



Triton Knoll Offshore Wind Farm Limited Triton Knoll Electrical System

Appendix 9: HRA Screening Matrices

Date: September 2015

**Appendix 9 of the Applicant's
Response to Deadline 1**

Triton Knoll Offshore Wind Farm Limited

Triton Knoll Electrical System

Appendix 9: HRA Screening Matrices

Appendix 9 of the Applicant's Response to
Deadline 1

Date September 2015

Triton Knoll
Offshore Wind Farm Limited
4th Floor One Kingdom Street
Paddington Central
London
W2 6BD

T: 0845 026 0562

Email: info@tritonknoll.co.uk

www.rweinnogy.com/tritonknoll

Drafted By:	GoBe Consultants
Approved By:	Paul Carter
Date of Approval:	30 September 2015
Revision:	1.0

Triton Knoll
Offshore Wind Farm Limited
**Copyright © 2015 RWE
Innogy UK Ltd**
All pre-existing rights reserved

TABLE OF CONTENTS

APPENDICES	4
------------	---

TABLE OF TABLES

Table 1 Inner Dowsing, Race Bank, and North Ridge Site of Community Importance (SCI).....	6
Table 2 Greater Wash future Special Protection Area (SPA).....	8
Table 3 Humber Estuary Special Area of Conservation (SAC).....	10
Table 4 Wash and North Norfolk Coast Special Area of Conservation (SAC)	14
Table 5 Humber Estuary Special Protection Area (SPA)/Ramsar	18
Table 6 Saltfleetby-Theddlethorpe Dunes and Gibraltar Point Special Area of Conservation (SAC).....	21
Table 7 The Wash Special Protection Area (SPA)	24
Table 8 North Norfolk Coast Special Protection Area (SPA)	27
Table 9 Flamborough and Bempton Cliffs Special Protection Area (SPA)	30
Table 10 Hornsea Mere Special Protection Area (SPA)	32
Table 11 Outer Thames Estuary Special Protection Area (SPA)	34

APPENDIX to ExA Q HRA 1.4

- STAGE 1: SCREENING MATRICES

The European Sites included within the screening assessment are:

Inner Dowsing, Race Bank, and North Ridge Site of Community Importance (SCI)

Greater Wash future Special Protection Area (SPA)

Humber Estuary Special Area of Conservation (SAC)

Wash and North Norfolk Coast Special Area of Conservation (SAC)

Humber Estuary Special Protection Area (SPA)/Ramsar

Saltfleetby-Theddlethorpe Dunes and Gibraltar Point Special Area of Conservation (SAC)

The Wash Special Protection Area (SPA)

North Norfolk Coast Special Protection Area (SPA)

Flamborough and Bempton Cliffs Special Protection Area (SPA)

Hornsea Mere Special Protection Area (SPA)

Outer Thames Estuary Special Protection Area (SPA)

Evidence for likely significant effects on their qualifying features is detailed within the footnotes to the screening matrices below.

Matrix Key:

✓ = Likely significant effect **cannot** be excluded

✗ = Likely significant effect **can** be excluded

C = construction

O = operation

D = decommissioning

Likely effects of the NSIP – drawing on the pressure categories available in relevant Regulation 35/33 documents

Note:

The following sites were mentioned within Volume 2 Chapter 6 of the ES (Marine Mammals) only in the context of potential marine mammal interest at these cSACs at that time. Neither of the sites has marine mammals as a qualifying feature of the SCI and they have therefore not been considered in detail here:

Haisborough, Hammond and Winterton Site of Community Importance (SCI)

Dogger Bank Site of Community Importance (SCI)

Table 1 Inner Dowsing, Race Bank, and North Ridge Site of Community Importance (SCI)

Name of European Site: Inner Dowsing, Race Bank, and North Ridge Site of Community Importance												
Distance to NSIP 0km												
European Site features	Likely Effects of NSIP											
	Physical damage			Increased suspended sediment / smothering			Physical loss			In combination effects		
Stage of Development	C	O	D	C	O	D	C	O	D	C	O	D
Sabellaria spinulosa reef	x _a	x _a	x _a	x _b	x _b	x _b	x _a	x _a	x _a	x _c	✓ _c	x _c
Sandbanks slightly covered by sea water at all times	x _d	x _d	x _d	x _d	x _d	x _d	x _d	x _d	x _d	x _d	x _d	x _d

Evidence supporting conclusions:

- a) **Error! Reference source not found.** presents known *S. spinulosa* reef sensitivities (including those in the SAC Site selection document; JNCC/Natural England 2013) pooled from a range of sources as recommended by consultation with JNCC/Natural England. This demonstrates that the proposed development boundary avoids any known reef locations as defined within the Regulation 35 advice package and subsequent MMO

