XLINKS' MOROCCO-UK POWER PROJECT

Environmental Statement

Volume 1, Appendix 5.1: Scoping Responses

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Contents

Tables

1 SCOPING RESPONSES

1.1 Introduction

1.1.1 This document forms Volume 1, Appendix 5.1: Scoping Responses of the Environmental Statement (ES) prepared for the United Kingdom (UK) elements of Xlinks' Morocco-UK Power Project (the 'Project'). For ease of reference, the UK elements of the Project are referred to as the 'Proposed Development, which is the focus of the Environmental Statement (ES). The ES presents the findings of the Environmental Impact Assessment (EIA) process for the Proposed Development.

1.1.2 In January 2024, Xlinks 1 Limited ('the Applicant') submitted a Scoping Report to the Secretary of State, which described the scope and methodology for the EIA process being undertaken to provide an assessment of any likely significant effects and, where necessary, to determine suitable mitigation measures for the construction, operation and maintenance, and decommissioning phases of the Project. It also described those topics or sub-topics which are proposed to be scoped out of the EIA process and provided justification as to why the Proposed Development would not have the potential to give rise to significant environmental effects in these areas.

1.1.3 Following consultation with the statutory bodies, the Planning Inspectorate (on behalf of the Secretary of State) provided a Scoping Opinion on 7 March 2024.

1.1.4 This Appendix sets out details of the overarching points raised by the Planning Inspectorate in the Scoping Opinion dated 7 March 2024. This includes all points raised in the Scoping Opinion and the response to these and location in which information can be found within the ES.

1.1.5 **Table 1.1** provides a summary of all points raised, the consultee and how and where it has been addressed in the ES.

Table 1.1: Summary of Scoping Responses

Stakeholder	Summary of Response	Formal response
Planning Inspectorate	The Inspectorate notes the intention to apply a 'Rochdale Envelope' approach. This is employed when there is a need to seek flexibility to address uncertainty. The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. It is noted that the Scoping Report refers interchangeably to 'maximum design scenario' and 'Project Design Envelope' (PDE) when referencing the use of the Rochdale Envelope approach. The terminology used in the ES should be consistent. The ES should also ensure consistency throughout the ES and any other relevant assessments supporting the application from which the ES draws. The Inspectorate advises that flexibility should only be sought where absolutely necessary, in the interests of a proportionate ES based on the most realistic and refined PDE possible. The ES should assess the worst case that could potentially be built out in accordance with the Authorised Development of the Development Consent Order (DCO) being applied for.	The approach is set out in Volume 1, Chapter 3: Project Description of the ES, based on guidance presented in the NPSs and Advice Note 9 (Planning Inspectorate, 2018). Volume 1, Chapter 3: Project Description of the ES sets out the project design envelope for the elements of the Proposed Development. Each topic chapter in Volumes 2, 3 and 4 of the ES sets out the maximum design scenario for that topic, which is based upon the parameters identified in the project description. Through an iterative site selection process and design process, along with non-statutory consultation, the Applicant has looked to refine the range of options, where possible. The site selection and design evolution is presented within Volume 1, Chapter 4: Needs and Alternatives, of the ES.
Planning Inspectorate	The Scoping Report states at paragraph 4.4.2 that no High Voltage Alternate Current (HVAC) overhead pylons will be installed as part of the Proposed Development. However, it is noted that the Scoping Report also refers to diversions of existing overhead lines and that DCO application may include the Alverdiscott Substation Connection Development, which includes repositioning of overhead lines and tower structures. The ES should clearly describe the works relating to any overhead lines and structures, where included, and include an assessment of any likely significant effects from such works.	The Proposed Development does not propose the installation of any new overhead lines (OHLs), however, it would include the re-positioning of existing OHLs. Discussions with statutory undertakers have been undertaken to understand the likely extent of third party utility diversions. Further detail on the utility diversions are provided in Volume 1, Chapter 3: Project Description and presented in Volume 1, Figure 3.4: Utilities Diversion Plan.
Planning Inspectorate	**Programme**	It is anticipated that the construction works for the Proposed Development would be undertaken between 2026 and 2032.

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	Construction of the Bipole 2 Convertor Station appears in Phase 2; however, the timescales for commencement of Phases 1 and 2 are the same. It is unclear from the Scoping Report if the two convertor stations would be constructed concurrently or consecutively, and if consecutively, whether there would be a period of no construction in between. The ES should clearly state the anticipated construction programme used for the assessment and ensure aspect chapters are consistent in this regard.	Construction at the Converter Site would last 72 months, with each converter station being developed in overlapping phases but commissioned separately. The description of the construction activities and programme is detailed within section 3.6 of Volume 1, Chapter 3: Project Description, of the ES.
Planning Inspectorate	The Inspectorate notes from the Scoping Report that the Alverdiscott Substation Connection Development could be delivered as part of the DCO or separately by National Grid, and this is yet to be determined. The Scoping Report includes a limited description of the likely parameters for the works for the Alverdiscott Substation Connection Development at present and very few aspect chapters include reference to an assessment of likely effects from this development, either as part of the DCO application or cumulatively as a separate project. The ES should clearly describe the elements of the project to be included in the DCO application. The Applicant should reduce the options for the Proposed Development as far as possible (see also the Inspectorate's comment above regarding flexibility at ID 2.1.2). Where included in the DCO, the ES should clearly set out the worst case parameters for the assessment and include an assessment of the likely effects of the proposed Alverdiscott Substation Connection Development in the relevant aspect chapters, for example in relation to landscape and visual impacts. Where the Alverdiscott Substation Connection Development is not included in the DCO application, the ES should include an assessment of the likely significant cumulative effects of the Proposed Development with the proposed Alverdiscott Substation Connection Development.	The key elements of the Proposed Development are summarised within section 3.5 of the Project Description (see Volume 1, Chapter 3 of the ES). Volume 1, Chapter 3: Project Description of the ES sets out the design parameters each element of the Proposed Development. Each topic chapter in Volumes 2, 3 and 4 of the ES sets out the maximum design scenario for that topic, based upon the design parameters identified in Volume 1, Chapter 3: Project Description of the ES. Following discussions with National Grid Electricity Transmission (NGET), the anticipated Alverdiscott Substation Connection Development will be planned and developed by NGET. However, it would be necessary to facilitate a connection to the national grid and thus, the ES considers likely cumulative effects that might arise. The approach to the cumulative assessment is detailed within Volume 1, Chapter 5: EIA Methodology of the ES.
Planning Inspectorate	The ES should include a description of the nature and quantity of materials and natural resources used in the Proposed Development, including expected quantities and types of any waste that would be	An Outline Site Resource and Waste Management Plan (SRWMP) is included as part of the Outline Onshore Construction Environmental Management Plan (On-CEMP) (document reference 7.7), which details

Stakeholder	Summary of Response	Formal response
	generated during construction, operation and decommissioning. The ES should describe the assumptions made in the assessment with regards to likely exportation of waste.	the estimated waste arisings resulting from the Proposed Development. The Outline SRWMP also sets out the measures for managing waste and resources during the construction phase, including following the waste hierarchy principle. The final SRWMP(s) would be developed in accordance with the Outline SRWMP and will include waste and resource use forecasts that will be prepared alongside the detailed design process.
Planning Inspectorate	The Inspectorate notes Section 10.2 of the Scoping Report, which confirms that no separate waste aspect chapter is to be produced but that a Site Waste Management Plan (SWMP) would detail quantities of waste and management as an appendix to the ES. Although the Inspectorate is content with this approach, an assessment of effects relating to waste should be provided in the relevant aspect chapters where significant effects are likely to occur, including in relation to transport effects arising from the movement of waste.	The Outline Site Resource and Waste Management Plan (SRWMP) has been included as Appendix B of the Outline On-CEMP (document reference 7.7). The Outline SRWMP outlines the estimated waste arisings and proposed management as part of the construction phase of the Proposed Development. Where relevant, topic chapters have considered impacts relating to waste, including Volume 2, Chapter 5: Traffic and Transport of the ES. The construction traffic estimates set out within Volume 2, Chapter 5: Traffic and Transport of the ES account for the movement of waste. Noise impacts associated with this construction traffic is considered within Volume 2, Chapter 6: Noise and Vibration of the ES.
Planning Inspectorate	The ES should describe the range of burial depths that have been considered as part of the assessment and the degree of confidence in these parameters. It should establish the parameters likely to result in the maximum adverse effects and include an assessment of these to determine likely significance of effects.	Volume 1, Chapter 3: Project Description of the ES presents the burial depths that have been considered as part of the assessment. This includes the trench depth for the onshore HVDC Cable and HVAC Cable trenches and the cable burial depth for the Offshore Cable Corridor. Each topic chapter in Volumes 2, 3 and 4 of this ES sets out the maximum design scenario for that topic, including the consideration of burial depths, where relevant.
Planning Inspectorate	The Scoping Report states that separate consents would be sought for offshore UXO clearance works, if required. The Inspectorate advises that the ES should still include a high-level assessment of offshore UXO clearance in relevant aspect chapters based on a likely worst case scenario (any assumptions used in the definition of the worst case scenario should be explained in the ES). The ES should address any cumulative effects from the construction of the Proposed Development with the likely effects from the UXO clearance.	UXO survey and clearance would be undertaken as standalone activities prior to cable lay activities. Should UXO clearance be required, any impacts arising from these works will be assessed as part of the standalone marine licence process (not intended to be included within the draft deemed Marine Licence submitted as part of the application for DCO). This Scoping Opinion response was specifically discussed with the

Stakeholder	Summary of Response	Formal response
		MMO in preparation of the PEIR. The MMO confirmed their preference that UXO assessment and licensing should be undertaken as a two-stage marine licence process separate to the EIA. (This approach is understood to be in the process of becoming mandatory.) The two stages would consist of initial marine licence for UXO survey and separate marine licence for site specific clearance (where identified as necessary). As discussed, this process allows a feature specific response to be developed, which could not be assessed in advance. Therefore, impact pathways in relation to UXO clearance have not been considered in the EIA.
Planning Inspectorate	The Scoping Report states that debris collected during the grapnel run for seabed clearance, together with cut sections of OOS cables, would be recovered on board the vessel for onshore disposal at appropriately licensed disposal facilities. The Scoping Report also describes that dredged material may be generated at the Horizontal Directional Drilling (HDD) site for the landfall. It is stated that disposal options would be considered as the design evolves with a preference for the beneficial re-use of dredged material. However, where this is not possible, alternative disposal options in line with regulatory and consenting requirements for disposal of dredged material would be adhered to. It is unclear whether dredged material would also be generated through seabed preparation.	At PEIR stage, the potential for localised dredging and removal of dredge arisings was being considered at the HDD exit points (using e.g. Trailer Suction Hopper Dredging (TSHD)). These methods have been discounted prior to the ES assessment. The HDD exit pits will be temporarily cleared of superficial sediments (mainly sands), most likely using long-reach back-hoe from the jack-up barge(s). Following completion of the HDD and installation of the associated cable protection (concrete mattresses at the exit points) the cleared sediments will be refilled – via a combination of further back-hoe work and through natural infilling. The ES Offshore Project Description has been amended to clarify that there will be no dredge 'arisings' i.e. no collection and movement of dredged material within the marine environment. Furthermore review of the CBRA (Volume 1, Appendix 3.4: Outline Cable Burial Risk Assessment of the ES) and the baseline environmental survey data (e.g. Volume 3, Appendix 8.4 GEOxyz Environmental Report of the ES) confirms that there will be no requirement for 'sandwave sweeping' i.e. broadscale sandwave clearance, in UK waters (which would be classed as dredging under the Marine and Coastal Access Act 2009).
Planning Inspectorate	The Inspectorate notes the intention to produce a Site Waste Management Plan (SWMP) to contain details of waste quantities as an appendix to the ES. However, it is unclear whether this would also	The Outline SWMP is intended to be an onshore document only. There will be no offshore dredge 'arisings' i.e. no collection and movement of dredged material within the marine environment. The management of

Stakeholder	Summary of Response	Formal response
	include predicted quantities of any offshore waste, or dredged materials, and its management and any subsequent disposal.	any offshore waste generated via grapnel runs would be undertaken via the final offshore CEMP. The Outline Offshore CEMP is provided with the DCO application (document reference 7.9).
Planning Inspectorate	The ES should clearly identify the quantities of dredged material and likely method and location for disposal. Any likely significant effects from offshore waste collection and disposal, including dredging or dredge disposal, should be assessed.	The management of any offshore waste generated via grapnel runs would be undertaken via the final offshore CEMP. The Outline Offshore CEMP is provided with the DCO application (document reference 7.9)
Planning Inspectorate	It is unclear from Table 4.8.2 if any of the proposed management plans (such as the Biosecurity Plan, Marine Mammal Mitigation Protocol) and assessments listed in this table would be provided in outline with the DCO application. The Inspectorate notes reference at Section 4.10 to an outline Offshore Construction Environmental Management Plans (CEMP) to be provided with the DCO application; however, it is unclear at this stage what outline plans would be provided for the offshore environment.	The Outline Offshore CEMP has been submitted with the DCO application (see document reference 7.9). Note the ES assessment has confirmed that a Marine Mammal Mitigation Protocol (MMMP) is not required. Key embedded mitigation measures and how they will be secured are outlined within Volume 1, Appendix 3.1: Commitments Register of the ES. Where necessary, consultation has been undertaken to discuss mitigation measures and seek feedback on outline management plans.
Planning Inspectorate	Any measures relied upon in the ES should be discussed with relevant consultation bodies, including such as Natural England (NE), in effort to agree the approach. Measures relied upon in the ES should be adequately secured e.g. through the CEMP(s).	Where necessary, consultation has been undertaken to discuss mitigation measures and seek feedback on outline management plans. All commitments relied upon in the ES to reduce significance of effect are provided in Volume 1, Appendix 3.1: Commitments Register of the ES, which details how measures would be secured.
Planning Inspectorate	The Inspectorate notes the description of Operation and Maintenance in Chapter 4 of the Scoping Report, and the subsequent separation of the operational phase to two distinct stages (i.e. 'Operation' and 'Operation Repair') for the scoping out of matters in the offshore aspect chapter tables. To clarify, the Inspectorate has provided opinions in the relevant offshore aspect chapter tables below based on the information in Chapter 4 of the Scoping Report. The Inspectorate has therefore assumed that the 'Operation' stage refers to the presence of the operational cable plus inspection survey and repair, as described in Paragraphs 4.11.9 to 4.11.11, and 'Operation Repair' comprises the maintenance and repair activities described at Paragraphs 4.11.12 to 4.11.14.	Volume 1, Chapter 5: EIA Methodology of the ES has been updated to clarify the difference in approach in the operation and maintenance and decommissioning phases considered between the onshore and offshore assessments. Volume 1, Chapter 3: Project Description has also been updated to further clarify what specific activities are included for each phase.

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Planning Inspectorate	**Decommissioning** Paragraph 4.12.6 states that an Onshore Decommissioning Plan would be developed in a 'timely manner'. The ES should explain the anticipated timescales for production of the Onshore Decommissioning Plan, whether agreement has been sought with Local Authorities and how it would be secured.	Details regarding the anticipated timescales for the production of the onshore decommissioning plan(s) are included within Volume 1, Chapter 3: Project Description. If decommissioning is required, the onshore decommissioning plan(s) would be developed in consultation with the relevant authority and in line with the latest available guidance, legislation and any new technologies at the time of the Proposed Development's decommissioning.
Planning Inspectorate	**Figures** The labelling, key/legend, and hatched elements on a number of figures provided in the Scoping Report are not clearly legible, for example Figure 8.2.3, Figure 9.3.1, and the figures presented in Chapter 7.4. It is also not possible to distinguish the proximity of designated sites to the cable route and landfall site in figures such as Figure 8.3.2 at the scale currently provided. The ES must include clear and appropriate figures to support the impact assessment. Figures should be of an appropriate scale and shading to allow each element on the figure to be clearly distinguishable and include clear keys/legends and labels.	Noted - this has been addressed within this ES. The figures associated with the ES chapters have been compiled into separate documents, as detailed below: • Volume 1, Figures. • Volume 2, Figures. • Volume 3, Figures. • Volume 4, Figures.
Planning Inspectorate	No direct reference is made to the potential requirement for dewatering activities in Section 4 of the Scoping Report, although it is noted that dewatering is referenced as an example activity in Table 7.4.4 and at paragraph 7.5.54 in respect of potential inter-related effects between the hydrology and flood risk chapter and hydrogeology, geology and ground conditions chapter. The ES should provide a full description of any such activities and present an assessment of any resulting likely significant effects, where these could arise. The Applicant's attention is directed to the comments of the Environment Agency (EA) at Appendix 2 of this Opinion with regards to dewatering and permits.	Dewatering is discussed within Volume 2, Chapter 4: Hydrogeology, Geology and Ground Conditions of the ES. Mitigation measures relating to dewatering activities adopted as part of the Proposed Development are presented within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES. The potential impact of dewatering activities on reduction of groundwater quantity or quality in aquifer units is also considered within Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES.
Planning Inspectorate	Several aspect chapters in the Scoping Report refer to fixed distance study areas with no explanation as to why these have been selected. The ES should ensure the study area for each aspect reflects the	Each topic chapter, within Volumes 2, 3 and 4 of the ES, details their assessed study area(s) and includes justification.

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	Proposed Development's ZoI and the impact assessment should be based on the ZoI from the Proposed Development with reference to potential effect pathways. Clear justification should be provided to support any distances applied.	
Planning Inspectorate	**Evidence based approach** The Inspectorate acknowledges that data and knowledge regarding the baseline environment exists for the offshore area in which the Proposed Development would be located. The Inspectorate understands the benefits of utilising this information to supplement site-specific survey data but advises that suitable care should be taken to ensure that the information in the ES remains representative and fit for purpose. The Applicant should make effort to agree the suitability of information used for the assessments in the ES with relevant consultation bodies.	Data and information from desk-based review was used to supplement data from site-specific surveys when describing the baseline environment in the Scoping Report. These data sources were reviewed again to ensure suitability of the information to inform the assessment in the PEIR, with information updated in the PEIR where appropriate. It has also been reviewed for the ES to ensure that the most up to date information available is taken into account, with baseline data sources agreed with relevant consultation bodies for the ES, where necessary.
Planning Inspectorate	The Inspectorate notes the intention to identify the projects and plans considered in the Cumulative Effects Assessment (CEA) and that the assessment of cumulative effects would be included in each aspect chapter. It is not clear from Table 5.10.1 where the information identifying the projects and plans considered in the CEA will be presented. The ES should clearly identify the projects and plans considered in the CEA. This could be presented as an Appendix. The Applicant is directed to the Inspectorate's Advice Note 17 with regards to a potential approach. The Applicant is also advised to seek to agree with relevant consultation bodies which plans and projects should be included in the CEA.	A CEA screening matrix forms Appendix 5.3 to Volume 1 of the ES, which includes the list of plans and projects to be included within the CEA. The cumulative projects and plans include the White Cross Offshore Wind Farm (onshore project) and The Crown Estate Round 5 Celtic Sea project development areas.
Planning Inspectorate	North Devon Council identify the potential for cumulative impacts with other renewable energy projects in the area, as identified in the response. NE also identify two potential projects/plans that may also require consideration in the CEA, namely White Cross Offshore Wind Farm (onshore project) and The Crown Estate Round 5 Celtic Sea Flow.	A CEA screening matrix forms Appendix 5.3 to Volume 1 of the ES, which includes the list of plans and projects to be included within the CEA. The cumulative projects and plans include the White Cross Offshore Wind Farm (onshore project) and The Crown Estate Round 5 Celtic Sea project development areas.
Planning Inspectorate	It is noted that the Scoping Report includes consideration of potential transboundary effects in relation to the following aspects:	Volume 1, Appendix 5.2: Transboundary Screening of the ES identifies whether the Proposed Development has the potential for significant

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	• Benthic Ecology; • Fish and Shellfish Ecology; • Commercial Fisheries; • Marine Mammals and Sea Turtles; • Offshore Ornithology; • Other Marine Users; • Marine Archaeology and Cultural Heritage; • Physical Processes; • Underwater Noise; and • Climate Change. The Inspectorate also notes reference to potential positive impacts on other EEA States at paragraphs 9.4.37 to 9.4.38 in respect of Socio-economic effects but these are proposed to be scoped out on the basis that they are positive. The Inspectorate recommends that the ES should identify whether the Proposed Development has the potential for significant transboundary effects, and if so, what these are, and which EEA States would be affected. The Inspectorate will undertake a transboundary screening on behalf of the SoS in due course.	transboundary effects. Consideration of transboundary effects are also considered within topic chapters in Volumes 2, 3 and 4.
Planning Inspectorate	On the basis that temporary and permanent habitat loss would not occur during the operational phase, the Inspectorate is content that this matter can be scoped out of further assessment for operation.	Noted - Impact scoped out of the assessment.
Planning Inspectorate	On the basis of NE's advice, the Inspectorate is content that effects on terrestrial European sites can be scoped out of the impact assessment. Should this conclusion be subject to change as the Proposed Development progresses, the ES and HRA Report must clearly describe all likely significant effects to European sites. Where the Applicant concludes there are no pathways that could lead to effects on terrestrial European sites from the Proposed Development,	Noted - Effects on terrestrial European sites scoped out of the assessment. Meeting notes from Natural England's Discretionary Advice Service (DAS) is provided in Volume 2, Appendix 1.12 of the ES, which includes advice regarding the scoping out of effects on terrestrial European sites.

Stakeholder	Summary of Response	Formal response
	the ES should provide a justification as to why there would be no pathways of effect on European sites.	
Planning Inspectorate	The Scoping Report does not list specific non-statutory sites for consideration in the impact assessment. The Applicant's attention is directed to the responses of NE and the EA at Appendix 2 to this Opinion with regards to potential County Wildlife Sites (CWS) that lie within or near to the study area, which may be affected by the Proposed Development. The ES should clearly identify and assess likely significant effects to non-statutory sites where they could occur. The Applicant should seek to agree the scope of the assessment for such sites with the relevant consultation bodies, where possible.	Features of statutory and non-statutory designated sites were considered when identifying the list of Important Ecological Features (IEFs) listed within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation. The assessment of effects for the Proposed Development in relation to ecological sites (including statutory and non-statutory sites) has been assessed in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation.
Planning Inspectorate	The Inspectorate notes a suite of project-specific ecological surveys have been carried out between 2021 to 2023 and are ongoing in 2024. Paragraphs 1.4.6 and 6.2.6 describe that a DCO application is anticipated in Autumn 2024. Limited information is provided on the extent of the further data collection in 2024, including information on the proposed locations and scope of planned surveys, and when data collection would be completed. The Inspectorate advises that survey effort should be designed to provide sufficient information such that the baseline data in the ES submitted at application is adequate for the purposes of assessing the likely significant effects of the Proposed Development.	Details of the surveys undertaken to date and their coverage are provided within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES. The results of the surveys are presented in Volume 2, Appendices 1.1 to 1.11 of the ES. The onshore ecology assessment has been prepared under the precautionary assumption of species presence at the Converter Site and Alverdiscott Substation Site and between the A39 and Landfall, where surveys have not been possible prior to submission of the DCO application. This approach is considered to define a sufficiently robust baseline evaluation for an accurate assessment of the 'realistic worst case' likely significant effects of the Proposed Development. This, in combination with an assumption that the Proposed Development will be undertaken to the maximum design limits (unless it can be demonstrated at this stage that it is possible to reduce these) means that the assessment undertaken in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation should provide an accurate assessment of the 'maximum design scenario'. Survey data collected from 2024 and 2025 will not require placement of additional mitigation measures which have not been included. The final CEMP(s) will use the data in defining how and where the measures will be implemented in practice.

