

**RWE Renewables UK Dogger Bank
South (West) Limited**

**RWE Renewables UK Dogger Bank
South (East) Limited**

Dogger Bank South Offshore Wind Farms

Environmental Statement

Volume 7

**Appendix 6-2 Offshore Cumulative Effects Assessment
Methodology**

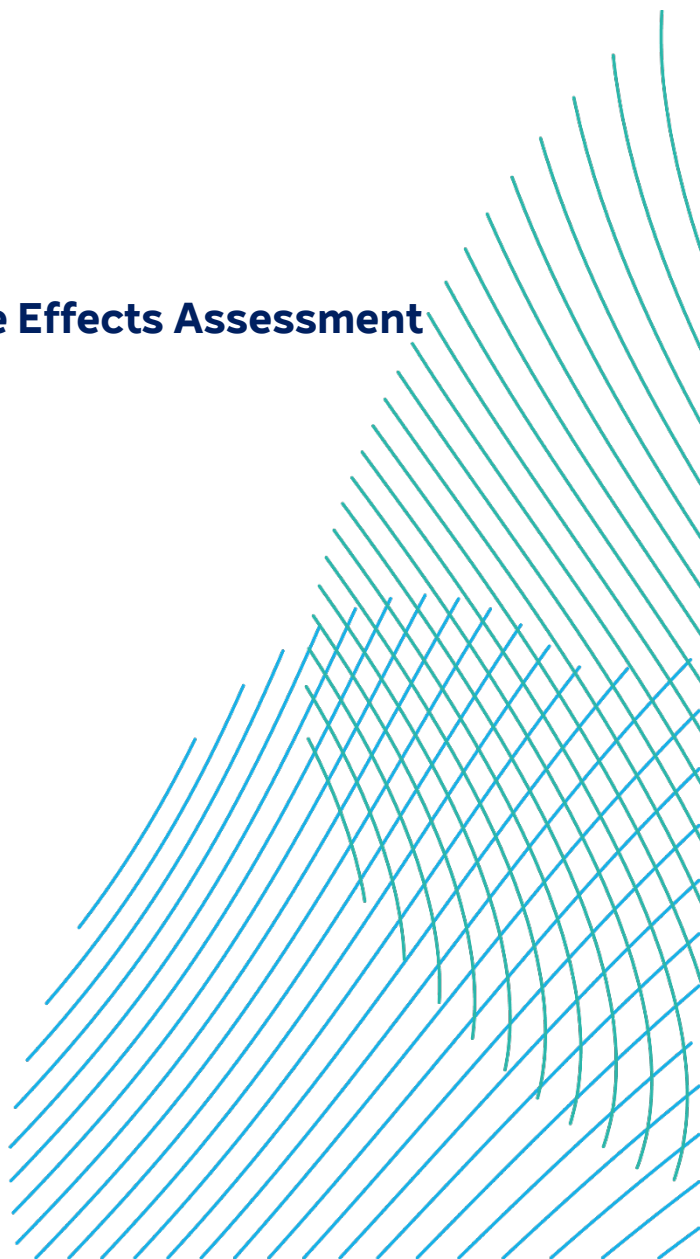
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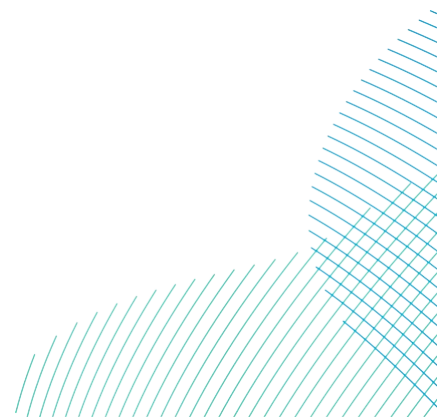
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Glossary

