the existing windfarms in the OTE. There is clear evidence of windfarms resulting in re-distribution within the SPA, and therefore AEol in-combination cannot be ruled out.</p> <p>Although both EA1N and EA2 lie outside the SPA boundary, their proximity to the boundary is less than the distance over which RTD have been shown in some studies to display avoidance reactions to wind turbines. Thus, it cannot be ruled out that both EA1N and EA2 as configured will not contribute further to the overall percentage of the SPA within which the density of RTD is altered by windfarm development and so an AEol.</p>			
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