- reef protection byelaw areas and it is therefore not possible for those construction, operation or decommissioning impacts associated with the proposed development to impact these.
- b) As detailed within the Regulation 35 advice package Sabellaria reefs are adapted to moderate sediment loads and are not considered sensitive to smothering.
 - c) Following consultation with Natural England it has been concluded that as a result of the Operation and Maintenance phases of Lincs and LID OWFs having a likely significant effect on the *S. spinulosa* reef features of the SCI there is the potential for the Triton Knoll Electrical System to have a likely significant effect in-combination with those projects.
 - d) Paragraph 1.13 of the RIAA concluded ‘no LSE on the “Sandbanks which are slightly covered by seawater at all times” features of the IDRBNR SCI, based on a prediction of sediment pathways being unchanged’. The predictions of sedimentary pathways are made within the Marine Physical Environment Chapter (Volume 2, Chapter 2).

Table 2 Greater Wash future Special Protection Area (SPA)

Name of European Site: Greater Wash future Special Protection Area																					
Distance to NSIP 0km																					
European Site features	Likely Effects of NSIP																				
	Physical Loss			Physical Damage			Non-physical disturbance			Toxic contamination			Non-toxic contamination			Biological disturbance			In combination effects		
Stage of Development	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D
Annex 1 breeding (tern species)	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^c	X ^d	X ^e	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^g	X ^g	X ^g
Annex I (RTD and little gull), non breeding	X ^b X ^f	X ^b X ^f	X ^b X ^f	X ^b X ^f	X ^b X ^f	X ^b X ^f	X ^c X ^f	X ^d X ^f	X ^e X ^f	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^f X ^g	X ^f X ^g	X ^f X ^g
Non-breeding migratory (common scoter)	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^c	X ^d	X ^e	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^g	X ^g	X ^g

Evidence supporting conclusions:

-
- a) As stated in paragraph 1.29 of the RIAA, 'The pressure categories toxic contamination, non-toxic contamination and biological disturbance are not considered to have effect-receptor pathways arising from the Triton Knoll Electrical System and as such are not considered further'. Further justification is provided in the Applicants response to the Rule 8 letter, specifically to Question Number HRA 1.20. Agreement has been reached with Natural England (SoCG) that there would not be a likely significant effect on this site where the project is considered alone or in-combination with other projects.
 - b) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) found, in paragraph 3.73, that 'Potential effects to intertidal and marine ornithology receptors during the construction phase are anticipated to arise from disturbance related impacts only.
 - c) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) assessed the potential for construction related vessel traffic (paragraph 3.74 *et seq*) and other construction activity (paragraph 3.79 *et seq*) to result in disturbance to intertidal and marine ornithology receptors. The assessment focused on those species identified through the preceding sections as being vulnerable. Such effects were concluded to be of negligible significance and therefore LSE does not apply.
 - d) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for operational stage affects, noting in paragraph 3.85 that 'In agreement with the statutory nature conservation bodies and following the scoping opinion operation affects are scoped out from further assessment'. Therefore LSE does not apply
 - e) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for decommissioning stage affects. Such effects were concluded to be of negligible significance and therefore LSE does not apply.
 - f) Specifically for red throated diver, Volume 2 Chapter 3 (Marine and Intertidal Ornithology) found, in paragraph 3.87 that there would be no likely significant effect on the red-throated diver population and specifically no effect on the Outer Thames Estuary SPA or the future Greater Wash SPA either alone or in-combination'.
 - g) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for cumulative affects in paragraph 3.102 *et seq*, with the ES concluding them to be Not Significant and therefore LSE does not apply.
-

Table 3 Humber Estuary Special Area of Conservation (SAC)

Name of European Site: Humber Estuary Special Area of Conservation																					
Distance to NSIP 11km																					
European Site features	Likely Effects of NSIP																				
	<i>Physical Loss</i>			<i>Physical Damage</i>			<i>Non-physical disturbance</i>			<i>Toxic contamination</i>			<i>Non-toxic contamination</i>			<i>Biological disturbance</i>			<i>In combination effects</i>		
<i>Stage of Development</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>
Estuaries	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^a	X ^a	X ^a	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Sandbanks slightly covered by seawater all the time	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^a	X ^a	X ^a	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Coastal lagoons	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^a	X ^a	X ^a	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Salicornia and other annuals colonizing mud and sand	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^a	X ^a	X ^a	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Atlantic salt meadows	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^a	X ^a	X ^a	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Embryonic shifting dunes	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f