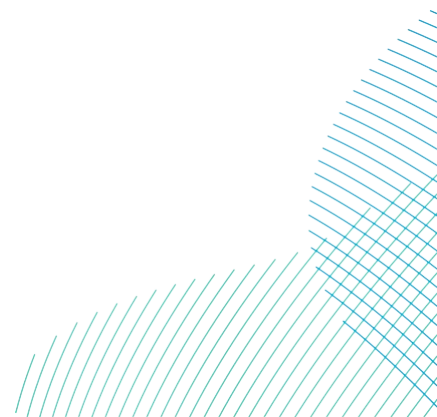
Term	Definition
Cumulative Effects	The combined effect of the Projects in combination with the effects of a number of different (defined cumulative) schemes, on the same single receptor / resource.
Cumulative Effects Assessment (CEA)	The assessment of the combined effect of the Projects in combination with the effects of a number of different (defined cumulative) schemes, on the same single receptor/resource.
Cumulative impact	The combined impact of the Projects in combination with the effects of a number of different (defined cumulative) schemes, on the same single receptor / resource.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Directive and EIA Regulations, including the publication of an Environmental Statement (ES).
Landfall Zone	The generic term applied to the entire landfall area between Mean Low Water Spring (MLWS) and the Transition Joint Bays (TJBs) inclusive of all construction works, including the landfall compounds, Onshore Export Cable Corridor and intertidal working area including the Offshore Export Cables.
Offshore Development Area	The Offshore Development Area for ES encompasses both the DBS East and West Array Areas, the Inter-Platform Cable Corridor, the Offshore Export Cable Corridor, plus the associated Construction Buffer Zones.
Order Limits	The limits within which the Projects may be carried.

Term	Definition
Projects Design (or Rochdale) Envelope	A concept that ensures the EIA is based on assessing the realistic worst-case scenario where flexibility or a range of options is sought as part of the consent application.
The Projects	DBS East and DBS West (collectively referred to as the Dogger Bank South Offshore Wind Farms).



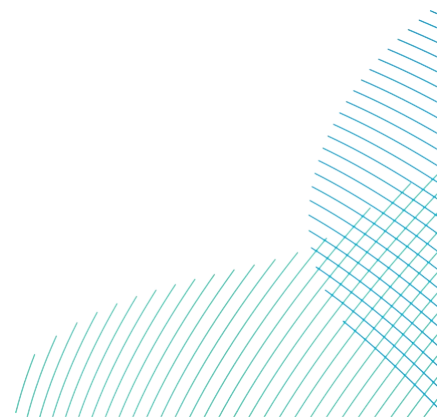
Acronyms

Term	Definition
AN17	Advice Note 17
CEA	Cumulative Effects Assessment
DBS	Dogger Bank South
DCO	Development Consent Order
DESNZ	Department of Energy Security and Net Zero
ECC	Export Cable Corridor
EIA	Environmental Impact Assessment
ERYC	East Riding of Yorkshire Council
ES	Environmental Statement
MHWS	Mean High Water Springs
NPS	National Policy Statements
NSIP	Nationally Significant Infrastructure Project
PEIR	Preliminary Environmental Information Report
PINS	The Planning Inspectorate
SoS	Secretary of State
ZoI	Zone of Influence



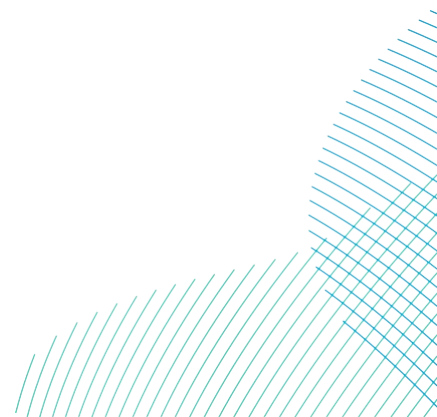
1 Introduction

1. A fundamental requirement of undertaking the Cumulative Effects Assessment (CEA) is to identify those projects, plans and activities (hereafter referred to as 'schemes') with which Dogger Bank South (DBS) East and DBS West offshore wind farms, collectively known as DBS offshore wind farms (herein 'the Projects') may interact to produce a cumulative effect. These interactions may arise within the construction, operation and maintenance phases. The objective of this Appendix is to provide details on the methodology for the Projects offshore CEA, the justification for the approach taken regarding cumulative impacts, and to detail the long list of schemes that have been considered within the offshore CEA. The approach for cumulative impacts is based upon the Planning Inspectorate (PINS) Advice Note Seventeen: Cumulative Effects Assessment (PINS, 2019). The approach to the CEA is intended to be specific to the Projects and takes into account the available knowledge of the environment and other and other activities around the Offshore Development Area. Due to the anticipated lifetime of the Projects (anticipated to be 30 years), it is not possible to undertake a meaningful assessment of potential Cumulative Effects for the decommissioning phase at this time, which is in line with common practice for Nationally Significant Infrastructure Projects (NSIPs).
2. The Environmental Statement addresses the Cumulative Effects for both the onshore and offshore elements of the Projects. This Appendix details the methodology for the offshore CEA only. The methodology for the onshore CEA is detailed in **Volume 7, Appendix 6-1, Onshore Cumulative Effects Assessment Methodology (application ref: 7.6.6.1)**.



