



codling
wind park



Environmental Impact Assessment Report

Volume 4

Appendix 7.2 Representative
Scenario and Limits of
Deviation Assessment



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APPENDIX 7.2 REPRESENTATIVE SCENARIO AND LIMITS OF DEVIATION ASSESSMENT

1 Introduction

1. Complex, large-scale infrastructure projects with a terrestrial and marine interface such as the CWP Project, are consented and constructed over extended timeframes. The ability to adapt to changing supply chain, policy or environmental conditions and to make use of the best available information to feed into project design, promotes environmentally sound and sustainable development. This ultimately reduces project development costs and therefore electricity costs for consumers and reduces CO₂ emissions.
2. Case law recognises that the plans and particulars submitted with planning applications can allow for a certain limited flexibility, where this is applied reasonably and, in a context-specific way. In addition, section 287A of the Planning and Development Act (PDA) (as inserted by the Planning and Development, Maritime and Valuation (Amendment) Act 2022) has expanded the flexibility available and allows planning applications to be made and decided before the Applicant has confirmed certain details of the project.
3. Due to the complexity of the Codling Wind Park (CWP) Project, significant and rapid progression in wind farm technology development, potential changes in environmental conditions and in policy and legislation, the Applicant considers that consenting a degree of design flexibility is appropriate and legally compliant.
4. In this regard the approach to the design development of the CWP Project has sought to introduce flexibility where required to enable the best available technology to be constructed, whilst at the same time to specify project boundaries, project components and project parameters wherever possible, whilst having regard to known environmental constraints.

2 Approach to Presenting the Project Design

5. The approach to the design development of the CWP Project considers permanent infrastructure, temporary infrastructure and installation methods.
6. In general, the CWP Project has sought to specify the location, scale and extents of permanent and temporary infrastructure, however in some cases a degree of design flexibility is required. Subject to the detail concerned, this flexibility is presented in three ways:
 - **Options:** Consent is sought for up to two options for certain permanent infrastructure details and layouts, for example, wind turbine generator (WTG) Layout Option A (250 m rotor diameter) or WTG Layout Option B (276 m rotor diameter). Each design option is described in detail in **Chapter 4 Project Description**, which provides the details associated with each option.
 - **Dimensional flexibility:** Dimensional flexibility is described as a limited parameter range i.e. upper (maximum) and lower (minimum) values for a given detail such as cable length.
 - **Locational flexibility:** Locational flexibility of permanent infrastructure is described as a limit of deviation (LoD) from a specific point of alignment.
7. Installation methods for permanent infrastructure have been identified and described in full, however, as with the design of permanent infrastructure, a degree of flexibility is required as final decisions on

methods and techniques to be employed will not be made until the appointment of the primary contractors closer to the time of construction.

8. Where required, flexibility concerning installation methods is presented by means of options. The details associated with the installation methods are specified, where possible, or otherwise described as a limited parameter range i.e. upper (maximum) and lower (minimum) values for a given detail.

3 Representative Scenario Assessment

9. The CWP Project Environmental Impact Assessment Report (EIAR) will identify, describe and assess all of the likely significant effects of the proposed development on the environment. To achieve this for all options and dimensional flexibility, and at the same time to produce application documents that are concise and readable, each chapter of the EIAR will identify and assess a selection of representative scenarios, rather than assessing every possible scenario. A “representative scenario” is a combination of options and dimensional flexibility that has been selected to represent all of the likely significant effects of the project on the environment. Some topics may require several representative scenarios to be identified to ensure all impacts are identified, described and assessed.
10. For marine water quality this analysis for construction and operation and maintenance (O&M) phase impacts is presented in **Table 1**, **Table 2**, respectively. Each table identifies one or more representative scenarios for each impact with supporting text to demonstrate that no other scenarios would give rise to new or materially different effects; taking into consideration the potential impact of other scenarios on the magnitude of the impact or the sensitivity of the receptor(s) that is being considered.
11. Where the potential for a new or materially different impact is identified, then further representative scenarios must be assessed in full within the main chapter.
12. This is distinct from the approach to assessing locational flexibility, where differences in impacts are assessed in this Appendix. The difference in approaches arises because there is a much higher degree of confidence in the locations and alignments assessed in the main chapter than there is for the final options and dimensions.
13. Overall, this approach will ensure that the EIAR will identify, describe and assess:
 - Every impact type that could arise from the proposed development, taking account of the full range of options and dimensional flexibility;
 - Every materially different magnitude of impact that could arise from the proposed development within the proposed options and dimensional flexibility; and
 - Every materially different sensitivity of receptor that could arise from the proposed development within the proposed options and dimensional flexibility.