Shifting dunes along the shoreline with <i>Ammophila arenaria</i>	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^c	X ^e	X ^e	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Fixed coastal dunes with herbaceous vegetation	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^c	X ^e	X ^e	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Dunes with <i>Hippophya rhamnoides</i>	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^c	X ^e	X ^e	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Sea lamprey	X ^g	X ^g	X ^g	X ^g	X ^g	X ^g	X ^g	X ^g	X ^g	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^g	X ^g	X ^g
River lamprey	X ^g	X ^g	X ^g	X ^g	X ^g	X ^g	X ^g	X ^g	X ^g	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^g	X ^g	X ^g
Grey seal	X ^h	X ^h	X ^h	X ^h	X ^h	X ^h	X ^h	X ^h	X ^h	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ⁱ	X ⁱ	X ⁱ

Evidence supporting conclusions:

- a) feature not identified in the Regulation 33 document as vulnerable to the pressure
- b) As stated in paragraph 1.29 of the RIAA, ‘The pressure categories toxic contamination, non-toxic contamination and biological disturbance are not considered to have effect-receptor pathways arising from the Triton Knoll Electrical System and as such are not considered further’. Further justification is provided in the Applicants response to the Rule 8 letter, specifically to Question Number HRA 1.20. Agreement has been reached with Natural England (SoCG) that there would not be a likely significant effect on this site where the project is considered alone or in-combination with other projects.

-
- c) Volume 2, Chapter 2 (Marine Physical Environment) identifies potential receptors in Table 2-9 (including the Humber Estuary SAC) and assesses the potential significance of relevant construction effects in paragraph 2.102 *et seq.* The effect was found to be Not Significant and therefore no LSE applies.
 - d) Volume 2, Chapter 2 (Marine Physical Environment) identifies potential receptors in Table 2-9 (including the Humber Estuary SAC) and assesses the potential significance of relevant operational effects in paragraph 2.160 *et seq.* Given that effects are anticipated to be localised or near-field, the Humber Estuary SAC is not included – the potential for effect at the Humber therefore being less than the negligible or minor found for the more localised sites and therefore no LSE applies.
 - e) Volume 2, Chapter 2 (Marine Physical Environment) identifies potential receptors in Table 2-9 (including the Humber Estuary SAC) and assesses the potential significance of relevant decommissioning effects in paragraph 2.178 *et seq.* Impacts are anticipated to be comparable or less than those during construction and therefore no LSE applies
 - f) Volume 2, Chapter 2 (Marine Physical Environment) identifies potential receptors in Table 2-9 (including the Humber Estuary SAC) and assesses the potential significance from cumulative effects in paragraph 2.195 *et seq.* The overall conclusion is Not Significant and therefore no LSE applies
 - g) Volume 2, Chapter 5 (Fish and Shellfish Ecology) notes in paragraph 5.56 that lamprey were not recorded during site specific surveys (although the surveys were not designed to target migratory species). The assessment alone and cumulatively (as relevant to lamprey) found a negligible significance and therefore no LSE applies.
 - h) Volume 2, Chapter 6 (Marine Mammals) notes the inclusion of grey seal as a qualifying feature at the Humber Estuary SAC. Potential for impact is discussed in paragraph 6.62 *et seq.*, with all potential impacts on grey seal (construction, operation and decommissioning), found to be negligible and therefore no LSE applies.
 - i) Volume 2, Chapter 6 (Marine Mammals) notes the inclusion of grey seal as a qualifying feature at the Humber Estuary SAC. Potential for cumulative impact is discussed in paragraph 6.89 *et seq.*, with all potential impacts
-

on grey seal (construction, operation and decommissioning), found to be negligible and therefore no LSE applies

Table 4 Wash and North Norfolk Coast Special Area of Conservation (SAC)

Name of European Site: Wash and North Norfolk Coast Special Area of Conservation																					
Distance to NSIP 16km																					
European Site features	Likely Effects of NSIP																				
	<i>Physical Loss</i>			<i>Physical Damage</i>			<i>Non-physical disturbance</i>			<i>Toxic contamination</i>			<i>Non-toxic contamination</i>			<i>Biological disturbance</i>			<i>In combination effects</i>		
<i>Stage of Development</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>
Sandbanks slightly covered by seawater all the time	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^a	X ^a	X ^a	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Mudflats and sandflats not covered by seawater at low tide	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Large shallow inlets and bays	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Reefs	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Salicornia and other annuals	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^a	X ^a	X ^a	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f

colonizing mud and sand																					
Atlantic salt meadows	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^a	X ^a	X ^a	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Mediterranean and thermos-Atlantic halophilous scrubs	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^f	X ^f	X ^f
Coastal lagoons	X ^c	X ^d	X ^e	X ^c	X ^d	X ^e	X ^a	X ^a	X ^a	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^f	X ^f	X ^f
Harbour seal	X ^g	X ^g	X ^g	X ^g	X ^g	X ^g	X ^g	X ^g	X ^g	X ^b	X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^h	X ^h
Otter	X ⁱ	X ⁱ	X ⁱ	X ⁱ	X ⁱ	X ⁱ	X ⁱ	X ⁱ	X ⁱ	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ⁱ	X ⁱ	X ⁱ