2 Policy and Legislative Context

3. The Planning Act 2008 underpins the consenting regime for certain types of development classed as NSIPs. The Secretary of State (SoS) for the department of Energy Security and Net Zero (DESNZ) has confirmed that the Projects will require development consent under the Planning Act. The Infrastructure Planning (Environmental Impact Assessment) Regulations (2017) implemented the requirements of the Environmental Impact Assessment (EIA) Directive (Directive 2014/52/EU) into UK law in relation to DCO applications.
4. The overarching National Policy Statement (NPS) for Energy (EN-1) and the NPS for Renewable Energy Infrastructure (EN-3) both identify the requirement to address the maximum potential adverse impacts. Matters considered to affect the maximum adverse impact are topic impacts, inter-relationships between topics, and cumulative impacts. The maximum adverse scenario, or envelope, is termed the Design (or 'Rochdale') Envelope.
5. The Planning Inspectorate has produced 'Advice Note Nine: Rochdale Envelope' (2018) setting out the views of the Planning Inspectorate regarding how this approach should be used in the context of the Planning Act 2008. The well understood concept of the Rochdale Envelope approach involves ensuring that any EIA is based on assessing the realistic worst-case scenario where flexibility, or a range of options is sought as part of the consent application. This guidance reinforces that in order to ensure a robust application of the Rochdale Envelope principle to the EIA process, this principle must also be applied to cumulative as well as individual effects.
6. The Planning Inspectorate have produced 'Advice Note Seventeen: Cumulative Effects Assessment' (PINS, 2019), which provides guidance on a staged process that can be used for Cumulative Effects Assessments for NSIPs. Advice Note Seventeen (AN17) details a four-step process that can be followed by developers, and which has been applied here.

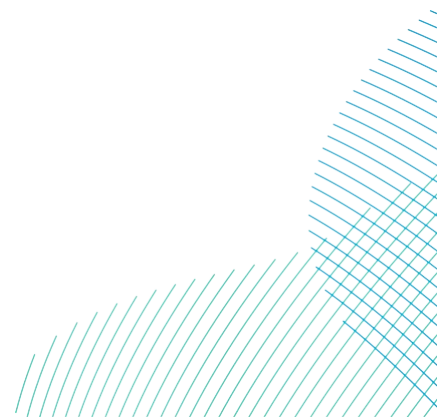


3 Consultation

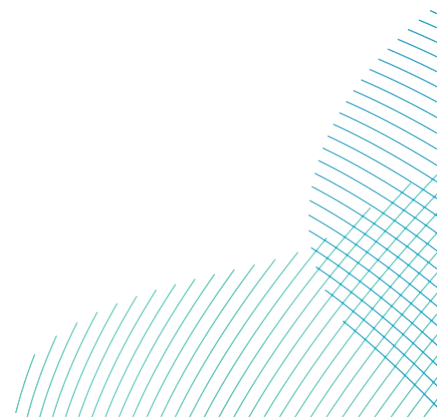
8. As part of the Environmental Statement (ES) for the Projects, consultation in relation to Cumulative Effects has been undertaken with various statutory and non-statutory authorities and stakeholders as part of the evidence plan process. A record of the key areas of consultation is provided within **Volume 7, Chapter 7 Consultation (application ref: 7.7)**. Consultation to date is also summarised in the topic-specific ES chapters.
9. A summary of responses from the Planning Inspectorate relevant to the CEA from the Scoping Opinion (PINS, 2018) are provided **Table 6-2-1**.

Table 6-2-1 Planning Inspectorate Scoping Comments Relating to the CEA for Offshore Topics (September 2022)

Planning Inspectorate Reference ID	Comment	Response to Issue Raised and/or Where Considered in this Appendix
2.4.1	The ES should clearly explain which other developments will be assumed to be under construction or operational as part of the assessment of the future baseline, with and without the Projects.	Each ES chapter identifies the potential future baseline. The CEA identifies those projects that may be under construction or operation at the same time as the Projects.