Stakeholder	Summary of Response	Formal response
Planning Inspectorate	The Scoping Report does not at this stage identify whether there are any ancient woodland or veteran tree habitats present in the study area that could be affected by the Proposed Development. The ES should include an assessment of the effects of the Proposed Development on ancient woodland and veteran trees, where significant effects are likely to occur, and explain the effort made to avoid effects on ancient woodland and veteran trees, and increased fragmentation of these habitats. Measures to fully mitigate direct and indirect effects of the Proposed Development on ancient woodland, veteran trees, or other irreplaceable habitats should be clearly described and appropriately secured.	The arboricultural (tree) surveys and Arboricultural Impact Assessment are set out in Volume 4, Appendix 2.6: Tree Survey and Aboricultural Impact Assessment of the ES. It identifies that no Veteran Trees or trees within Ancient Woodland are proposed for removal. There are no areas of ancient woodland or replanted ancient woodland within the Proposed Development. None of the trees within or adjacent to the Proposed Development have been classified as Veteran or Ancient based on their structure and size. Further details are provided in Volume 4, Appendix 2.6: Tree Survey Report and Arboricultural Impact Assessment of the ES. The boundary of one block of ancient woodland adjoins the boundary of the Proposed Development at Hallsannery. A minimum buffer of 15 m will be created between the working area and the boundary of the ancient woodland through Heras fencing. Additional native tree and shrub planting is proposed to create a new woodland habitat alongside this existing ancient woodland. This is presented in Volume 2, Figure 1.4. Further details on proposed planting is included within the Outline Landscape and Ecology Management Plan (LEMP) (document reference 7.10).
Planning Inspectorate	Although a proposed a Biosecurity Method Statement and Invasive Species Management Plan are described as measures to be adopted for the Proposed Development, the Scoping Report does not describe whether any INNS have been identified in the study area or whether the impact of INNS is proposed to be included in the assessment of likely significant effects. The Applicant's attention is directed to the comments of the EA at Appendix 2 to this Opinion, who have identified that there are multiple records of INNS within the study area, including Japanese knotweed, Indian balsam, Wireweed/Japanese seaweed, and common cord-grass. The ES should describe the INNS present within the ZoI of the Proposed Development and include an assessment of significant effects resulting from the spread of INNS, where likely to occur.	The presence of Invasive Non-Native Species (INNS) in the ZoI of the Proposed Development is set out in the Ecology Desk Study (Volume 2, Appendix 1.2 of the ES) and updated Phase 1 Habitat (Volume 2, Appendix 1.1 of the ES). The ZoI covers a radius of 2 km around the Onshore Infrastructure Area extending beyond the ZoI. Himalayan balsam has not been recorded within the footprint of the Proposed Development. Japanese knotweed has been identified in one location on the edge of the Onshore HVDC Cable Corridor while Montbretia plants occurs in several locations. The extent and distribution can change over time. Robust measures include exclusion and treatment of stands of Schedule 9 INNS outside of the working areas and target removal where avoidance is not possible. The implementation of measures to prevent the spread of any INNS as a result of the construction activities associated with the Proposed Development are set out in the Outline Onshore Construction

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		Environmental Management Plan (On-CEMP) (document reference 7.7). Up to date survey data covering all INNS within and adjoining to working areas, in advance of the commencement of construction, and the full implementation of the detailed final On-CEMP(s) will ensure no significant effect could occur.
Planning Inspectorate	Table 7.2.2 contains limited information on the types of effects that may occur to ecological receptors from the Proposed Development, which are described very broadly in this table (e.g. impacts on designated sites). In respect of species, the description of likely impacts focuses largely on temporary and permanent habitat losses, with limited reference to other potential effects such as disturbance. There is also no reference to potential disturbance due to lighting associated with the Proposed Development during construction or operation. The ES should include an assessment of all likely significant effects to important ecological features/receptors, including the potential impact of lighting on watercourses and other habitats of importance to light-sensitive species such as otters and bats.	Commitments relating to construction and operational noise and lighting are detailed within Volume 1, Appendix 3.1: Commitments Register of the ES. Construction site lighting would only operate when required and would be designed, positioned and directed to avoid unnecessary illumination of adjacent properties, sensitive ecological receptors and users of public footpaths. The design of the construction lighting would accord with details provided in the Outline On-CEMP (document reference 7.7) and the latest guidance. Temporary lighting compliance with the On-CEMP restrictions will be subject to review and monitoring by the ECoW. Operational lighting at the Converter Site would be designed in accordance with the Design Principles (document reference 7.4), as well as the latest guidance and legislation. This would include directional lighting to minimise overspill into the surrounding landscape.
Planning Inspectorate	It is unclear from the Scoping Report what potential effects on statutory designated sites are to be included in the impact assessment. The Inspectorate notes the statement that the Proposed Development would not directly affect the Torridge Estuary SSSI/LNR and would avoid its primary estuarine habitats by drilling under using HDD. At present there is no information in the Scoping Report to confirm the likely proximity of construction activity to the designated sites and their interest features, such as the likely location of HDD exit/entry points, compounds, and haul roads. The SSSI and LNR are designated for their important estuarine habitats, plants and bird species. The Inspectorate considers there is the potential for likely significant effects during construction (and decommissioning) to these sites and their features from potential	The location of HDD crossing sites and associated compounds are presented in Volume 1, Appendix 3.2: Onshore Crossing Schedule of the ES. These locations have been considered within the hydrology and flood risk assessment. The impact of contaminated runoff on the quality of surface water and groundwater receptors' is discussed within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES. Mitigation measures are detailed within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES. HDD (or other trenchless methodology) entry and exit points will be located at least: • 8 m away from the banks of ordinary watercourses, • 16 m from banks of the River Torridge, a tidal EA Main River and the landward toe of associated formal and informal flood defences. Impacts on designated sites due to potential changes to air quality and

Stakeholder	Summary of Response	Formal response
	changes to air quality, including dust deposition, changes to water quality, including proximity of HDD and accidental release of drilling fluids such as bentonite, and disturbance to species. The ES should include an assessment of such impacts to designated sites and features, where likely effects could occur.	disturbance to species are considered within Volume 2, Chapter 7: Air Quality and Volume 2, Chapter 1: Onshore Ecology and Nature Conservation, respectively. Deterioration of water quality is discussed within Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions, and groundwater dependent receptors are discussed within Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions,
Planning Inspectorate	The ES should confirm whether any European Protected Species licences and/or mitigation licenses for other protected species licenses would be required. To provide the Examining Authority (ExA) with assurance that any necessary licence(s) are likely to be obtained, the Applicant should seek to obtain letters of no impediment (LoNI) from NE where possible. The Applicant is referred to the Inspectorate's Advice Note Eleven, Annex C.	The ecology and nature conservation chapter (see Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES) confirms that a European Protected Species (EPS) licence will be required for hazel dormouse and under a precautionary approach, assumes that an EPS licence will be required for the loss of at least one bat roost. The draft dormouse EPS licence will draw upon survey data obtained in 2010, 2021/2022, 2023 and 2024 with the findings consistently showing dormouse populations are widely distributed in the landscape crossed by the cable route, with most activity recorded close to woodland. The draft licence application will draw upon habitat status and connectivity as well as the survey data. This will allow the potential impacts of Proposed Development to be confidently predicted and inform the mitigation measures to minimise temporary fragmentation. The trees within the Order Limits have been subject to ground level assessment with additional and updated assessments ongoing in autumn 2024. All trees with bat roost potential that could be adversely affected will be subject to climbing surveys in autumn/winter 2024. A draft licence and method statement will be prepared in relation to the potential for bat roosts in trees to be affected. The draft licence applications and method statements will be issued to Natural England for their assurance that any such licences would be approved and 'Letters of No Impediment' (LoNI) can be issued from licensing authorities (Natural England).
Planning Inspectorate	Noting that the net gain enhancements are also proposed as part of the Proposed Development, the ES should clearly distinguish between measures intended to avoid or reduce the potential for likely significant	The mitigation measures proposed as part of the Proposed Development are defined as primary, secondary and tertiary mitigation, as well as enhancements. Proposed mitigation measures and

Stakeholder	Summary of Response	Formal response
	effects, and those which have been identified for enhancement only.	enhancements are included within Volume 1, Appendix 3.1: Commitments Register of the ES.
Planning Inspectorate	The Scoping Report Ecology and Nature Conservation aspect chapter does not include reference to measures to protect the estuarine and downstream habitats from contamination/pollution during construction activities. The ES should provide details of proposed measures to avoid contamination or pollution of estuary and downstream habitats and explain how these measures will be secured.	Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES outlines the measures to avoid contamination/pollution incidents downstream on the estuary, although this will primarily be achieved by the proposed trenchless crossing method. Measures and methods to ensure downstream contamination events are avoided are set out in the Outline Bentonite Breakout Plan (document reference 7.20), Outline Pollution Prevention Plan (document reference 7.7, Appendix A) and Outline On-CEMP (document reference 7.7).
Planning Inspectorate	The ES should consider the potential for protected and notable species to become trapped in open trenches, such as but not limited to otters and badgers. Appropriate measures should be secured through the draft DCO (dDCO) to mitigate for such events.	Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES provides an assessment of impacts on protected and notable species during the construction phase. The On-CEMP would be developed in accordance with the Outline On-CEMP (document reference 7.7), which outlines measures to prevent trapping terrestrial mammals or other wildlife in excavations.
Planning Inspectorate	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.	Information on the specific location of places of rest and other places used by sensitive species have been provided as a confidential appendix to the ES. Redacted versions have also been provided to ensure sensitive information remains confidential: see Volume 2, Appendix 1.6: Otter and Water Vole Survey and Volume 2, Appendix 1.7: Badger Survey.
Planning Inspectorate	Given that the operation/ maintenance of the onshore elements is unlikely to require additional land take, the Inspectorate agrees that this matter is unlikely to give rise to significant effects. However, consideration should be given to the potential for changes to groundwater levels and/ or heat output from buried cables to result in the deterioration of buried archaeological/ geoarchaeological assets	The cable trenches would be backfilled with the excavated material, which would not affect the current permeability of the subsurface deposit sequence, thus there would be no dewatering of organic deposits. During transmission of power, buried cables generate heat which dissipates to the surrounding ground. The heat loss from electrical

Stakeholder	Summary of Response	Formal response
	and how the risk of such impacts would be managed. Where significant effects are likely, this matter should be scoped into the ES.	cables has the potential to alter the environment and therefore, damage any waterlogged archaeological remains. Until the final engineering design and soil structure are known, it is not possible to determine the maximum heat loss and subsequent dissipation of heat. Regardless, any heat dissipation would be localised to the areas immediately surrounding the onshore cables and ducts. These same areas, including any sub-surface archaeological/ geoarchaeological remains, would have been disturbed during the installation of the buried cables during the construction phase. These remains, if present, will have been considered during the construction phase and effects mitigated where possible (See Volume 2, Chapter 2: Historic Environment of the ES).
Planning Inspectorate	The Inspectorate notes that unlike for the operation phase above, no justification is presented in the Scoping Report to explain why this matter is scoped out for decommissioning. The Inspectorate agrees that should loss of, or harm to, buried archaeological remains and deposits of geoarchaeological interest have occurred in the construction phase and no further loss or harm/disturbance occurs at the decommissioning stage, this can be scoped out of the impact assessment. However, in the absence of such confirmation, the ES should include an assessment of decommissioning effects, where likely significant effects could occur, or further evidence why likely significant effects would not arise.	Effects arising from impacts on buried archaeological and geoarchaeological resources during decommissioning have been scoped out, as set out in as set out in Volume 2, Chapter 2: Historic Environment, section 2.5 of the ES. The Outline Decommissioning Strategy (document reference 7.17) sets out that onshore decommissioning plan(s) would be developed if decommissioning is required. An onshore decommissioning plan would be developed in a timely manner in consultation with the relevant consultees and prior to commencement of decommissioning. It is currently considered that the decommissioning of the onshore elements of the Proposed Development will not require additional land take and is unlikely to damage or result in the permanent loss of buried archaeological and geoarchaeological resources. Any such resources would have been suitably examined during the construction phase. If this is not the case and additional land take is required for decommissioning, a suitable programme of archaeological work will be agreed with the relevant consultees as part of the onshore decommissioning plan.
Planning Inspectorate	The Inspectorate agrees that likely significant effects on the settings of above ground heritage assets during operation and maintenance from the Proposed Development (excluding the converter stations) are	Noted - this has been scoped out of the assessment.

Stakeholder	Summary of Response	Formal response
	unlikely and is content that this matter can be scoped out of further assessment.	
Planning Inspectorate	The Design Manual for Roads and Bridges LA 106 was updated in 2020 and the National Planning Policy Framework was updated in 2023 (although the latter is correctly referenced at Paragraph 7.3.3 of the Scoping Report). The Applicant's attention is directed to the response of Historic England at Appendix 2 of this Opinion, which highlights other guidance and legislative documents which the Applicant should have regard to. The ES should be based on up to date and relevant guidance documents.	The assessment has been undertaken with reference to the most up to date and relevant guidance documents, including the Design Manual for Roads and Bridges (2020) and the NPPF (2023). It has also been undertaken with reference to the current relevant guidance and legislative documents, including those highlighted by Historic England. A full list of legislation and guidance utilised during this assessment can be found in Volume 2, Chapter 2: Historic Environment of the ES and in Volume 2, Appendix 2.1: Historic Environment Desk-Based Assessment of the ES.
Planning Inspectorate	The Scoping Report states that a study area of 5km will be used to assess the effects on heritage assets resulting from the Converter Site. A 1km study area has been set for impacts on heritage assets resulting from the cable corridor. The Zone of Theoretical Visibility (ZTV) has not yet been established and therefore it is not possible at this stage to understand if there may be any heritage assets located outside the respective 5km and 1km study areas which may be affected. Where significant effects on heritage assets beyond 5km and 1km respectively are identified, they should be assessed in the ES. Additionally, the study area must take into account any likely significant effects associated with temporary elements of the Proposed Development such as haul roads and utility diversions. See also the Inspectorate's comment at ID 2.1.5 above with respect to the proposed Alverdiscott Substation Connection Development, which is not referenced in this aspect chapter.	A ZTV has been established for the Converter Site. Designated heritage assets potentially affected by the Converter Site through development within their setting are listed in Volume 2, Chapter 2: Historic Environment and shown in Volume 2, Figure 2.3 of the ES, with further information presented in Volume 2, Appendix 2.4: Settings Assessment of the ES. Examination has also been made regarding potential designated heritage assets outwith the 5 km settings study area that could be affected by the Proposed Development – no such assets have been identified. The study areas identified in Volume 2, Figure 2.1 of the ES cover all elements of the Proposed Development with the potential for impacts on heritage assets. These include temporary elements such as utility diversions, haul roads and construction compounds. The Alverdiscott Substation Connection Development is not part of the Proposed Development, however it is addressed within Volume 2, Chapter 2: Historic Environment, section 2.13 of the ES as part of the Cumulative Environmental Assessment.
Planning Inspectorate	The ES should include a figure (similar to Figure 7.3.1) to show the location of the converter site in relation to the identified assets, in addition to the cable route. The study areas/ZoI should also be shown on this figure.	The locations of designated heritage assets in relation to the Converter Site together with the 5 km study area and the ZTV are shown in Volume 2, Figure 2.3 of the ES. The location of designated heritage

Stakeholder	Summary of Response	Formal response
		assets in relation to the 1 km study area for the cable route is shown in Volume 2, Figure 2.2 of the ES.
Planning Inspectorate	The Applicant's attention is directed to the comments of Torridge District Council at Appendix 2 to this Opinion with regards to specific heritage assets that may be affected by the Proposed Development and should be considered in the assessment, where likely significant effects could occur.	Comments from Torridge District Council have been addressed, and the assets they identified incorporated within this assessment. The site of the possible windmill has been investigated through geophysical survey and trial trenching (see Volume 2, Appendix 2.2: Onshore Geophysical Survey Report and Volume 2, Appendix 2.3: Preliminary Trial Trenching Report of the ES).
Planning Inspectorate	The ZTV developed for the Landscape and Visual Impact Assessment (LVIA) should be used to confirm the heritage assets that may experience visual impacts from the Proposed Development. The assessment should be supported by appropriate visualisations such as photomontages to help illustrate the likely impacts of the Proposed Development. Effort should be made to agree appropriate viewpoint locations and such visualisations with relevant consultation bodies, including Local Authorities and Historic England. Cross reference can be made to the LVIA ES assessment to avoid duplication.	A ZTV has been prepared for the Converter Site and incorporated within the historic environment assessment. Designated heritage assets potentially affected by the Converter Site through development within their setting are listed in Volume 2, Chapter 2: Historic Environment of the ES and shown in Volume 2, Figure 2.3 of the ES. Detailed information is presented within Volume 2, Appendix 2.4: Settings Assessment of the ES. The assessment has been supported through review of the visualisations presented within Volume 4, Appendix 2.5: Landscape Visualisations of the ES. An additional visualisation in relation to the Scheduled Monument at Higher Kingdon is presented in Volume 2, Appendix 2.4: Settings Assessment of the ES (see Figures 5 to 7).
Planning Inspectorate	The Scoping Report states that the WSI would be developed prior to construction and that this would detail survey and mitigation requirements during the construction phase. Where possible, the WSI should be developed in conjunction with the Local Authority(ies)'s Historic Environment Team and Conservation Officer/archaeological advisor to ensure that local knowledge is captured.	The Outline Onshore Written Scheme of Investigation (document reference 7.8) has been developed in consultation with the archaeological advisors to the Local Authority. A detailed Onshore Written Scheme of Investigation (WSI) will be submitted to the archaeological advisors to the Local Authority for their review and approval prior to the commencement of the works.
Planning Inspectorate	The Inspectorate notes that the assessment methodology proposed for this aspect will follow the matrix approach described in Section 5 of the Scoping Report, with reference also to the assessment guidance documents listed at Paragraph 7.3.22, including the Design Manual for Roads and Bridges (DMRB) and Historic England guidance. The Applicant's attention is directed to the comments of Historic England at Appendix 2 to this Opinion with regards to the approach to recording	In addition to the matrix-based approach set out in the Scoping Report, the assessment of individual impacts is also articulated in an accompanying narrative setting out the significance of any heritage assets affected and the level of impact and harm, and duly cognisant of the relevant Historic England guidance. This information is presented within Volume 2, Appendix 2.4: Settings Assessment of the ES. This

Stakeholder	Summary of Response	Formal response
	significance of heritage assets (both designated and nondesignated). The Applicant should make effort to agree the approach with Historic England and other relevant consultation bodies. In the event that the Applicant's approach to recording significance of an asset deviates from the advice it has received, the ES should explain why and provide justification based on relevant evidence and professional opinion.	approach has proved acceptable to Historic England in recent similar DCO applications.
Planning Inspectorate	Impacts on heritage assets from alterations to drainage patterns, changes to groundwater flows and levels, and from the movement of contaminants or pollutants should be assessed, where significant effects are likely to occur. This should consider the potential for hydrological effects from both drying out and inundation. Cross references to Chapter 7.5: Hydrology, Geology and Ground Conditions should be included.	No areas of waterlogged ground have been identified within the Onshore Infrastructure Area therefore there is no potential for the Proposed Development to cause drying out of such ground with consequent effects on deposits of palaeoenvironmental importance. The Proposed Development would not lead to alterations in drainage patterns or groundwater flows. This is set out in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.
Planning Inspectorate	The Scoping Report proposes to scope this matter out as the onshore High Voltage Direct Current (HVDC) cable corridor is not likely to generate contaminated runoff. Noting that the cable would be underground and would require infrequent on-site inspections and corrective maintenance (Paragraph 4.11.6 of the Scoping Report), the Inspectorate agrees that this matter can be scoped out of the assessment.	Noted - this has been scoped out of the assessment.
Planning Inspectorate	Potential for contaminated runoff from operation and maintenance of the proposed converter station and/ or Alverdiscott Substation Connection Development is not referred to in Table 7.4.4 or Table 7.4.5. For the avoidance of doubt, the Inspectorate advises that this matter should be scoped into the impact assessment, or it should otherwise be explained in the ES, with evidence of agreement from relevant consultation bodies, why significant effects are not likely to occur. See also the Inspectorate's comment at ID 2.1.5 above in this regard.	This has been scoped out of the assessment. Activities associated with the operation and maintenance of the onshore elements of the Proposed Development are unlikely to generate contaminated run-off. Furthermore, the drainage strategy for the Converter Site would include measures to treat any pollution or contamination on-site. Further rationale for scoping out this impact during operation and maintenance phase is discussed in greater detail within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES. An Outline Drainage Strategy is also provided as part of the DCO application (document reference 7.22).
Planning Inspectorate	**Increased flood risk from additional surface water runoff during operation and maintenance of the onshore HVDC cable corridor**	Noted - this has been scoped out of the assessment.

Stakeholder	Summary of Response	Formal response
	The Scoping Report proposes to scope this matter out as the minor increase in impermeable land created from the presence of the onshore HVDC cable is unlikely to result in notable change in drainage patterns and surface water runoff rates. On that basis, the Inspectorate agrees that this matter can be scoped out of the assessment.	
Planning Inspectorate	**Increased flood risk arising from additional surface water runoff during operation of the Converter Site (construction and decommissioning stage)** On the basis that this impact would not occur until the operation phase, an assessment of this matter during the construction and decommissioning phase can be scoped out of the assessment.	Noted - this has been scoped out of the assessment.
Planning Inspectorate	**Increased flood risk from damage to existing flood defences during operation** The Scoping Report proposes to scope this matter out but does not present any reasoning. The Inspectorate notes that there are formal flood defences along the banks of the River Torridge (Paragraph 7.4.22 of the Scoping Report), which the proposed onshore HVDC cable corridor would cross. However, it is unclear where the flood defences are located and whether the presence of the cable during operation could affect them. This matter should be scoped into the assessment, or it should otherwise be explained in the ES, with evidence of agreement from relevant consultation bodies, why significant effects are not likely to occur.	As detailed within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES, this impact during operation and maintenance phase has been scoped out. This is because it is unlikely that any operation and maintenance activities would impact the integrity (or efficacy) of existing flood defences.
Planning Inspectorate	**Damage to existing field drainage and existing water pipelines during operation** The Scoping Report proposes to scope this matter out but does not present any reasoning. Given the nature of the Proposed Development and the limited operational maintenance requirements, as described in Chapter 4 of the Scoping Report, the Inspectorate considers it is unlikely that damage would be caused to field drainage and water pipelines during operation. This should be confirmed in the	Noted, rationale for scoping out this impact during operation and maintenance phase is discussed in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES. Activities that could damage existing field drainage are to take place during construction and decommissioning phases only. As such it is unlikely that damage would be caused to field drainage during operation. Therefore, the potential impact of damage to field drainage during operation and maintenance of the onshore elements of the Proposed Development is unlikely to result in significant effects and has been scoped out of the assessment.

Stakeholder	Summary of Response	Formal response
	ES. Where significant effects are likely, these should be considered in the assessment	
Planning Inspectorate	The Applicant's attention is drawn to the response of the EA at Appendix 2 of this Scoping Opinion, which sets out several additional guidance documents and data sources that may provide information of relevance to establishing the baseline and/ or assessment approach in the ES. This includes information on permitted sites, discharges or abstractions.	Noted. The baseline for the geology, hydrogeology and ground conditions chapter (Volume 2, Chapter 4) and the hydrology and flood risk chapter (Volume 2, Chapter 3) has considered data regarding permitted sites, discharges and abstractions.
Planning Inspectorate	**Flood risk assessment (FRA) climate change allowances** The Scoping Report states that the EA's FRA climate change allowances guidance from 2020 would be used to inform the assessment. The Inspectorate advises the most up-to-date iteration of the climate change allowances (as relevant to the Proposed Development) should be used in the assessment, noting that updates have been made since 2020.	The latest climate change guidance by the EA updated in May 2022 has been used within Volume 2, Appendix 3.1: Flood Risk Assessment of the ES (https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances).
Planning Inspectorate	The Scoping Report states that the landfall area of the Proposed Development would be located within Flood Zone 3. It does not specify whether it is Flood Zone 3a or 3b. The ES should distinguish between Flood Zones 3a and 3b to determine which parts of the site are in areas of 'high probability of flooding' and 'functional floodplain'. This should be shown on a figure. It should specify what infrastructure will be in which flood risk zones. The ES should explain what mitigation is in place, including any requirement for compensatory flood storage, and how this would be secured through the DCO.	As assessed within Volume 2, Appendix 3.1: Flood Risk Assessment of the ES, extents of Flood Zone 3 at the Landfall are considered to be tidal in nature. Extents of Flood Zone 3 across the remainder of the study area are associated with fluvial flows from small ordinary watercourses. Due to data availability, the extent of Flood Zone 3b is informed by the extent of Flood Zone 3. Permanent development includes the Converter Stations and their associated access and egress Proposed permanent development is located within Flood Zone 1. Due to its vulnerability classification and location within Flood Zone 1, 2, 3a and 3b, the Landfall and Onshore HVDC Cable Corridor has been subject to and have deemed to have passed the sequential test and exception test (see Volume 2, Appendix 3.1: Flood Risk Assessment of the ES). Aside from highways improvements, all temporary and permanent elements of the Proposed Development are located within Flood Zone 1 aside from cables which pass underneath extents of Flood Zones 3 via

Stakeholder	Summary of Response	Formal response
		HDD. HDD compounds which include the entry and exit pits are all located within Flood Zone 1. In regards to highways improvements located within Flood Zone 3, these elements of development relate to junction upgrades and road widening and are expected to tie into existing ground levels. As such, no floodplain displacement will occur and no floodplain compensation will be required.
Planning Inspectorate	The Scoping Report contains limited information about the existing flood defences on the River Torridge, which could be affected by the Proposed Development. The ES should clearly include in the baseline, a description of existing (and where relevant, proposed) flood defences that could be impacted by the Proposed Development, together with figures showing their location. Effort should be made to agree the extent of baseline information required with relevant consultation bodies, including the EA.	Location and description of flood defences upon either bank of the River Torridge are provided within Volume 2, Chapter 3: Hydrology and Flood Risk and Volume 2, Appendix 3.1: Flood Risk Assessment of the ES. An Expert Working Group (EWG) meeting was undertaken in April 2024 to discuss baseline information to be provided within the ES. RPS submitted two technical notes to the EA in May and October 2024 detailing flood risk data limitations, the assessment approach of flood risk to the development and anticipated impacts from an increase in peak river flow and sea level rise as a result of climate change. The EA agreed to the approach which has since been incorporated within the FRA and has been submitted as part of the DCO application.
Planning Inspectorate	The Scoping Report states that no water sampling or analysis of existing watercourses and ground receptors within the study area is proposed to inform the assessment of effects from contaminated runoff. It is proposed to rely on desk-based information. The Inspectorate advises that effort should be made to seek to agree the requirement for water sampling and analysis with relevant consultation bodies, including the EA.	Classification data for each Water Framework Directive (WFD) waterbody within the study area from 2019 and 2022 has been used to inform the water quality baseline within the hydrology and flood risk study area. As such, additional surface water sampling is not expected to be required. Taking a precautionary approach in assuming surrounding water bodies have achieved/maintained 'good' status at the time when construction begins, the surface watercourses and groundwater bodies within the study area are to be assessed with a WFD status of 'good'. 'The impact of contaminated runoff on the quality of surface water and groundwater' which discusses how mitigation measures adopted as part of the Proposed Development will ensure no degradation to WFD waterbodies will occur. Mitigation measures are presented within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.. Following submission of the DCO and during detailed design the need

Stakeholder	Summary of Response	Formal response
		for water sampling will be reviewed and if necessary, consultation will be undertaken with the relevant consultees including the EA.
Planning Inspectorate	In addition to potential for contaminated run-off during construction, the assessment should describe how sewage from construction welfare facilities would be discharged/ managed and assess any significant effects likely to occur.	The impact of contaminated runoff on the quality of surface water and groundwater is discussed within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.
Planning Inspectorate	For the avoidance of doubt, the assessment should also consider impacts from increased flood risk from additional surface water runoff arising at the existing Alverdiscott substation, if extension or upgrade works are proposed in the DCO, and for any highways' improvements, where significant effects are likely to occur (in addition to impacts at the converter station). The Inspectorate's comment at ID 2.1.5 with regards to the assessment approach, dependent on whether the Alverdiscott Substation Connection Development works are within the DCO or subject to a separate consenting process, also apply.	The development at the Alverdiscott Substation Connection Development is not included within the DCO application. Impacts have been assessed cumulatively within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.
Planning Inspectorate	In addition to field drainage and water pipelines, the assessment should also identify any land drains and/ or utilities infrastructure (e.g. foul sewer or oil-insulated cables) that may be present and assess potential impacts from damage to this infrastructure, where significant effects are likely to occur.	The impact of damage to the existing water supply and drainage infrastructure is considered within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.
Planning Inspectorate	The Scoping Report states that surface water attenuation modelling would be undertaken to inform the assessment where appropriate. Effort should be made to agree the scope of any modelling required to inform the assessment with relevant consultation bodies, e.g. the EA and lead local flood authority (LLFA). If desk-based analysis only is relied upon, the ES must clearly explain why this data is sufficient to establish the baseline from which to undertake an assessment	Noted. The Converter Site Drainage Strategy will be developed post-consent, in accordance with the Outline Drainage Strategy (document reference 7.22) and would be prepared in line with national and local policy guidance and technical standards. The climate change allowance to be incorporated within the drainage strategy has been discussed and agreed with the LLFA within the April 2024 meeting with the LLFA and EA. A meeting with the LLFA in October 2024 discussed and agreed pollution prevention measures.
Planning Inspectorate	The Inspectorate advises that an outline version of the proposed SFWMP should be submitted as part of the ES. It should include a description of any measures required to avoid impacts to surface	A Construction Drainage Strategy is proposed, which would incorporate pollution prevention and flood response measures to ensure that the potential for any temporary effects on water quality or flood risk are

Stakeholder	Summary of Response	Formal response
	water flow paths and how reinstatement works would be carried out to avoid impacts on surface water flooding.	reduced as far as practicable during the construction stage. Details regarding the proposed Construction Drainage Strategy has been included within the Outline On-CEMP (document reference 7.7) which forms part of the application for development consent. Mitigation measures adopted as part of the Proposed Development are presented within Volume 2, Chapter 3: Hydrology and Flood Risk.
Planning Inspectorate	The Inspectorate advises that measures required to manage flood risk during construction, including to prevent sediment and debris flowing into surface watercourses/ drainage features, should also be described in the ES and demonstrably secured in the dDCO. Such measures could be specified in the proposed onshore CEMP(s).	Measures required to manage flood risk during construction, including to prevent sediment and debris flowing into surface watercourses/drainage features are detailed within the Outline On-CEMP (document reference 7.7). These measures would be secured as part of the DCO. Mitigation measures adopted as part of the Proposed Development are also presented within Volume 2, Chapter 3: Hydrology and Flood Risk.
Planning Inspectorate	The Inspectorate advises that the ES should include reference to how the sequential and exception tests have been applied in the FRA, as relevant.	The Sequential Test and Exception Test has been undertaken within the Volume 2, Appendix 3.1: Flood Risk Assessment of the ES for the Onshore HVDC Cable Corridor which passes underneath of Flood Zone 3 and highway improvements located within Flood Zone 3. The Sequential Test and Exception Test have been deemed to have been passed for the Converter Site and due to being located within Flood Zone 1 and assessed to have a low risk of flooding from all sources.
Planning Inspectorate	Section 7.4 of the Scoping Report primarily focuses on risk from additional surface water runoff due to the Proposed Development but baseline information in the Scoping Report suggests that there is flood risk associated with other sources including coastal and reservoir. No reference is made to the potential for groundwater flood risk. Table 7.4.4 states that the FRA will assess flood risk from all sources. This should include figures showing relevant flood mapping for all sources. The FRA should inform the assessment in the ES, which should also consider all relevant forms of flood risk which the Proposed Development may be affected by or add to where these could give rise to likely significant effects.	Volume 2, Appendix 3.1: Flood Risk Assessment of the ES considers and assesses flood risk from all sources, including coastal, reservoir and groundwater.
Planning Inspectorate	The Scoping Report lists onshore and transitional WFD waterbodies at Table 7.4.2 but does not describe an approach to WFD assessment.	Volume 2, Appendix 3.2: Onshore Water Framework Directive Assessment has been undertaken as part of the Volume 2, Chapter 3:

Stakeholder	Summary of Response	Formal response
	The Inspectorate draws the Applicant's attention to Advice Note Eighteen: The Water Framework Directive, which provides a suggested outline methodology for WFD assessment. If the Proposed Development has potential to impact upon WFD waterbodies, then a WFD assessment should be submitted as part of the DCO application either as an appendix to the ES or as a separate WFD report. The findings of any WFD assessment should inform the ES. The location of WFD waterbodies should be shown on a figure. Where it is determined that a full WFD assessment is not required, a clear justification for this position with evidence of agreement with relevant consultation bodies should be provided.	Hydrology and Flood Risk of the ES. The methodology for the onshore WFD assessment is detailed in Volume 2, Appendix 3.2: Onshore Water Framework Directive Assessment.
Planning Inspectorate	The Inspectorate advises that, in addition to the receptors identified in the Scoping Report, the ES should identify, describe and assess any likely significant effects to the following receptors: • Westward Ho! designated bathing water; • Permitted sites, discharges and/ or abstractions, reflecting data available from the EA's public register; • Jennetts Reservoir and Gammaton Lower Reservoir, in terms of their designated nitrate vulnerable zones; and Torridge Estuary designated shellfish water (refer to the Inspectorate's comments at ID 3.10.7 of this Opinion). The Applicant's attention is drawn to the comments of the EA (Appendix 2 of this Scoping Opinion).	Receptors assessed within this chapter are presented within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES. This includes permitted sites, discharges and/or abstractions, Jennetts Reservoir, and Gammaton Lower Reservoir. Westward Ho! Designated bathing waters and Torridge Estuary designated shellfish waters are located outside of the Zone of Influence and thus have not been assessed. However, please see 'The impact of contaminated runoff on the quality of surface water and groundwater' which discusses how mitigation measures adopted as part of the Proposed Development will ensure no degradation to WFD waterbodies will occur. Mitigation measures are presented within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.
Planning Inspectorate	The Scoping Report suggests that crossings of sensitive watercourses may be required. The ES should describe the nature of any proposed works within or in proximity of sensitive watercourses (i.e. main rivers and Ordinary watercourses). Information should be provided regarding the location, scale, and dimensions of any proposed watercourse crossings/ instream structures, as well as the nature of any associated construction works (e.g. dewatering, trenching, and HDD). The ES should consider the potential of such works to negatively impact watercourses within the study area, including the ecological status of any watercourses protected under the WFD such as the Torridge	Details on crossing methodologies are presented within Volume 1, Appendix 3.2: Onshore Crossing Schedule of the ES. Mitigation measures adopted as part of the Proposed Development is presented within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES. 'The impact of contaminated runoff on the quality of surface water and groundwater' within Volume 2, Chapter 3 of the ES discusses potential impacts and how mitigation measures adopted as part of the Proposed Development will ensure no degradation to WFD waterbodies will occur.

