

Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Appendix 4 to Deadline 4B Submission: RIAA
Addendum

Relevant Examination Deadline: 4B

Submitted by Vattenfall Wind Power Ltd

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Revision A

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Contents

1	Introduction	4
1.2	Report to Inform Appropriate Assessment.....	5
2	Implications of the SEZ.....	26
2.1	Overview	26
2.2	The Outer Thames Estuary SPA.....	26
2.3	Project Description.....	26

Tables

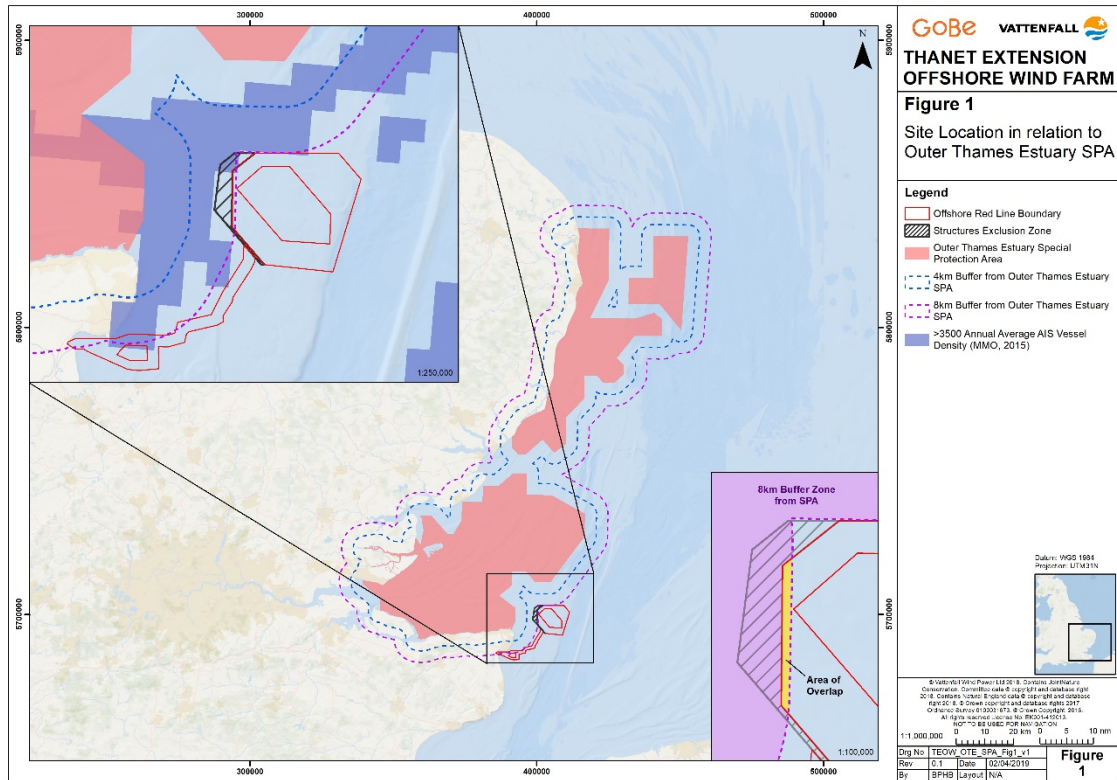
Table 1:	Implication of the SEZ for the RIAA.....	6
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1 Introduction

- 1 At Deadline 3, a number of responses were received regarding shipping and navigation issues (with these summarised in Appendix 4 to Deadline 4). Appendix 14 to Deadline 4 (REP4-018) detailed a proposed structures exclusion zone (SEZ) to the western extent of the array Red Line Boundary (RLB) (Figure 1). The purpose of the SEZ is to identify an area within the RLB where no above sea structures will be installed – noting that cables may still be installed within this zone.