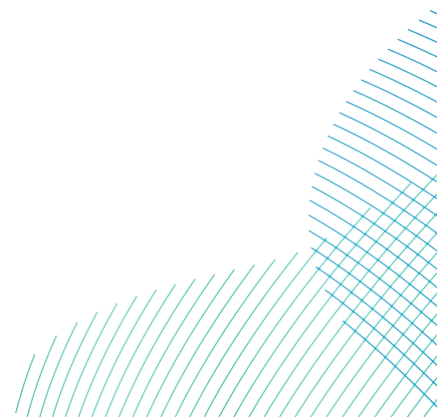


Planning Inspectorate Reference ID	Comment	Response to Issue Raised and/or Where Considered in this Appendix
2.4.2	<p><u>Cumulative Impact Assessment (CIA)</u> It is noted that Paragraph 126 states ‘Only projects which are reasonably well defined and sufficiently advanced to provide information on which to base a meaningful and robust assessment will be included in the CIA.....Where possible RWE Renewables will use as-built project parameter information (if available) as opposed to consented parameters to reduce over-precaution (inaccuracies) in the cumulative assessment’.</p> <p>The Inspectorate advises that where projects are not fully defined, the worst-case scenario available should be used in the assessment. The parameters applied in relation to existing projects should also represent the worst-case, taking into account the circumstances around what is legally secured for those projects. The level of precaution associated with the outcomes of the cumulative assessment should be explained in the ES. The Inspectorate does not agree that a high degree of precaution is equitable to inaccuracies in an assessment.</p> <p>In general, the description of the approach to the cumulative impact assessment within each aspect chapter of the Scoping Report is very limited. The Inspectorate expects the ES to specifically identify how impacts could combine and to provide an assessment of their significance, in accordance with the advice in the Inspectorate’s National Infrastructure Advice Note 17.</p>	<p>Annex A, of this appendix, contains the long list of projects which have been formulated based on the worst-case scenario available for the projects listed where limited public information is available.</p> <p>The ES identifies how impacts could combine and assesses their significance.</p> <p>This appendix sets out the approach to the CEA with the long list of schemes presented in Annex A. Topic-specific assessments are included in the relevant ES chapters (see Volume 7, Chapters 8 to 30 (application ref: 7.8 to 7.30)).</p>



4 Definitions of Cumulative Effects for Dogger Bank South

10. For the purposes of the Projects' CEA process, Cumulative Effects are defined as effects upon certain receptors / resources from the Projects when considered alongside other proposed schemes and any other reasonably foreseeable schemes and activities. This includes all schemes that result in a comparative or ongoing effect.
11. In-combination effects are defined as the combined effect of the Projects, with the effects from a number of different schemes, on the integrity of European Sites designated for their nature conservation value. In-combination effects are presented within **Volume 6, Report to Inform the Appropriate Assessment (RIAA) (application ref: 6.1)**. Cumulative Effects therefore apply in the EIA, whilst in-combination effects apply to the RIAA in Habitat Regulation Assessment terms but are also reported in the ES.
12. These definitions are consistent with the definition provided by the Planning Inspectorate in AN17 and have been applied consistently throughout the ES.



5 Approach to Cumulative Effects assessment

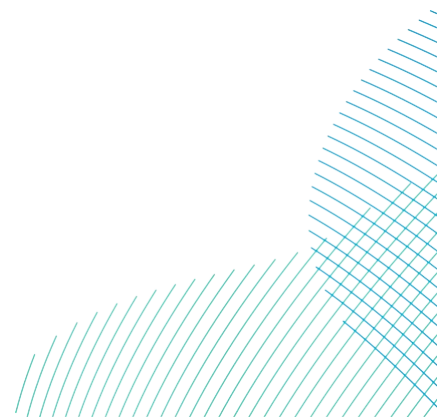
5.1 Overview

13. In the past, there has been a lack of guidance for CEA, and historical projects have consequently tended to adopt different methods for assessment. The Planning Inspectorate produced Advice Note Seventeen: Cumulative Effect Assessment, to provide guidance on a staged process that can be used for CEAs for NSIPs (summarised in **Table 6-2-2**). In addition to AN17, the approach to cumulative assessment for the Projects has also taken into account the Cumulative Impacts Assessment Guidelines issued by RenewableUK and the Planning Inspectorate Advice Note Nine: Rochdale Envelope.

Table 6-2-2 Stages and Activities Involved in the CEA Process (Taken from the Planning Inspectorate AN17)

CEA Stage	Activity
Stage 1 – Establish a long-list of other developments and the project’s Zone of Influence (Zol)	<p>The Projects undertake a desk study to identify the Zol for the development for the topics that are proposed to be scoped into the EIA. The Zol analysis is documented (i.e. table of topics and Zol), with supporting GIS.</p> <p>The long list of other schemes is drawn up through a desk study of planning applications, development plan documents, relevant development frameworks and any other available sources such as through the EPP and ETG process, to identify ‘other developments’ within the Zol.</p> <p>Information on each project (development type, when occurring, etc.) is documented, along with the certainty or tier assigned to the ‘other development’ (i.e. confidence it will take place in the current form and when it will take place in relation to the project).</p> <p>AN17 notes that the project should then consult with the relevant planning authority/authorities and statutory consultees regarding the long list.</p> <p>These processes have identified 426 potential projects which form the ‘long-list’ based on the criteria Table 6-2-4. In order to attribute an element of certainty to the CEA each project has been assigned a Tier reflecting their current status within the planning and development process. This approach allows appropriate weight to be given to each scenario (tier) when considering the</p>