Table 1 Representative scenario assessment - construction phase impacts

Impact	Relevant project details			Representative scenario(s) and notes / assumptions	Rationale for representative scenario(s)	
Impact 1: Direct temporary disturbance resulting in temporary increases in SSC	Array site (including WTGs, inter-array cables (IACs), interconnectors and offshore substation structures (OSSs)) and offshore export cable corridor (OECC) (including transition zone)	WTG Option A	WTG Option B		Questions to demonstrate assessment has considered all scenarios	Response
	Installation methods and effects			WTG Option A forms the representative scenario as this represents the greatest level of direct temporary disturbance resulting in temporary increase in SSC, and therefore WTG Option A forms the basis of the assessment. WTG Option B, or any other scenario resulting in a lower level of temporary increases in SSC would not introduce new or different impacts and would not result in an effect of materially different significance. Greatest increases in SSC are anticipated to be caused by dredge disposal operations and cable installations, which underwent sediment plume modelling, as presented in Appendix 6.3 Modelling Report .	1. Are there infrastructure layout options (permanent or temporary) which may introduce new impacts? Note - this could be a new impact entirely or the introduction of an existing impact pathway to a new receptor. 2. Are there infrastructure layout options (permanent or temporary) which may introduce a materially different magnitude of impact? 3. Are there infrastructure layout options (permanent or temporary) which may introduce a material change in the sensitivity of the receptor(s) (greater or lesser)? 4. Are there alternative installation methods which may introduce new impacts? 5. Are there alternative installation methods which may introduce a materially different magnitude of impact? 6. Are there alternative installation methods which may materially alter the sensitivity of	1. No, WTG Option B would not introduce any new impact receptor pathways that have not already been considered as part of the assessment. 2. No, the two layouts are highly unlikely to have differing magnitudes for Impact 1. 3. No, infrastructure layout will not influence the sensitivity of the receptor that is being assessed. 4. No, the installation methods for the permanent infrastructure, including installation of foundations and cables do not introduce new impacts. 5. No, the installation methods for the permanent infrastructure, including installation of foundations, cables and onshore substations do not introduce materially different magnitude of impact. 6. No, the installation methods for the permanent infrastructure, including installation of foundations, cables and the onshore substation do not materially alter the sensitivity of the relevant receptors.
	Boulder clearance: Array site seabed clearance area (m²)	2,556,000 - 2,934,000	2,494,000 - 2,772,000			
	Sand wave clearance: Array Site volume of material disturbed by sand wave clearance (m³)	615,750 – 777,750	660,000 - 832,500			
	IAC and interconnector cable installation: Total volume of sediment disturbed (m³)	2,866,500 – 3,321,000	1,786,500 – 3,118,500			
	Boulder clearance: OECC seabed clearance area (m²)	2,220,000 - 2,616,000				
	OECC volume of material disturbed by sand wave clearance (m³)	471,450 – 595,650				
	Offshore export cable installation: total volume of sediment disturbed (m³)	471,450 – 595,650				
	JUV operations total impact area (m²)	240,000	180,000			
	WTGs and OSS anchoring operations total impact volume (m³)	1,404,000	1,134,000			
	IAC and interconnector cable anchoring operations total impact volume (m³)	1,857,6000	1,404,000			
	Total volume of WTG monopile drill arisings (m³)	24,516	23,220			
	Offshore export cable anchoring operations total impact volume (m³)	3,153,600				
	Landfall					
	Installation methods and effects					
	Total seabed disturbed by cofferdam (m²)	6,100				
	Total seabed disturbed by intertidal cable duct installation (m³)	72,000				
	Total area of seabed in transition zone affected by support structures (m²)	6,900				
	Total volume of seabed in transition zone affected by installation of cables using either open cut trenching or a shallow water trenching tool (m³)	216,000				