Evidence supporting conclusions:

- a) feature not identified in the Regulation 33 document as vulnerable to the pressure
- b) As stated in paragraph 1.29 of the RIAA, ‘The pressure categories toxic contamination, non-toxic contamination and biological disturbance are not considered to have effect-receptor pathways arising from the Triton Knoll Electrical System and as such are not considered further’. Further justification is provided in the Applicants response to the Rule 8 letter, specifically to Question Number HRA 1.20. Agreement has been reached with Natural England (SoCG) that there would not be a likely significant effect on this site where the project is considered alone or in-combination with other projects.
- c) Volume 2, Chapter 2 (Marine Physical Environment) identifies potential receptors in Table 2-9 (including the Wash and North Norfolk Coast SAC) and assesses the potential significance of relevant construction effects in paragraph 2.102 *et seq.* The effect was found to be Not Significant and therefore no LSE applies.

-
- d) Volume 2, Chapter 2 (Marine Physical Environment) identifies potential receptors in Table 2-9 (including the Wash and North Norfolk Coast SAC) and assesses the potential significance of relevant operational effects in paragraph 2.160 *et seq.* Given that effects are anticipated to be localised or near-field, the Humber Estuary SAC is not include – the potential for effect at the Humber therefore being less than the negligible or minor found for the more localised sites and therefore no LSE applies.
 - e) Volume 2, Chapter 2 (Marine Physical Environment) identifies potential receptors in Table 2-9 (including the Wash and North Norfolk Coast SAC) and assesses the potential significance of relevant decommissioning effects in paragraph 2.178 *et seq.* Impacts are anticipated to be comparable or less than those during construction and therefore no LSE applies
 - f) Volume 2, Chapter 2 (Marine Physical Environment) identifies potential receptors in Table 2-9 (including the Wash and North Norfolk Coast SAC) and assesses the potential significance from cumulative effects in paragraph 2.195 *et seq.* The overall conclusion is Not Significant and therefore no LSE applies
 - g) Volume 2, Chapter 6 (Marine Mammals) notes the inclusion of harbour seal as a qualifying feature at the Wash and North Norfolk Coast SAC. Potential for impact is discussed in paragraph 6.62 *et seq.*, with all potential impacts on grey seal (construction, operation and decommissioning), found to be negligible and therefore no LSE applies.
 - h) Volume 2, Chapter 6 (Marine Mammals) notes the inclusion of harbour seal as a qualifying feature at the Wash and North Norfolk Coast SAC. Potential for cumulative impact is discussed in paragraph 6.89 *et seq.*, with all potential impacts on grey seal (construction, operation and decommissioning), found to be negligible and therefore no LSE applies
 - i) Volume 3 Chapter 4 (Terrestrial Ecology) in paragraph 4.72 references the project specific otter surveys conducted, with no signs of otter activity detected (although there is potential, given the suitability of habitat). The species is given as a qualifying feature, but not a primary reason, for site selection. It is considered
-

appropriate here to consider the assessment of potential habitat impact drawing on the relevant points and references highlighted above.

Table 5 Humber Estuary Special Protection Area (SPA)/Ramsar

Name of European Site: Humber Estuary Special Protection Area/Ramsar																					
Distance to NSIP 11km																					
European Site features	Likely Effects of NSIP																				
	Physical Loss			Physical Damage			Non-physical disturbance			Toxic contamination			Non-toxic contamination			Biological disturbance			In combination effects		
Stage of Development	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D
Annex I species under Article 4.1 (avocet, bittern, hen harrier, golden plover, bar-tailed godwit, ruff, marsh harrier, little tern)	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^c	X ^d	X ^e	X ^a	X ^a	X ^a	X ^a	X ^a	X ^a	X ^a	X ^a	X ^a	X ^f	X ^f	X ^f
Migratory species under Article 4.2 (shelduck, knot,	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^c	X ^d	X ^e	X ^a	X ^a	X ^a	X ^a	X ^a	X ^a	X ^a	X ^a	X ^a	X ^f	X ^f	X ^f

dunlin, black-tailed godwit, redshank)																					
Assemblage qualification under Article 4.2.	x ^b	x ^b	x ^b	x ^b	x ^b	x ^b	x ^c	x ^d	x ^e	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^f	x ^f	x ^f