Stakeholder	Summary of Response	Formal response
	Estuary designated shellfish water. The results of the WFD Assessment should inform the ES.	
Planning Inspectorate	**Impact of ground contamination on human health receptors and controlled waters during operation** Given the nature of the Proposed Development and the maintenance requirements described at Section 4.11 of the Scoping Report and noting that any residual risk would be remediated/ mitigated during the construction phase, the Inspectorate agrees that this matter can be scoped out of the assessment for the operation phase. The ES should describe the remediation/ mitigation to be carried out during construction, together with confirmation of how any contaminating substances required e.g. to support operation of the converter substation, would be appropriately stored, and how this would be secured through the DCO.	Noted. Protective measures to be included in the design of the operational drainage strategy have been described in the ES. Further details are provided Volume 2, Chapter 3: Hydrology and Flood Risk of the ES, and the Outline Drainage Strategy (document reference 7.22).
Planning Inspectorate	**Impacts resulting from contact with UXO during operation and decommissioning** The Inspectorate agrees that this matter can be scoped out of the assessment on the basis that any UXO encountered during construction would have been addressed and could not be encountered again during operation or decommissioning. The ES should describe the measures proposed to deal with UXO encountered during construction and confirm how the measures would be secured through the DCO.	Noted. The impact resulting from contact with Unexploded Ordnance (UXO) and associated mitigation measures are covered in Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions.
Planning Inspectorate	The Inspectorate notes that limited information is presented in the Scoping Report as a justification for scoping operational and decommissioning effects out of the ES beyond that there would be no change during these phases. However, based on the commitment to use HDD at the Mermaid's Pool to Rowden Gut SSSI during construction, and noting that this technique is designed to avoid surface excavation across the foreshore or surface laying of cables, coupled with the noted low level of coastal erosion in this location, the Inspectorate agrees that there is unlikely to be a change in the physical environment that would give rise to significant effects during	Noted - impact on geological SSSIs during operation and decommissioning scoped out.

Stakeholder	Summary of Response	Formal response
	operation. Similarly, if the cable is retained in situ on decommissioning, there is unlikely to be an impact pathway to significant effects. The Inspectorate agrees that these matters can be scoped out of the assessment on that basis and provided that the commitment to HDD is demonstrably secured through the DCO.	
Planning Inspectorate	**Impact on mineral resources** The Inspectorate agrees that this matter can be scoped out of the assessment on the basis that final defined study area does not fall within a defined mineral safeguarding or consultation area.	Noted - impact on mineral resources scoped out.
Planning Inspectorate	**Impact of ground contamination on construction workers** The Inspectorate agrees that this matter can be scoped out of the assessment on the basis that protections are required through health and safety measures and other legislation, including the Construction Design Management (CDM) Regulations. The ES should describe the expected measures that would be in place and how these would be secured.	The impact of ground contamination has been scoped out of the assessment, as construction works would be carried out in accordance with relevant Construction Design Management (CDM) Regulations 2015. Further detail is provided within Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions, of the ES.
Planning Inspectorate	In addition to onshore HVDC cable corridor and converter station, if the Alverdiscott Substation Connection Development is part of the DCO, this needs to form part of the study area.	The Alverdiscott Substation Connection Development is not a component of the Proposed Development, and is therefore not considered within the study areas and assessments of topic chapters in Volumes 2, 3 and 4. Instead it is assessed cumulatively where necessary.
Planning Inspectorate	**Geology, Hydrogeology and Ground Conditions Study Area** The study area should include the nearshore area and be of sufficient extent to enable an assessment of all likely significant effects arising from ground conditions and contamination, including where this extends into the offshore area. Effort should be made to agree the final study area with relevant consultation bodies	The study area for geology, hydrogeology and ground conditions is detailed within Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions, of the ES. The study area is shown on Volume 2, Figure 4.1 of the ES.
Planning Inspectorate	**Ground condition surveys** The Scoping Report states that additional surveys are proposed in 2024 to supplement an intrusive survey of the proposed converter station site in 2023. No information is presented about the proposed location and scope of the planned surveys.	Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES provides a summary of the site-specific surveys undertaken to date, including the following: • A targeted site walkover survey was undertaken on 24 January 2023. • A preliminary ground investigation for the Converter Site was

Stakeholder	Summary of Response	Formal response
	The Inspectorate advises that survey effort should be designed to provide sufficient information to inform an understanding of the baseline to enable assessment in the ES. Effort should be made to agree survey location and scope with relevant consultation bodies. The Inspectorate understands from information presented in Table 7.5.4 that a survey is to be undertaken where HDD is proposed at the landfall location within Mermaid's Pool to Rowden Gut SSSI to inform design/ construction techniques. The findings of the survey should be reported in the ES.	undertaken by RPS in February 2023. • Ground investigation is currently being undertaken across the Proposed Development. Further ground investigations to inform mitigation are provided within Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES.
Planning Inspectorate	**Impact of ground contamination to controlled water receptors.** For the avoidance of doubt, the Inspectorate considers that reference to controlled water receptors to be considered in the assessment includes WFD groundwater bodies within the study area. The ES should consider whether the construction and/ or decommissioning of the Proposed Development could negatively impact the status of any groundwater bodies protected under the WFD. The results of the WFD Assessment should inform the ES.	The impact of ground contamination to controlled water receptors is considered within Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES. Furthermore, the assessment of WFD water bodies, including surface water and groundwater bodies is presented in Volume 2, Appendix 3.2: Onshore Water Framework Directive Assessment of the ES.
Planning Inspectorate	The Inspectorate notes the reference to the desk-based assessment, including a conceptual site model (CSM) and preliminary risk assessment (PRA). The Applicant should seek to agree the approach to the assessment, including the CSM and PRA with relevant consultation bodies, including the EA and Local Authority.	The conceptual site model (CSM) and preliminary risk assessment (PRA) are provided within Volume 2, Appendix 4.1: Desk Top Study, Preliminary Risk Assessment and Site Reconnaissance of the ES.
Planning Inspectorate	The Scoping Report states that inter-related effects will be considered in this chapter of the ES, including in relation to potential for a reduction in groundwater levels to impact on flow of surface watercourses. It is not apparent from the Scoping Report where this would be considered and presented. The ES must include an assessment of any likely significant effects on groundwater flow arising from the Proposed Development. Any proposed mitigation and monitoring with regards to groundwater flow effects must be clearly described in the ES, including likely efficacy. Mitigation and monitoring measures should be appropriately secured.	Inter-related effects are presented within Volume 4, Chapter 5: Inter-related Effects of the ES. The assessment of reduced groundwater quantity in aquifer units is provided in Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES. This chapter also presents the proposed mitigation measures and how they would be secured.

Stakeholder	Summary of Response	Formal response
Planning Inspectorate	Table 7.5.3 of the Scoping Report states that the British Geological Survey (BGS) ground stability hazard ratings identify a moderate landslide risk at the valley slides of River Torridge. Paragraph 7.5.30 states there is moderate [risk] rating for compressible ground and uneven settlement at the river crossing. It is unclear whether the Proposed Development would require activities that could result in ground stability hazard and potential likely significant effects. The ES should include an assessment of any likely significant effects and, where relevant, describe any mitigation required and how this would be secured.	Ground stability is discussed within Volume 2, Appendix 4.1: Desk Top Study, Preliminary Risk Assessment and Site Reconnaissance of the ES. The following easements will be maintained between watercourses and all temporary working areas for the Onshore HVDC Cable Corridor and HVAC Cable Corridors, temporary construction compounds and the converter stations. • 8 m away from the banks of ordinary watercourses; and • 16 m from tidal EA Main Rivers and the landward toe of associated formal and informal flood defences. Therefore, construction activities (including the HDD compounds) would be located away from the banks where there would be a ground stability risk.
Planning Inspectorate	**Potential impacts – construction impacts to Mermaid's Pool to Rowden Gut SSSI** For the avoidance of doubt, the assessment should include consideration of any likely significant effects arising from exploratory cores into the rock on the foreshore as part of geological investigation prior to HDD, where such investigation is proposed	The impact of damage to Mermaid's Pool to Rowden Gut SSSI is provided in Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES.
Planning Inspectorate	Table 7.6.2 of the Scoping Report states that impacts of AILs on the safety of users of the highway network during operation and decommissioning are scoped out of the assessment, although no justification is provided and it is not known whether AILs would be required for the decommissioning stage, for example. Taking into account the nature of the operation and maintenance, the Inspectorate is content that this matter can be scoped out. The Inspectorate is also content that the assessment of the construction phase would represent a worst-case, in the event that AILs are required for decommissioning, and therefore considers a detailed assessment of decommissioning traffic impacts can be scoped out of the ES. However, the ES should explain the approach taken.	The approach to the traffic and transport assessment is outlined within Volume 2, Chapter 5: Traffic and Transport of the ES. There are no planned AIL movements to be generated during operation and maintenance of the Proposed Development. During decommissioning, any AILs generated would be the same as those generated during construction and would be subject to the same mitigation measures set out in Volume 2, Chapter 5: Traffic and Transport of the ES. The impacts of AILs on the safety of users of the highway network during operation and maintenance and decommissioning have therefore been scoped out of the assessment.

Stakeholder	Summary of Response	Formal response
Planning Inspectorate	The Scoping Report proposes to scope out impacts of additional vehicle movements on the highway network on: • Driver and pedestrian delay; • Fear and intimidation; • Severance; and • Road safety on the basis that operation and maintenance of the Proposed Development would generate only a limited number of additional vehicle movements on the network. The Inspectorate agrees that due to the likely low numbers of staff to be employed (as described at Paragraph 4.11.4 of the Scoping Report) this matter can be scoped out of the ES	Noted - this has been scoped out of the ES.
Planning Inspectorate	The Scoping Report proposes to scope out impacts of additional vehicle movements on the highway network on: • driver and pedestrian delay; • fear and intimidation; • severance; and • road safety on the basis that the decommissioning phase of the Proposed Development would generate a lower number of additional vehicle movements on the highway network than the construction phase. The Scoping Report also states that measures to be included in the Construction Traffic Management Plan (CTMP), updated as necessary, would also be employed during the decommissioning phase. Although the Inspectorate is content that the assessment of this matter for the construction phase would represent a worst-case compared to decommissioning, the Inspectorate considers that insufficient evidence has been provided to support the scoping out of additional vehicle movements during decommissioning at this stage. The ES should include an assessment of these matters for decommissioning phase,	Decommissioning of the Proposed Development will generate a lower number of additional vehicle movements on the highway network than the construction phase. This is because retired infrastructure/equipment will either be left in situ or transported away from site in bulk, reducing the number of additional vehicle movements required to facilitate decommissioning of the Proposed Development. In addition, measures to be included in the CTMP, updated as necessary, will also be employed during the decommissioning phase. Therefore, the potential impact of additional vehicle movements on the highway network and other transport receptors during decommissioning of the Proposed Development based upon future year baseline conditions that could be estimated at this time would be no higher than those impacts during the construction phase. The potential impacts of additional vehicle movements on the highway network during the decommissioning phase of the Proposed Development has therefore been scoped out of the traffic and transport assessment in Volume 2, Chapter 5: Traffic and Transport of the ES. The preparation of an Outline Decommissioning Strategy (document reference 7.17) has been submitted as part of the DCO application, which details that onshore and offshore decommissioning plans would

Stakeholder	Summary of Response	Formal response
	where likely significant effects could occur, or provide evidence that significant effects would be unlikely to occur.	be prepared in accordance with the principles set out by the strategy, if decommissioning is required.
Planning Inspectorate	The Barnstaple with Bideford and Northam Local Cycling and Walking Infrastructure Plan was recently approved. Consideration of this Plan should be included within the ES.	The contents of the 'Barnstaple with Bideford and Northam Local Cycling and Walking Infrastructure Plan' (January 2024) has been considered throughout Volume 2, Chapter 5: Traffic and Transport of the ES.
Planning Inspectorate	The ES should explain how the study area for the Traffic and Transport assessment has been defined, with reference to the extent of the likely impacts. The Inspectorate notes that agreement will be sought with the relevant highways authorities regarding any additional parts of the highway network that may require consideration in the traffic and transport assessment. The ES should document any consultation undertaken with regards to the scope of the proposed assessment, including matters agreed/not agreed. Where the scope differs from that requested by the relevant highways authority, the ES should provide justification for the alternative approach.	The traffic and transport study area is shown in Volume 2, Figure 5.1 and considers the transport network landward of the MLWS where potential impacts are likely to occur. This includes active travel routes and parts of the highway network most likely to be used by construction traffic and staff movements during the construction of the Proposed Development, as well as all accesses (whether temporary or permanent) and any highway improvements required to facilitate the construction of the Proposed Development. The highway links and transport network within the traffic and transport study area set out in Volume 2, Chapter 5: Traffic and Transport of the ES have been agreed with DCC through the consultation process.
Planning Inspectorate	The Inspectorate advises that collision and casualty data is obtained from https://www.devon.gov.uk/roads-and-transport/safetravel/road-safety/collision-data/ as a source of verified collision data from Devon County Council, the relevant highway authority	The assessment of highway safety presented in Volume 2, Chapter 5: Traffic and Transport of the ES uses verified PIA data obtained from DCC to identify clusters of injury accidents and evaluate the highway safety record of the highway links within the traffic and transport study area.
Planning Inspectorate	The Scoping Report proposes to scope out impacts on human receptors and heritage assets arising from vibration on the basis that additional vehicle movements during the construction and decommissioning phases are unlikely to generate high levels of vibration. The Inspectorate agrees that significant effects are unlikely and is content that this matter can be scoped out of the ES.	An assessment of vibration impacts due to construction traffic has been scoped out of the assessment for the construction and decommissioning phases of the Proposed Development.
Planning Inspectorate	**The impact on human receptors and heritage assets arising from vibration generated during operation and maintenance**	The assessment of predicted impacts on heritage assets during construction of the Converter Site includes consideration of vibration

Stakeholder	Summary of Response	Formal response
	The Scoping Report proposes to scope out impacts on human receptors and heritage assets arising from vibration on the basis that operation and maintenance of the Proposed Development is unlikely to generate high levels of vibration, and the plant strategy for the converter stations would incorporate vibration control as part of the design. The Inspectorate is content that vibration from the operation and maintenance of the onshore cable is unlikely to result in significant effects and agrees this matter can be scoped out of the ES. With regards to the converter stations, the Inspectorate is not in a position to agree to scope out this matter as the location of the converter stations are not yet determined and the distance to any human receptor or historic asset is unknown. The Scoping Report does not provide information on the anticipated vibration levels from the stations. Accordingly, the ES should include an assessment of these matters or the information demonstrating agreement with relevant stakeholders and the absence of likely significant effect. The ES should describe the potential sources of vibration arising from the operation of the converter stations, as well as any measures to control emissions and confirmation of how these are secured through the dDCO or other mechanism.	impacts. This is set out within Volume 2, Appendix 2.4: Settings Assessment of the ES.
Planning Inspectorate	The Scoping Report proposes to scope out impacts on human receptors and heritage assets from noise and vibration associated with the operation and maintenance of onshore cable and associated infrastructure on the basis that impacts are likely to be intermittent, short term and temporary in nature. The impact of noise and vibration generated during the operation and maintenance of the onshore cable and associated infrastructure Considering the nature and characteristics of the operational Proposed Development, the Inspectorate agrees that impacts are	An assessment of vibration impacts due to construction traffic has been scoped out of the assessment for the construction and decommissioning phases of the Proposed Development. This is detailed within Volume 2, Chapter 6: Noise and Vibration of the ES.

Stakeholder	Summary of Response	Formal response
	unlikely to be significant and is content to scope this matter out of the ES.	
Planning Inspectorate	The Scoping Report confirms sound surveys have been undertaken to date, with additional sound monitoring to be undertaken in 2024 and that the locations and methodology proposed will be agreed with the relevant stakeholders prior to deployment of the survey equipment. The location of noise monitoring undertaken to date is not presented in the Scoping Report and therefore it is difficult for the Inspectorate to comment on the locations and scope to date. The Inspectorate expects a project-specific baseline survey. The assessment methodology and choice of noise receptors should be agreed with the relevant local authorities.	A project-specific baseline sound survey has been undertaken at locations representative of the nearest sensitive receptors to the Proposed Development. These locations and the subsequent assessment methodology were agreed with Torridge District Council. Full details of this survey are provided in Volume 2, Appendix 6.1: Baseline Sound Survey of the ES.
Planning Inspectorate	The Scoping Report does not clearly state what constitutes a 'sensitive receptor' for the purposes of the noise and vibration assessment. The ES must include an assessment of noise and vibration impacts on all noise sensitive receptors, including ecological and heritage receptors, where significant effects are likely to occur. The impact assessment should cross-refer to the findings of other relevant aspect chapters, such as Ecology and Nature Conservation and Historic Environment.	Receptor sensitivity for the purposes of the noise and vibration impact assessments is defined in Volume 2, Chapter 6: Noise and Vibration of the ES. The potential impact of noise disturbance on ecological receptors have been assessed in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES.
Planning Inspectorate	The ES should detail the type and number of anticipated vehicle movements during all phases of the Proposed Development and explain the assumptions upon which these have been established. The Inspectorate would expect the ES to confirm whether thresholds would/would not be exceeded to justify scoping out this matter from further assessment.	Expected vehicle movements generated by the Proposed Development are set out in Volume 2, Chapter 5: Traffic and Transport, and Volume 2, Appendix 5.3: Construction Traffic Generation of the ES.
Planning Inspectorate	The Scoping Report proposes to scope out impacts from emission of dust on ecological receptors from onsite activities during construction on the basis that there is only one SSSI within 50m of the Proposed Development Scoping Boundary, which is designated for geological features and is therefore not sensitive to air quality changes. The Scoping Report does not expand on what is included as an 'onsite	With regards to dust, the impacts have been considered on all designated ecological sites within the study area as detailed within Volume 2, Chapter 7: Air Quality of the ES. The air quality study area is provided in Volume 2, Figure 7.1. Air quality impacts on the Kynoch's Foreshore LNR is included within the air quality chapter. Locally designated sites, such as CWS and UWS, within 50 m of the Order Limits have also been considered as ecological receptors.

Stakeholder	Summary of Response	Formal response
	construction activity'. Notwithstanding this, and with reference to Section 7.1 of the Scoping Report and the Inspectorate's comments at ID 3.1.8 above, the Inspectorate considers this statement to be incorrect as there are other designated sites within the scoping boundary, such as Kynoch's Foreshore LNR, and potentially also habitats and species sensitive to dust emissions. It is considered there is insufficient justification provided in the Scoping Report and the Inspectorate does not agree to scope this matter out. The ES should identify sensitive ecological receptors and any potential effect pathways from air quality changes, including dust, and include an assessment of any likely significant effects. This can be included in the Ecology and Nature Conservation ES chapter with reference to information in the air quality assessment.	
Planning Inspectorate	**The impact on ecological receptors arising from air emissions generated by vehicles during the construction phase.** As per the Inspectorate's comments at ID 3.7.1 and ID 3.7.2 above, it is considered that insufficient justification has been provided in the Scoping Report and the Inspectorate does not agree to scope this matter out at this stage. The Inspectorate would expect the ES to provide a detailed explanation of the likely construction emission to justify not undertaking further assessment. The ES should include an assessment of air emissions during construction on sensitive ecological receptors, such as habitats and species of the LNR, during the construction phase where likely significant effects could occur or provide evidence that this matter can be scoped out	Details on the anticipated vehicle movements are included within Volume 2, Chapter 5: Traffic and Transport, of the ES. The results of the transport assessment (detailed in Volume 2, Chapter 5: Traffic and Transport of the ES) indicates that the relevant thresholds are not expected to be exceeded for any individual road during the construction, operation and maintenance, and decommissioning phases. As such, the impact on human and ecological receptors arising from air emissions generated by vehicles has been scoped out, as detailed within Volume 2, Chapter 7: Air Quality of the ES.
Planning Inspectorate	**The impact on human and ecological receptors (dust soling and human health) arising from fugitive dust emissions generated during operation and maintenance of the onshore elements of the Proposed Development** This matter is proposed to be scoped out on the basis that onshore elements of the Proposed Development are unlikely to generate fugitive dust.	Impacts arising from fugitive dust emissions associated with operation and maintenance have been scoped out of the air quality assessment as agreed with the Planning Inspectorate Volume 2, Chapter 7: Air Quality of the ES.

Stakeholder	Summary of Response	Formal response
	The Inspectorate agrees that fugitive dust emissions associated with operation and maintenance of the Proposed Development are unlikely to result in significant effects, and this matter can be scoped out of the ES.	
Planning Inspectorate	The Scoping Report proposes to scope out onshore plant generated impacts on human and ecological receptors during operation and maintenance on the basis that the Proposed Development does not include proposals for any onshore plant or stacks which could generate air emissions. On the basis that there are no stacks and provided no significant emissions are likely to arise from operational plant/stations, the Inspectorate agrees that this matter can be scoped out of the ES.	Impacts arising from emissions from plant and stacks have been scoped out of the air quality assessment as agreed with the Planning Inspectorate detailed in Volume 2, Chapter 7: Air Quality of the ES.
Planning Inspectorate	**Air Quality** The Inspectorate notes that this aspect chapter makes no reference to the proposed Alverdiscott Substation Connection Development (see comment at ID 2.1.5 above).	The anticipated Alverdiscott Substation Connection Development would form part of a separate application to be taken forward by National Grid Electricity Transmission. However, it has been considered cumulatively alongside the Proposed Development. Cumulative impacts for air quality are considered in Volume 2, Chapter 7: Air Quality of the ES.
Planning Inspectorate	**The permanent loss of agricultural land, including the Best and Most Versatile (BMV) land, arising from the Proposed Development – operation and decommissioning** The Scoping Report proposes to scope this matter out during operation and decommissioning phases in Table 7.9.2 but does not present any reasoning, particularly in respect of decommissioning activities. Table 7.9.3 does explain that any permanent effects on agricultural land would occur during the construction phase and would be assessed as part of the assessment of effects for construction. Where there would be no further permanent losses during operational and maintenance or decommissioning activities that would result in likely significant effects on agricultural land, including BMV, the Inspectorate is content that this matter can be scoped out of the	Noted - The impacts during the operation of the onshore development would be limited to maintenance and repair activities and would be small in magnitude, short term and infrequent. Any land impacted during maintenance and repair activities would be reinstated to its original condition, and the potential impact on agricultural land during operation and maintenance of the onshore infrastructure is therefore considered unlikely to result in significant effects and is proposed to be scoped out of the assessment. However, the permanent loss of agricultural land during decommissioning has been considered within Volume 2, Chapter 8: Land Use and Recreation of the ES.

Stakeholder	Summary of Response	Formal response
	impact assessment. However, the ES should clearly describe the assumptions made in respect of decommissioning and potential effects on agricultural land and make clear of the reasonings for the conclusions reached.	
Planning Inspectorate	**The impact of disruption and reduced access to agricultural land during operation and maintenance** The Scoping Report states that impacts during the operation of the onshore development would be limited to maintenance and repair activities and would be small in magnitude, short term and infrequent. Any land impacted during maintenance and repair activities would be reinstated to its original condition, and the potential impact on agricultural land during operation and maintenance of the onshore infrastructure is therefore considered unlikely to result in significant effects and is proposed to be scoped out of the assessment. The Inspectorate is content that there is unlikely to be a significant effect from the level of disruption and reduced access to agricultural and due to operational and maintenance activities. The Inspectorate agrees that this matter can be scoped out on this basis.	Noted - this matter has been scoped out.
Planning Inspectorate	**The impact of disruption and reduced access to recreation resources (e.g. access land, common land, village greens, PRoW, cycle routes and other recreational resources) during operation and maintenance** The Scoping Report states that impacts arising during of the operation of the onshore development would be limited to maintenance and repair activities (e.g. investigation of onshore HVDC cables) and would be small in magnitude, short term and infrequent. The potential impact on recreation resources during operation and maintenance of the onshore infrastructure is considered unlikely to result in significant effects and is proposed to be scoped out of the assessment.	Noted - this matter has been scoped out.