Impact	Relevant project details			Representative scenario(s) and notes / assumptions	Rationale for representative scenario(s)	
	Onshore substation				the relevant receptor(s) (greater or lesser).	
	Onshore substation: length of combi-wall below the High Water Mark (HWM) (requiring marine piling) (m)	150				
	Onshore substation: Total length of new revetments (m)	150				
Impact 2: Direct disturbance resulting in resuspension of contaminated sediments	Array site (including WTGs, inter-array cables (IACs), interconnectors and offshore substation structures (OSSs)) and offshore export cable corridor (OECC)	WTG Option A	WTG Option B		Questions to demonstrate assessment has considered all scenarios	Response
	Representative scenario parameters are the same as those above for Impact 1 above. Coastal processes modelling indicates that spring tides, which generate the greatest horizontal displacement, can extend along the tidal axis for a maximum of up to 10 km. Sediment plume modelling suggests that the greatest direction and distance of dispersion of disturbed material was 9 - 10 km to the east, although one scenario showed dispersion to the south east reaching 6 - 7 km and to the west reaching 3-4 km.	As above	As above	Direct disturbance resulting in resuspension of contaminated sediments relates to seabed preparation for foundations and cables, jack up and anchoring operations, and cable installation. Remobilisation of contaminated sediments occur as a result of temporary disturbance to the seabed and as such the construction activities relating to these impacts are the same as those of Impact 1. It should be noted that where boulder clearance overlaps with sand wave clearance, the boulder clearance footprint will be within the sand wave clearance footprint. Offshore, WTG Option A forms the representative scenario as this represents the greatest level of temporary habitat disturbance, and therefore Option A forms the presentational basis of the assessment for Impact 2: remobilisation of contaminated sediments in this chapter. Option B would result in a lower level of disturbance and would not introduce new impacts, or an impact of materially different magnitude.		1. No, WTG Option B would not introduce any new impact receptor pathways that have not already been considered as part of the assessment. 2. No, the two layouts are highly unlikely to have differing magnitudes for Impact 2. 3. No, Option B will not influence the sensitivity of the receptor that is being assessed. 4. No, the installation methods for the permanent infrastructure, including installation of foundations and cables do not introduce new impacts. 5. No, the installation methods for the permanent infrastructure, including installation of foundations and cables do not introduce materially different magnitude of impact. 6. No, the installation methods for the permanent infrastructure, including installation of foundations and cables do not materially alter the sensitivity of the relevant receptors.

Impact	Relevant project details			Representative scenario(s) and notes / assumptions	Rationale for representative scenario(s)	
Impact 3: Accidental pollution events	Total WTG	75	60	Accidental pollution events relate to the potential for accidental pollution such as oil and hydraulic fluids being introduced to the environment from vessels during construction activities. WTG Option A forms the representative scenario as this represents the number of vessels required, and the greatest number of locations that may require drilling, and therefore Option A forms the presentational basis of the assessment for Impact 3. Option B would result in a lower potential for accidental pollution events to occur and would not introduce new impacts, or an impact of materially different magnitude.		1. No, WTG Option B would not introduce any new impact receptor pathways that have not already been considered as part of the assessment. 2. It is highly unlikely that, the two layouts will have differing magnitudes for Impact 3. Furthermore, the primary project mitigation outlined in Chapter 7 Section 7.9, in the form of a CEMP, will ensure that vessels follow best practice guidelines for the prevention of pollution at sea and that analogous protocols are adhered to, to minimise such risk associated with works in intertidal or onshore habitats. Therefore, option A forms the presentational basis for the assessment with option B conclusions being no different. 3. No, WTG Option B will not influence the sensitivity of the receptor that is being assessed. 4. No the permanent infrastructure, including installation of foundations and cables do not introduce new impacts. 5. No, the installation methods for the permanent infrastructure, including installation of foundations and cables do not introduce materially different magnitude of impact. 6. No, the installation methods for the permanent infrastructure, including installation of foundations and cables do not materially alter the sensitivity of the relevant receptors.
	Total construction vessels (round trips)	2,409	2,387			
	Number of WTG and OSS locations that may require drilling	12	10			