- 2 At Deadline 4, a number of documents were submitted in relation to a Structure Exclusion Zone (SEZ). These documents are:
 - Appendix 4 to Deadline 4: Response to Deadline 3 Submissions by Interested Parties – Shipping and Navigation (REP4-006);
 - Appendix 5 to Deadline 4: Responses to comments on Shipping Policy Considerations (REP4-007);
 - Appendix 14 to Deadline 4: Structures Exclusion Zone (REP4-018);
 - Appendix 19 to Deadline 4: The consequences of the SEZ on assessment of Red-throated Diver interest feature of OTE SPA alone and in-combination (REP4-023);
 - Appendix 23 to Deadline 4: Review of the Environment Statement and Report to Inform Appropriate Assessment in relation to the Structure Exclusion Zone (REP4-027); and
 - Appendix 27 to Deadline 4: Data Analysis and Validation Paper (REP4-030).

Exclusion Zone



3 The purpose of this Appendix to Deadline 4b is to provide an Addendum to the Report to Inform Appropriate Assessment (RIAA), as issued at Deadline 2 (REP2-018 and REP-019), to confirm what (if any) implications the SEZ has for the RIAA. The current Appendix therefore compliments and expands on Appendix 23 to Deadline 4 (REP4-027) ‘Review of the Environment Statement and Report to Inform Appropriate Assessment in relation to the Structure Exclusion Zone’.

1.2 Report to Inform Appropriate Assessment

4 The following Table 1 updates and expands on Table 2 from Appendix 23 to Deadline 4, to provide an Addendum to the RIAA (REP2-018 and REP-019). It examines each Section/subsection (including individual designated sites) and presents an appraisal of what (if any) effect the SEZ has on each section/designated site. Where an update applies, this is highlighted in bold and discussed in Section 2 below.

5 For information and completeness, Appendix 19 and 23 from Deadline 4 (PINS Ref REP4-023 and 027) which provide the Applicant’s position on the Outer Thames Estuary SPA and Flamborough and Filey Coast SPA are annexed to this document.

Table 1: Implication of the SEZ for the RIAA¹

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
Figures	N/A	N/A	Figures throughout the RIAA do not include the SEZ – however the RLB remains relevant and correct. The SEZ does not remove all works from that area, with vessel movements, seabed works (e.g. cabling) etc still anticipated within that area. The figures are for visual reference only – assessments are made on area/footprint/range values and any change in those values is detailed below.
Section 1 – Introduction	N/A	N/A	Although the SEZ is not included within the Introduction (or noted in 1.1: Revised document introduction), the background to the project (1.2), purpose of the report (1.3), project literature (1.4) and structure of the RIAA (1.5), sections and content remain correct and relevant (noting the additional documents submitted at Deadline 4, referenced above).
Section 2 – Legislation, policy and guidance	N/A	N/A	The legislative context and government policy (2.1), guidance documents (2.2) and HRA process (2.3) have not changed following Deadline 2 or the inclusion of the SEZ and therefore no change would be required to Section 2.
Section 3 – Roles and responsibilities	N/A	N/A	There has been no change to roles and responsibilities following Deadline 2 or the inclusion of the SEZ and therefore no change would be required to Section 3.
Section 4 - Consultation	N/A	N/A	As expected, a number of comments relevant to the RIAA have been received following resubmission of the RIAA at Deadline 2. These are noted below, together with any implications for the content of the RIAA.

¹ Noting that ranges are from the array RLB (or SEZ as appropriate) and not the cable corridor