Stakeholder	Summary of Response	Formal response
	The Inspectorate is content that there is unlikely to be a significant disruption and reduction in access to recreational resources due to operational and maintenance activities. The Inspectorate agrees that this matter can be scoped out on this basis.	
Planning Inspectorate	The ES should ensure an assessment of the amenity value of recreational resources is clearly presented in the ES, where likely significant effects could occur, and appropriate cross-referencing is applied between aspect chapters.	Recreational resources are considered within Volume 2, Chapter 8: Land Use and Recreation of the ES, which outlines inter-related effects and cross references to other chapters where relevant. Potential receptor led effects are those affecting the amenity of recreational resources as a result of changes to the visual and acoustic environments arising from the construction, operation and maintenance and decommissioning of the Proposed Development. These are assessed, where relevant, in Volume 4: Chapter 2: Landscape, Seascape and Visual Resources and Volume 2: Chapter 6: Noise and Vibration of the ES. Further details are included within Volume 4, Chapter 5: Inter-related Effects of the ES.
Planning Inspectorate	Where surveys are undertaken in respect to agricultural land classification (ALC) and soil, the Applicant's attention is directed to the response of NE at Appendix 2 of this Opinion, which provides comment on the level of detail recommended. The Inspectorate recommends that effort should be made to agree survey methodology and locations with relevant consultation bodies	Information related to soil surveys is provided in Volume 2, Chapter 8: Land Use and Recreation of the ES. Where complete ALC survey of the land to be permanently affected by the Proposed Development has not been possible, a conservative assumption has been applied to the assessment that assumes that land currently unsurveyed could comprise the best and most versatile land.
Planning Inspectorate	The ES should clearly identify the extent of BMV affected by the Proposed Development and include details of how any adverse impacts on BMV agricultural land would be minimised through design.	The potential effects of the Proposed Development on best and most versatile land are assessed in Volume 2, Chapter 8: Land Use and Recreation of the ES.
Planning Inspectorate	The Scoping Report states that the construction process would take into account the principles of good practice in soil handling at Paragraph 4.9.42. It is considered that the handling, storage and reinstatement of soil should be conducted in accordance with a Soil Management Plan (SMP), or as secured through the CEMP, which sets out good practice mitigation to minimise adverse effects on the soil resource. The ES should address how soils and agriculture would be managed and describe any assumptions made. Any mitigation required should be explained in the ES and appropriately secured.	Measures adopted as part of the Proposed Development are set out in Volume 2, Chapter 8: Land Use and Recreation of the ES. A detailed Soil Management Plan will be prepared in general accordance with the Outline Soil Management Plan that forms part of the ES. A detailed Soil Management Plan has been prepared as part of the Outline On-CEMP submitted as part of the DCO application (document reference 7.7, Appendix D) to ensure that potential adverse impacts on soils can be limited, as far as possible.

Stakeholder	Summary of Response	Formal response
Planning Inspectorate	The ES should describe what mitigation would be put in place to ensure minimal disruption of PRoWs and other recreational resources and how this would be secured through the DCO	An Outline Public Rights of Way Management Plan (document reference 7.11) has been submitted with the DCO application to limit the disruption to PRoWs and other recreational routes during the construction of the Proposed Development.
Planning Inspectorate	Direct habitat loss during operation (excluding operational repair) and decommissioning (if the cable is left in situ) The Inspectorate notes that no justification is presented in the Scoping Report for the proposal to scope these matters out during operation (repair) and decommissioning (in situ). It is also noted that the potential for a change in hydrodynamic regime from localised areas of scour is scoped into the assessment.	In this ES the assessment in Volume 3, Chapter 1: Benthic Ecology for the impact 'Temporary habitat loss/disturbance' considers any direct habitat loss during operation (repair) as a result of any de-burial and re-burial of cable failure points. The assessment for the impact 'Long-term habitat loss/change' considers any direct habitat loss during decommissioning if the cable was left in situ. Effects of changes in hydrodynamic regime are assessed in Volume 3, Chapter 1: Benthic Ecology.
Planning Inspectorate	**Direct habitat loss during operation (excluding operational repair) and decommissioning (if the cable is left in situ)** The Inspectorate considers that there is a possibility for localised scour due to the presence of the offshore cable and cable protection (if required), which could also result in direct habitat loss. This matter should be considered in the assessment, where likely significant effects could occur, or provide evidence demonstrating agreement with the relevant consultation bodies that significant effects are not likely to occur.	The ES assessment in Volume 3, Chapter 1: Benthic Ecology for the impact 'Change in hydrodynamic regime (scour & accretion)' considers the potential for localised scour due to the presence of the offshore cable and cable protection (if required).
Planning Inspectorate	**Physical habitat change during decommissioning (if the cable is removed)** The Inspectorate notes that no justification is presented in the Scoping Report for the proposal to scope this matter out and that paragraphs 4.12.11 to 4.12.14 of the Scoping Report provide limited information about the proposed approach to decommissioning if the cable is removed, beyond it being similar to installation. It is unclear whether the armour protection would be fully removed and any works that might be required to reinstate habitat affected during operation.	In this ES the assessment in Volume 3, Chapter 1 for the impact 'Temporary habitat loss/disturbance' considers any habitat loss during decommissioning if the cable is removed, which is primarily based on the assessment for the construction phase. The decommissioning project description has been updated in this ES, containing further detail compared to the Scoping Report and PEIR (refer to Volume 1, Chapter 3 of the ES).

Stakeholder	Summary of Response	Formal response
	The Inspectorate does not have sufficient evidence to exclude the possibility of likely significant effects and this matter should be scoped into the assessment, where likely significant effects could occur.	It is anticipated the effects of any decommissioning activities would be less than for the construction phase, with e.g. footprint of disturbance less than construction.
Planning Inspectorate	**Physical disturbance and displacement (disturbance of bottom sediments) and changes to water quality (resuspension of sediments and increased sediment loading) during operation (excluding operational repair) and decommissioning (if the cable is left in situ)** The Inspectorate notes that no justification is presented in the Scoping Report to scope these matters out. However, it considers that a pathway for effect from these matters is unlikely to arise during operation and decommissioning from the presence of the offshore cable, the majority of which is predicted to be buried as described at paragraph 4.7.38 of the Scoping Report, and on the basis that there would be no physical works or significant vessel movements. The Inspectorate agrees that these matters can be scoped out of the assessment on that basis. Please note the Inspectorate's comments at ID 2.1.10 of this Scoping Opinion regarding the definitions of operation and operational repair, which also applies to the Inspectorate's comments at ID 3.9.4 to ID 3.9.6 in this table.	'Temporary habitat loss/disturbance' and 'Temporary increase in suspended sediments and sediment deposition' have been scoped out of assessment for operation (excluding operational repair) and decommissioning (if cable is left in situ).
Planning Inspectorate	**Changes to water quality (release of hazardous substances) during operation (excluding operational repair) and decommissioning (if the cable is left in situ)** The Inspectorate notes that no justification is presented in the Scoping Report for the proposal to scope these matters out. However, it considers that a pathway for effect from these matters is unlikely to arise during operation (excluding repair) and decommissioning (in situ) given the limited activities involved and the infrequent vessel movements along the offshore cable corridor, as described in Chapter 4 of the Scoping Report respectively. The Inspectorate agrees that these matters can be scoped out of the assessment on that basis.	'Changes to water quality (release of hazardous substances from sediments)' has been scoped out of assessment for operation (excluding operational repair) and decommissioning (if cable is left in situ).

Stakeholder	Summary of Response	Formal response
Planning Inspectorate	Introduction and spread of INNS during operation (excluding operational repair) and decommissioning (if the cable is left in situ) The Inspectorate agrees that these matters can be scoped out of the ES on the basis that the Applicant has committed to embedded mitigation measures including the production and implementation of a biosecurity plan with incorporation of biosecurity risk assessment during all phases of the Proposed Development (Table 4.8.2 of the Scoping Report). The Scoping Report also indicates that vessel movements during operation (excluding repair) would be minimal with a single vessel per year for the first five years, and five yearly thereafter (Paragraph 4.11.11).	'Introduction and spread of INNS' has been scoped out of assessment for operation (excluding operational repair), and decommissioning (if the cable is left in situ). Embedded mitigation measures including the production and implementation of a biosecurity plan with incorporation of biosecurity risk assessment are presented in Volume 3, Chapter 1: Benthic Ecology of the ES.
Planning Inspectorate	**Introduction and spread of INNS during operation (excluding operational repair) and decommissioning (if the cable is left in situ)** An outline of the biosecurity plan and risk assessment should be submitted with the DCO application. It should describe how available best industry practice would be incorporated into the plan. The ES should also explain the proposed measures and how these are secured through DCO requirements (or other suitably robust methods). Effort should be made to agree such measures with relevant consultation bodies.	An outline biosecurity plan is included as part of the application for development consent which describes how available industry best practice is incorporated into the plan (document reference 7.20). Embedded mitigation measures including the production and implementation of a biosecurity plan (document reference 7.20) have been agreed with relevant consultation bodies and are presented in Volume 3, Chapter 1 of the ES. This is also included within the principal commitments on the deemed Marine Licence and within the Commitments Register (Volume 1, Appendix 3.1 of the ES).
Planning Inspectorate	**Change in hydrodynamic regime (scour and accretion) during construction, operational repair and decommissioning (if the cable is removed)** The Scoping Report states that changes could occur from presence of rock berms, which may be required for cable protection at crossings or in isolated hard seabed areas during operation. The Inspectorate notes the predicted construction timetable and two offshore cable laying phases as described at Paragraphs 4.7.10 to 4.7.12 of the Scoping Report. It appears possible that rock berms would be in place for extended periods of construction activity in advance of the cable becoming operational and that mitigation may also be required during this period. The Inspectorate advises that the potential for change to	Acknowledging that the separate bipoles / cable bundles may be installed in separate construction years, there is potential for hydrodynamic and scour effects to commence prior to completion of the 'construction phase'. However, consistent with the further PINS comment below (The Inspectorate is content for the effect of the introduction of hard substrate to be considered during the operational phase and therefore agrees this matter can be scoped out of the construction stage assessment) the impact 'Change in hydrodynamic regime (scour & accretion)' on benthic ecology receptors has been assessed for the operational phase but not the construction phase. Effects during the operation phase will effectively be worst case with all seabed rock protection and crossings in place.

Stakeholder	Summary of Response	Formal response
	the hydrodynamic regime due to the presence of cable protection should be assessed for the phases during which it is likely to give rise to significant effects and that the ES should describe any mitigation required and explain how this would be secured in the DCO.	
Planning Inspectorate	**Change in hydrodynamic regime (scour and accretion) during construction, operational repair and decommissioning (if the cable is removed** The Inspectorate agrees that there is unlikely to be an effect pathway during operational repair and this matter can be scoped out of assessment.	'Change in hydrodynamic regime (scour & accretion)' has been scoped out of assessment for operation (repair).
Planning Inspectorate	**Change in hydrodynamic regime (scour and accretion) during construction, operational repair and decommissioning (if the cable is removed)** The Inspectorate's comments at ID 3.9.2 of this Scoping Opinion apply equally to this matter in respect of decommissioning. The Inspectorate does not have sufficient evidence to exclude the possibility of likely significant effects and this matter should be scoped into the assessment, where likely significant effects could occur	'Change in hydrodynamic regime (scour & accretion)' has been scoped in to assessment for decommissioning (if the cable is removed).
Planning Inspectorate	**Underwater noise and vibration during operation (including repair) and decommissioning (both options** The Inspectorate does not agree to scope this matter as no supporting evidence has been provided in the Scoping Report. It is unclear whether underwater noise and vibration could be generated during these phases of the Proposed Development for example from vessel movements, cable repair and/ or reburial, and cable removal activity and whether there are noise and/ or vibration sensitive benthic receptors that could be affected by these works. The ES should include an assessment of underwater noise, where likely significant effects could occur, or provide evidence demonstrating agreement with the relevant consultation bodies that significant effects are not likely to occur.	For benthic ecology, underwater noise and vibration has only been assessed for the HDD aspects of construction with justification provided in Volume 3, Chapter 1: Benthic Ecology of the ES. The noise levels that would be generated by construction vessels, by cable laying equipment and during boulder clearance would be very low compared to e.g. much louder sources of noise such as pile driving (an impact which is not associated with the Proposed Development), and any effects on benthic invertebrates are anticipated to be minimal. NE and JNCC have not raised any concerns about underwater noise and vibration in relation to benthic ecology in either their Scoping opinion or in their meetings with the Applicant at PEIR and ES stages.

Stakeholder	Summary of Response	Formal response
Planning Inspectorate	**Sediment heating and electromagnetic fields (EMFs) from the cable during construction and decommissioning (both options)** The Inspectorate notes that no justification is presented in the Scoping Report for the proposal to scope these matters out. However, the Inspectorate considers that a pathway for effect from these matters would only arise when the cable is operational and live, and as such significant effects are not likely to occur during construction and decommissioning. The Inspectorate agrees that these matters can be scoped out of the assessment.	Consideration of sediment heating and EMFs has been scoped out of assessment for construction and both decommissioning options.
Planning Inspectorate	**Guidance** The CIEEM guidelines for Ecological Impact Assessment for Terrestrial, Freshwater and Coastal Environments (2018) was updated in April 2022 as version 1.2. The assessment should refer to the most recent iteration of the guidelines as relevant	The updated CIEEM guidelines have been referred to within the ES but they are still referenced as 2018 (as specified in the 2022 update). This has been referenced as 'CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (version 1.2 – Updated April 2022)' within the reference list in relevant chapters.
Planning Inspectorate	**Guidance** The Applicant's attention is drawn to the comments of NE and the Joint Nature Conservation Council (JNCC) (Appendix 2 of this Opinion) regarding joint NE and JNCC guidance of relevance to subsea cables and the Marine Evidence based Sensitivity Assessment	This guidance has been used to inform the assessment of potential impacts.
Planning Inspectorate	**Study Area** The Scoping Report states that the study area will be based on the pathway for effect likely to have the greatest spatial extent, which is expected to be suspended sediment carried in plumes from cable burial activities. It states for scoping a precautionary approach has been adopted to encompass the ZoI, comprising a 15km buffer from the 500m offshore cable corridor.	The Study Area for benthic ecology is presented in Volume 3, Chapter 1 and Volume 3, Figure 1.1, of the ES. The Study Area comprises the Offshore Cable Corridor with a buffer area between 5 km and 15.2 km. This is a precautionary distance fully encompassing the zone of influence (ZoI) for suspended sediment dispersion (maximum distance of 15.2 km within Bideford Bay) which is the impact with the greatest ZoI (refer to Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES).
Planning Inspectorate	**Study Area** Whilst the Inspectorate agrees that suspended sediment carried in plumes is likely to be pathway resulting in the greater spatial extent, it is noted that no survey or modelling evidence has been presented in the Scoping Report to explain how the proposed 15km buffer relates	

Stakeholder	Summary of Response	Formal response
	to the potential extent of suspended sediment plumes and/ or whether there is potential for effects to extend beyond this including to designated sites with benthic features located outside of the 15km buffer. Section 8.9 of the Scoping Report proposes a 30km buffer for physical processes. The ES should clearly identify and justify the final study area applied to the assessment of effects on benthic ecology, based on the ZoI and considering relevant guidance.	
Planning Inspectorate	**Study Area** Effort should be made to agree whether modelling is required to identify the ZoI, together with scope and extent of any modelling, with relevant consultation bodies.	The methods for the semi-empirical approach used to estimate the ZoI for suspended sediment dispersion have been provided to NE, the MMO and JNCC for comment, with consultation comments included within Volume 3, Chapter 8: Physical Processes of the ES (methods and results are in Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES).
Planning Inspectorate	**Site-specific survey data** The Scoping Report describes site-specific benthic surveys that have been carried out to inform the baseline. In the absence of information on the rationale behind the approach to sampling and the area covered by the survey, it is difficult for the Inspectorate to understand if the baseline data is likely to be adequate. The ES should either demonstrate that the adequacy of the baseline data has been agreed through consultation with relevant consultation bodies (with supporting information e.g. meeting minutes) or present a detailed justification as to why it is considered adequate.	Site-specific subtidal benthic surveys were conducted by GEOxyz between August and October 2023. The survey design consisted of a total of 61 camera transects and 51 grab sample stations covering the length of the Offshore Cable Corridor. Sampling locations were informed by geophysical survey. Data was obtained for the distribution of seabed habitats and associated fauna within the survey area, including assessment of the presence or absence of potential habitats/species of conservation importance including Annex I habitats. Additionally, water profiling was also conducted at each target location. Reports outlining methods and survey results were provided to NE, the MMO and JNCC for information ahead of PEIR consultation, with responses highlighted in Volume 3, Chapter 1 of the ES.. . An intertidal survey has been conducted to provide additional data for the intertidal environment in the vicinity of the HDD works to inform the assessment in the ES, the results of which are included in Volume 3, Appendix 1.1: Offshore Intertidal Survey Report of the ES.
Planning Inspectorate	**Site-specific survey data**	See response to comment directly above. Site-specific survey data has been collected to inform preparation of the Cable Burial Risk

Stakeholder	Summary of Response	Formal response
	The Applicant should ensure the baseline is adequately understood for the purposes of impact assessment and to inform preparation of the cable burial risk assessment, and development of any necessary mitigation measures thereafter.	Assessment (CBRA) (Volume 1, Appendix 3.4: Cable Burial Risk Assessment of the ES), and development of any necessary mitigation measures, as included in the Commitments Register (Volume 1, Appendix 3.1 of the ES).
Planning Inspectorate	**Site-specific survey data** The Inspectorate advises that effort should be made to agree the scope and method of any future survey work with relevant consultation bodies, including the JNCC, NE and the Marine Management Organisation (MMO). The Applicant's attention is drawn to the comments from JNCC in Appendix 2 of this Opinion in relation to the scope of the baseline surveys.	The Proposed Development benefits from extensive benthic survey data which is deemed sufficient to inform the ES (c.f. e.g. the 'Site-Specific Surveys' section of Volume 3, Chapter 1: Benthic Ecology). Additional geophysical survey data may be collected as part of UXO identification and characterisation surveys; the scope of these surveys would be agreed with the MMO (and other relevant bodies). Any such surveys would be undertaken prior to construction and under separate marine licence (approach confirmed by MMO consultation discussions); c.f. Volume 3, Chapter 4: Marine Mammals and Sea Turtles of the ES. Similarly, any additional geophysical surveys required for additional characterisation of unknown archaeological features (as identified by the Wessex Archaeology review of existing data), would be designed in consultation with statutory bodies, including Historic England (c.f. Volume 3, Appendix 7.2 Outline Offshore Archaeological Written Scheme of Investigation of the ES).
Planning Inspectorate	**Receptors – SACs and Marine Conservation Zones (MCZ)** Section 8.2 of the Scoping Report identifies several SACs and MCZs within the study area, but these are not referred to as receptors for consideration in the assessment in Table 8.2.5. For the avoidance of doubt, the potential for likely significant effects to designated MCZ and SAC, and relevant benthic ecology features, should be considered in the impact assessment	Features of SACs and MCZs identified within the study area have been considered as key receptors for consideration within the assessment in Volume 3, Chapter 1 of the ES. A RIAA has been submitted alongside the ES (document reference 7.17). An MCZ assessment has been submitted alongside the ES (document reference 7.16).
Planning Inspectorate	**Receptors – SACs and Marine Conservation Zones (MCZ)** The assessment should include reference to, and consideration of, the conservation objectives for the MCZ. The Applicant's attention is	Benthic ecology features of MCZs within the ZoI of the Proposed Development are outlined in Volume 3, Chapter 1 of the ES.

Stakeholder	Summary of Response	Formal response
	drawn to the comments of NE and the JNCC (Appendix 2 of this Scoping Opinion), which highlight the availability of further information about MCZ.	An indication of potential effects on MCZ features is provided in the ES and an MCZ assessment has been submitted alongside the ES (document reference 7.15).
Planning Inspectorate	**Receptors – SACs and Marine Conservation Zones (MCZ)** For the SACs, cross-reference can be made to information within a HRA Report(s) to avoid duplication.	The ES indicates that potential effects on SAC features are indicated in the RIAA accompanying the ES (document reference 7.16).
Planning Inspectorate	**Cable protection** The Applicant's attention is drawn to the comments of NE (Appendix 2 of this Scoping Opinion) regarding its position on cable protection. Where cable protection is required, the Inspectorate advises that the ES should identify the options available and provide an assessment of the likely significant effects that would arise from installation of the selected option (or options if flexibility is sought), including impacts from secondary scouring. The ES should clearly describe any mitigation measures relied on to avoid significant effects on benthic receptors including SACs and MCZs and explain how the measures would be secured	This proposed cable protection is described in Volume 1, Chapter 3: Project Description of the ES for the offshore HVDC Cables and assessed in the relevant topic chapters in Volume 3 of the ES.
Planning Inspectorate	**Matters to scope out for the operational phase and decommissioning (in situ) phase:** • **Direct habitat loss** • **Temporary increase in suspended sediments** • **Injury and disturbance from noise and vibration** • **Collision risk to basking shark** • **Changes to water quality from resuspension of sediments** • **Changes to water quality as a result of accidental pollution** • **Introduction of INNS** On the basis that such effects would not occur in the operation (excluding repair) and decommissioning (where left in situ) stages, as there would be no physical works or significant vessel movements, the Inspectorate agrees that these matters can be scoped out of the	The matters listed in this scoping opinion comment have been scoped out of the operational and maintenance phase (normal) and decommissioning (in-situ). However, they have been assessed for construction phase, operational and maintenance phase repair activities and/or decommissioning (cable removal) phase in Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES.

Stakeholder	Summary of Response	Formal response
	assessment for the operation (excluding repair) and decommissioning (in situ) stages.	
Planning Inspectorate	**Matters to scope out for the construction phase and decommissioning phase:** • **Assessment of EMF** • **Sediment heating** As the cable would not be in operation during construction or either decommissioning phase options, the Inspectorate agrees that an assessment of EMF and sediment heating can be scoped out of assessment for these phases of the Proposed Development	EMF and sediment heating have been scoped out of the construction and decommissioning phases. However, they have been assessed for the operational phase in Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES.
Planning Inspectorate	**Habitat alteration and change in hydrodynamic regime in the construction and both decommissioning phases (i.e. in situ and removal)** The text in Table 8.3.3 of the Scoping Report indicates that the potential effects of 'habitat alteration' and 'changes in hydrodynamic regime' would be assessed for the operational phase due to the potential for long term habitat alteration and changes to the hydrodynamic regime that may arise from new hard substratum habitats (i.e. the presence of cable protection (rock berm)).	The impacts identified as a result of the introduction of hard substrata (Habitat alteration and long-term habitat loss and change in hydrodynamic regime) have been scoped out of the construction phase. However, they have been assessed for the operational and maintenance phase in relevant chapters. A precautionary approach to decommissioning (removal) impacts is adopted i.e. to assume equivalent impacts to those associated with the construction phase (despite likely reduced magnitudes in many instances); c.f. Volume 1, Chapter 3 of the ES for project description.
Planning Inspectorate	**Habitat alteration and change in hydrodynamic regime in the construction and both decommissioning phases (i.e. in situ and removal)** The Inspectorate is content for the effect of the introduction of hard substrate to be considered during operational phase and therefore agrees this matter can be scoped out of the construction stage assessment. The ES should however consider the removal of subsequent hard substate in the decommissioning (removal) phase, where likely significant effects could occur, or provide evidence demonstrating agreement with the relevant consultation bodies that significant effects are not likely to occur.	
Planning Inspectorate	**Direct injury/mortality of fish and shellfish from vessel activities**	Collision risk to basking sharks from vessel activities has been assessed in Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES.

Stakeholder	Summary of Response	Formal response
	The Inspectorate notes the ES will include an assessment of collision risk to basking sharks due to vessel activities and concurs with this position. The Inspectorate also agrees that significant effects on other fish and shellfish as a result of vessel activities are unlikely to occur and agrees this matter can be scoped out of the assessment	Impacts as a result of vessel activities to other species of fish and shellfish have been scoped out of the assessment.
Planning Inspectorate	**Baseline data** The Scoping Report identifies baseline data for fish and shellfish available from existing literature and surveys and thus no additional site-specific fish and shellfish surveys are proposed, although the benthic site-specific surveys and samples will be used to inform the assessment. Whilst the Inspectorate acknowledges the various data sources available to inform the fish and shellfish assessment, it notes that a number are over 10 years old, particularly in relation to potential spawning grounds. The Applicant should ensure that the baseline data used in the ES assessments are sufficiently up to date to provide a robust baseline. The ES should provide evidence to justify that the largely desk-based data constitutes a robust characterisation of the receiving environment, with reference to the date, seasonal period and geographic coverage of the data. Effort should be made to agree the approach to baseline characterisation with the relevant consultation bodies and the approach should be sufficiently justified in the ES.	The most recent publicly available survey data sets have been used to characterise the fish and shellfish community, with reference to the date of the surveys and subsequent records given throughout the baseline section (section 2.5). Ellis et al. (2012) and Coull et al. (1998) are key data sets for mapping the spatial extent of nursery and spawning grounds for a number of key species. The limitations of these data sets, including the age, has been recognised and summarised in Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES. Where possible the presence of spawning and/or nursery grounds has been corroborated with recent fish eggs surveys and, in the case of sandeels and Nephrops, using PSA data to predict habitat suitability.
Planning Inspectorate	**Potential impacts – designated sites** Paragraphs 8.3.13 to 8.3.18 describe a number of designated sites with fish and shellfish interest features. However, it is unclear from Table 8.3.3 how an assessment of potential effects on designated sites for fish and shellfish will be presented. The table refers predominantly to 'fish and shellfish receptors' and does not specifically reference designated sites. The ES should ensure that all designated sites, including sites for migratory fish, that could interact with the Proposed Development are assessed, where significant effects are likely to occur.	Designated sites with qualifying fish and shellfish features have been identified in Volume 3, Chapter 2 of the ES. Through this several SACs, SSSIs, MCZs and shellfish water protected areas have been identified with their qualifying features being assessed as IEFs. The full range of potential impact pathways with potential to influence fish (i.e. all impact generating mechanisms) have been considered and presented in Volume 3, Chapter 2 of the ES. The effects on fish species that relate to the designation of SACs is also presented within the Habitats Regulations Assessment (HRA) Report to Inform Appropriate Assessment, which is submitted to regulators alongside this ES

Stakeholder	Summary of Response	Formal response
		(document reference 7.16). The HRA RIAA concludes No Adverse Effect on Integrity (NAEOI) on any SACs, including the Severn Estuary SAC which is designated for twaite shad, sea lamprey, and river lamprey. The effects of the Proposed Development on Marine Conservation Zones (MCZs) has been considered separately within the MCZ Assessment (document reference 7.15). No significant effects were determined for MCZs with fish and shellfish species, which included Bideford to Foreland Point MCZ and Lundy MCZ designed for spiny lobster. The effects of the Proposed Development on shellfish water protected areas has been considered separately within the Offshore WFD Assessment (document reference 7.14), which concluded no potential for WFD deterioration or significant adverse effect on WFD Protected Areas.
Planning Inspectorate	**Shellfish waters** The Scoping Report describes Shellfish water protected areas at Paragraph 8.3.15, including the Taw-Torridge Estuary, Torridge Estuary and Taw Estuary, to the north of the landfall site. It is unclear whether the ES will include an assessment of potential effects to these designated waters, including from the onshore elements. The ES should include an assessment of effects to shellfish waters from all relevant elements of the Proposed Development, where likely significant effects could occur. The Applicant should seek to agree the scope of the assessment with relevant consultation bodies, such as the EA and the MMO	Reference has been made to the Taw-Torridge shellfish water protected area throughout the impact assessment in Volume 3, Chapter 2 of the ES, particular with respect to the distance from the ZoI for those impacts that are not restricted to the Offshore Cable Corridor (i.e. propagation of underwater noise and suspended solids). The effects of the Proposed Development on shellfish water protected areas is specifically considered within the Offshore WFD Assessment (document reference 7.15), the scope of which was discussed during specific Environment Agency consultations. The WFD Assessment concluded no potential for WFD deterioration or significant adverse effect on WFD Protected Areas.
Planning Inspectorate	**Qualitative or quantitative modelling of sediments and sediment deposition** Table 8.3.3 refers to the use or qualitative and/or quantitative modelling; however, no criteria are given as to how the modelling	A semi-empirical approach has been used to estimate the ZoI for suspended sediment dispersion (refer to Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES).