Table 2 Representative scenario assessment - operational phase impacts

Impact	Relevant project details			Representative scenario(s) and notes / assumptions	Rationale for representative scenario(s)	
	Array site (including WTGs, OSSs and offshore export cables within the Array Site) and Offshore export cable corridor	WTG Option A	WTG Option B		Questions to demonstrate assessment has considered all scenarios	Response
Impact 1: Direct temporary disturbance resulting in temporary increases in SSC	Array site (including WTGs, OSSs and offshore export cables within the array site) and offshore export cable corridor	N/A	N/A	Temporary habitat disturbance relates to maintenance activities such as cable repair, vessel jack-up operations and deployment of scour protection. These periodic maintenance activities will be required under both Option A and Option B.	1. Are there infrastructure layout options (permanent or temporary) which may introduce new impacts? 2. Are there infrastructure layout options (permanent or temporary) which may	1. No, impact does not vary between layout options. Potential for O&M work considered to be equal. 2. No, impact does not vary between layout options. Potential for O&M work considered to be equal. 3. No, sensitivity of receptor is not affected by layout option.

Impact	Relevant project details			Representative scenario(s) and notes / assumptions	Rationale for representative scenario(s)	
	Array site (including WTGs, OSSs and offshore export cables within the Array Site) and Offshore export cable corridor	WTG Option A	WTG Option B		Questions to demonstrate assessment has considered all scenarios	Response
					<i>introduce a materially greater magnitude of impact?</i> <i>3. Are there infrastructure layout options (permanent or temporary) which may introduce a material change in the sensitivity of the receptor(s) (greater or lesser)?</i> <i>4. Are there alternative installation methods which may introduce new impacts?</i> <i>5. Are there alternative installation methods which may introduce a materially greater magnitude of impact?</i> <i>6. Are there alternative installation methods which may materially alter the sensitivity of the relevant receptor(s) (greater or lesser).</i>	4. No, impact pathways all considered. 5. No. Magnitude contingent on volume of work defined in PD. 6. No, sensitivity of the receptor does not vary based upon installation (O&M) methodology.
Impact 2: Direct disturbance resulting in resuspension of contaminated sediments	Resuspension of contaminants sediments is associated with the disturbance of seabed sediments are increases in SSC. Temporary increases in SSC during operation and maintenance of the CWP Project are anticipated to occur in the event one of the following is required: • Cable reburial, following movement of seabed sediments resulting in the exposure of the buried cable; • Cable repair, requiring exposure, recovery and reburial of cables; and • Use of JUVs during WTG / OSS maintenance. It is anticipated that the same or similar methodology will be required as described for the construction phase, except over a greatly reduced area.	N/A	N/A	Direct disturbance resulting in resuspension of contaminated sediments relates to maintenance activities such as cable repair, vessel jack-up operations and deployment of scour protection. These periodic maintenance activities will be required under both Option A and Option B.		1. No, impact does not vary between layout options. Potential for O&M work considered to be equal. 2. No, impact does not vary between layout options. Potential for O&M work considered to be equal. 3. No, sensitivity of receptor is not affected by layout option. 4. No, impact pathways all considered. 5. No. Magnitude contingent on volume of work defined in PD. 6. No, sensitivity of the receptor does not vary based upon installation (O&M) methodology.