CEA Stage	Activity
	<p>potential cumulative impact. The proposed tier structure is intended to ensure that there is a clear understanding of the level of confidence in the cumulative assessments provided in the ES. An explanation of each tier is included in Table 6-2-3.</p> <p>The full list of projects and relevant tiers assigned can be found in Annex A.</p>
<p>Stage 2 - Identify a shortlist of other developments for the CEA (Screening of the long list)</p>	<p>The Planning Inspectorate have provided inclusion/exclusion threshold criteria, against which the potential for 'other development to give rise to significant Cumulative Effects by virtue of overlaps in temporal scope, the scale and nature of the 'other developments' and/or receiving environment, or any other relevant factors is assessed. From this assessment, a shortlist of 'other developments' to be included in the CEA is produced. It is noted that documented information on each of the 'other development' is likely to be high level at this stage, outlining the key issues to take forward.</p> <p>Following on from the Stage 1 long-list a consideration of effect-receptor pathways, data confidence and temporal and spatial scales has allowed the selection of the relevant projects for a topic-specific cumulative short-list which is presented within each of the topic-specific offshore ES Chapters.</p> <p>Predicted Cumulative Effects predominantly relate to direct effects, however a topic-specific buffer (Table 6-2-5) around the the Projects Offshore Development Area was selected to ensure that the indirect impacts on each specific topic were also appropriately included. It is considered unlikely that significant effects greater than this distance would occur given the impacts under assessment.</p>



CEA Stage	Activity
<p>Stage 3 - Information gathering</p>	<p>All available information on the 'other developments' within the shortlist generated at Stage 2 is collated to inform the CEA.</p> <p>At this stage (i.e. ES), information is high level unless explicitly discussed with the relevant licensing authority (e.g. MMO). The information collected on each development is presented in Annex A.</p>
<p>Stage 4 - Assessment</p>	<p>The project reviews each of the 'other developments' in turn to assess whether Cumulative Effects may arise, which in turn produces topic-specific shortlists (for the topic-specific CEA study area) that are referred to and considered within each technical offshore chapter in (see Volume 7, Chapters 8 to 17 (application ref: 7.8 to 7.17)). This should also include, where relevant, consideration of any mitigation measures where significant adverse Cumulative Effects are identified and should clearly signpost to the relevant means of securing mitigation (e.g. DCO requirements and associated mitigation plans).</p> <p>While not to be used as a means to shift the burden of mitigation, it may be appropriate to ascertain the contribution of each development to the effect (done via professional judgement). However, it may be useful during the consultation with other developers to identify means to jointly address mitigation of significant adverse Cumulative Effects and the means to ensure delivery.</p> <p>The CEA has been undertaken in two phases, where:</p> <ul style="list-style-type: none"> • Phase one is where each of the potential effects that are subject to assessment alone have been reviewed against the potential for Cumulative Effects to occur; and • Phase two is where a CEA assessment of each of the other developments on the shortlist has taken place for those effects where it is considered that potential Cumulative Effects could occur.



CEA Stage	Activity
	The CEA also includes, where relevant, consideration of any mitigation measures where adverse Cumulative Effects are identified and signposts to the relevant means of securing mitigation.

14. The following sections sets out the Projects approach to completing Stages 1 to 3, incorporating development of the long list, tiering of projects and development of the topic-specific short lists. These short lists have been considered in detail in each of the topic-specific offshore ES chapters as part of the cumulative assessment process (Stage 4).

5.2 Stage 1 - Establish the Zols and Identify Long List of ‘Other Development’

5.2.1 Approach to the Long List

15. Under the first stage of the offshore CEA, a long-list of relevant schemes occurring within a study area surrounding the Projects has been developed.
16. CEA is undertaken for each technical topic, for those impacts that have the potential for Cumulative Effects. The technical chapters considered in the CEA are listed in **Table 6-2-5**. The Zone of Influence (Zol) of impacts is established in each chapter and used to establish CEA screening ranges, as provided in **Table 6-2-5**. It is noted that the Zol ranges differ significantly between chapters, as does the type of plan or project that could contribute to a cumulative effect. The screening ranges are the basis of the long list for offshore projects, shown in **Annex A** of this document.
17. Due to the size of the study area and range of activities that can result in Cumulative Effects, additional schemes have been screened in for **Volume 7, Chapter 11 Marine Mammals (application ref: 7.11)** and are detailed in **Volume 7 Appendix 11-5 Marine Mammal Cumulative Effects Assessment Screening (application ref: 7.11.11.5)**.
18. The list of schemes was established using a number of sources, such as:
- Geographic data (for example the for the identification of existing offshore windfarms, oil and gas infrastructure, disposal sites, aggregate areas);
 - UK Hydrographic Office (UKHO) data;
 - The PINS website (inducing searches for projects in the planning system for the Dogger Bank region and wider North Sea);

- Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) website; and
- Individual project websites.