Stakeholder	Summary of Response	Formal response
	methodology will be decided. The ES should provide details of how the method is chosen, and details of the modelling methodology once undertaken. The Applicant should seek to agree the modelling with the relevant consultation bodies where possible.	These methods have been presented to, and (a previous draft of) the Technical Note (Volume 3, Appendix 8.1 of the ES) issued, to the MMO and Natural England. As further detailed in Volume 3, Chapter 8: Physical Processes of the ES, these consultation bodies have confirmed that they deem this semi-qualitative assessment (which are presented as a worst-case estimate of likely sediment transport distances), as a sufficient level of 'modelling' to inform the ES
Planning Inspectorate	**Noise modelling** The Scoping Report contains very limited information with regards to potential noise modelling that may be undertaken to inform the fish and shellfish ecology assessment. The ES, and/or accompanying appendices, should provide details of any noise modelling used to inform the impact assessment	Details on the noise modelling methodology can be found within Volume 3, Appendix 4.1: Underwater Noise Technical Assessment, of the ES. An assessment of the noise modelling outputs in relation to fish and shellfish receptors can be found in Volume 3, Chapter 2 of the ES.
Planning Inspectorate	**Inter-related effects – fish and shellfish as prey species** The Scoping Report states that impacts on fish and shellfish receptors would affect prey availability for some marine mammal and bird receptors, but the scale of this inter-related effect has already been considered and scoped out at Section 8.5. The Applicant is directed to the comments of the Inspectorate at Tables 3.12 and 3.24 below regarding the scoping out of such effects	The fish and shellfish impact assessment is taken into account within dependent chapters, including Volume 3, Chapter 4: Marine Mammals and Sea Turtles, and Volume 3, Chapter 9: Offshore Ornithology, of the ES.
Planning Inspectorate	**Increased vessel traffic associated with the Proposed Development within fishing grounds leading to interference with fishing activity –operation and decommissioning (in situ) phases only** On the basis that the operational (excluding repair) and decommissioning (in situ) phases would not involve a significant increase in vessel traffic, the Inspectorate is in agreement that this matter can be scoped out of the assessment.	Noted by the Applicant and the matter is scoped out of EIA.
Planning Inspectorate	**Physical presence of infrastructure leading to gear snagging – construction, operation (excluding repair) and decommissioning (remove)**	Noted, and in agreement with the Inspectorate, the potential impact has been scoped back into assessment for all phases of the Proposed Development. Assessment outcomes are presented in Volume 3, Chapter 3 of the ES.

Stakeholder	Summary of Response	Formal response
	The Inspectorate is unclear why this entry in the table uses n/a instead of indicating whether the phase of the Proposed Development is scoped in or out. It appears likely that as construction proceeds, there is an increasing risk that infrastructure would be present that could lead to gear snagging. Similarly, there remains the presence of infrastructure as a snagging risk during operational repair activities and until the cable is entirely removed (where this method is chosen). The Inspectorate therefore does not agree that that these stages can be scoped out of the assessment. Accordingly, the ES should include an assessment of this matter or provide a justification (for instance through explaining the relevant mitigation and how it has been secured) as to why likely significant effects would not arise.	
Planning Inspectorate	**Fishing restrictions, including bylaws** The Scoping Report references various fishing restrictions including the Inshore Fisheries and Conservation Authorities (IFCA) and MMO byelaws to protect designated features. The ES should demonstrate that the Proposed Development does not undermine these byelaws or hinder the implementation of the management measures.	The Proposed Development is not anticipated to have significant residual effects on commercial fisheries. Reflecting this, the Proposed Development will not undermine existing byelaws or hinder the implementation of fisheries management measures.
Planning Inspectorate	**Measures - cable burial** The Scoping Report states that the offshore cable would be buried, where possible. The ES should include an assessment of the effects of cable protection from methods other than burial, based on the worst-case scenario which has been defined for the area of cable protection likely to be required. The Applicant is encouraged to seek to agree cable burial depth and protection measures with relevant consultation bodies and stakeholders.	The commercial fisheries assessment is based upon a maximum design scenario that includes consideration of cable protection including but not limited to burial (i.e. the assessment is undertaken based on the potential maximum footprint of infrastructure on the seabed). Commitments to cable burial where possible are presented in Volume 3, Chapter 3 of the ES. Consultations with relevant consultation bodies have been undertaken, with no specific concerns regarding commercial fisheries interests identified.
Planning Inspectorate	**Underwater noise impacts** The Scoping Report states at Paragraph 8.10.13 (Underwater Noise) that consideration of potential underwater noise impacts on commercial fisheries is considered in Section 8.4. However, the Inspectorate is unable to find reference to underwater noise in this aspect chapter.	The commercial fisheries chapter assesses the potential for the Proposed Development to result in 'disturbance of commercially important fish and shellfish resources leading to displacement or disruption of fishing activity' in Volume 3, Chapter 3 of the ES. This assessment is informed by the outcomes of the fish and shellfish

Stakeholder	Summary of Response	Formal response
		ecology assessment presented in Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES, with appropriate cross-referencing to that Chapter provided. This commercial fisheries chapter does not duplicate the information provided on underwater noise in Volume 3, Chapter 2.
Planning Inspectorate	**Underwater noise impacts** The Inspectorate notes that an assessment of underwater noise is proposed to be undertaken for the fish and shellfish ecology assessment. The Commercial Fisheries impact assessment should draw upon and cross-reference to the findings of the fish and shellfish ecology assessment as appropriate	The commercial fisheries chapter assesses the potential for the Proposed Development to result in 'disturbance of commercially important fish and shellfish resources leading to displacement or disruption of fishing activity' in Volume 3, Chapter 3 of the ES. This assessment is informed by the outcomes of the fish and shellfish ecology assessment presented in Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES, with appropriate cross-referencing to that Chapter provided. This commercial fisheries chapter does not duplicate the information provided on underwater noise in Volume 3, Chapter 2.
Planning Inspectorate	**Impacts due to disturbance from anthropogenic noise and vessels during operation (excluding repairs) and decommissioning (where cable is left in situ).** On the basis that disturbance due to noise and vessels would not arise during these phases, the Inspectorate is content that this matter can be scoped out of further assessment.	No action required (scoped out).
Planning Inspectorate	**Collision with vessels** The Scoping Report describes that the risk of collision with marine mammals would be low due to the likely low speeds of vessels, the likely predefined routes taken, the low number of vessels involved in construction (and decommissioning) relative to the existing background numbers, and the implementation of measures in a Vessel Management Plan (VMP)	Noted
Planning Inspectorate	**Collision with vessels** In the absence of information demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter out of further assessment. The ES should include an assessment of vessel interaction and collision risk to	An assessment of vessel interaction and risk of collision to marine mammals is considered in Volume 3, Chapter 4 of the ES. A draft VMP is provided with the ES (Volume 3, Appendix 5.2: Vessel Management Plan of the ES).

Stakeholder	Summary of Response	Formal response
	marine mammals, where likely significant effects could occur, or evidence demonstrating the agreement of the relevant consultation bodies that the matter can be scoped out and the absence of likely significant effects. The Inspectorate advises that the Applicant should provide an outline VMP to demonstrate how effects on marine mammals would be minimised.	
Planning Inspectorate	**Hearing damage and auditory injury (e.g. permanent threshold shift (PTS)), and temporary changes in hearing (e.g. Temporary Threshold Shift (TTS)) caused by increased anthropogenic noise from ground condition surveys, seabed preparation, route clearance, cable lay and burial activities** This is proposed to be scoped out on the basis that the noise levels associated with the proposed activities would not result in instantaneous PTS or TTS for marine mammals or sea turtles. Also, that cumulative PTS or TTS is very unlikely to occur. The Scoping Report contains very limited information regarding the likely noise generated from the Proposed Development and coupled with the presence of marine mammal qualifying features of the Bristol Channel Approaches SAC, which are sensitive to noise disturbance, the Inspectorate considers that insufficient justification has been provided as to why this matter can be scoped out. The ES should therefore include an assessment of PTS and TTS effects on marine mammals and sea turtles, where significant effects are likely to occur. The Applicant should seek to agree the approach to assessment with the relevant consultation bodies, such as NE and JNCC.	The Proposed Development activities will generate non-impulsive noise only (i.e., no impulsive noise sources form part of these works). A literature review of underwater noise assessments (some including empirical modelling) undertaken for other projects carrying out similar activities has demonstrated that instantaneous TTS and PTS thresholds are not exceeded for the key receptors, hence this impact was initially intended to be scoped out. Underwater noise modelling has been undertaken as part of the ES to assess the potential impacts on marine mammals from different activities as part of the Proposed Development. Results of the modelling and an assessment of the PTS results (including TTS) are presented in Volume 3, Chapter 4 of the ES. Detailed information on the underwater noise modelling is provided in Volume 3, Appendix 4.1: Underwater Noise Technical Assessment, of the ES. This assessment has concluded that it is unlikely that cumulative PTS onset level will be reached across all functional hearing groups (FHGs) during the proposed noise emitting activities. For marine mammal receptors, there is currently no threshold for TTS-onset that would indicate a biologically significant amount of TTS in marine mammals. Therefore, it was not possible to carry out assessment of the sensitivity, magnitude, or significance of the impact of TTS on marine mammals. Disturbance from sources of underwater noise is included as part of the qualitative assessment, which will occur over greater distances as compared to TTS. An assessment of vessel interaction and risk of collision to marine

Stakeholder	Summary of Response	Formal response
		mammals and sea turtles, and assessment of TTS impacts on sea turtle are conducted in Volume 3, Chapter 4 of the ES.
Planning Inspectorate	**Accidental pollution** The Scoping Report seeks to scope out this matter on the grounds that measures including the Marine Pollution Contingency Plan (MPCP) as part of the Offshore CEMP would ensure that accidental spills/leaks would be very limited. The Inspectorate agrees that, provided the measures to mitigate the risks of accidental pollution are clearly described in the ES and secured in the dDCO, this matter can be scoped out of further assessment.	No action required (scoped out).
Planning Inspectorate	**Presence of EMF** The Scoping Report seeks to scope this matter out on the grounds that there is no evidence to suggest that EMFs affect seals or the cetaceans likely to be present within the study area. The Scoping Report also states that the presence of EMFs is unlikely to affect leatherback turtles but acknowledges that magnetic cues are used during life stages, hatching and as reproductive adults. The Scoping Report goes on to state that as turtles use multiple cues, the EMFs would be localised the risk to turtles is deemed negligible.	Noted
Planning Inspectorate	**Presence of EMF** The Inspectorate agrees that EMF impacts to seals and cetaceans can be scoped out of further assessment. It is less clear whether leatherback turtles would be affected by EMF. The ES should include either an assessment of this matter or information demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.	To our knowledge, no further literature/evidence is available with respect to EMF and potential impacts on leatherback turtles (or other species of marine turtle). Further engagement was sought on this topic with relevant stakeholders and an assessment has been included in Volume 3, Chapter 4 of the ES
Planning Inspectorate	**Indirect impacts resulting from impacts on marine mammal prey species.** This matter is proposed to be scoped out on the basis that impacts are likely to be short-term and localised, and marine mammals and sea	Noted

Stakeholder	Summary of Response	Formal response
	turtles are highly mobile and could exploit other prey resources nearby.	
Planning Inspectorate	**Indirect impacts resulting from impacts on marine mammal prey species** In the absence of the findings of the fish assessment and information demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not able to agree to scope this matter out of further assessment at this stage. The ES should include an assessment of indirect impacts to marine mammals as a result of impacts to prey species, including consideration of the implications for the marine mammal populations of the Bristol Channel Approaches SAC, where likely significant effects could occur.	The impacts on fish and shellfish receptors have been assessed in Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES, as not significant. This is in agreement with the assessment at scoping and PEIR phase to scope out indirect impacts resulting from impacts on prey species of marine mammals and sea turtles, hence no consideration was given in the PEIR. The Applicant consulted further with the relevant consultation bodies on the above and has included impact assessment of indirect effects on prey species to marine mammals and sea turtles in Volume 3, Chapter 4 of the ES. Consideration of the implications for the marine mammal populations of the Bristol Channel Approaches SAC has been undertaken in the HRA RIAA (document reference 7.16) which is submitted alongside the ES. The HRA RIAA is relevant to the harbour porpoise only, as it is the only species of marine mammal that is a qualifying feature of the site. The HRA RIAA also includes consideration of Conservation Objective 3 (i.e. 'The condition of supporting habitats and processes, and the availability of prey is maintained').
Planning Inspectorate	**Disturbance at seal haul-outs** The Scoping Report identifies that the closest known haul-out sites for grey seals are Lundy Island and the Isles of Scilly at 3.6km and 32km from the Proposed Development, respectively. This matter is proposed to be scoped out based on distance to haul-out sites and the nature of the construction activities, which are not expected to directly impact seal haul-outs. The Inspectorate agrees that on this basis, disturbance at seal haul-out sites can be scoped out of the impact assessment.	No action required (scoped out).
Planning Inspectorate	**Water quality changes**	No action required (scoped out).

Stakeholder	Summary of Response	Formal response
	The Scoping Report states that marine mammals are known to forage in tidal areas where water conditions are turbid and visibility conditions are poor. It further notes the short term and localised nature of changes, and that both marine mammals and sea turtles could exploit alternative adjacent habitat. The Inspectorate agrees that water quality changes are unlikely to result in significant effects to marine mammals and sea turtles and therefore this matter can be scoped out.	
Planning Inspectorate	**Receptor value** The table does not include reference to EPS. It is recommended that EPS be included in the appropriate definition within this table.	Table was updated for the PEIR to include EPS and this has been carried forward into the ES.
Planning Inspectorate	**Magnitude of impact** The table of magnitude in all cases refers to reversibility; however, the Inspectorate queries whether there may be instances when impacts are deemed irreversible. The ES should clearly define the magnitude of impacts including likely reversibility and permanence.	As requested by the Inspectorate, magnitude has been revised to include likely reversibility and permanence in the ES.
Planning Inspectorate	**Collision of a passing third-party vessel with a vessel associated with cable installation, maintenance or decommissioning during operation (excluding repairs) and decommissioning (where the cable is left in situ)** On the basis that no/very few vessels would be present during the operational (excluding repair) and decommissioning (in situ) phases, the Inspectorate is content that this matter can be scoped out of further assessment for these phases of the Proposed Development.	No action required (scoped out).
Planning Inspectorate	**Matters to be scoped out during operational (repair) and decommissioning (removal):** • **vessel drags anchor over the cable;** • **vessel anchors over the cable in an emergency; and** • **a vessel engaged in fishing snags its gear on the cable.** The Applicant proposes to scope out an assessment of these matters during operational (repair) and decommissioning (removal). However,	The impacts noted have been considered in the assessment of operational effects and the assessment of decommissioning effects in Volume 3, Chapter 5 of the ES.

Stakeholder	Summary of Response	Formal response
	no justification has been provided to explain why these activities would not result in similar impacts compared to the construction and operation phases of the Proposed Development. It appears likely that the presence of infrastructure will remain a risk for vessel anchors and snagging of fishing gear during operational repair activities and until the cable is entirely removed at decommissioning stage (where this method is selected). The Inspectorate therefore does not agree that that these potential impacts can be scoped out of the assessment for these phases of the Proposed Development. Accordingly, the ES should include an assessment of these matters or provide a justification (for instance through explaining the relevant mitigation and how it has been secured) as to why likely significant effects would not arise	
Planning Inspectorate	**Reduction in under keel clearance resulting from laid cable and associated protection during construction and decommissioning removal** The Inspectorate considers that the presence of infrastructure would result in a reduction in under keel clearance during the construction phase as it progresses and also remain until removed entirely (where removal is sought). Therefore, the Inspectorate does not agree this potential impact can be scoped out of the assessment for these phases of the Proposed Development. The ES should include an assessment of this matter, where likely significant effects could occur.	Consideration has been given to the reduction in under keel clearance due to the laid cable and associated protection during the construction phase and during the decommissioning phase in Volume 3, Chapter 5 of the ES.
Planning Inspectorate	**Reduction in under keel clearance resulting from laid cable and associated protection during operational repairs.** The Scoping Report states that the cable and associated protection may lead to a reduction in under-keel clearance, which could pose a risk of vessels grounding. However, no evidence has been provided to explain why operational repairs would not lead to potential impacts resulting from a reduction in under-keel clearance. In the absence of this information, the Inspectorate is not in a position to agree to scope out this matter from further assessment.	Consideration has been given to the reduction in under keel clearance due to the laid cable and associated protection during the operational and maintenance phase in Volume 3, Chapter 5 of the ES.

Stakeholder	Summary of Response	Formal response
Planning Inspectorate	**Interference with marine navigational equipment during construction, operational (repair) and decommissioning (in situ or removed)** The Scoping Report acknowledges that the EMF created by buried direct current cables has the potential to create interference on a vessel's magnetic compass and thus this matter is scoped into the assessment for the operational phase. On the basis that EMF would only be generated when the cable is active/live, the Inspectorate agrees that this matter can be scoped out from an assessment for the construction, operational (repair) and decommissioning phases.	No action required (scoped out)
Planning Inspectorate	**Reduced access to local ports during operation (including repairs) and decommissioning (where the cable is left in situ)** On the basis that access to local ports is unlikely likely to arise during operation and decommissioning (where the cable is left in situ), the Inspectorate is content that this matter can be scoped out of further assessment. However, it is unclear whether the operational maintenance (repair) stage could result in reduced access to local ports. The ES should include an assessment of this matter for the Operational (repair) stage, where likely significant effects could occur	Reduction in access to local ports has been considered in the assessment of operational effects in Volume 3, Chapter 5 of the ES.
Planning Inspectorate	**Guidance documents** The Applicant's attention is directed to the response of the Maritime and Coastguard Agency (MCA) at Appendix 2 with regards to further guidance documents, including the MCA's Under Keel Clearance Policy Paper.	Noted. Compliance with the MCA guidance on the reduction in water depths is included within the mitigation measures adopted as part of the Proposed Development, detailed in Volume 3, Chapter 5 of the ES.
Planning Inspectorate	**Assessment methodology** The Scoping Report proposes to determine significance as either broadly acceptable, tolerable, or unacceptable. The ES should clearly set out how the risk assessment approach leads to an assessment of significance of effect consistent/ compatible with the terminology	The impact assessment methodology for shipping and navigation is outlined in Volume 3, Chapter 5 of the ES, and includes how the terms used in the impact assessment relate to the terms defined in EIA Regulations. The impact assessment presented also notes how the

Stakeholder	Summary of Response	Formal response
	used in the ES, for which the intended approach is set out in Chapter 5 (Section 5.5) of the Scoping Report	significance of each impact relates to the terminology defined in the EIA Regulations.
Planning Inspectorate	**Increased vessel traffic causing disruption to other marine user activities during operation (excluding repairs) and decommissioning (where the cable is left in situ)** On the basis that operation (excluding repairs) and decommissioning (in situ) are not likely to increase vessel traffic and cause disruption to other marine user activities, the Inspectorate is content that this matter can be scoped out of further assessment.	No further action (scoped out)
Planning Inspectorate	**Temporary increase in suspended sediment concentrations (SSC) and deposition of sediment on diving and water sports receptors during operation (excluding repairs) and decommissioning (where the cable is left in situ)** On the basis that operation (excluding repairs) and decommissioning (in situ) are unlikely to lead to a temporary increase in SSC and deposition of sediment that could have potential to impact diving and water sports receptors, the Inspectorate is content that this matter can be scoped out of further assessment.	No further action (scoped out)
Planning Inspectorate	**Temporary increase in SSC and deposition of sediment on the following receptors:** • **offshore wind;** • **subsea cables and pipelines;** • **recreational boating and sailing;** • **recreational fishing and seaweed farming; and military activity and munitions.** Table 8.7.2 states in the final column that an assessment of the impact of a temporary increase in SSC and deposition of sediment on these other marine user receptors is to be scoped out with reference to Table 8.7.3; however, these receptor types are not described in	Increases in SSC and the associated deposition of sediment has been assessed for construction, operation and maintenance, and decommissioning in Volume 3, Chapter 6 of the ES.

Stakeholder	Summary of Response	Formal response
	Table 8.7.3 and no explanation has been provided. In the absence of supporting justification and information, the Inspectorate is not in a position to agree to scope these matters from further assessment. Temporary increases in SSC or sediment deposition may, for example, affect recreational fishing or the seaweed farm presented on Figure 8.7.6. Accordingly, the ES should include an assessment of these matters or justification as to why no likely significant effects would arise.	
Planning Inspectorate	**Increased subsea noise on diving and water sports and recreational fishing and seaweed farming receptors during operation(excluding repairs) and decommissioning (where the cable is left in situ)** On the basis that operation (excluding repairs) and decommissioning (in situ) are unlikely to lead to an increase in subsea noise on these receptors, the Inspectorate is content that this matter can be scoped out of further assessment	No further action (scoped out)
Planning Inspectorate	**Increased subsea noise the following receptors:** • **offshore wind;** • **military activity and munitions;** • **subsea cables and pipelines; and** • **recreational boating and sailing.** The Inspectorate agrees that subsea noise is unlikely to affect these receptors and is content that this matter can be scoped out for these receptors.	No further action (scoped out)
Planning Inspectorate	**Interaction with and/ or disruption to oil and gas infrastructure** The Applicant proposes to scope out this matter on the basis that there is no spatial overlap between the Proposed Development and active or planned oil and gas infrastructure. The Inspectorate agrees that the Proposed Development is unlikely to lead to significant effects on oil and gas infrastructure and is content to scope out this matter from further assessment.	No further action (scoped out)

Stakeholder	Summary of Response	Formal response
Planning Inspectorate	**Interaction with and/ or disruption to aggregate extraction or resource areas** The Scoping Report explains that there is no spatial overlap between the Proposed Development and known areas of aggregate extraction or resources areas, with the nearest aggregate extraction area located 30km north of the proposed study area. On this basis, the Inspectorate is content that this matter can be scoped out of further assessment.	No further action (scoped out)
Planning Inspectorate	**Interaction with and/ or disruption to marine disposal sites** The Scoping Report states that there is no spatial overlap between the Proposed Development and any known active disposal sites and the Hartland Point (LU020) disposal site, located approximately 850m south of the Offshore Cable Corridor, is closed. On this basis, the Inspectorate is content that this matter can be scoped out of further assessment.	No further action (scoped out)
Planning Inspectorate	**Interaction with and/ or disruption to other offshore energy (excluding offshore wind)** The Applicant proposes to scope out this matter on the basis that there is currently no spatial overlap, or planned overlap between offshore energy infrastructure (excluding offshore wind energy infrastructure) and the Proposed Development. The Inspectorate agrees that the Proposed Development is unlikely to lead to significant effects on other offshore energy infrastructure and is content to scope out this matter from further assessment.	No further action (scoped out)
Planning Inspectorate	**Baseline data** The Applicant's attention is directed to the response of the Ministry of Defence (MoD) at Appendix 2 of this Opinion with regards to the misidentification of D001 – Trevose Head as an Army danger area, which is in fact a Navy area, together with the use of the UK Aeronautical Information Publication (AIP) as a data source to determine the extent/management of MoD designated Danger Areas.	The D001 – Trevose Head Navy Danger Area has been amended within Volume 3, Chapter 6 of the ES to identify the MoD receptor more accurately. Specific consultations with DIO have been undertaken post PEIR. Consultation with the MoD has been conducted to identify areas of MoD activity which are not on the public record and may be impacted by the proposed development. A summary of consultation responses has been presented in Volume 3, Chapter 6 of the ES.

Stakeholder	Summary of Response	Formal response
	The MoD also confirm there are other defence interests in the locality relating to navigational interests and installations, which are not defined in the public domain. The Applicant should seek to agree the baseline data and sensitive receptors with relevant consultation bodies, such as the MoD, where possible.	
Planning Inspectorate	**Impacts to other marine users of the River Torridge** The Applicant's attention is drawn to the consultation response from the Maritime and Coastguard Agency. The ES should confirm whether any proposed works to facilitate the Proposed Development will be undertaken below the Mean High-Water Spring (MHWS) within the River Torridge. The impact of any potential works below the MHWS within the River Torridge on other marine users Torridge should be assessed in the ES.	The Proposed Development will undertake HDD below MHWS at the River Torridge crossing. There are not anticipated to be any interactions between the construction, operation and maintenance, and decommissioning phases of the project on OMU in the River Torridge below MHWS. The use of the jack-up vessel offshore (to facilitate the offshore HDD exit) has been included in the construction phase assessment of impacts resulting from increased vessel movement in Volume 3, Chapter 6 of the ES.
Planning Inspectorate	**Direct impacts to cultural heritage assets within the footprint of the Proposed Development during operation (excluding repair) and decommissioning (in-situ).** The Inspectorate notes that no justification is presented in the Scoping Report to scope this matter out from these stages of the Proposed Development. However, it considers that a pathway for effect is unlikely to arise during operation (excluding repair) and decommissioning (in situ) given the limited activities involved. The Inspectorate agrees that this matter can be scoped out of the assessment.	The scoped out elements have been summarised in Volume 3, Chapter 7 of the ES.
Planning Inspectorate	**Direct and indirect impacts as a result of geo-morphological changes during decommissioning (in situ** The Inspectorate notes that no justification is presented in the Scoping Report to scope this matter out from the decommissioning (in situ) option. Where the offshore cable is proposed to remain in situ there could be future effects with geomorphological changes, akin to potential effects by remaining in-situ during operation. It is not clear why this matter is not required to be scoped in and therefore the Inspectorate cannot agree to scope this matter out at this stage.	Indirect physical Impacts from geomorphological changes during decommissioning (in-situ) have been reconsidered and scoped into the assessment. This impact has been considered in Volume 3, Chapter 7 of the ES as part of Impact 6.