Evidence supporting conclusions:

- a) As stated in paragraph 1.29 of the RIAA, ‘The pressure categories toxic contamination, non-toxic contamination and biological disturbance are not considered to have effect-receptor pathways arising from the Triton Knoll Electrical System and as such are not considered further’. Further justification is provided in the Applicants response to the Rule 8 letter, specifically to Question Number HRA 1.20. Agreement has been reached with Natural England (SoCG) that there would not be a likely significant effect on this site where the project is considered alone or in-combination with other projects.
- b) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) found, in paragraph 3.73, that ‘Potential effects to intertidal and marine ornithology receptors during the construction phase are anticipated to arise from disturbance related impacts only
- c) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) assessed the potential for construction related vessel traffic (paragraph 3.74 *et seq*) and other construction activity (paragraph 3.79 *et seq*) to result in disturbance to intertidal and marine ornithology receptors. The assessment focused on those species identified through the preceding sections as being vulnerable. Such effects were concluded to be of negligible significance and therefore LSE does not apply.

-
- d) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for operational stage affects, noting in paragraph 3.85 that 'In agreement with the statutory nature conservation bodies and following the scoping opinion operation affects are scoped out from further assessment'. Therefore LSE does not apply
 - e) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for decommissioning stage affects. Such effects were concluded to be of negligible significance and therefore LSE does not apply.
 - f) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for cumulative affects in paragraph 3.102 *et seq*, with the ES concluding them to be Not Significant and therefore LSE does not apply.

Table 6 Saltfleetby-Theddlethorpe Dunes and Gibraltar Point Special Area of Conservation (SAC)

Name of European Site: Saltfleetby-Theddlethorpe Dunes and Gibraltar Point Special Area of Conservation																					
Distance to NSIP 16km																					
European Site features	Likely Effects of NSIP																				
	<i>Physical Loss</i>			<i>Physical Damage</i>			<i>Non-physical disturbance</i>			<i>Toxic contamination</i>			<i>Non-toxic contamination</i>			<i>Biological disturbance</i>			<i>In combination effects</i>		
<i>Stage of Development</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>
<i>Shifting dunes along the shoreline with <i>Ammophila arenaria</i></i>	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	X ^b	X ^c	X ^d	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	X ^e	X ^e	X ^e
<i>Fixed coastal dunes with herbaceous vegetation</i>	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	X ^b	X ^c	X ^d	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	X ^e	X ^e	X ^e
<i>Dunes with <i>Hippopha rhamnoides</i></i>	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	X ^b	X ^c	X ^d	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	X ^e	X ^e	X ^e
<i>Humid dune slacks</i>	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	X ^b	X ^c	X ^d	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	X ^e	X ^e	X ^e

Embryonic shifting dunes	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^b	x ^c	x ^d	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^a	x ^e	x ^e	x ^e
--------------------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------	----------------

Evidence supporting conclusions:

- a) Information on ‘pressure’ for this site are not available. However, Natural England requested (in their Section 42 response reference M_NE_T23) that this site be considered with regard to potential for cable protection to act as a barrier to sediment transport only. Therefore it is concluded that ‘Non-Physical Disturbance’ represents the only pressure of potential concern – all others being excluded. Agreement has been reached with Natural England (SoCG) that there would not be a likely significant effect on this site where the project is considered alone or in-combination with other projects.
- b) Volume 2, Chapter 2 (Marine Physical Environment) identifies potential receptors in Table 2-9 (including the Saltfleetby to Theddlethorpe Dunes and Gibraltar Point SAC) and assesses the potential significance of relevant construction effects in paragraph 2.102 *et seq* (particularly in paragraph 2.112 *et seq*). The effect was found to be Not Significant and therefore no LSE applies.
- c) Volume 2, Chapter 2 (Marine Physical Environment) identifies potential receptors in Table 2-9 (including the Saltfleetby to Theddlethorpe Dunes and Gibraltar Point SAC) and assesses the potential significance of relevant operational effects in paragraph 2.160 *et seq* (particularly in paragraph 2.160 *et seq*). Given that effects are anticipated to be localised or near-field, the potential for effect was found to be Not Significant and therefore no LSE applies.
- d) Volume 2, Chapter 2 (Marine Physical Environment) identifies potential receptors in Table 2-9 (including the Saltfleetby to Theddlethorpe Dunes and Gibraltar Point SAC) and assesses the potential significance of relevant decommissioning effects in paragraph 2.178 *et seq*. Impacts are anticipated to be comparable or less than those during construction and therefore no LSE applies