5.2.2 Tiered Approach

19. In assessing the potential for Cumulative Effects from the Projects, it is important to consider that schemes, predominantly those 'proposed', may or may not be taken forward for development. Therefore, there is a need to build in some consideration of certainty (or uncertainty) with respect to the potential impacts which might arise from such proposals, in line with the approach set out by the Planning Inspectorate in AN17. For example, projects which are already under construction are more likely to contribute to Cumulative Effects than those whose development applications that are not yet submitted. It is also important to consider overlapping future construction periods given the long construction period of the Projects. Overlapping operational phases of other schemes and the Projects are also considered, for example in regards to offshore windfarm cumulative operational effects.
20. For these reasons, all of the relevant long list schemes have been allocated into 'tiers', reflecting their current status within the planning and development process. This allows the cumulative impact assessment to present several scenarios if required, reflecting the varying levels of certainty of an activity proceeding and therefore the potential for impacts to arise that might act cumulatively with the impacts arising from the Projects. Appropriate weight may therefore be given to each scenario (tier) in the decision-making process when considering the potential cumulative impacts associated with the Projects. For example, it may be considered that greater weight be attributed to tier 1 than tier 2.
21. In accordance with the Phase III Best Practice by Natural England and DEFRA (Parker *et al.*, 2022) Guidance the tiering structure is described in **Table 6-2-3**. The tiers are listed in descending order of level of detail likely to be available (and certainty of effects arising).

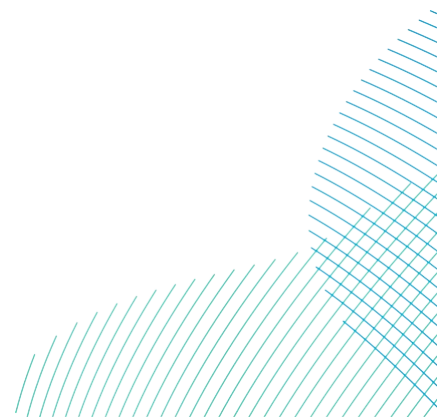
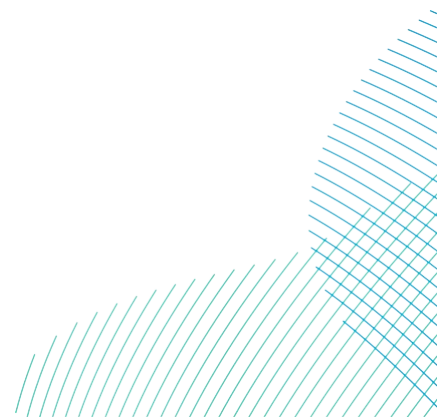


Table 6-2-3 Description of Tiers of Other Developments Considered for CEA (Parker et al., 2022)

Tiers	Development Stage
Tier 1	Built and operational schemes should be included within the cumulative assessment where they have not been included within the environmental characterisation survey, i.e. they were not operational when baseline surveys were undertaken, and / or any residual impact may not have yet fed through to and been captured in estimates of “baseline” conditions, such as “background” distribution or mortality rate for birds.*
Tier 2	Tier 1 + schemes under construction.
Tier 3	Tier 2 + schemes that have been consented (but construction has not yet commenced).
Tier 4	Tier 3 + schemes that have an application submitted to the appropriate regulatory body that have not yet been determined.
Tier 5	Tier 4 + schemes that have produced a PEIR and have characterisation data within the public domain.
Tier 6	Tier 5 + schemes that the regulatory body are expecting an application to be submitted for determination (e.g., projects listed under the Planning Inspectorate programme of projects).
Tier 7	Tier 6 + schemes that have been identified in relevant strategic plans or programmes.

*Or if there are ongoing impacts that are greater than predicted where there is no evidence that the impacts will dissipate over the lifetime of the Project, e.g., displacement

22. The tiering allocated to each of the long-list schemes is indicated as part of the long-list presented in **Annex A**.