Stakeholder	Summary of Response	Formal response
	The ES should include an assessment of this matter, where likely significant effects could occur, or evidence to support that significant effects are not likely.	
Planning Inspectorate	**Potential effects to the setting of onshore cultural heritage assets – all phases.** The Inspectorate is content to scope out this matter as all onshore cultural heritage assets are located away from the marine environment, therefore any activity is unlikely to impact the setting of any onshore assets.	The scoped out elements have been summarised in Volume 3, Chapter 7 of the ES.
Planning Inspectorate	**Potential effects arising from the decommissioning of the Proposed Development** The general approach and justification to scoping out the decommissioning phase is described in Table 8.8.3; however, it is not confirmed whether this relates to decommissioning (in situ) or decommissioning (removal). It is however assumed it relates to decommissioning (in situ) as Table 8.8.2 confirms that decommissioning (removal) would be assessed in the ES. As such, the Inspectorate agrees that this matter can be scoped out.	The scoping for aspects of the decommissioning phase has been clarified in Volume 3, Chapter 7 of the ES.
Planning Inspectorate	**Heritage Assets** The Inspectorate considers that the Hartland Heritage Coast should be included on Figure 8.8.1, which shows other heritage assets in the vicinity of the Proposed Development.	The Heritage Coasts that lay within the boundary of the study area have been added to Volume 3, Figure 7.1 of the ES and have been considered within the assessment in Volume 3, Chapter 7 of the ES.
Planning Inspectorate	**Mitigation measures** The ES should clearly identify the proposed mitigation measures to be included in respect of marine archaeology. A WSI should steer the final design of the offshore cable and appropriate mechanisms should be clearly laid out to deal with any finds during implementation. Mitigation measures including any Archaeological Exclusions Zones (AEZs) should be clearly identified and the distance justified accordingly. The ES should also explain how the WSI, including any AEZs, are to be appropriately secured and effort made to agree the WSI with consultation bodies.	Proposed mitigation measures are outlined in Volume 3, Chapter 7 of the ES and the results of the archaeological review of the geophysical and geotechnical surveys undertaken in 2024 have allowed for a detailed targeted mitigation strategy to be identified for the ES chapter. An Offshore Outline Archaeological WSI is presented as Volume 3, Appendix 7.5 of the ES.

Stakeholder	Summary of Response	Formal response
Planning Inspectorate	**Assessment criteria** Tables 8.8.4 and 8.8.5 describe how the value/sensitivity and magnitude of change is defined; however, there is no explanatory text to confirm where this has been derived from. The ES should include information regarding any guidance used to inform the assessment criteria.	The guidance used to inform the value/sensitivity and magnitude of change definitions is described in Volume 3, Chapter 7 in the ES.
Planning Inspectorate	**Potential inter-related effects** The Scoping Report states that data gathered for the onshore archaeological and cultural heritage assessment will be reviewed as part of the marine archaeology assessment. Consideration should be given to including onshore archaeology and cultural heritage aspect chapter within an inter-related effects section, should it be appropriate following consultation feedback and further design work.	Onshore archaeology and cultural heritage data have been reviewed to provide context for the potential marine archaeology and cultural heritage assets. The onshore cultural heritage chapter (Volume 2, Chapter 2: Historic Environment of the ES) has been considered within the inter-related effects section.
Planning Inspectorate	**The following effects during the operation (excluding repair) and decommissioning (where left in situ) stages:** • **Physical disturbance of seabed geology and morphology (nearshore only, <20 m depth)** • **Generation of sediment disturbance (sediment plumes) associated with construction type activities** • **Increase in contaminants through the suspension of contaminated sediment** No explanation is provided in the Scoping Report with regards to why these potential effects are to be scoped out for the operational and decommissioning (where left in situ) stages of the Proposed Development. However, the Inspectorate assumes this is on the basis such impacts are not anticipated at these stages. On this basis, the Inspectorate is content to scope out these matters for the operation and decommissioning (where left in situ) stages.	Justification for scoping out these potential effects for the operational and maintenance and decommissioning (where left in-situ) phases is included in Volume 3, Chapter 8 of the ES.
Planning Inspectorate	**Impacts to metocean processes (deep water, >20m depth) – all stages** This matter is proposed to be scoped out on the basis that at 20m and deeper, the water depth is such that the effects of the seabed on	Justification for scoping out impacts to metocean processes (deep water, >20m depth) is included in Volume 3, Chapter 8 of the ES.

Stakeholder	Summary of Response	Formal response
	waves and currents is negligible, and thus the likely localised changes in bathymetry due to trenching or shallow berms associated with crossing points would not have a direct effect. The Inspectorate notes that metocean processes in the nearshore have been scoped into the impact assessment. On the basis of the above, the Inspectorate is content for this matter to be scoped out of the impact assessment	
Planning Inspectorate	**Physical disturbance of seabed geology and morphology (deep water, >20m depth) – all stages** The Scoping Report states that although the Proposed Development would result in a physical disturbance of the seabed geology, it is unlikely that the works would affect seabed morphology in deepwater due to the low-energy environment where metocean processes do not normally mobilise seabed sediments. Also, on the basis that the Offshore Cable Corridor has been selected to avoid excessive preparatory works and due to scale of the works in the context of the wider Celtic Sea and English Channel area. On the basis of the above, the Inspectorate is content for this matter to be scoped out of the impact assessment.	Justification for scoping out physical disturbance of seabed geology and morphology (deep water, >20m depth) is included in Volume 3, Chapter 8 of the ES.
Planning Inspectorate	**Impacts on local sediment regimes (deep water, >20m depth)** This matter is proposed to be scoped out on the basis that sediment would not travel significant distances and would likely resettle within close proximity to the cable corridor. Therefore, it is considered unlikely there would be any direct effects to local sediment regimes in deep water, as a result of the Proposed Development. On the basis of the above, the Inspectorate is content for this matter to be scoped out of the impact assessment.	Justification for scoping out impacts on local sediment regimes (deep water, >20m depth) is included in Volume 3, Chapter 8 of the ES.
Planning Inspectorate	**Study area** Paragraph 8.9.4 describes a study area encompassing the Offshore Cable Corridor with a 1km buffer; however, a 30km buffer is shown on Figure 8.9.1. The ES should make clear the study area for coastal processes, together with the ZoI from the Proposed Development	The 1 km buffer, mentioned within the ES Scoping text, was an error and the study area, and ZOI, is clearly stated as 30 km within the Physical Processes ES chapter.

Stakeholder	Summary of Response	Formal response
	over which potential likely significant effects in respect of physical processes could arise	
Planning Inspectorate	**Potential impacts – designated sites including SACs and MCZ** The Scoping Report describes designated sites within and near to the offshore cable corridor; however, the scoping-in table for physical processes does not make clear how information and assessment of any likely significant effects on these sites would be presented in the ES. The ES should include an assessment of likely significant effects to habitats of the designated sites, or appropriate cross-references to information presented in the MCZ and/or HRA assessments provided with the DCO application.	The likely significant effects on designated sites is considered within Volume 3, Chapter 8 of the ES. The methodology for assessing the likely significant effects is detailed within the Impact Assessment Methodology within this chapter. The physical processes assessments presented in Volume 3, Chapter 8 of the ES have informed the HRA RIAA (document reference 7.16) and MCZ assessments (document reference 7.15).
Planning Inspectorate	**Potential impacts – designated sites including SACs and MCZs** The Applicant's attention is also directed to the comments of NE at Appendix 2 to this Opinion with regards to the need to avoid the introduction of cable protection within designated sites.	Volume 3, Chapter 8 of the ES includes an assessment of secondary (localised) scour, building on recent modelled estimates of bed currents (refer to Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES). Methodologies have been agreed with relevant stakeholders.
Planning Inspectorate	**Potential impacts – scour and secondary scour** The Scoping Report physical processes aspect chapter does not refer to scour or secondary scour, although the potential for scour is described and proposed to be included in the impact assessments for benthic ecology and fish and shellfish ecology. The ES should include an assessment of the impacts associated with changes to seabed from scour, where significant effects are likely to occur. Additionally, the potential impact from secondary scour around cable protection should also be included in the physical processes impact assessment, where likely significant effects could occur. The Applicant should make effort to agree the approach with relevant consultation bodies, including NE and the MMO.	Volume 3, Chapter 8 of the ES includes an assessment of secondary (localised) scour, building on recent modelled estimates of bed currents (refer to Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES). Methodologies have been agreed with relevant stakeholders.
Planning Inspectorate	**Modelling** It is not clear whether modelling will be undertaken to inform the physical processes assessment and related assessments for aspects such as benthic ecology and fish and shellfish ecology. The physical	A semi-empirical assessment of sediment transport has been completed in support of the physical processes ES chapter. Refer to Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES for more details on the methodology and findings of this assessment.

Stakeholder	Summary of Response	Formal response
	processes chapter contains no detail with regards to potential modelling (quantitative or qualitative), although reference is made to potential modelling in the fish and shellfish ecology chapter of the Scoping Report at paragraph 8.3.5.	These methods have been presented to, and the Technical Note (Volume 3, Appendix 8.1 of the ES) issued, to the MMO and Natural England. These consultation bodies have confirmed that they deem this semi-qualitative assessment (which are presented as a worst-case estimate of likely sediment transport distances), as a sufficient level of 'modelling' to inform the ES.
Planning Inspectorate	**Modelling** The Inspectorate notes reference in Table 8.9.6 to a qualitative assessment of the spatial extent of sediment disturbance, and also that a number of aspects also refer to an understanding of sediment plume effects (such as benthic ecology).	A semi-empirical assessment of sediment transport has been completed in support of the physical processes ES chapter. Refer to Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES for more details on the methodology and findings of this assessment. These methods have been presented to, and the Technical Note (Volume 3, Appendix 8.1 of the ES) issued, to the MMO and Natural England. These consultation bodies have confirmed that they deem this semi-qualitative assessment (which are presented as a worst-case estimate of likely sediment transport distances), as a sufficient level of 'modelling' to inform the ES.
Planning Inspectorate	**Modelling** The Applicant's attention is directed to the response of JNCC at Appendix 2 to this Opinion, with reference to the recommendation to undertake sediment plume modelling. The impact assessment should be informed by plume modelling. The ES should clearly describe the modelling undertaken to inform the impact assessment and seek to agree the scope of the physical process modelling with relevant consultation bodies, such as JNCC, NE and the MMO.	A semi-empirical approach has been used to estimate the ZoI for suspended sediment dispersion (refer to Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES). These methods have been presented to, and (a previous draft of) the Technical Note (ES Volume 3, Appendix 8.1) issued, to the MMO and Natural England. As further detailed in Volume 3, Chapter 8: Physical Processes of the ES, these consultation bodies have confirmed that they deem this semi-qualitative assessment (which are presented as a worst-case estimate of likely sediment transport distances), as a sufficient level of 'modelling' to inform the ES.
Planning Inspectorate	**Seabed levelling**	Impacts on current/ flow and wave regimes, as a result of seabed levelling, has been scoped out of this assessment. Justification is

Stakeholder	Summary of Response	Formal response
	The Scoping Report at Section 4.7 states that seabed levelling may be required but the extent is not yet known. This is not subsequently mentioned in the physical processes chapter. The ES should assess any likely significant secondary effects that this may have on changes to the current/flow regime, wave regime and sediment transport regime and any morphological changes. Impacts from dredging and disposal of material should also be assessed, where significant effects are likely to occur. Any disposal method should be described and should include the estimated volume of material to be disposed.	included in Volume 3, Chapter 8 of the ES. Changes to the sediment transport regime and any morphological changes, as a result of seabed levelling, is considered within the Impact Assessment (refer to Volume 3, Chapter 8 of the ES).
Planning Inspectorate	**Underwater noise assessment approach** The Inspectorate notes that an underwater noise assessment will be presented as a technical appendix to the ES to which other marine disciplines will refer and welcomes the consideration of underwater noise during the construction, operation and decommissioning phases of the Proposed Development. Effort should be made to agree the methodology with the relevant consultation bodies and agreements should be clearly outlined within the ES. Early engagement with the MMO is encouraged to ensure that any noise modelling utilising site specific physical parameters and project specific detail is appropriate and fit for purpose.	Details on the noise modelling methodology can be found within Volume 3, Appendix 4.1: Underwater Noise Technical Assessment, of the ES. The methodology was discussed and agreed with the MMO prior to the ES.
Planning Inspectorate	**Inter relationships with commercial fisheries assessment** Section 8.10.16 of the Scoping Report states that underwater noise impacts will be considered within the Commercial Fisheries ES chapter. However, Section 8.4 of the Scoping Report (Commercial Fisheries) does not identify underwater noise as a potential impact. The influence of underwater noise impacts on commercial fisheries should be clearly explained and assessed within the ES	The commercial fisheries chapter assesses the potential for the Proposed Development to result in 'disturbance of commercially important fish and shellfish resources leading to displacement or disruption of fishing activity' in Volume 3, Chapter 3 of the ES. This assessment is informed by the outcomes of the fish and shellfish ecology assessment presented in Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES, with appropriate cross-referencing to that Chapter provided. This commercial fisheries chapter does not duplicate the information provided on underwater noise in Volume 3, Chapter 2.
Planning Inspectorate	The Scoping Report states that the construction phase would not be lengthy enough for significant climate change risks to occur compared to the present-day baseline. The Applicant states that they would	The vulnerability of the Proposed Development to potential climate risks during construction, operation and maintenance, and decommissioning

Stakeholder	Summary of Response	Formal response
	employ good health and safety practices with respect to risks such as heatstroke or storm events offshore. A construction programme of approximately up to 84 months (7 years) is estimated at Paragraph 4.2.98 of the Scoping Report. The Inspectorate disagrees that during this period of construction the impacts from climate change would not lead to a significant effect, as this does not take into account extreme weather events both onshore and offshore or impacts to human receptors (e.g. construction workers). The ES should assess impacts from climate change, including extreme weather events over the construction and decommissioning periods, where significant effects are likely to occur and describe and secure any relevant mitigation measures.	has been assessed within this chapter and is supported by Volume 4, Appendix 1.2: Climate Change Risk Assessment of the ES.
Planning Inspectorate	In-combination climate change effects are proposed to be scoped out of the Climate Change ES chapter as they will be addressed individually within each applicable ES chapter. The Inspectorate is content with this approach. The Climate Change chapter should signpost where such effects are considered and presented in other relevant chapters	In-combination climate change effects are identified and assessed as relevant within Volume 4, Chapter 1: Climate Change of the ES.
Planning Inspectorate	The Climate Risk Study Area should explain in more detail why the two 25km grid cells based on the UKCP18 probabilistic projections have been chosen for the study area in the ES. Figure 9.2.1 does not make clear which of the three grid cells have been identified.	The climate risk study area is presented on Figure 1.1 (see Volume 4, Figures), which covers two 25 km grid cells based on the UK Climate Projections 2018 (UKCP18) probabilistic projections (Met Office Hadley Centre (MOHC), 2021). These grid cells have been selected to cover the majority of the Onshore Infrastructure Area. Further detail is provided in Volume 4, Chapter 1: Climate Change of the ES.
Planning Inspectorate	Mitigation measures which may be required for climate change effects referenced in other topic chapters such as the water environment with respect to flood risk where mitigation will be based on the FRA findings. Mitigation measures should be clearly set out in the ES and cross referenced between relevant ES chapters as appropriate.	Volume 4, Appendix 1.2: Climate Change Risk Assessment cross references the Volume 2, Chapter 3: Hydrology and Flood Risk of the ES in relation to flood risk mitigation measures proposed as part of the Proposed Development.
Planning Inspectorate	The Inspectorate notes the references in the Scoping Report to professional guidance (i.e. 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (Institute of Environmental	The methodology considered within the climate change assessment considers the following guidance: • Institute of Environmental Management and Assessment (IEMA)

Stakeholder	Summary of Response	Formal response
	Management and Assessment (IEMA) 2022)) and IEMA's 'Environmental Impact Assessment Guide to: Climate Change Resilience and Adaptation (IEMA, 2020). The ES should set out the methodologies used to explain any departure from the proposed approach where professional judgement is applied. Outputs from other assessments should be clearly explained where these have been applied.	Guidance on Climate Change Adaptation and Resilience (IEMA, 2020); and • IEMA guidance on 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (IEMA, 2022). Further information is provided within Volume 4, Chapter 1: Climate Change of the ES.
Planning Inspectorate	Where significance criteria are not explicitly defined within the guidance, the ES should clearly set out where deviation from guidance has occurred and professional judgement has been applied.	The impact assessment methodology is presented in topic chapters in Volumes 2, 3 and 4 of the ES. Criteria for sensitivity and magnitude have been informed by several guidance documents.
Planning Inspectorate	The Inspectorate draws the Applicant's attention to Devon County Council's comments on the methodological approach used for the assessment of avoided or 'saved' baseline GHG emissions with respect to carbon intensity factors	The methodology for the GHG assessment, with respect to the avoided or 'saved' emissions over the wider Project lifetime, utilises the BEIS long-run marginal figures for the future baseline, which show a year-on-year decarbonisation. This is a worst case assessment as it would result in lower savings. However, a sensitivity analysis has been carried out using both the 2024 national grid intensity factor and BEIS 'non-renewable fuels' estimations. Further details are provided within Volume 4, Appendix 1.1: Greenhouse Gas Assessment. The avoided emissions and net emissions of the Proposed Development, assessed cumulatively with the wider Project, are set out within Volume 4, Chapter 1: Climate Change of the ES.
Planning Inspectorate	**Potentially significant change in character (to seascape or landscape designations/ types/ areas) as a result of offshore and onshore activity (including lighting) - operation and decommissioning** Table 9.3.2 of the Scoping Report proposes to scope this matter out for the operation and decommissioning phases of the Proposed Development, stating that the ZTV production shows where the Proposed Development may influence seascape and landscape character. However, it is noted that summary Table 12.1.3 scopes this matter in for operation and decommissioning. The proposed scope is therefore unclear in this regard.	Only the impacts on character arising as a result of the Onshore HVDC Cable Corridor and Offshore Cable Corridor during operation and maintenance and decommissioning have been scoped out. This is because the cables would be buried underground and existing habitats and features will be reinstated once construction is complete, with no significant changes in visual amenity likely to persist post-construction. However, the impacts of the Converter Site on landscape and seascape character during operation and maintenance has been considered within Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. This includes the consideration of night-time lighting effects due to the operation of the converter stations.

Stakeholder	Summary of Response	Formal response
	Considering the nature of the operational development, the Inspectorate agrees that changes in character from offshore activities during operation can be scoped out. However, the Inspectorate does not consider that sufficient evidence is provided to scope this matter out from onshore activities during operation, in the absence of the ZTV and information regarding operational lighting, for example. Changes to character from onshore activities during operation, including the use of lighting, should be assessed and reported in the ES, where likely significant effects could occur. With respect to decommissioning, the Scoping Report does not contain sufficient evidence to explain why likely significant effects would not occur from either offshore or onshore activities. The ES should include an assessment of this matter or evidence to confirm that likely significant effects would not arise.	The assessment of impacts arising during the decommissioning phase is considered in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. The decommissioning phase is effectively the construction process in reverse for the Converter Site medium-term and temporary, albeit taking place within an established and maturing landscape. Note this is not the case with the Onshore HVDC Cable Corridor where the cable ducts will be left in situ with only the cables and link boxes being removed, with no potential for significant effects. Therefore, it is considered that the decommissioning effects would be no greater than the construction phase of the Proposed Development.
Planning Inspectorate	**Potentially significant effects on publicly accessible views as a result of offshore and onshore activity (including lighting) and use of construction compounds - operation and decommissioning** The Inspectorate notes that this matter is repeated in two separate rows of Table 9.3.2, one appears to scope in construction stage effects only, the other scopes in all stages of the Proposed Development. Summary Table 12.1.3 also identifies this matter as being scoped in for all stages. For the avoidance of doubt, the Inspectorate considers that this matter should be scoped in for all stages of the Proposed Development, where likely significant effects could occur.	Details and justification for scoping out topics have been presented within Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. The impact of the Converter Site on landscape, seascape and visual resources during operation and maintenance has been scoped into the assessment, as it is recognised that there is potential for significant effects. However, the impacts of the Onshore HVDC Cable Corridor on landscape, seascape and visual resources during operation and maintenance has been scoped out. This is because the cables would be buried underground. The existing habitats and features affected by the construction of the Onshore HVDC Cable Corridor will be reinstated following completion with no significant landscape effects likely to persist post-construction as there would be no above ground features along the Onshore HVDC Cable Corridor during operation.
Planning Inspectorate	**All construction phase impacts on landscape, seascape and visual resources and receptors at far distance from the Offshore Cable Corridor and Onshore HVDC Cable Corridor study areas – construction**	The LVIA study area includes a 1 km radius extending from the Onshore HVDC Cable Corridor. It was defined based on the medium-term, temporary duration and expected scale of the construction works required for the installation of the linear underground development, also considering the underlying topography and vegetated nature of the

Stakeholder	Summary of Response	Formal response
	The Scoping Report proposes to scope this matter out and states that effects beyond 1km from the offshore and onshore cable corridors would not be significant. Given the nature of the offshore works, the Inspectorate agrees to scope out effects during construction on seascape beyond 1km from the offshore cable corridor. However, the Inspectorate does not agree that onshore visual effects during construction at a distance of beyond 1km from the cable corridor can be scoped out of the ES. A ZTV has not been provided with the Scoping Report to support the statement that there would be no significant visual effects beyond 1km from the cable corridor during construction. The Scoping Report states that the onshore cable corridor would have a typical temporary width of 65m, whilst the permanent width would be 32m wide but with easements that could be up to 60m wide. Lighting requirements are highlighted in Paragraph 4.6.23 of the Scoping Report, but full details are not provided, nor methods of managing lighting to reduce adverse effects on human and ecological receptors. Accordingly, the ES should include an assessment of construction phase impacts on landscape, seascape and visual resources and receptors beyond 1km from the onshore HVDC cable, where likely significant effects could occur. The Applicant is encouraged to seek to agree the sensitive receptors/resources with relevant consultation bodies, such as the Local Authorities.	surrounding landscape. A ZTV has not been produced for the Onshore HVDC Cable Corridor construction phase, as the plant used in the construction of the Proposed Development is varied and its location changes. In addition, the ZTV is considered as not being effective for such a low-lying development by using 5 m DTM data, also it does not consider the effect of distance. Therefore, professional experience and judgement has been applied.
Planning Inspectorate	**All impacts on landscape and visual resources and receptors outside the converter stations study area -construction** Alverdiscott Substation Connection Development on the basis that significant effects are not anticipated. A ZTV has not been provided with the Scoping Report to justify the statement that there will be no significant visual effects beyond 10km, particularly at elevated locations, from the converter stations or the Alverdiscott Substation Connection Development during construction. As such, the Inspectorate does not agree that onshore visual effects during	The 10 km LSVIA study area for the Converter Site has been agreed with Torridge District Council. The extent of the study area was defined by the height of the proposed converter stations. A ZTV was generated using the heights of the converter stations (based on the table under paragraph 48 of Visual Representation of Wind Farms Version 2.2, NatureScot, 2017). As the effect of distance cannot be modelled in the ZTV, this was verified through the fieldwork. Although the converter stations might be visible beyond 10 km, there is no potential for significant landscape or visual

Stakeholder	Summary of Response	Formal response
	construction at a distance of beyond 10km from the converter stations can be scoped out of the ES at this stage. The ES should include an assessment of impacts on sensitive landscape and visual resources/receptors due to the construction of the converter station and Alverdiscott Substation Connection Development, where likely significant effects could occur.	effects to occur at this distance. The landscape, seascape and visual assessment of construction, operation and maintenance, and decommissioning is detailed within Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. The Alverdiscott Substation Connection Development does not form part of the Proposed Development, as detailed within Volume 1, Chapter 5: EIA Methodology. However, it is considered as a cumulative development in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES.
Planning Inspectorate	**All impacts of the offshore and onshore cable corridors on landscape, seascape and visual resources and receptors - operation** The Scoping Report states there would be no significant changes to seascape, landscape or visual resources on receptors as the cables would be buried under the seabed/underground. The Inspectorate agrees to scope out this matter for the offshore cable corridor. The Inspectorate however does not agree to scope out this matter with regards to the onshore cable corridor during operation. The Scoping Report states that the onshore cable corridor will have a typical temporary width of 65m wide, whilst the permanent width would be 32m wide but with easements could be up to 60m wide. No details are provided regarding mitigation landscape planting and how long it would take to be established. It is unclear whether there would be planting restrictions over the cable corridor during operation. The Inspectorate considers that effects from the onshore cable corridor during operation on landscape, visual resources and receptors should be assessed in the ES, where likely significant effects could occur	The Onshore HVDC Cable Corridor assessment has been scoped out for operational and decommissioning phases, which is detailed and justified within Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. The Onshore HVDC Cable Corridor is underground and the existing habitats and features will be reinstated once construction is complete, with no significant changes in visual amenity likely to persist post-construction. Details relating to the reinstatement of habitats are described within Volume 1, Chapter 3: Project Description of the ES. Further mitigation measures are outlined within Volume 1, Appendix 3.1: Commitments Register, which relate to the protection, reinstatement, compensation and enhancement of habitats.
Planning Inspectorate	**All impacts on landscape and visual resources and receptors outside the Converter Site study area – operation** The Scoping Report states that distances greater than 10km are not anticipated to experience significant effects. A ZTV is not provided	The 10 km LSVIA study area for the Converter Site has been agreed with Torridge District Council's landscape consultant, as detailed within Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES.

Stakeholder	Summary of Response	Formal response
	with the Scoping Report and therefore it is not clear why a 10km study area has been applied. In the absence of justification, the Inspectorate is not content to scope this matter out, an assessment of impacts on landscape and visual resources and receptors beyond 10km from the converter sites should be included in the ES, where likely significant effects could occur.	The extent of the study area was defined by the visual envelope of the Proposed Development, based on the ZTV. As the effect of distance cannot be modelled in the ZTV, this was verified through the field survey.
Planning Inspectorate	**Cumulative impacts of the offshore and onshore cable corridors on seascape, landscape and visual resources - operation and decommissioning** The Scoping Report considers that as the cables would be undersea/underground it will not give rise to significant effects during operation and decommissioning. The Inspectorate agrees to scope this matter out for the offshore cable corridor. However, as the cumulative effects assessment has not yet been undertaken, the cable route is not finalised and the ZTV not yet been produced, the Inspectorate does not agree to scope out cumulative effects at this stage and these should be assessed in the ES	The cumulative projects selected for consideration within the landscape, seascape and visual resources chapter are listed at Volume 4, Appendix 2.4: Landscape and Visual Impact Assessment Methodology of the ES. The specific projects, plans and activities scoped into the CEA, are outlined and assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources and are illustrated on Volume 4, Figure 2.7.
Planning Inspectorate	**Viewpoints** Effort should be made to agree the number and location of viewpoints with relevant consultation bodies, such as the host and neighbouring local authorities, the North Devon National Landscapes team, and other stakeholders such as the North Devon UNESCO Biosphere Strategy and the Exmoor National Park Authority. The Inspectorate advises that the ES should include confirmation of the consultation undertaken, together with evidence of agreement about the final viewpoints selected. Where any disagreement remains, an explanation as to how the final selection was made should be provided. Viewpoint locations should be identified on a plan within the ES and viewpoints should include night-time views to identify any effects from lighting requirements. Baseline viewpoint photography for summer and winter should be provided.	The representative viewpoints have been agreed with Torridge District Council's landscape consultant, which includes viewpoints within Torridge District and North Devon District, as well as the North Devon Biosphere Reserve and the North Devon Coast NL. Details of consultation undertaken are presented in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. The Exmoor National Park lies approximately 21.5 km from the Converter Site at the closest point, which is outside the study area and is too distant for any potential significant effects to be experienced from within it. Therefore, Exmoor National Park Authority has not been consulted. Both statutory and non-statutory consultees have been consulted. Devon County Council, Torridge District Council, North Devon District Council, Natural England, North Devon Coast National Landscape and The Woodland Trust, have all been consulted, in respect of landscape and visual matters.