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			<p>Comments were received at Deadline 3 with relevance to the Revised RIAA submitted at Deadline 2:</p> <p>a) Kent Wildlife Trust (KWT) (REP3-081) – provided a response to the questions/actions put to KWT by the ExA at ISH3. Information provided clarified the position of KWT.</p> <p>b) Natural England and Environment Agency (REP3-076) – comments on the Saltmarsh Mitigation and Monitoring Plan (SMRMP).</p> <p>c) Marine Management (REP3-078) – comments on the Site Integrity Plan (SIP).</p> <p>d) Natural England (REP3-075) – includes comment on the SMRMP, draft SIP and RIAA issued at Deadline 2.</p> <p>e) Natural England (REP3-089) – update to the wording in the offshore ornithology Statement of Common Ground (SoCG).</p> <p>Responses to the Deadline 3 submissions were made by the Applicant at Deadline 4 within the following documents:</p> <p>(i) Deadline 4 Appendix 3 (REP4-005) – Response to Deadline 3 Submissions by Interested Parties (including a response to (a), (b), (c), (d) and (e). Information provided for clarification, confirmation and to note minor (non-material) typos. No information provided would necessitate a revision of the RIAA or a change in the existing conclusions.</p> <p>(ii) Deadline 4 Appendix 16 (REP4-020) – SMRMP. Updated post Deadline 3 (including response to (c) and (d) above). Relates to confirmation of mitigation only and not the assessment or conclusions.</p> <p>(iii) Deadline 4 Appendix 18 (REP4-022) Draft Site Integrity Plan. Update post Deadline 3 (including response to (c) and (d) above). Relates to</p>

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			<p>confirmation of mitigation only and not the assessment or conclusions.</p> <p>(iv) Deadline 4 Appendix 19 (REP4-023) – The consequences of the SEZ on assessment of Red-throated Diver interest feature of OTE SPA [Outer Thames Estuary Special Protection Area] alone and in-combination. The document does not change the conclusions but does provide greater evidence in support of the conclusions (post the SEZ). Clarity provided below under the OTE SPA.</p> <p>(v) Deadline 4 Appendix 21 (REP4-025) – Reef Biogenic Mitigation Plan. Update post Deadline 3. Relates to mitigation only and not the assessment or conclusions.</p> <p>(vi) Deadline 4 Appendix 23 (REP027) - Review of the Environment Statement and Report to Inform Appropriate Assessment in relation to the Structure Exclusion Zone. Summarises the relevance of the SEZ to the ES and designated sites screened into the RIAA. For the RIAA, determined the need for further consideration at Deadline 4a for the OTE SPA only (confirmation provided below on a site by site basis).</p> <p>(vii) Deadline 4 Appendix 25 (REP4-029) - Offshore Ornithology Incombination Effects Position Paper on Kittiwake and the FCC SPA. Provided confirmation. The document provides further clarification and evidence in support of the Applicants position (unrelated to the SEZ) and does not change the assessment parameters or the conclusions.</p>
Section 5 – Project Overview	N/A	N/A	<p>The information is presented in the following:</p> <p>5.1 - Introduction. No change required.</p> <p>5.2 – Project Description. Table 5.1 does not include the SEZ, with the implication of the SEZ</p>

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			<p>addressed for the relevant designated site(s) below.</p> <p>5.3 – Consideration of Alternatives. No change required.</p> <p>5.4 – Maximum Adverse Scenario. Table 5.2 includes all relevant aspects of the project. The only change is the location of some above sea structures – none of the parameters listed will change (the SEZ resulting in a change in distance between certain structures and certain designated sites/features only, and therefore influencing the pathway in the cause-pathway-effect model but not the cause or effect).</p> <p>5.5 – Construction programme. No change.</p> <p>5.6 – Operation, Maintenance and Decommissioning Programme. No change.</p>
Section 6 – Embedded Mitigation	N/A	N/A	<p>The SEZ has been developed as mitigation for navigation. However, it affords mitigation for the OTE SPA as well. The existing mitigation in Table 6.1 for red-throated diver (RTD) and the OTE SPA reads ‘The original (pre-scoping) site boundary was reduced in size to ensure that the nearest WTG [wind turbine generator] was separated by 4 km to the Outer Thames Estuary SPA’. That statement provides less mitigation than the SEZ which now applies (i.e. the RIAA is more precautionary than the SEZ) as the distance between the nearest WTG and the OTE SPA is now 7.65km at its nearest point.</p>
Section 7 – The Screening Process for the Project Alone	N/A	N/A	<p>The effects to be considered in screening will not change with the SEZ – as the same activities and structures are required, it is purely a change in the area within which above sea structures can be located. Below sea surface structures can still be installed (e.g. cables) and vessel activity can still occur.</p>