Impact	Relevant project details			Representative scenario(s) and notes / assumptions	Rationale for representative scenario(s)	
	Array site (including WTGs, OSSs and offshore export cables within the Array Site) and Offshore export cable corridor	WTG Option A	WTG Option B		Questions to demonstrate assessment has considered all scenarios	Response
Impact 3: Accidental pollution events	Total construction vessels (round trips)	1,209	1,209	Accidental pollution events relate to the potential for accidental pollution such as oil and hydraulic fluids being introduced to the environment from vessels during construction activities. The estimated number of vessels required during operation and maintenance are the same regardless of the WTG option selected. Therefore, there is only one scenario for this potential impact, and this represents the representative scenario.		1. No, WTG Option B would not introduce any new impact receptor pathways that have not already been considered as part of the assessment. 2. It is highly unlikely that the two layouts will have differing magnitudes. The estimated number of vessels required during operation and maintenance are the same regardless of the WTG option selected. Furthermore, the primary project mitigation outlined in Chapter 7 Section 7.9, in the form of a CEMP, will ensure that vessels follow best practice guidelines for the prevention of pollution at sea and that analogous protocols are adhered to, to minimise such risk associated with works in intertidal and onshore habitats. Therefore, option A forms the presentational basis for the assessment with option B conclusions being no different. 3. No, WTG Option B will not influence the sensitivity of the receptor that is being assessed.

Table 3 Representative scenario assessment – decommissioning phase impacts

Impact	Relevant project details			Representative scenario(s) and notes / assumptions	Rationale for representative scenario(s)	
	Array site (including WTGs, OSSs and offshore export cables within the Array Site) and Offshore export cable corridor	WTG Option A	WTG Option B		Questions to demonstrate assessment has considered all scenarios	Response
Impact 1: Direct temporary disturbance resulting in temporary increases in SSC Impact 2: Direct disturbance resulting in resuspension of contaminated sediments	It is recognised that legislation and industry best practice change over time. However, for the purposes of the EIA, at the end of the operational lifetime of the CWP Project, all offshore infrastructure will be rehabilitated. In this regard, for the purposes of a representative scenario for decommissioning impacts, the following assumptions have been made: - The WTGs and OSS topsides shall be completely removed; - Following WTG and OSS topside decommissioning and removal, the monopile foundations will be cut below the seabed level, to a depth that will ensure the remaining foundation is unlikely to become exposed. This is likely to be approximately one metre below seabed, although the exact depth will depend upon the sea-bed conditions and site characteristics at the time of decommissioning; and - All cables and associated cable protection in the offshore environment shall be wholly removed. It is likely that equipment similar to that which is used to install the cables may be used to reverse the burial process and expose them. Therefore, the area of seabed impacted during the removal of the cables is anticipated to be the same as the area impacted during the installation of the cables.				1. Are there infrastructure layout options (permanent or temporary) which may introduce new impacts? 2. Are there infrastructure layout options (permanent or temporary) which may introduce a materially greater magnitude of impact? 3. Are there infrastructure layout options (permanent or temporary) which may introduce a material change in	It is not anticipated that there will be differing options for installed infrastructure nor removal methods. Given the above it is anticipated that for the purposes of a representative scenario, the impacts will be no greater than those identified for the construction phase.