Stakeholder	Summary of Response	Formal response
		Viewpoint locations are shown on the ZTV overlay on Volume 4, Figures 2.5a to 2.5e. The baseline panoramas from the agreed representative viewpoints for the Proposed Development are presented in Figures 2.3.1 to 2.3.47 of Volume 4, Appendix 2.3: Visual Baseline Technical Report. The figures are baseline summer and winter photography of all representative viewpoints listed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES..
Planning Inspectorate	Part of the cable corridor route goes through the North Devon National Landscapes and the Hartland Heritage Coast. The Inspectorate considers that effects on these receptors should be included within the assessment, where likely significant effects could occur	Assessment of construction impacts to the landscape inclusive of the Onshore HVDC Cable Corridor is provided in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES.
Planning Inspectorate	Section 4 of the Scoping Report makes reference to the need for landscape and ecological planting for the Converter Sites. No mitigation measures appear to be discussed for the cable corridor. The ES should explain the types of mitigation proposed to avoid/reduce adverse effects on landscape and how they would be secured. The ES should include a masterplan and visualisations/ illustrations, where possible, to demonstrate the effectiveness of landscape mitigation.	The Outline LEMP has been submitted as part of the DCO application (document reference 7.10) to present details of the management of the proposed mitigation planting at the Converter Site and along the Onshore HVDC Cable Corridor, including the location, species and details as well as maintenance and management of planting.
Planning Inspectorate	The Inspectorate agrees that effects on the local housing market due to the operational development would be not significant and this matter can be scoped out of the assessment.	Light pollution/night-time effects are considered at a high level within sections within Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES.
Planning Inspectorate	The scope of the assessment should clarify how impacts within the North Devon District have been considered in the ES in relation to wider Devon and the UK, reflecting the wider socio-economic aspects of the Proposed Development on tourism, housing, and employment.	North Devon, alongside Devon County and the UK, have been considered throughout the socio-economic assessment within Volume 4, Chapter 3 of the ES, including in the assessment of construction effects and assessment of operational and maintenance effects.
Planning Inspectorate	The impact on community services in addition to the availability of temporary accommodation based on the anticipated number of workers should form part of the assessment in the ES for both the construction and the decommissioning phases, where likely significant effects could occur.	The impact to community services and assets, as well as effects to the local housing market during the construction and decommissioning phases are considered is introduced in Volume 4, Chapter 3: Socio-economics of the ES.

Stakeholder	Summary of Response	Formal response
Planning Inspectorate	The proposed assessment methodology in the Scoping Report is high level and largely focuses on the economic assessment. It is not clear if the methodology would also integrate with the overarching assessment methodology as presented in Chapter 5 of the Scoping Report. It also does not identify what would be considered a significant effect in EIA terms for the socio-economic assessment. The ES should make clear how any likely significant effects have been determined for socio-economic aspects of the Proposed Development and clearly describe the methodology adopted for the assessment. Where professional judgement has been used this should be supported with robust evidence.	The methodology for determining significant effects is set out in Volume 4, Chapter 3: Socio-economics of the ES, alongside the definition of sensitivity and magnitude criteria for each impact scoped into the socio-economic assessment.
Planning Inspectorate	The Scoping Report states that the socio-economics chapter covers both offshore and onshore matters; however, the references to offshore receptors are limited. The Socio-economic chapter does not refer to other aspect chapters; however, the Inspectorate notes that assessments of socio-economic matters, including tourism, are included in the scope of offshore ES aspect chapters such as commercial fisheries, shipping and navigation, and other marine users. The Inspectorate is content with this approach to avoid duplication of effort, but it should be clear to the reader where relevant information is located within the ES. Offshore socio-economic matters should be assessed in the ES where significant effects are likely. The ES must clearly explain which matters are included in each assessment and any inter-relationships between them, to avoid duplication or omission.	Matters scoped into the socio-economic assessment is set out in Volume 4, Chapter 3: Socio-economics and Tourism of the ES. The inter-relationships between the assessment and other chapters are set out in relevant sections including those impacts that relate to tourism sectors and tourism and recreation assets. These include the relationships with the following ES chapters; Volume 4, Chapter 2: Landscape, Seascape and Visual Resources; Volume 2, Chapter 6: Noise and Vibration; Volume 2, Chapter 8: Land Use and Recreation; Volume 2, Chapter 2: Historic Environment; and Volume 3, Chapter 5: Shipping and Navigation.
Planning Inspectorate	Consideration should be given to the availability and origin of the workforce in the context of other projects proposed in the region. Any assumptions around workforce origins within the socio-economic assessment used to inform the study area should be made clear in the ES.	The assessment of impacts relating to economic activity during the construction phase has accounted for workforce origin by considering the ability of each study area to carry out the given contract value. This is embedded in the assessment set out in Volume 4, Chapter 3: Socio-economics and Tourism of the ES. This is also considered as part of the assessment on the tourism economy in Devon. The cumulative effects assessment considers availability of workforce.

Stakeholder	Summary of Response	Formal response
Planning Inspectorate	The ES should detail the criteria used to identify businesses, likely to be affected during construction and decommissioning phases. The Applicant should seek to agree these with relevant consultation bodies, such as the local authorities.	For individual tourism and recreation businesses that will be affected, these have been identified within Volume 4, Chapter 3: Socio-economics and Tourism of the ES. For supply chain companies, sectors of opportunity have been highlighted, rather than individual companies.
Planning Inspectorate	The Inspectorate considers that significant effects on tourism accommodation should be considered in the assessment, and this should be cross referenced to the land use and recreation assessment of the impact of disruption and reduced access to recreational resources in the ES.	Impacts to tourism accommodation are considered as part of the assessment of tourism economy introduced in the construction phase, in Volume 4, Chapter 3: Socio-economics of the ES.. Impacts to tourism and recreation assets are cross referenced with the following chapters outlined throughout. This includes reference to the following ES chapters; Volume 4, Chapter 2: Landscape, Seascape and Visual Resources; Volume 2, Chapter 6: Noise and Vibration; Volume 2, Chapter 8: Land Use and Recreation; Volume 2, Chapter 2: Historic Environment; and Volume 3, Chapter 5: Shipping and Navigation.
Planning Inspectorate	**Human health matters: offshore** The Scoping Report proposes to scope out an assessment of the offshore effects on the following matters: • Health related behaviours - physical activities; risk taking behaviour; diet and nutrition. • Social environment - housing; relocation; open space, leisure and play; transport modes, access and connections; community safety; community identity, culture, resilience and influence; social participation, interaction and support. • Economic environment - education and training; employment and income. • Bio-physical environment – climate change and adaptation; air quality; water quality and availability; land quality; noise and vibration; radiation.	Noted - The listed offshore determinants are scoped out of the assessment. Offshore health effects from wider indirect economic impacts are scoped in and included within Volume 4, Chapter 4: Human Health of the ES.

Stakeholder	Summary of Response	Formal response
	• Institutional and built environment – health and social care services; built environment; wider social infrastructure and resources. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that these matters as listed in Table 9.5.3 can be scoped out of the ES.	
Planning Inspectorate	The Inspectorate notes that any issues relating to shipping safety would be discussed within the Shipping and Navigation ES chapter and is content with this approach. The Inspectorate also notes that Table 9.5.2 scopes in in respect of offshore impacts an assessment of health effects from wider indirect economic impacts, for example temporary changes to commercial fishing, together with any potential unemployment or adverse economic implications. The Inspectorate is content with this approach.	Noted
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of onshore physical activity health effects for all phases, as the potential impacts would be considered under the open space, leisure and play health determinant instead. The Inspectorate is content with this approach.	Physical activity is scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024). To avoid duplication, potential health effects related to physical activity are addressed under open space, leisure and play, see Volume 4, Chapter 4: Human Health of the ES
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore health effects related to risk-taking behaviour for all project phases on the basis that the workforce will be comprised of professionals who would return to their usual place of residence during periods of leave and is unlikely to be large enough to affect local markets to an extent which could significantly affect community health. The Inspectorate agrees that this matter can be scoped out of the ES.	Health effects related to risk-taking behaviour are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024).
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore health effects related to diet and nutrition for all project phases on the basis that construction and operation of the Proposed Development would not change population diet or food prices. Given the nature of the Proposed Development and the information	Health effects related to diet and nutrition are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024).

Stakeholder	Summary of Response	Formal response
	provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore health effects related to housing for the operational phase on the basis that minimal workforce numbers are anticipated. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	Noted - this matter has been scoped out.
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore health effects related to housing for the decommissioning phase on the basis that fewer workers would be required for a shorter duration than the construction phase. No further information is provided regarding likely numbers of workers during the decommissioning phase and so the Inspectorate considers that insufficient justification has been provided for scoping this matter out at this stage. The ES should include an assessment of this matter or evidence demonstrating agreement with the relevant stakeholders and the absence of likely significant effects.	During the construction phase, onshore health effects related to housing are scoped in, see Volume 4, Chapter 4: Human Health of the ES. During operation (and maintenance), minimal operational workforce numbers are anticipated to check and maintain the Proposed Development. The onshore infrastructure, is relatively low impact in terms of its built form, limiting the potential for any widespread adverse effect on housing value or affordability at a population level. This issue is therefore scoped out during the operational phase. Information regarding the likely number of workers is provided in Volume 4, Chapter 4: Human Health of the ES, Employment and Income – Offshore. The decommissioning workforce number is expected to be no higher than for construction (see Volume 1, Chapter 3: Project Description of the ES).
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects related to housing for all project phases on the basis that the Proposed Development would not involve compulsory purchases of homes or community facilities. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	Health effects related to relocation are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024)
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on open space for the operational phase on the basis that the Proposed Development would not involve the acquisition of	Open space, leisure and play health effects are scoped out of the assessment for the operational phase, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024).

Stakeholder	Summary of Response	Formal response
	land used for community recreation. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES	
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on transport modes, access and connections for the operational and decommissioning stages on the basis that the expected vehicle movements associated with the Proposed Development would have a minimal impact on road transport. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	Transport modes, access and connections health effects are scoped out of the assessment for the operational and decommissioning phases, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024).
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on community safety for all phases on the basis that appropriate management plans and fencing would be in place to manage security and safety risks to the public. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	Community safety health effects are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024).
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on community identity, culture, resilience and influence for all project phases on the basis that visual impacts associated with the Proposed Development are not expected to be of a scale that could affect population health or community identity. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	Community identity, culture, resilience and influence health effects are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024).
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on social participation, interaction and support for all	Social participation, interaction and support health effects are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024).

Stakeholder	Summary of Response	Formal response
	project phases on the basis that the Proposed Development would not directly affect land or areas used for community interaction. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on education and training opportunities for all project phases on the basis that the Proposed Development would not affect access to schools and would not involve a large influx of workers and their families which may affect educational capacity or quality. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	Onshore health effects related to education and training opportunities are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024).
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on employment and income for all project phases on the basis that employment opportunities associated with the Proposed Development are not expected to be on a scale that could have significant population level effects. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES provided that information is included within the ES with regards to likely employment numbers and to evidence how this conclusion was reached.	Onshore health effects related to employment and income are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024). Information and evidence regarding likely employment numbers is provided in Volume 4, Chapter 4: Human Health of the ES.
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on climate change and adaptation for all project phases on the basis that embodied carbon and climate altering pollutant emissions are not of a scale that could have population level effects. Given the nature of the Proposed Development and the information	Onshore health climate change effects are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024). Wider public health benefits of electrical infrastructure during operation and maintenance are assessed under wider societal infrastructure and resources, see Volume 4, Chapter 4: Human Health of the ES.

Stakeholder	Summary of Response	Formal response
	provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES. The Inspectorate notes that the public health benefits of electrical infrastructure during operation and maintenance of the Proposed Development are assessed in the 'wider societal infrastructure and resources' determinant and is content with this approach.	
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on air quality for the operation and maintenance phase on the basis that air emissions and odour from the Proposed Development are not expected to be on a scale that would affect population health. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	Onshore air quality health effects during operation and maintenance are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024)
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on water quality and availability for the operation and maintenance phase on the basis that impacts resulting from emissions to water are not expected to be on a scale that would affect population health. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	Onshore water quality and availability health effects are scoped out for the operation and maintenance phase, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024).
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on land quality for the operation and maintenance phase on the basis that activities requiring land excavations are considered unlikely and any risks would be managed by industry best practice contamination avoidance and response measures. Given the nature of the Proposed Development and the information	Onshore land quality health effects during operation and maintenance are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024).

Stakeholder	Summary of Response	Formal response
	provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	
Planning Inspectorate	The Inspectorate notes that while onshore effects on noise and vibration sensitive community receptors during the operational phase is scoped into the assessment, noise and vibration effects associated with maintenance checks and activities are not expected to be of a magnitude that could impact on human health and so have been scoped out. The Inspectorate is content with this approach.	Noise and vibration health effects during the maintenance phase are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024).
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on radiation for the construction and decommissioning phases on the basis that the Proposed Development would not use or make changes to major EMF producing electrical infrastructure, and for the operational phase on the basis that levels of exposure to EMF would not pose a risk to public health. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	Onshore radiation health effects are scoped out during all phases, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024).
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on health and social care services for the operation and maintenance and decommissioning phases on the basis that a minimal number of workers will be required and so demands on local healthcare will not be significant. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	Onshore effects on health and social care services during the operation and maintenance and decommissioning phases are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024). Onshore effects on health and social care services during construction are scoped in, see Volume 4, Chapter 4: Human Health of the ES.
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on the built environment for all project phases on the basis that significant population health implications associated with the Proposed Development are not anticipated, and long-term impacts on land use patterns are restricted to the converter stations.	Onshore built environment health effects are scoped out of the assessment, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024).

Stakeholder	Summary of Response	Formal response
	Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES	
Planning Inspectorate	The Scoping Report proposes to scope out an assessment of the onshore effects on wider social infrastructure and resources during the construction and decommissioning phases on the basis that the Proposed Development's energy infrastructure would not be operational. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.	Onshore effects on wider social infrastructure and resources during the construction and decommissioning phases are scoped out, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024). Onshore effects on wider social infrastructure and resources during the operation and maintenance phases are discussed in Volume 4, Chapter 4: Human Health of the ES.
Planning Inspectorate	The Scoping Report proposes to scope out potential impacts arising from operational waste on the basis that operation and maintenance of the Proposed Development will generate limited amounts of waste, and waste collection procedures will be agreed with the relevant regulator and local authorities. The Inspectorate agrees that waste generation during operation is unlikely to result in significant effects and is content to scope this matters out of the ES.	Noted.
Planning Inspectorate	The Inspectorate agrees that likely significant effects arising from residues and emissions (e.g. dust, pollutants, light, noise, vibration) are to be assessed in the relevant aspect chapters of the ES and a standalone aspect chapter for residues and emissions is not required. The Applicant's attention is however directed to the Inspectorate's comments in the relevant aspect chapters above with regards to residue and emission matters, for example lighting.	The potential impacts of residues and emissions (e.g., dust, pollutants, light, noise or vibration) arising from the construction, operation and maintenance, and decommissioning phases of the Proposed Development have been considered in the following topic chapters of this ES, where relevant: • Volume 3, Chapters 1, 2, 4 and 9: Benthic Ecology; Fish and Shellfish Ecology; Marine Mammals and Sea Turtles, and Offshore Ornithology (impacts of emissions to water and noise emissions on ecological receptors); • Volume 2, Chapter 4: Geology, Hydrogeology, and Ground Conditions (impacts of emissions/residues to land on soil quality); • Volume 2, Chapter 3: Hydrology and Flood Risk (impacts of surface water runoff on water quality and flood risk);

Stakeholder	Summary of Response	Formal response
		• Volume 2: Chapter 1: Onshore Ecology and Nature Conservation (impacts of emissions to water, land or air and noise emissions on ecological receptors); • Volume 2, Chapter 6: Noise and Vibration (impacts of noise emissions and vibration); and • Volume 2, Chapter 7: Air Quality (impacts of emissions to air, including dust and other pollutants).
Planning Inspectorate	The Scoping Report states that potential impacts on material assets arising from the Proposed Development will be considered in the other marine users, historic environment, land use and recreation; and socio-economics aspect chapters of the ES and a standalone material assets aspect chapter is not proposed. The Inspectorate agrees with the proposed approach on this basis.	The potential impacts on material assets arising from the construction, operation and maintenance, and decommissioning phases of the Proposed Development have been considered in the following topic chapters of this ES. • Volume 3, Chapter 3: Commercial Fisheries; • Volume 3, Chapter 5: Shipping and Navigation; • Volume 3, Chapter 6: Other Marine Users; • Volume 3, Chapter 7: Marine Archaeology and Cultural Heritage; • Volume 2, Chapter 2: Historic Environment; • Volume 2, Chapter 8: Land Use and Recreation; • Volume 4, Chapter 3: Socio-economics and Tourism.
Planning Inspectorate	A standalone ES chapter for major accidents and disasters is not proposed on the basis that potential accidents and disasters will be assessed in other aspect chapters, where relevant, including significant effects arising from the vulnerability of the Proposed Development to major accidents and disasters. The Scoping Report also states that a description of how major accidents and disasters have been considered in the design of the Proposed Development will be outlined in the project description chapter of the ES. The Inspectorate has considered this approach and agrees that a standalone chapter is not necessary on the basis that the information relating to major accidents and disasters will be provided elsewhere in the ES.	An overarching section on Major Accidents and Disasters is included in Volume 1, Chapter 3: Project Description of the ES. This section introduces the topic of major accidents and disasters provides cross references to those chapters where specific accidents and disasters have been addressed.

Stakeholder	Summary of Response	Formal response
	The Inspectorate notes that various aspect chapters in the Scoping Report do not clearly identify those impacts scoped-in to the assessment that include an assessment of major accidents and disasters. The Inspectorate advises that the ES ensures clarity on what has been considered within the technical assessments. The Inspectorate would expect an overarching section in the ES which explains how potential impacts have been identified and where in the ES the assessment of their effects is presented. The Applicant's attention is also directed to the comments of the Inspectorate in Section 3.18 above in respect of climate and extreme weather events. The Applicant's attention is drawn to the Maritime and Coastguard Agency comments at Appendix 2 of this Opinion with respect to collision risk, navigational safety, and other related issues that should be considered in the assessment of likely significant effects.	
Planning Inspectorate	**All potential effects on offshore ornithology including direct impacts due to disturbance, displacement and impacts on foraging birds (all phases)** The Inspectorate notes the presence of Lundy SSSI 2km north of the study area, designated for its breeding populations of guillemot, razorbill, Manx shearwater, kittiwake and puffin, together with a further seven internationally important designated sites and 17 nationally important sites with qualifying features with potential connectivity to the study area. It is acknowledged that apart from Lundy SSSI, all other designated sites are located at a distance greater than 35km from the study area.	Noted. Restrictions on working near Lundy and the adoption of a Vessel Management Plan are discussed in Volume 3, Chapter 9 of the ES.
Planning Inspectorate	Appendix C to the Scoping Report confirms that there potential for impacts to qualifying features of designated sites foraging within the study area (functionally linked habitat). The proposed programme for construction of the Offshore Export Cable identifies the period February to October and thus includes breeding and migratory seasons. The Scoping Report states that potential impacts would be	

Stakeholder	Summary of Response	Formal response
	highly localised and for a limited, short-term duration and only last as long as vessels are present within c.2km of any area.	
Planning Inspectorate	The Scoping Report states that it is considered "unlikely that the study area supports significant numbers of foraging birds in the context of their UK distribution, or in comparison to the surrounding area. As vessels would only be present within a discrete area for a short period of time, any impacts arising from noise and visual disturbance would be short-term and reversible. In addition, disturbance from vessels is common within the Celtic Sea, and therefore species will be habituated to this source of disturbance, which will be similar to the baseline conditions within the wider area."	
Planning Inspectorate	The Scoping Report acknowledges that the area supports foraging bird species, including those associated with European sites, and that the Celtic Sea supports large numbers of birds. While the Scoping Report concludes that significant effects are unlikely, it also relies on a number of measures such as that to be included within a VMP to avoid likely significant effects and makes the assumption that the number of vessels present would only be present for a short period of time. The Inspectorate notes that JNCC concurs with this position. While NE has confirmed that it considers this matter can be scoped out of further assessment, this is on the basis that seasonal restrictions are applied when working closest to Lundy (i.e. in the months approximately May to August, when seabird breeding and foraging will be at its peak), and restrictions on vessel speeds around any rafts of birds encountered on the sea surface, need to be secured.	
Planning Inspectorate	In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of this matter, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.	Noted and the assessment of potential offshore ornithology effects is now presented as a full ES chapter (Volume 3, Chapter 9 of the ES)

Stakeholder	Summary of Response	Formal response
Planning Inspectorate	**All potential effects on offshore ornithology including indirect impacts due to effects on prey species and habitats (all phases)** The Scoping Report identifies the potential for indirect effects on offshore ornithology due to potential underwater noise or the generation of suspended sediments that may alter the distribution, physiology or behaviour of prey species. However, the Scoping Report states that any impacts on prey species arising from noise and visual/physico-chemical/chemical disturbance would be short-term and reversible, and any habitats which are impacted are likely to be rapidly recolonised by prey species following cable burial. Also, that the area within which prey would be impacted is also very small in relation to the foraging range of qualifying features. It is therefore considered that the significance of any indirect impacts on offshore ornithology receptors due to effects on prey would be negligible during all phases of the Proposed Development, and therefore scoped out of the impact assessment. In the absence of the findings of the fish assessment and information demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not able to agree to scope this matter out of further assessment at this stage. The ES should include an assessment of indirect impacts to offshore ornithology receptors as a result of impacts to prey species, where likely significant effects could occur.	The Planning Inspectorate has agreed in their scoping response that "direct injury/mortality of fish and shellfish from vessel activities" can be scoped out of the assessment. However, as requested, the ES includes an assessment of indirect impacts to offshore ornithology receptors resulting from impacts to prey species. This is discussed further within Volume 3, Chapter 9 of the ES.
Planning Inspectorate	**All potential effects on offshore ornithology including pollution incidents (all phases)** The Scoping Report describes that pollution, including accidental spills and contaminant releases associated with the construction activities and use of supply/service vessels, may lead to direct mortality of birds or indirect impacts via causing a deterioration in habitat quality or a reduction in prey availability, either of which may affect species' survival rates. However, it predicts that any impact would be of local spatial extent, short term duration, and not significant in EIA terms. The Scoping Report states that assuming that construction best practice is followed, it is intended to scope this impact out of further	Noted. Mitigation measures proposed as part of the Proposed Development are outlined in Volume 3, Chapter 9 of the ES, which includes adherence to standard pollution prevention measures via a Construction Environmental Management Plan (CEMP) (an outline Offshore CEMP is provided as part of the application for DCO (document reference 7.9)).

Stakeholder	Summary of Response	Formal response
	consideration within the impact assessment. Based on the information provided on the proposed mitigation and control measures, the Inspectorate agrees that significant effects from accidental release of pollution on offshore ornithology receptors during all project phases are unlikely. The ES should provide full details of the proposed mitigation measures for all project phases and describe how they are to be secured	
Planning Inspectorate	The Scoping Report states a standalone ES chapter for local planning policy is not proposed as the relevant legislative and planning policy context will be described within each aspect chapter of the ES. The Inspectorate is content with this approach.	Noted - The local planning policy is introduced within Volume 1, Chapter 2: Policy and Legislation of the ES, and is considered within the individual topic chapters in Volumes 2, 3 and 4.
Planning Inspectorate	Daylight, sunlight, and microclimate aspects are proposed to be scoped out of the ES on the basis that any built elements, such as the converter stations, would not be sufficiently tall or close to other buildings to result in likely significant effects. In addition, given the nature of the offshore and onshore elements of the Proposed Development such as buried cables and limited above ground buildings and infrastructure, these are not likely to result in microclimate changes. The Inspectorate notes the proposed assessments of climate change and LVIA to be included in the ES and has considered the nature and characteristics of the Proposed Development and agrees an assessment of daylight, sunlight and microclimate aspects can be scoped out of the assessment.	Noted.
Planning Inspectorate	The Scoping Report confirms that heat generated during the operation and maintenance of the Proposed Development (e.g. heat generated by offshore and onshore cables) will be considered within the relevant aspect chapters, including Benthic Ecology, Fish and Shellfish Ecology; and Commercial Fisheries. However, activities during construction and decommissioning of the Proposed Development are unlikely to generate significant levels of	Sediment heating has been scoped in and assessed during the operation and maintenance phase for relevant Volume 3 chapters.

Stakeholder	Summary of Response	Formal response
	heat. The Scoping Report also states that the technical specification of the onshore converter stations will consider any heat generated within the design and which as usual practice prevent any overheating or heat effects. With these measures in place, it is not considered likely that significant effects in relation to heat will occur at the Converter Site. The Inspectorate agrees that activities during construction and decommissioning are unlikely to result in significant environmental effects and can be scoped out of the assessment. The ES should clearly explain the design measures that control heat generation associated with the onshore convertor stations.	
Planning Inspectorate	The Inspectorate agrees that pathways for effects from EMFs would only arise when the cable is operational and live, and as such significant effects are not likely to occur during construction and decommissioning. The Inspectorate agrees that an assessment of EMFs during construction and operation can be scoped out	Noted.
Planning Inspectorate	**EMFs - operation phase** The Scoping Report confirms that EMFs generated during the operation of the Proposed Development will be considered in the following aspect chapters and would not be included in a standalone ES chapter in respect of heat and radiation: • Benthic Ecology; • Fish and Shellfish Ecology; • Commercial Fisheries; • Marine Mammals and Sea Turtles; and • Shipping and Navigation. The Inspectorate is content with this approach.	Noted.
Alverdiscott and Huntshaw Parish Council	The security and lighting aspects of the Alverdiscott site which are included in sections 4.6.13, 14 & 23, are felt to require further detail. The area, although not a designated Dark Sky area, does enjoy a high degree of night-time darkness at present. The council feels that both	Operational lighting at the Converter Site is described in Volume 1, Chapter 3: Project Description of the ES. Further information and requirements for operational lighting are secured within the Design Principles (document reference 7.4) and would be in accordance with

Stakeholder	Summary of Response	Formal response
	these aspects are to a greater or lesser extent connected, and therefore would enquire as to what extent the lighting would impinge upon this (we note that measures to prevent light spill would be considered), and to what extent the security fencing would be lit.	the Institute of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light. Light pollution and night time effects on landscape, seascape and visual resources are considered within Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES.
Alverdiscott and Huntshaw Parish Council	Surface and Foul Water Drainage (sections 4.6.19 onwards) note that measures to control surface water runoff would be put in place. These need to be robust enough to cope with potential increases in rainfall, similar to those levels experienced during the current winter. We are not aware of any sewer system in the vicinity, and therefore any foul water would have to be collected by septic tank or waste treatment plant. We are assuming, rightly or wrongly, that foul water generation would be from human activity rather than the plant itself. However, if any oil filled electrical equipment is to be used, what provision will be made to handle leakage or spillage.	Surface water drainage systems associated with the converter stations have been designed to accommodate the 1 in 100-year critical rainfall event with a 50% uplift for climate change, as per latest climate change guidance by the EA updated May 2022 (https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances). Further information is presented within Volume 3, Appendix 3.1: Flood Risk Assessment of the ES. Foul water flows are to be addressed within the Operational Drainage Strategy. An Outline Drainage Strategy has been provided as part of the DCO application (document reference 7.22). As no South West Water sewers are located within the vicinity of the Converter Site, it is expected foul flows will be collected via Septic tank located within the Converter Site boundary. The preferred method for controlling foul waste will be determined during detailed design and will depend on the availability and cost of a mains connection and the number of visiting hours staff will attend site.
Alverdiscott and Huntshaw Parish Council	Construction Access (sections 4.6.94-97) also gives some concerns. Whilst all major construction traffic appears to have been accommodated, there remains the question of secondary traffic to the site. There are many very narrow lanes turning off the B3232 between St.John's Chapel and Torrington that can provide access to the site from a southerly direction and any increase in traffic on these lanes brought about by additional delivery vans and any workforce living to the south will cause local residents substantial disruption as they travel towards Bideford. Additionally any larger vehicles mistakenly using satnav to reach the site from a southerly direction may be tempted to try to get through these lanes causing major disruption as they risk becoming stranded at various choke points. These local lanes, many of which are single track are already seeing the impact of	An Outline CTMP (document reference 7.12) has been submitted with the DCO application. A CTMP would be developed in accordance with the Outline CTMP which will set out suitable construction vehicle routes to be adhered to. The access strategy for the Proposed Development has been designed so construction vehicles do not have to use the narrow lanes between St John's Chapel and Torrington. These management measures will include the restriction of vehicle movements on certain routes, including the B3232.