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			<p>The screening process (Table 7.1) is linked to the following points:</p> <ol style="list-style-type: none"> 1. Physical overlap between the red line boundary (RLB) and a designated site – no change in the RLB following the SEZ and therefore no change to screening. 2. Designated species associated at a site at distance from the RLB, that may occur at some point within the RLB or footprint of effect. The RLB has not changed, with the footprint of effect only changed in relation to effects linked to construction, O&M and decommissioning of above sea structures. The only change following the SEZ is where above sea level structures may be located. This is potentially relevant for species during operation and maintenance – notably birds, both in relation to displacement and collision risk, but also marine mammals during construction. For benthic ecology, cables can be installed within the SEZ and therefore no change in the potential sediment plume extent (the driver for screening benthic features). Onshore ecology (too remote) and diadromous fish (screened out) will be unaffected by the SEZ. The implications for birds and marine mammals are considered on a site by site basis below – noting that based on the screening distances applied within the RIAA, and the change in distance between where structures could be installed and a designated site, there would be no change in the designated sites/features screened in or out. 3. Designated site with migratory species. See point 2. 4. Feature within range of effect. See point 2. 5. Qualifying feature recorded at the site. See point 2.

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			Overall, the SEZ alters the range at which certain effects may be felt from a specific designated site/feature (those effects associated with construction, O&M and decommissioning of above sea structures). The range at which an effect is screened in for a given site/feature is determined within the RIAA (Section 7). The SEZ is not sufficient to reduce the range of any potential effect relative to a designated site/feature enough to screen out a site/feature currently screened in. The SEZ does not increase the range of any effect and therefore does not result in additional sites/features being screened in. There is, therefore, no change in the screening presented in Section 7 of the RIAA.
Section 8 – The Screening Process for the Project In-combination	N/A	N/A	Given that the SEZ does not result in a change in screening for the project alone (in terms of no change of site/feature or effects screened in/ out), no change will result to in-combination screening.
Section 9 – Summary of Designated Sites	N/A	N/A	Given that the SEZ does not result in a change to screening alone and in-combination, there would be no change to the sites identified and described in Section 9.
Section 10 – Assessment Criteria	N/A	N/A	The SEZ has not changed the way the assessment has been carried out and therefore no change to Section 10.
Section 11 – Assessment of Adverse Effect Alone			
Section 11 – Assessment of Adverse Effect Alone	See individual site consideration below		The assessment is presented in a receptor group/ project stage/ effect basis – to minimise the repetition. With individual sites/features considered within each sub-section as relevant based on screening for the project alone. Each site is considered below, with respect to the effects screened in and assessed.

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
Section 11 – Thanet Coast SAC	6.32	7.28	<p>Construction & Decommissioning</p> <p>Accidental pollution – no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Temporary habitat loss and disturbance - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Increased suspended sediment and associated deposition - no change in activities required, therefore no change in the assessment and conclusion of no AEol.</p> <p>Operation & Maintenance</p> <p>Accidental pollution – no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Temporary habitat loss and disturbance - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Increased suspended sediment and associated deposition - no change in activities required, therefore no change in the assessment and conclusion of no AEol.</p> <p>Change to physical processes – no change in infrastructure required and therefore no change in the assessment and conclusion of no AEol.</p>
Section 11 – Margate and Long Sands SAC	5.05	6.46	<p>Construction & Decommissioning</p> <p>Accidental pollution – no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p>