Impact	Relevant project details			Representative scenario(s) and notes / assumptions	Rationale for representative scenario(s)	
	Array site (including WTGs, OSSs and offshore export cables within the Array Site) and Offshore export cable corridor	WTG Option A	WTG Option B		Questions to demonstrate assessment has considered all scenarios	Response
					<i>the sensitivity of the receptor(s) (greater or lesser)?</i> <i>4. Are there alternative installation methods which may introduce new impacts?</i> <i>5. Are there alternative installation methods which may introduce a materially greater magnitude of impact?</i> <i>6. Are there alternative installation methods which may materially alter the sensitivity of the relevant receptor(s) (greater or lesser).</i>	
Impact 3: Accidental pollution events	It is recognised that legislation and industry best practice change over time. However, for the purposes of the EIA, at the end of the operational lifetime of the CWP Project, all offshore infrastructure will be rehabilitated. In this regard, for the purposes of a representative scenario for decommissioning impacts, the following assumptions have been made: Generally, decommissioning is anticipated to be a reverse of the construction and installation process for the CWP Project and the assumptions around the number of vessels on site, and vessel round trips is therefore the same as described for the construction phase of the offshore components.					For the purposes of the EIA, at the end of the operational lifetime of the CWP Project, all offshore infrastructure will be rehabilitated and there will be no differing options for removal in terms of number of vessels required. Given the above it is anticipated that for the purposes of a representative scenario, the impacts will be no greater than those identified for the construction phase.

4 Limit of Deviation Assessment

14. As described in **Section 1** of this document, locational flexibility of permanent and temporary infrastructure is described as a Limit of Deviation (LoD) from a specific point or alignment.
15. The project components for which a LoD has been defined are presented in **Table 4**. These are further described in **EIAR Chapter 4 Project Description** and have been presented on the planning drawings that accompany the planning application.

Table 4 Defined limits of deviation

Project component	LoD
Offshore project components	
WTGs	100 m from the centre point of each WTG location
WTG monopile locations	Same as WTGs.
WTG monopile scour protection	Same as WTGs.
OSSs	100 m from the centre point of each OSS location
OSS monopile locations	Same as OSSs.
OSS monopile scour protection	Same as OSSs.
IACs and interconnector cables	100 m either side of the preferred alignment of each IAC and interconnector cable 200 m from the centre point of each WTG location
Offshore export cables	250 m either side of the preferred alignment within the array site. The offshore export cable corridor (OECC) outside of the array site
Landfall	
TJBs	0.5 m either side (i.e. east / west) of the preferred TJB location
Landfall cable ducts (and associated offshore export cables within the ducts)	Defined LoD boundary
Intertidal cable ducts (and associated offshore export cables within the ducts)	The OECC
Intertidal offshore export cables (non ducted sections)	The OECC
Onshore Substation	
Location of onshore substation revetment perimeter structure	Defined LoD boundary

16. For the purposes of the EIAR, the main chapter for marine water quality assesses the specific preferred location for permanent infrastructure. However, this document provides further analysis to determine

if the proposed LoD for permanent infrastructure may give rise to any new or materially different effects, taking into consideration the potential impact of the proposed LoD on the magnitude of the impact.

17. For marine water quality this analysis for construction and is presented in **Table 5**. Where the potential for a LoD to cause a new or materially different effect is identified, then this is noted in the tables below and is considered in full within the main chapter.
18. For marine water quality LOD for permanent infrastructure will not give rise to any new or materially different effects for O&M phase impacts.