-
- e) Volume 2, Chapter 2 (Marine Physical Environment) identifies potential receptors in Table 2-9 (including the Saltfleetby to Theddlethorpe Dunes and Gibraltar Point SAC) and assesses the potential significance from cumulative effects in paragraph 2.195 *et seq.* The overall conclusion is Not Significant and therefore no LSE applies

Table 7 The Wash Special Protection Area (SPA)

Name of European Site: Wash Special Protection Area																							
Distance to NSIP 19km																							
European Site features			Likely Effects of NSIP																				
			Physical Loss			Physical Damage			Non-physical disturbance			Toxic contamination			Non-toxic contamination			Biological disturbance			In combination effects		
Stage of Development			C	O	D	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D
Annex I breeding (little tern, common tern)			X ^c	X ^c	X ^c	X ^a X ^c	X ^a X ^c	X ^a X ^c	X ^a X ^d	X ^a X ^e	X ^a X ^f	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^g	X ^g	X ^g
Migratory species (bar-tailed godwit, Bewicks swan, black-tailed godwit, common scoter, curlew, dark-bellied brent goose, dunlin, gadwall, grey			X ^c	X ^c	X ^c	X ^c	X ^c	X ^c	X ^d	X ^e	X ^f	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^g	X ^g	X ^g

plover, goldeneye, knot, oyster catcher, pink- footed goose, pintail, redshank, sanderling, shelduck, turnstone, wigeon)																						
Wintering waterfowl assemblage	X ^c	X ^c	X ^c	X ^c	X ^c	X ^c	X ^d	X ^e	X ^f	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^g	X ^g	X ^g

Evidence supporting conclusions:

- a) Feature not identified in the Regulation 33 document as vulnerable to the pressure
- b) As stated in paragraph 1.29 of the RIAA, ‘The pressure categories toxic contamination, non-toxic contamination and biological disturbance are not considered to have effect-receptor pathways arising from the Triton Knoll Electrical System and as such are not considered further’. Further justification is provided in the Applicants response to the Rule 8 letter, specifically to Question Number HRA 1.20. Agreement has been reached with Natural England (SoCG) that there would not be a likely significant effect on this site where the project is considered alone or in-combination with other projects.

-
- c) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) found, in paragraph 3.73, that ‘Potential effects to intertidal and marine ornithology receptors during the construction phase are anticipated to arise from disturbance related impacts only
 - d) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) assessed the potential for construction related vessel traffic (paragraph 3.74 *et seq*) and other construction activity (paragraph 3.79 *et seq*) to result in disturbance to intertidal and marine ornithology receptors. The assessment focused on those species identified through the preceding sections as being vulnerable. Such effects were concluded to be of negligible significance and therefore LSE does not apply.
 - e) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for operational stage affects, noting in paragraph 3.85 that ‘In agreement with the statutory nature conservation bodies and following the scoping opinion operation affects are scoped out from further assessment’. Therefore LSE does not apply
 - f) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for decommissioning stage affects. Such effects were concluded to be of negligible significance and therefore LSE does not apply.
 - g) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for cumulative effects in paragraph 3.102 *et seq*, with the ES concluding them to be Not Significant and therefore LSE does not apply.

Table 8 North Norfolk Coast Special Protection Area (SPA)

Name of European Site: North Norfolk Coast Special Protection Area																					
Distance to NSIP 16km																					
European Site features	Likely Effects of NSIP																				
	Physical Loss			Physical Damage			Non-physical disturbance			Toxic contamination			Non-toxic contamination			Biological disturbance			In combination effects		
Stage of Development	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D
Article 4.1 breeding (avocet, bittern, common tern, little tern, marsh harrier, Mediterranean Gull, roseate tern, sandwich tern)	X ^c	X ^c	X ^c	X ^c	X ^c	X ^c	X ^d	X ^e	X ^f	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^g	X ^g	X ^g
Article 4.1 over winter (avocet, bar-tailed godwit, bittern, golden plover,	X ^c	X ^c	X ^c	X ^c	X ^c	X ^c	X ^d	X ^e	X ^f	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^g	X ^g	X ^g

hen harrier, ruff)																						
Article 4.2 breeding (redshank, ringed plover)	X ^c	X ^c	X ^c	X ^c	X ^c	X ^c	X ^d	X ^e	X ^f	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^g	X ^g	X ^g	
Article 4.2 on passage (ringed plover)	X ^c	X ^c	X ^c	X ^c	X ^c	X ^c	X ^d	X ^e	X ^f	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^g	X ^g	X ^g	
Article 4.2 over winter (dark-bellied brent goose, knot, pink-footed goose, pintail, redshank, wigeon)	X ^c	X ^c	X ^c	X ^c	X ^c	X ^c	X ^d	X ^e	X ^f	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^g	X ^g	X ^g	
Article 4.2 assemblage	X ^c	X ^c	X ^c	X ^c	X ^c	X ^c	X ^d	X ^e	X ^f	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^a X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^b X ^c	X ^g	X ^g	X ^g	