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			<p>Increased suspended sediment and associated deposition - no change in activities required, therefore no change in the assessment and conclusion of no AEoI (noting the increase in range of WTG but not cables from the SAC).</p> <p>Operation & Maintenance</p> <p>Accidental pollution – no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p> <p>Increased suspended sediment and associated deposition - no change in activities required, therefore no change in the assessment and conclusion of no AEoI.</p> <p>Change to physical processes – no change in infrastructure required and therefore no change in the assessment and conclusion of no AEoI.</p>
Section 11 – Thanet Coast and Sandwich Bay SPA	7.92	8.7	<p>Construction & Decommissioning</p> <p>Accidental pollution – no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p> <p>Temporary habitat loss and disturbance - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p> <p>Increased suspended sediment and associated deposition - no change in activities required, therefore no change in the assessment and conclusion of no AEoI.</p> <p>Noise and visual disturbance - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p>

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			<p>Potential disturbance due to possible displacement of recreational users from Pegwell Bay Country Park - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p> <p>Operation & Maintenance</p> <p>Accidental pollution – no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p> <p>Temporary habitat loss and disturbance - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p> <p>Increased suspended sediment and associated deposition - no change in activities required, therefore no change in the assessment and conclusion of no AEoI.</p> <p>Noise and visual disturbance - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p>
Section 11 – Thanet Coast and Sandwich Bay Ramsar	7.92	8.7	<p>Construction & Decommissioning</p> <p>Accidental pollution – no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p> <p>Temporary habitat loss and disturbance - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p> <p>Increased suspended sediment and associated deposition - no change in activities required, therefore no change in the assessment and conclusion of no AEoI.</p>

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			<p>Habitat loss via land-take/ land cover change - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Noise and visual disturbance - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Potential disturbance due to possible displacement of recreational users from Pegwell Bay Country Park - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Spread of INNS - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Operation & Maintenance</p> <p>Accidental pollution – no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Temporary habitat loss and disturbance - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Increased suspended sediment and associated deposition - no change in activities required, therefore no change in the assessment and conclusion of no AEol.</p> <p>Disturbance/ temporary loss of habitat - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Noise and visual disturbance - no change in activities required, no change in mitigation agreed,</p>

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			therefore no change in the assessment and conclusion of no AEoI.
Section 11 – Southern North Sea SAC	0	0	<p>Construction and Decommissioning</p> <p>Accidental pollution – no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p> <p>Increase in underwater noise – no change in the number, type or duration of activities resulting in underwater noise, and no change in the minimum range from the designated site. Therefore no change in the assessment and conclusion of no AEoI.</p> <p>Operation & Maintenance</p> <p>Accidental pollution – no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p>
Section 11 – Bancs de Flandres SCI	23.41	23.41	<p>Construction and Decommissioning</p> <p>Accidental pollution – no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p> <p>Increase in underwater noise – no change in the number, type or duration of activities resulting in underwater noise, and no change in the minimum range from the designated site. Therefore no change in the assessment and conclusion of no AEoI.</p> <p>Operation & Maintenance</p> <p>Accidental pollution – no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEoI.</p>

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
<p>Section 11 – Other marine mammal transboundary sites:</p> <p>Baie de Canche et couloir des trois estuaries</p> <p>Vlakte van de Raan</p> <p>Voordelta</p> <p>Estuaires et littoral picards (baies de Somme et d'Authie)</p> <p>Recifs Gris-Nez Blanc-Nez</p> <p>Vlaamse Banken</p> <p>SBZ1</p> <p>SBZ2</p> <p>SBZ3</p> <p>Ridens et dunes hydrauliques</p>	Variable range but no change for any following the SEZ		<p>Construction and Decommissioning</p> <p>Increase in underwater noise – no change in the number, type or duration of activities resulting in underwater noise, and no change in the minimum range from the designated site. Therefore no change in the assessment and conclusion of no AEol.</p>
<p>Section 11 – Outer Thames Estuary SPA</p>	6.15 ²	7.65	<p>Construction & Decommissioning</p> <p>Disturbance and displacement – the increase in distance between the SPA boundary and the closest possible WTG provides greater evidence to support the existing conclusion of no AEol, as summarised in REP4-023.</p>