5.3 Stage 2 – Screening of Long List (Interactions)

23. Having developed the Projects long list, all schemes have been screened based on the level of detailed information available and the potential interaction with the Projects, whether this interaction be temporal and / or spatial and where a potential pathway exists. This screening has produced EIA topic-specific short-lists of projects to be considered further within the CEA as part of each EIA topic chapter. It should be noted that this process may have screened a project in for one EIA topic but screened it out for another. The individual short-lists are presented in each technical topic chapter of the ES (**Volume 7, Chapters 8 to 30 (application ref: 7.8 to 7.30)**). The screening process has applied the criteria presented in **Table 6-2-4**.

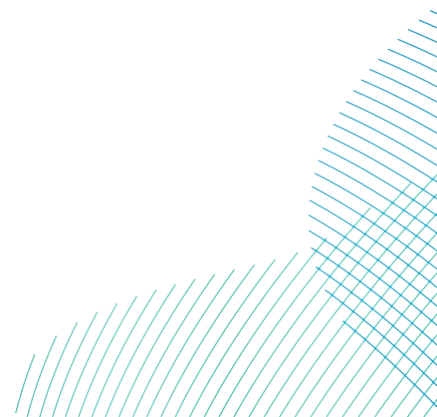
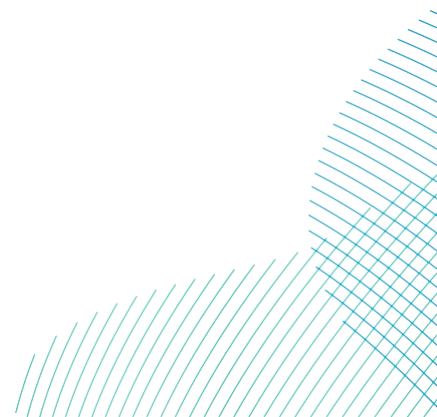


Table 6-2-4 CEA Long List Screening Criteria

Scheme Screened-in	Scheme Screened-out
<ul style="list-style-type: none"> • Scheme is considered as part of the baseline environment but has ongoing effects; • Potential for an impact-receptor pathway to exist; • Potential for a spatial effect interaction to exist; and/or • Potential for temporal effect interaction exists. 	<ul style="list-style-type: none"> • Scheme included as part of the baseline environment (therefore not a consideration in the CEA); • Low data confidence (meaningful assessment cannot be undertaken); • No potential impact-receptor pathway exists; • No potential for a spatial effect interaction; and/or • No potential for a temporal effect interaction.

24. During the screening process, the steps above have been followed in the defined order to allow a clear justification for screening projects in / out. Definitions of relevance to **Table 6-2-4** comprise:

- **Spatial effect interaction:** The impacts on a receptor from the Projects and one or more other schemes have a geographical overlap. For example, noise from construction operations at the Projects could overlap with those of another offshore construction project, if it is sufficiently close to the Projects. If there is no spatial interaction, there is no potential for a cumulative effect.
- **Temporal effect interaction:** The impacts from the Projects and one or more other schemes have the potential to occur at the same time. If there is no temporal interaction, there is no potential for a cumulative effect.
- **Potential impact-receptor pathway:** There is the potential that a pathway exists whereby an impact could have an effect on a receptor. For example, construction sediment plumes could have an impact on water receptors, but noise could not have an effect on geology and ground condition receptors.



25. Only where there is the potential for both spatial and temporal interaction between effects from the Projects and one or more other schemes, has a cumulative impact been taken forward for consideration in the CEA. The screening of the longlist will identify those projects screened in or out for further consideration on the basis of one or more of the preceding criteria into a topic-specific shortlist. The shortlist identifies all the schemes that have the potential to give rise to Cumulative Effects when considered alongside the worst-case potential impacts arising from the Projects but does not identify the differences in impact ranges for different environmental receptors.

5.4 Stage 2 – Topic-Specific Screening of Long List (Impact Ranges)

26. The screened long list identifies all of the other schemes that might give rise to Cumulative Effects when considered alongside the potential impacts arising from the Projects but does not identify the differences in impact ranges for different environmental receptors. In order to focus the topic-specific CEAs presented in the ES chapters, the screened long list was subject to further topic-specific screening to identify those relevant schemes within the Zols of the Projects for each topic. The topic-specific screening distances used to refine the screened long list into topic-specific short lists are provided in **Table 6-2-5**.