Table 5 Limit of deviation assessment - construction phase impacts

Impact	Project element	Limit of deviation	Questions to demonstrate assessment has considered all scenarios	Response
Impact 1: Direct temporary disturbance resulting in temporary increases in SSC	Generating station		<i>1. Does the proposed LoD (locational flexibility) introduce new impacts? (i.e. the introduction of an existing impact pathway to a new receptor).</i> <i>2. Does the proposed LoD (locational flexibility) introduce a materially different magnitude of impact?</i>	1. No, the implementation of the LoD does not introduce any new impact receptor pathways that have not already been considered as part of the assessment. 2. No, temporary disturbance resulting in temporary increases in SSC during pre-installation activities has been calculated based on the upper limit for IAC, interconnector and export cable lengths which factors in the proposed LoD for these project elements. LoD associated with works at the onshore substation is minimal and will not introduce a materially different magnitude of impact.
	IACs and interconnector cables	100 m either side of the preferred alignment of each IAC and interconnector cable 200 m from the centre point of each WTG location		
	Offshore export cables			
	Offshore export cables	250 m either side of the preferred alignment of each export cable within the array site. The offshore export cable corridor (OECC) outside of the array site.		
	WTGs / OSSs			
	Including monopile and scour protection	100 m from the centre point of each WTG location is proposed to allow for small adjustments to be made to the structure locations.		
	Onshore substation			
	Onshore substation	Defined LoD boundary		
Impact 2: Direct disturbance resulting in resuspension of contaminated sediments	Generating station		<i>1. Does the proposed LoD (locational flexibility) introduce new impacts? (i.e. the introduction of an existing impact pathway to a new receptor).</i> <i>2. Does the proposed LoD (locational flexibility) introduce a materially different magnitude of impact?</i>	1. No, the implementation of the LoD does not introduce any new impact receptor pathways that have not already been considered as part of the assessment. 2. No, remobilisation of contaminated sediments during pre-installation activities has been calculated based on the upper limit for IAC, interconnector and export cable lengths which factors in the proposed LoD for these project elements. LoD associated with works at the onshore substation is minimal and will not introduce a materially different magnitude of impact.
	IACs and interconnector cables	100 m either side of the preferred alignment of each IAC and interconnector cable 200m buffer from the centre point of each WTG location		
	Offshore export cables			
	Offshore export cables	250 m either side of the preferred alignment of each export cable within the array site. The offshore export cable corridor (OECC) outside of the array site.		
	WTGs / OSSs			
	WTGs / OSSs	100 m from the centre point of each WTG and OSS location is proposed to allow for small adjustments		

Impact	Project element	Limit of deviation	Questions to demonstrate assessment has considered all scenarios	Response
		to be made to the structure locations.		
	Onshore substation			
	Onshore substation	LoD boundary		

Table 6 Limit of deviation assessment – operational phase impacts phase impacts

Impact	Project element	Limit of deviation	Questions to demonstrate assessment has considered all scenarios	Response
Impact 1: Direct temporary disturbance resulting in temporary increases in SSC	Generating station		1. Does the proposed LoD (locational flexibility) introduce new impacts? (i.e. the introduction of an existing impact pathway to a new receptor). 2. Does the proposed LoD (locational flexibility) introduce a materially different magnitude of impact?	1. No, the implementation of the LoD does not introduce any new impact receptor pathways that have not already been considered as part of the assessment. 2. No, temporary disturbance resulting in temporary increases in SSC has been calculated based on the upper limit for IAC, interconnector and export cable lengths which factors in the proposed LoD for these project elements.
	IACs and interconnector cables	100 m either side of the preferred alignment of each IAC and interconnector cable 200 m from the centre point of each WTG location		
	Offshore export cables			
	Offshore export cables	250 m either side of the preferred alignment of each export cable within the array site. The offshore export cable corridor (OECC) outside of the array site.		
	WTGs / OSSs			
	Including monopile and scour protection	100 m from the centre point of each WTG location is proposed to allow for small adjustments to be made to the structure locations.		
Impact 2: Direct disturbance resulting in resuspension of contaminated sediments	Generating station		1. Does the proposed LoD (locational flexibility) introduce new impacts? (i.e. the introduction of an existing impact pathway to a new receptor). 2. Does the proposed LoD (locational flexibility) introduce a materially different magnitude of impact?	1. No, the implementation of the LoD does not introduce any new impact receptor pathways that have not already been considered as part of the assessment. 2. No, remobilisation of contaminated sediments has been calculated based on the upper limit for IAC, interconnector and export cable lengths which factors in the proposed LoD for these project elements.
	IACs and interconnector cables	100 m either side of the preferred alignment of each IAC and interconnector cable 200m buffer from the centre point of each WTG location		
	Offshore export cables			
	Offshore export cables	250 m either side of the preferred alignment of each export cable within the array site.		



Impact	Project element	Limit of deviation	Questions to demonstrate assessment has considered all scenarios	Response
		The offshore export cable corridor (OECC) outside of the array site.		
	WTGs / OSSs			
	WTGs / OSSs	100 m from the centre point of each WTG and OSS location is proposed to allow for small adjustments to be made to the structure locations.		