² Noting that the RIAA and ES based the assessment on PEIR values – which applied a previous RLB with a range of approximately 4km (REP4-023)

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			<p>Operation and Maintenance</p> <p>Disturbance and displacement – the increase in distance between the SPA boundary and the closest possible WTG provides greater evidence to support the existing conclusion of no AEoI, as summarised in REP4-023.</p> <p>Collision risk – The SEZ does not change the number of wind turbines. No change to the existing conclusion of no AEoI.</p>
Section 11 – Foulness SPA	38.24	39.43	<p>Operation & Maintenance</p> <p>Collision risk – The SEZ does not change the number of wind turbines. No change to the existing conclusion of no AEoI.</p>
Section 11 – Alde-Ore Estuary SPA	60.57	60.82	<p>Operation & Maintenance</p> <p>Collision risk – The SEZ does not change the number of wind turbines. No change to the existing conclusion of no AEoI.</p>
Section 11 – Alde-Ore Estuary Ramsar	60.57	60.82	<p>Operation & Maintenance</p> <p>Collision risk – The SEZ does not change the number of wind turbines. No change to the existing conclusion of no AEoI.</p>
Section 11 – Flamborough and Filey Coast SPA	311.47	312.07	<p>Construction & Decommissioning</p> <p>Disturbance and displacement – the minor increase in distance between the SPA boundary and the closest possible WTG does not change the existing conclusion of no AEoI.</p> <p>Operation & Maintenance</p> <p>Disturbance and displacement – the minor increase in distance between the SPA boundary and the closest possible WTG does not change the existing conclusion of no AEoI.</p>

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			Collision risk – The SEZ does not change the number of wind turbines. No change to the existing conclusion of no AEol. Noting that REP4-029 provides further evidence to support the existing conclusion of no AEol, however the information is not affected by the SEZ.
Section 11 – St Abbs Head to Fast Castle SPA	549.27	549.99	<p>Construction & Decommissioning</p> <p>Disturbance and displacement – the minor increase in distance between the SPA boundary and the closest possible WTG does not change the existing conclusion of no AEol.</p> <p>Operation & Maintenance</p> <p>Disturbance and displacement – the minor increase in distance between the SPA boundary and the closest possible WTG does not change the existing conclusion of no AEol.</p> <p>Collision risk – The SEZ does not change the number of wind turbines. No change to the existing conclusion of no AEol.</p>
Section 11 – Northumberland Marine SPA	452.1	452.8	<p>Construction & Decommissioning</p> <p>Disturbance and displacement – the minor increase in distance between the SPA boundary and the closest possible WTG does not change the existing conclusion of no AEol.</p> <p>Operation & Maintenance</p> <p>Disturbance and displacement – the minor increase in distance between the SPA boundary and the closest possible WTG does not change the existing conclusion of no AEol.</p>
Section 11 – Farne Island SPA	452.1	452.8	<p>Construction & Decommissioning</p> <p>Disturbance and displacement – the minor increase in distance between the SPA boundary and the</p>

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			<p>closest possible WTG does not change the existing conclusion of no AEol.</p> <p>Operation & Maintenance</p> <p>Disturbance and displacement – the minor increase in distance between the SPA boundary and the closest possible WTG does not change the existing conclusion of no AEol.</p>
Section 12 – Assessment of Adverse Effect In-combination			
Section 12 – Assessment of Adverse Effect In-combination	See individual site consideration below		As for the project alone (Section 11 above), the assessment is presented in a receptor group/ project stage/ effect basis – to minimise the repetition. With individual sites/features considered within each sub-section as relevant based on screening in-combination. Each site is considered below, with respect to the effects screened in and assessed.
Tables 12.1 and 12.2	N/A	N/A	<p>The identification of plans/ projects to consider in-combination. It is noted that Natural England raised a large-scale seismic survey in their Deadline 3 submission - Comments on Clarification Notes Submitted at Deadline 1 and 2 (REP3-075), however in the Applicants Deadline 4 response (Appendix 3) (REP4-005), it is clarified that the location of the survey is such that it is not relevant to the Thanet Extension in-combination assessment – therefore no change to the RIAA.</p> <p>No other change in plans and projects in-combination has been highlighted since the RIAA was re-issued at Deadline 2 and therefore no change required to Tables 12.1 and 12.2.</p>
Section 12.2 – subtidal and benthic	N/A	N/A	No change to plans and projects and therefore no change to the existing conclusions (no in-combination plans and projects).