Table 6-2-5 Topic-Specific Screening Ranges. Applied to the Long-List, Specific to Each EIA Receptor Topic

EIA Topic	Maximum Extent of Effect
Marine Physical Environment	14km – based on the 14km Zol tidal excursion and potential for overlap with the tidal excursion from other projects
Benthic and Intertidal Ecology	
Fish and Shellfish Ecology	International Council for the Exploration of the Sea (ICES) rectangles 37F1, 37F2, 38F1 and 38F2 for the Array Areas, and ICS rectangles 36E9, 37E9, 37F0, 37F1, 38F0 and 38F1 for the Offshore Export Cable Corridor. ICES Rectangle 36F0 is also included within the Fish and study area due to its proximity to the Offshore Export Cable Corridor.
Marine Mammals	Based on the management unit of the reference populations



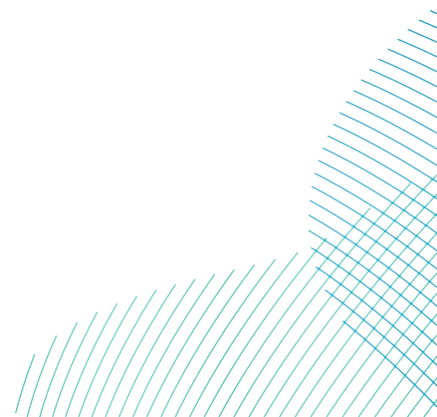
EIA Topic	Maximum Extent of Effect
Offshore Ornithology	Focused on offshore windfarms in the ZoI which is defined as the area within a receptor's mean-max foraging range.
Commercial Fisheries	ICES rectangles 36E9, 36F0, 37E9, 37F0, 37F1, 37F2, 38F0, 38F1 and 38F2.
Shipping and Navigation	50 nautical miles from the Offshore Development Area.
Aviation and Radar	Projects that could impact radar receptors out to 100km (maximum range at which radar Cumulative Effects are considered to occur)
Other Marine Users	50km – encompassing the ZoI and likely interactions over the region
Offshore Archaeology and Cultural Heritage	The Projects Offshore Development Area.

27. These topic-specific ranges have been applied to the long-list presented in **Annex A** to identify relevant short-list schemes to be taken forward to the topic-specific CEA presented in each ES chapter (summary short list tables are presented in each of the offshore ES topic chapters (see **Volume 7, Chapters 8 to 17 (application ref: 7.8 to 7.17)**).

5.5 Stage 3 (Information Gathering) and Stage 4 (Assessment)

28. Following on from the production of the topic-specific short lists, EIA topics authors have undertaken an information gathering exercise in relation to all schemes that have been screened in for each particular topic. This information gathering has then been used to inform the CEA assessments that are presented within each EIA topic chapter.
29. The CEA assessments are provided in each of the topic chapters in **Volume 7, Chapters 8 to 30 (application ref: 7.8 to 7.30)** of the ES and utilise topic-specific criteria and rationales for individual assessments which are not repeated here.

30. In terms of the scope of impacts that have been assessed within the CEA, these were the same impacts assessed for the Projects alone in the main EIA assessments. Any effect that has been concluded to be of **negligible** significance (in EIA terms) for the Projects alone, would make no material contribution to any potential cumulative effect, and was therefore scoped out of the CEA. Effects of greater than negligible significance for the Projects alone have been considered cumulatively.



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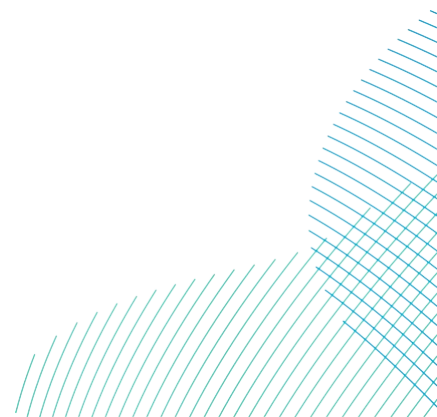
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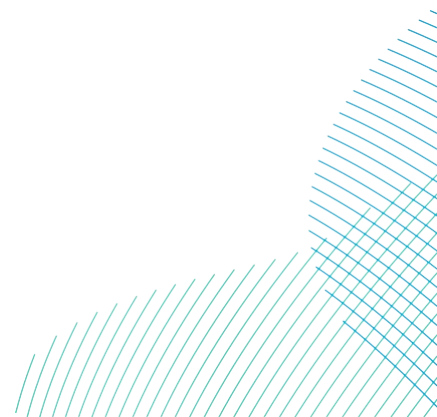
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Annex A

Offshore Cumulative Effects Long-List of Schemes



**RWE Renewables UK Dogger
Bank South (West) Limited**

**RWE Renewables UK Dogger
Bank South (East) Limited**

**Windmill Hill Business Park
Whitehill Way
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