Evidence supporting conclusions:

- a) Feature not identified in the Regulation 33 document as vulnerable to the pressure
- b) As stated in paragraph 1.29 of the RIAA, ‘The pressure categories toxic contamination, non-toxic contamination and biological disturbance are not considered to have effect-receptor pathways arising from the Triton Knoll Electrical System and as such are not considered further’. Further justification is provided in the

Applicants response to the Rule 8 letter, specifically to Question Number HRA 1.20. Agreement has been reached with Natural England (SoCG) that there would not be a likely significant effect on this site where the project is considered alone or in-combination with other projects.

- c) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) found, in paragraph 3.73, that ‘Potential effects to intertidal and marine ornithology receptors during the construction phase are anticipated to arise from disturbance related impacts only
- d) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) assessed the potential for construction related vessel traffic (paragraph 3.74 *et seq*) and other construction activity (paragraph 3.79 *et seq*) to result in disturbance to intertidal and marine ornithology receptors. The assessment focused on those species identified through the preceding sections as being vulnerable. Such effects were concluded to be of negligible significance and therefore LSE does not apply.
- e) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for operational stage affects, noting in paragraph 3.85 that ‘In agreement with the statutory nature conservation bodies and following the scoping opinion operation affects are scoped out from further assessment’. Therefore LSE does not apply
- f) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for decommissioning stage affects. Such effects were concluded to be of negligible significance and therefore LSE does not apply
- g) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for cumulative effects in paragraph 3.102 *et seq*, with the ES concluding them to be Not Significant and therefore LSE does not apply

Table 9 Flamborough and Bempton Cliffs Special Protection Area (SPA)

Name of European Site: Flamborough and Bempton Cliffs Special Protection Area																					
Distance to NSIP 83km																					
European Site features	Likely Effects of NSIP																				
	Physical Loss			Physical Damage			Non-physical disturbance			Toxic contamination			Non-toxic contamination			Biological disturbance			In combination effects		
Stage of Development	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D
Article 4.2 breeding (black legged kittiwake)	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^c	X ^d	X ^e	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^f	X ^f	X ^f
Assemblage qualification	X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^c	X ^d	X ^e	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^f	X ^f	X ^f

Evidence supporting conclusions:

- a) As stated in paragraph 1.29 of the RIAA, ‘The pressure categories toxic contamination, non-toxic contamination and biological disturbance are not considered to have effect-receptor pathways arising from the Triton Knoll Electrical System and as such are not considered further’. Further justification is provided in the Applicants response to the Rule 8 letter, specifically to Question Number HRA 1.20. Agreement has been reached with Natural England (SoCG) that there would not be a likely significant effect on this site where the project is considered alone or in-combination with other projects.

-
- b) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) found, in paragraph 3.73, that ‘Potential effects to intertidal and marine ornithology receptors during the construction phase are anticipated to arise from disturbance related impacts only
 - c) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) assessed the potential for construction related vessel traffic (paragraph 3.74 *et seq*) and other construction activity (paragraph 3.79 *et seq*) to result in disturbance to intertidal and marine ornithology receptors. The assessment focused on those species identified through the preceding sections as being vulnerable. Such effects were concluded to be of negligible significance and therefore LSE does not apply
 - d) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for operational stage affects, noting in paragraph 3.85 that ‘In agreement with the statutory nature conservation bodies and following the scoping opinion operation affects are scoped out from further assessment’. Therefore LSE does not apply
 - e) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for decommissioning stage affects. Such effects were concluded to be of negligible significance and therefore LSE does not apply
 - f) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for cumulative effects in paragraph 3.102 *et seq*, with the ES concluding them to be Not Significant and therefore LSE does not apply

Table 10 Hornsea Mere Special Protection Area (SPA)