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
intertidal habitats			
Section 12.3 – Marine Mammals Southern North Sea SAC Bancs des Flandres SCI	Ranges as above for the project alone		<p>Construction and Decommissioning</p> <p>Accidental pollution - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Underwater noise - no change in the project alone number, type or duration of activities resulting in underwater noise, no change in the minimum range from the designated site, no additional plans or projects (or alterations to the assigned tiers). Therefore no change in the assessment and conclusion of no AEol.</p> <p>Operation and Maintenance</p> <p>Accidental pollution - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p>
Section 12.4 – Offshore Ornithology	Ranges as above for the project alone		Considered on a site by site basis below
Section 12.4 – Outer Thames Estuary SPA	6.15³	7.65	<p>Construction and Decommissioning</p> <p>Offshore cables direct disturbance and displacement – no change in the potential location of cabling and therefore no change in the current conclusion of no AEol.</p> <p>Operation and Maintenance</p> <p>Offshore wind farms direct disturbance and displacement – the increase in distance between the SPA boundary and the closest possible WTG</p>

³ Noting that the RIAA and ES based the assessment on PEIR values – which applied a previous RLB with a range of approximately 4km (REP4-023)

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			<p>provides greater evidence to support the existing conclusion of no AEoI, as summarised in REP4-023.</p> <p>Collision risk – The SEZ does not change the number of wind turbines. As noted in the recent CRM Clarification Note, submitted at Deadline III (REP3-058), even under the most precautionary parameters requested by Natural England the collision risk totals estimated as a consequence of Thanet Extension alone will not make any appreciable contribution to the cumulative and in-combination totals. No change to the existing conclusion of no AEoI.</p>
Section 12.4 – Alde-Ore Estuary SPA	60.57	60.82	<p>Operation and Maintenance</p> <p>Collision risk – The SEZ does not change the number of wind turbines. As noted in the recent CRM Clarification Note, submitted at Deadline III (REP3-058), even under the most precautionary parameters requested by Natural England the collision risk totals estimated as a consequence of Thanet Extension alone will not make any appreciable contribution to the cumulative and in-combination totals. No change to the existing conclusion of no AEoI.</p>
Section 12.4 – Alde-Ore Estuary Ramsar	60.57	60.82	<p>Operation and Maintenance</p> <p>Collision risk – The SEZ does not change the number of wind turbines. As noted in the recent CRM Clarification Note, submitted at Deadline III (REP3-058), even under the most precautionary parameters requested by Natural England the collision risk totals estimated as a consequence of Thanet Extension alone will not make any appreciable contribution to the cumulative and in-combination totals. No change to the existing conclusion of no AEoI.</p>

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
Section 12.4 – Flamborough and Filey Coast SPA	311.47	312.07	<p>Operation and Maintenance</p> <p>Collision risk – The SEZ does not change the number of wind turbines. As noted in the recent CRM Clarification Note, submitted at Deadline III (REP3-058) together with the Offshore Ornithology Position Paper for kittiwake and the Flamborough and Filey Coast SPA submitted at Deadline IV (REP4-029), even under the most precautionary parameters requested by Natural England the collision risk totals estimated as a consequence of Thanet Extension alone will not make any appreciable contribution to the cumulative and in-combination totals. No change to the existing conclusion of no AEol.</p>
Section 12.4 – St Abbs Head to Fast Castle SPA	549.27	549.99	<p>Operation and Maintenance</p> <p>Collision risk – The SEZ does not change the number of wind turbines. As noted in the recent CRM Clarification Note, submitted at Deadline III (REP3-058), even under the most precautionary parameters requested by Natural England the collision risk totals estimated as a consequence of Thanet Extension alone will not make any appreciable contribution to the cumulative and in-combination totals. No change to the existing conclusion of no AEol.</p>
Section 12.5 – Onshore Biodiversity	Ranges as above for the project alone		Considered on a site by site basis below
Section 12.5 – Thanet Coast and Sandwich Bay SPA	7.92	8.7	<p>Construction and Decommissioning</p> <p>Disturbance (noise & vibration, visual, lighting) - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Disturbance due to possible displacement of visitors from Pegwell Bay Country Park - no change in</p>

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
			<p>activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Accidental pollution - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Operation and Maintenance</p> <p>Disturbance (noise & vibration, visual, lighting) - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Displacement during O&M - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p>
Section 12.5 – Thanet Coast and Sandwich Bay Ramsar	7.92	8.7	<p>Construction and Decommissioning</p> <p>Disturbance due to possible displacement of visitors from Pegwell Bay Country Park - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Accidental pollution - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p> <p>Operation and Maintenance</p> <p>Disturbance (noise & vibration, visual, lighting) - no change in activities required, no change in mitigation agreed, therefore no change in the assessment and conclusion of no AEol.</p>
Section 13 – Transboundary Statement	Ranges as above for the project alone		No change in the conclusions for transboundary designated sites therefore no change to the section.

RIAA Section	Distance (km) between the designated site and relevant boundary		Implications of the SEZ
	RLB	SEZ	
Section 14 – Conclusions of the Assessment	Ranges as above for the project alone		<p>Table 14.1 presents the summary of potential AEoI from Thanet Extension alone. No change to any of the sites/features screened in, no change to any of the effects screened in, and no change to any of the existing conclusions of no AEoI.</p> <p>As noted above – some re-enforcement and strengthening of the reasoning behind some of the conclusions.</p> <p>Table 14.2 presents the summary of potential AEoI from Thanet Extension in-combination. No change to any of the sites/features screened in, no change to any of the effects screened in, and no change to any of the existing conclusions of no AEoI.</p> <p>As noted above – some re-enforcement and strengthening of the reasoning behind some of the conclusions.</p>
Section 15 - References	N/A	N/A	No additional references identified (outside Examination documents).

2 Implications of the SEZ

2.1 Overview

- 6 The only sections of the RIAA that are affected by the introduction of the SEZ are those relating to the Outer Thames Estuary SPA and minor changes to the project description.

2.2 The Outer Thames Estuary SPA

- 7 The revised RIAA, submitted at Deadline 2, concluded no AEoI with respect to red-throated diver and the Outer Thames Estuary SPA. The SEZ does not change those conclusions. The SEZ does, however, provide greater weight behind those conclusions by strengthening the evidence base used to inform them.
- 8 Existing mitigation within the RIAA submitted at Deadline 2 (and the assessment) for the Outer Thames Estuary SPA is based on the PEIR distance between the SPA boundary and the closest WTG (4km). That distance, following the SEZ, is now very precautionary—now being 7.65km. The additional mitigation afforded by the increase in distance does not, however, change the existing conclusions (but does provide greater weight to them).
- 9 This addendum to the RIAA concludes that there will be no material change to the assessment.

2.3 Project Description

- 10 The revised RIAA, submitted at Deadline 2, did not include consideration of the SEZ (as it had not been proposed at that time). However, the project description clearly provides the maximum adverse scenario for the purposes of assessment and that has not changed. The only change is the location of above sea surface structures within the RLB (not specified in the project description), with the implications for this considered on a designated site by site basis.
- 11 This addendum to the RIAA concludes that there will be no material change to the assessment.