Name of European Site: Hornsea Mere Special Protection Area																							
Distance to NSIP 73km																							
European Site features			Likely Effects of NSIP																				
			<i>Physical Loss</i>			<i>Physical Damage</i>			<i>Non-physical disturbance</i>			<i>Toxic contamination</i>			<i>Non-toxic contamination</i>			<i>Biological disturbance</i>			<i>In combination effects</i>		
<i>Stage of Development</i>			<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>	<i>C</i>	<i>O</i>	<i>D</i>
Article 4.2 over winter (gadwall)			X ^b	X ^b	X ^b	X ^b	X ^b	X ^b	X ^c	X ^d	X ^e	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^f	X ^f	X ^f

Evidence supporting conclusions:

- a) As stated in paragraph 1.29 of the RIAA, ‘The pressure categories toxic contamination, non-toxic contamination and biological disturbance are not considered to have effect-receptor pathways arising from the Triton Knoll Electrical System and as such are not considered further’. Further justification is provided in the Applicants response to the Rule 8 letter, specifically to Question Number HRA 1.20. Agreement has been reached with Natural England (SoCG) that there would not be a likely significant effect on this site where the project is considered alone or in-combination with other projects.
- b) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) found, in paragraph 3.73, that ‘Potential effects to intertidal and marine ornithology receptors during the construction phase are anticipated to arise from disturbance related impacts only

-
- c) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) assessed the potential for construction related vessel traffic (paragraph 3.74 *et seq*) and other construction activity (paragraph 3.79 *et seq*) to result in disturbance to intertidal and marine ornithology receptors. The assessment focused on those species identified through the preceding sections as being vulnerable. Such effects were concluded to be of negligible significance and therefore LSE does not apply
 - d) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for operational stage affects, noting in paragraph 3.85 that 'In agreement with the statutory nature conservation bodies and following the scoping opinion operation affects are scoped out from further assessment'. Therefore LSE does not apply
 - e) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for decommissioning stage affects. Such effects were concluded to be of negligible significance and therefore LSE does not apply
 - f) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for cumulative effects in paragraph 3.102 *et seq*, with the ES concluding them to be Not Significant and therefore LSE does not apply

Table 11 Outer Thames Estuary Special Protection Area (SPA)

Name of European Site: Outer Thames Estuary Special Protection Area																					
Distance to NSIP 110km																					
European Site features	Likely Effects of NSIP																				
	<i>Physical Loss</i>			<i>Physical Damage</i>			<i>Non-physical disturbance</i>			<i>Toxic contamination</i>			<i>Non-toxic contamination</i>			<i>Biological disturbance</i>			<i>In combination effects</i>		
<i>Stage of Development</i>	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D	C	O	D
Article 4.1 over winter (RTD)	X _b X ^f	X ^b X ^f	X ^b X ^f	X ^b X ^f	X _b X ^f	X _b X ^f	X _c X ^f	X _d X ^f	X ^e X ^f	X _a X _b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^a X ^b	X ^f X ^g	X ^f X ^g	X ^f X ^g

Evidence supporting conclusions:

- a) As stated in paragraph 1.29 of the RIAA, ‘The pressure categories toxic contamination, non-toxic contamination and biological disturbance are not considered to have effect-receptor pathways arising from the Triton Knoll Electrical System and as such are not considered further’. Further justification is provided in the Applicants response to the Rule 8 letter, specifically to Question Number HRA 1.20. Agreement has been reached with Natural England (SoCG) that there would not be a likely significant effect on this site where the project is considered alone or in-combination with other projects.

-
- b) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) found, in paragraph 3.73, that ‘Potential effects to intertidal and marine ornithology receptors during the construction phase are anticipated to arise from disturbance related impacts only
 - c) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) assessed the potential for construction related vessel traffic (paragraph 3.74 *et seq*) and other construction activity (paragraph 3.79 *et seq*) to result in disturbance to intertidal and marine ornithology receptors. The assessment focused on those species identified through the preceding sections as being vulnerable. Such effects were concluded to be of negligible significance and therefore LSE does not apply.
 - d) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for operational stage affects, noting in paragraph 3.85 that ‘In agreement with the statutory nature conservation bodies and following the scoping opinion operation affects are scoped out from further assessment’. Therefore LSE does not apply
 - e) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for decommissioning stage affects. Such effects were concluded to be of negligible significance and therefore LSE does not apply.
 - f) Specifically for red throated diver, Volume 2 Chapter 3 (Marine and Intertidal Ornithology) found, in paragraph 3.87 that there would be no likely significant effect on the red-throated diver population and specifically no effect on the Outer Thames Estuary SPA or the future Greater Wash SPA either alone or in-combination’.
 - g) Volume 2 Chapter 3 (Marine and Intertidal Ornithology) considers the potential for cumulative effects in paragraph 3.102 *et seq*, with the ES concluding them to be Not Significant and therefore LSE does not apply.