Stakeholder	Summary of Response	Formal response
	increased traffic from the new estates being built in the Bideford area. We would strongly recommend that restrictive signage be put in place on all access points from the B3232 to prevent any increase in the number of traffic movements; measures similar to that used on the Barnstaple solar panel site may help but are likely to be insufficient.	
Alverdiscott and Huntshaw Parish Council	It seems to be unclear as to the time scale for the converter station site, as opposed to the cabling installation from the coast. Could this be more specific, as we have been receiving various comments ranging from eighteen months to six years.	Details of the programme for construction are set out in section 3.6 of Volume 1, Chapter 3: Project Description, of the ES.
Alverdiscott and Huntshaw Parish Council	Finally, there is the question of mitigation and/or compensation relating to the development. There is already evidence of a reduction in property values in the near vicinity, which is adding to the discontent noted at the beginning of this letter. Schemes of a similar nature, namely recent solar panel installations, have included ongoing compensation such as grants to the community as a whole based on achieved power output, or discounted tariffs. We feel that this aspect of the scheme needs to be addressed at an early stage.	The Applicant will develop a Community Benefit Fund to provide community benefit during the construction period and for a period of up to 15 years following construction. The Applicant will engage with the community to facilitate applications to the fund. The fund will be administered by an independent grant making body. This is included as a commitment within Volume 1, Appendix 3.1: Commitments Register of the ES.
Alverdiscott and Huntshaw Parish Council	The residents most affected by the construction and operation of the converter stations are largely retired, reside in old houses and all live off grid, so will be unlikely to benefit in any way from the output of the project except for a warm feeling from supporting the move towards a greener future. Any compensation for residents of Huntshaw and Alverdiscott parishes therefore needs to be considered separately from anything aimed at compensating residents along the cable route.	The Applicant will develop a Community Benefit Fund to provide community benefit during the construction period and for a period of up to 15 years following construction. The Applicant will engage with the community to facilitate applications to the fund. The fund will be administered by an independent grant making body. This is included as a commitment within Volume 1, Appendix 3.1: Commitments Register of the ES.
Alwington Parish Council	With regard to the email below I confirm that Alwington Parish Council has no comments.	Noted.
The Coal Authority	Our records indicate that coal mining features are present in the north eastern area of the site at surface and shallow depth, including mine entries and coal outcrops which may have been worked at shallow depth. Our records indicate that the mine entries relate to Mineral Black and not coal.	Noted. The historic exploitation of coal known locally as 'Culm' is summarised in Volume 2, Chapter 4: Ground Conditions of the ES.

Stakeholder	Summary of Response	Formal response
	Section 7.5.32 of the Scoping Report submitted notes that an area of development high risk linked to the conjectured outcrop of a coal (culm) seam is identified to the north of the Converter Site. The seam is to the north of the proposed construction compound. There are no coal mining features within the area identified for the proposal other than these coal outcrops which lie north of the site. On the basis of the above, and in light of our records which indicate the presence of no coal mining features in the area where the development is proposed, there is no requirement for coal mining legacy features to be considered further.	
Barnstaple Response Group	We have no comments or observations to make at this time and await sight of detailed plans and fire safety mitigation as part of the Building regulations consultation.	Noted.
Devon County Council	It is noted that there is little consideration being given to cycling within the proposed assessments. Some specifics are given below, but please ensure that Active Travel England provide comments and those comments are considered.	The potential impact of construction traffic on non-motorised users within the study area has been considered in the assessment set out in Volume 2, Chapter 5: Traffic and Transport of the ES). No comments have been received from Active Travel England through the consultation process.
Devon County Council	Paragraph 7.6.2 must include the Barnstaple with Bideford and Northam Local Cycling and Walking Infrastructure Plan which can be found at the following link https://www.devon.cc/bbnlcwip.	The contents of the Barnstaple with Bideford and Northam Local Cycling and Walking Infrastructure Plan have been considered within Volume 2, Chapter 5: Traffic and Transport of the ES.
Devon County Council	Paragraph 7.6.6 states that "*Agreement will be sought with the relevant highway authorities regarding any additional parts of the highway network that may need to be considered in the traffic and transport assessment*." This must also extend to the impact on public rights of way and the Tarka Trail, which is a Devon County Council owned route and not a public right of way.	Impacts upon PRoWs and footpaths, including the Tarka Trail and the South West Coast Path, are considered within Volume 2, Chapter 8: Land-Use and Recreation of the ES.
Devon County Council	Paragraph 7.6.10 states that "An initial desk-based review has identified a number of data sources which provide baseline data coverage of the traffic and transport study area. These data sources are summarised in Table 7.6.1" and table 7.6.1 goes on to provide a	The assessment of highway safety presented in Volume 2, Chapter 5: Traffic and Transport of the ES uses verified PIA data obtained from DCC to identify clusters of injury accidents and evaluate the highway

Stakeholder	Summary of Response	Formal response
	list of data sources one of which www.crashmap.co.uk. We would advise that www.crashmap.co.uk should not be used as it is not verified and we therefore recommend that the verified collision data provided by Devon County Council at the following link https://www.devon.gov.uk/roads-and-transport/safe-travel/roadsafety/collision-data/ should be used instead.	safety record of the highway links within the traffic and transport study area.
Devon County Council	The traffic and transport assessment needs to consider cyclist delay and as such we would request that paragraph 7.6.39 is amended accordingly to include a bullet point titled Cyclist delay.	The potential impact of construction traffic on non-motorised users, including pedestrians and cyclists, within the study area has been considered in the assessment set out in Volume 2, Chapter 5: Traffic and Transport of the ES. The assessment of pedestrian delay serves as a proxy for the delay of other modes of non-motorised users.
Devon County Council	**Mineral Planning:** It is noted that the impacts of the proposed development on mineral resources are proposed to be scoped out of the Environmental Statement. Given that the proposal is not located within any mineral safeguarding or consultation areas, it is unlikely to be a significant impact on the safeguarding of the County's mineral resources. Therefore, the County Council agree that this can be scoped out of the Environmental Statement.	Noted - this matter has been scoped out.
Devon County Council	**Mineral Planning:** We would recommend that, as part of the planning application, consideration is made into how much mineral is required for the construction of this project and where the minerals are likely to be sourced from.	Noted. The Application will consider materials management as part of its construction planning.
Devon County Council	**Mineral Planning:** We would recommend that the applicant considers using alternatives to primary aggregate.	Noted. The Application will consider materials management as part of its construction planning including the winning of materials from the Converter Site and the possibility of materials exchanges with other projects.
Devon County Council	**Waste Planning:** The Waste Planning Authority cannot find reference to how much material will be generated and, therefore, it is unknown if this will be significant. Due to the length of the proposed cable, we are concerned	The offshore elements of the proposed development will be undertaken having regard for the waste hierarchy. There will be no dredge 'arisings' i.e. no collection and movement of dredged material within the marine environment. At PEIR stage the

Stakeholder	Summary of Response	Formal response
	that a significant amount of offshore waste may be generated, along with excavation waste, with the expectation that it will be disposed of onshore and whether there is enough inert waste capacity at disposal sites in Devon. On this basis, it is considered the matter should be scoped in to the Environment Statement for assessment and all possible measures should be taken to reduce, reuse and recycle waste in accordance with the waste hierarchy. Should the applicant demonstrate that the amount of waste generated is not significant, then it can be scoped out of the Environmental Statement.	potential for localised dredging and removal of dredge arisings was being considered at the HDD exit points (using e.g. Trailer Suction Hopper Dredging (TSHD)). These methods have been discounted prior to the ES assessment. The HDD exit pits will be temporarily cleared of superficial sediments (mainly sands), most likely using long-reach back-hoe from the jack-up barge(s). Following completion of the HDD and installation of the associated cable protection (concrete mattresses at the exit points) the cleared sediments will be refilled – via a combination of further back-hoe work and through natural infilling. Furthermore review of the CBRA (Volume 1, Appendix 3.4: Outline Cable Burial Risk Assessment of the ES) and the baseline environmental survey data (e.g. Volume 3, Appendix 8.4 GEOxyz Environmental Report of the ES) confirms that there will be no requirement for 'sandwave sweeping' i.e. broadscale sandwave clearance, in UK waters (which would be classed as dredging under the Marine and Coastal Access Act 2009). In the case of marked abandoned, lost or discarded fishing gear (ALDFG), these would be returned to the MMO / relevant Inshore Fisheries and Conservation Authority (IFCA) for return to the owner of the marked gear. Unmarked gear and other debris retrieved on deck would be disposed of onshore at appropriate disposal facilities. At Out of Service (OOS) cable crossings, a section of the OOS cable would be cut and removed. The cut section would be recovered onboard the vessel and transported ashore for disposal at an appropriate onshore facility. The above measures would be implemented through the Offshore CEMP(s) and an associated Offshore Waste Management Plan. In addition, all project vessels would be required to comply with the Convention on the Prevention of Pollution from Ships (MARPOL Convention), which requires vessels to comply with regulations regarding the prevention of pollution and the discharge of sewage and garbage at sea.

Stakeholder	Summary of Response	Formal response
Devon County Council	**Waste Planning:** In any event, it is recommended that the outline site waste management plan addresses the following: • Demonstrate the provisions made for the management of any waste generated to be in accordance with the waste hierarchy, and that the minimum amount of waste is being disposed of • The amount of construction, excavation and decommissioning waste in tonnes, set out by the type of material. • Identify targets for the re-use, recycling and recovery for each waste type from during construction, excavation and decommissioning, along with the methodology for auditing this waste including a monitoring scheme and corrective measures if failure to meet targets occurs. • The details of the waste disposal methods likely to be used, including the name and location of the waste disposal site. • Identify measures taken to avoid all waste occurring.	Noted. An Outline Site Resource and Waste Management Plan has been appended to the Outline On-CEMP (document reference 7.7) submitted for the application for development consent. The Outline SRWMP sets out measures for managing waste and resources during construction to meet legislative and policy requirements, including the waste hierarchy principle. It also sets targets for the diversion of construction waste from landfill and provides an indicative forecast of key wastes and the preferred management method. The final SRWMP(s) will include waste and resource use forecasts prepared alongside the detailed design process.
Devon County Council	**Surface Water Flooding:** The applicant has confirmed that they will produce surface water management proposals for the planning application (which they anticipate to be an outline for the converter stations). This surface water management design should be submitted with the Environmental Statement and will need to ensure that the cable route and other works, both during the construction and operational phases does not negatively impact on surface water flow paths. The applicant should also include details of how reinstatement works will be carried out to avoid additional impacts on surface water flooding.	Noted. Mitigation measures adopted as part of the Proposed Development are presented within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES. In order to manage impacts to field drainage, additional field drainage will be installed if required to ensure existing surface water flow paths are maintained during and after construction. This is detailed within the Outline On-CEMP (document reference 7.7), which forms part of the application for development consent.
Devon County Council	**Surface Water Flooding:** Whilst the applicant has confirmed that they will assess surface water management for the converter station, the Environmental Statement should also show that consideration has been given to how surface water might also need to be managed for the Transition Joint and any upgrades/ expansion needed for the existing Alverdiscott substation.	Following discussions with NGET, the anticipated Alverdiscott Substation Connection Development will not form part of the Proposed Development as it will be taken forward by NGET. However, it would be necessary to facilitate a connection to the national grid and thus, the ES considers likely cumulative effects that might arise. Cumulative effects

Stakeholder	Summary of Response	Formal response
	In addition, it should also give consideration to how any highways improvements may impact on surface water management particularly if there are known surface water drainage issues.	are detailed in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.
Devon County Council	**Surface Water Flooding:** We welcome reference to an assessment of field drainage within the Hydrology section of the report but would like to highlight that in addition to field ditches (which could be classed as Ordinary Watercourses), land drains may also be present. As a result and because land drains may not show up on survey's and might not be known about, we would ask that the Environmental Statement addresses how the applicant intends to assess the presence of land drains and sets out the process for reinstatement should they be damaged or impacted upon during constructions works.	We anticipate a walkover of the Proposed Development will be undertaken post-ES stage to identify any ordinary watercourses not present within desk-based data. A mitigation measure regarding the reinstatement of watercourses should be proposed if the Proposed Development is unable to commit to trenchless crossings at all ordinary watercourses. A mitigation measure regarding the reinstatement of field drainage post-construction should also be proposed.
Devon County Council	**Surface Water Flooding:** The Environmental Statement should also acknowledge and assess the impacts during the construction phase on surface water management in order to prevent sediment and debris from flowing into drains and watercourses.	This is addressed within 'The Impact of Contaminated Runoff on the Quality of Surface Water and Ground Receptors' which is presented within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.
Devon County Council	**Surface Water Flooding:** The Environmental Statement shall ensure that temporary roads will include drainage features and outline where necessary if other features such silt fences, bunds, swales etc, have been considered or will be required. The management of any stockpiles and other materials and the requirement and location of any proposed site compounds, and associated cable laying during construction works will also need to be assessed to ascertain whether additional drainage features will be required.	A Outline Pollution Prevention Plan is detailed within the Outline On-CEMP (document reference 7.7) which has been developed and submitted as part of the DCO Application. A Construction Drainage Strategy would be developed post-consent and in accordance with the Outline On-CEMP, which outlines the measures and details to be incorporated into the strategy. This includes measures to incorporate pollution prevention and flood response measures to ensure that the potential for any temporary effects on water quality or flood risk are reduced as far as practicable during the construction stage. Mitigation measures adopted as part of the Proposed Development is presented within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.
Devon County Council	**Surface Water Flooding:** It would be useful for the applicant to highlight to readers that the operational phase of the cable route has been scoped out of the	Noted, rationale for scoping out this impact during operation and maintenance phase is discussed in greater detail within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.

Stakeholder	Summary of Response	Formal response
	Environmental Statement and the reasons why.	
Devon County Council	**Education:** Table 9.5.3 - Impacts proposed to be scoped out of the assessment for human Health states that "*During construction, the potential to adversely affect access to schools is limited by the use of trenchless techniques for major road crossings. A large influx for workers, including those bringing families, is not expected, so changes to educational capacity or quality, on a scale to affect population health, are unlikely and are scoped out*" but the County Council would like to also see consideration given to assessing the potential impacts of the routing of any cables and associated easements upon any new schools or extensions to existing schools which may come forward in the future.	No new schools or extensions to existing schools which may be impacted by the Proposed Development have been identified. The assessment of construction effects on schools and other receptors is provided in Volume 4, Chapter 4: Human Health of the ES. In terms of cumulative effects, the Volume 2, Chapter 5: Traffic and Transport, of the ES has not identified any new schools or extensions to existing schools within its cumulative assessment.
Devon County Council	**Historic Environment:** The Devon County Historic Environment Team (HET) concurs with the methodology set out in section 7.3 Historic Environment of the scoping report.	Noted.
Devon County Council	**Public Health:** The Joint Strategic Needs Assessment for Devon should be included with the Baseline data sources, alongside the Devon Health and Wellbeing Strategy, and Integrated Care System Strategy.	The Joint Strategic Needs Assessment for Devon, the Devon Health and Wellbeing Strategy and Integrated Care System Strategy are considered within Volume 4, Chapter 4: Human Health of the ES.
Devon County Council	Scoping out electromagnetic fields; although these should be very low risk due to depth and location (sparse housing), the EN-5 guidance suggests evidence should be provided that they comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP). Scoping out would suggest this evidence would not be presented. Although the guidance may be interpreted that it may be out of scope, there are reasons to keep this within scope. Given that there may be perceived health risks, which in themselves may generate health problems, provision of sufficient information to mitigate against these perceived	Electromagnetic fields are mitigated by adhering the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines and Government voluntary Code of Practice on EMF public exposure (Department for Energy Security and Net Zero, 2012; ICNIRP, 1998, 2010). Impacts arising from electric and magnetic fields (EMFs) in terms of public understanding of risks affecting mental health and wellbeing are scoped in, see Volume 4, Chapter 4: Human Health of the ES).

Stakeholder	Summary of Response	Formal response
	risks should be provided. Evidence provided should include that the line complies with National Policy Statements, including at the nearest residential properties for assurance.	
Devon County Council	DCC Public Health will respond to any Environmental Permitting Regulation requests as and when appropriate. In normal practice, DCC Public Health do not tend to respond to Environmental Permits, but may do so when a specific request is made.	Noted.
Devon County Council	It is recommended that the application assesses any impingement from light pollution, and directional lighting, on local properties and communities. It is not clear if the effects from lighting would be significant and should be scoped into the Environmental Statement, but it is likely that any significant effects could be mitigated to an acceptable level through the application process.	An initial assessment of visual and light impacts is provided in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. The assessment has been updated and potential mitigation provided in the ES.
Devon County Council	In relation to data collection, should the perceived concerns around the effects of dust, noise, or other factors be raised, further monitoring should be put in place in consultation with the local Environmental and Public Health teams (we note that early consultation has already made). Should concerns emerge, additional requests for information may be made. We note the general statement around identification of potential for significant harm and further investigation as highlighted in table 7.5.4, and would expect this as a general coverall.	Visual and light impacts are not on a scale to impact population health and are therefore scoped out of the assessment, see Table 9.5.3 of the Scoping Report (Xlinks 1 Limited, 2024). A full assessment of visual and light impacts is provided in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources. Dust control measures are secured through the Outline Dust Management Plan (DMP) as an appendix to the Outline On-CEMP (document reference 7.7) which is secured as a DCO requirement.
Devon County Council	Regarding climate change, the proposed methodology is satisfactory as it follows IEMA's guidance. The methodology states that "*This assessment will consider the avoided or 'saved' baseline GHG emissions. This will account for energy generated from the Moroccan Onshore Scheme, and their effects, in comparison to alternative grid-connected electricity generators. This will allow for the identification of the net lifetime effects*." which we agree is necessary. However, the methodology does not state which carbon intensity factors it will use for electricity and for which year and, as a result, we suggest the applicant uses the 2023 UK grid-supplied electricity carbon intensity factor for the duration of the lifecycle assessment, as without projects	The methodology for the GHG assessment, with respect to the avoided or 'saved' emissions over the wider Project lifetime, utilises the DESNZ (previously BEIS) long-run marginal figures for the future baseline, which show a year-on-year decarbonisation. This is a worst case assessment as it would result in lower savings for the purpose of the EIA. However, a sensitivity analysis has been carried out using both the 2024 grid intensity factor and DESNZ 'non-renewable fuels' estimations. Further details are provided within Volume 4, Appendix 1.1: Greenhouse Gas Assessment of the ES. The avoided emissions and net emissions of the Proposed Development, assessed cumulatively with the wider Project, are shown in Volume 4, Chapter 1: Climate Change of the ES.

Stakeholder	Summary of Response	Formal response
	of this scale the grid carbon-intensity factor will not reduce over time (as is forecast).	
Devon County Council	In addition, the whole life cycle assessment needs to show that the development saves more GHG emissions than it generates to be able to evidence the green, renewable energy commitments of the project.	A whole life assessment has been completed. The whole life assessment is a 'cradle to grave' calculation of all embodied energy and associated GHG of capital assets across the wider project considering the mining of raw materials, manufacture, transport, construction, use, maintenance and disposal and considers the renewable energy generated in Morocco. This assessment is considered a conservative estimate at present but shows net effects of between +3,531,368 (long-run marginal) to -519,370,356 tCO_2e (non-renewables mix) over the lifetime of the Project. The range of results reflects the scenarios used. Further details are provided in Volume 4, Chapter 1: Climate Change of the ES.
Devon County Council	The Environmental Statement should acknowledge that the proposal will affect a number of Public Rights of Way (PRoW) in the area and should therefore subsequently provide a detailed assessment of how each PRoW is likely to be impacted and what mitigation will be put in place to ensure minimal disruption.	Volume 2, Chapter 8: Land Use and Recreation of the ES details measures adopted as part of the Proposed Development. An Outline Public Rights of Way Management Plan (document reference 7.11) has been submitted as part of the DCO application to limit the disruption to PRoWs and other recreational routes during the construction of the Proposed Development. Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES considers the visual effects on users of PRoW.
Devon County Council	Given that it is likely that most disruption is likely to occur during the construction phase of the development, a Construction and Environmental Management Plan should also accompany the Environmental Statement detailing the measures being put in place to maintain access, where possible, to any affected routes during construction and detail how the applicant intends to ensure all Public Rights of Way legislation requirements are met should any routes require diversion or temporary closure.	An Outline On-CEMP (document reference 7.7) has been submitted with the application for development consent.
Devon County Council	We support the socio-economic assessments proposed but it should be evidenced that any jobs, skills and community benefits to Northern Devon (the Districts of Torridge and North Devon) from the project outweigh any negative impacts, including on tourism, from	The preliminary assessment of Socio-economic and tourism effects is presented in Volume 4, Chapter 3 of the ES.

Stakeholder	Summary of Response	Formal response
	implementing the project. Modelled estimates of the visitor economy from 2022, undertaken by The South West Research Company, point to the combined value of visitor spend in the two Districts being worth around £465m annually, supporting almost 8,300 jobs.	
Devon County Council	Northern Devon's economy has traditionally lagged the UK overall, but has recently significantly improved its offer and contribution towards the national picture. With the development of the Appledore Clean Maritime Innovation Centre and through the UK Government's recognition of both the economic need and the opportunity to deliver in Torridge through its awarding of Levelling Up status, there is currently a clear link to the area's emerging offshore renewables and maritime sector opportunities. In light of this, the Environmental Statement should assess whether this project would result in any impact on the development of future planned offshore renewables, or marine sector as part of the UK and Devon domestic economy and any future projects' potential contribution towards a highly skilled, high productivity, high value offer nationally and locally.	The cumulative projects and plans have been set out within Volume 1, Appendix 5.3: CEA Screening Matrix of the ES, which includes planned renewable energy development areas. Volume 4, Chapter 3: Socio-economics and Tourism of the ES contains an assessment of the investment benefitting the region as a consequence of the Proposed Development.
Devon County Council	Section 5.7 states the methodology for the Cumulative Effects Assessment. It is recommended that the other developments considered alongside the Proposed Development include the Celtic Sea Array and White Cross Offshore Windfarm.	Cumulative projects and plans have been set out within Volume 1, Appendix 5.3: CEA Screening Matrix of the ES, including the White Cross Offshore Wind Farm (onshore project) and The Crown Estate Round 5 Celtic Sea project development areas.
Environment Agency	Considering the nature and size of the proposed works, the chosen onshore ecology and nature conservation study area is appropriate.	Noted.
Environment Agency	The scoping boundary bisects the lower part of Kynoch's Foreshore (LNR), which is important for reedbeds, saltmarsh plants and is a feeding ground for birds. Whilst the HDD will avoid direct impact on the watercourse, the indirect impact of this activity (e.g. increased traffic and activity during the construction phase) may disturb wetland birds and this should be included in the EIA.	The potential impacts on statutory designated sites (such as Kynoch's Foreshore Local Nature Reserve (LNR) and potential disturbance to wetland birds are considered within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES.
Environment Agency	Non-statutory designated sites: Torridge Estuary, Tennacott Wood, Hallsannery, Gammaton Reservoir, Haddacott Moor, Abbotsham Cliff and Cornborough Cliff are all County Wildlife Sites (CWSs) which	County Wildlife Sites (CWS) are identified within the baseline environment section of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES. The onshore ecology and nature

Stakeholder	Summary of Response	Formal response
	partially or fully lie within the Scoping Corridor. The applicant should consult Devon Wildlife Trust to determine the impact of the proposed works on these sites of local wildlife importance.	conservation chapter also addresses the potential impacts on the CWSs within the preliminary assessment of construction.
Environment Agency	During the construction phase, the potential for accidental trapping of any wild mammals in open trenches should be considered.	Measures to prevent trapping terrestrial mammals or other wildlife in excavations will be detailed in the final On-CEMP(s) and LEMP.
Environment Agency	During the construction phase the impact of lighting on any watercourses should be scoped in to avoid disturbance to nocturnal and light-sensitive species such as otters and bats.	The effects of lighting on ecological receptors, such as bats, are detailed within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation, of the ES.
Environment Agency	Section 7.2.28 states that the applicant has proposed a Biosecurity Method Statement and Invasive Species Management Plan. However, the EA holds records for multiple INNS along the scoping corridor (such as Wireweed, Japanese knotweed, Himalayan balsam and common cord-grass), hence the potential impact of INNS should be scoped in.	The presence of Invasive Non-Native Species (INNS) in the ZoI of the Proposed Development is set out in the Ecology Desk Study (Volume 2, Appendix 1.2 of the ES) and updated Phase 1 Habitat (Volume 2, Appendix 1.1 of the ES). However, no INNS have been identified in the locations likely to be affected by the construction of the Proposed Development. Precautionary measures to prevent spread of any previously undiscovered INNS are integrated into the Outline On-CEMP (document reference 7.7) and Outline LEMP (document reference 7.10) covering maintaining up to date information of presence and mapping of their distribution and the implementation of avoidance/control/removal as part of standard working practice across all woks within the Proposed Development. Therefore, the impact of the potential spread or transmission of INNS has been scoped out of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES.
Environment Agency	We support the consideration of biodiversity at an early stage in the project, with collection of ecological data starting in 2021. We support the otter surveys to identify holts, couches and resting places, but recommend that pre-construction surveys for otters are also considered due to the roaming nature of the species.	Noted. The need for pre-commencement surveys for some species is addressed in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES.
Environment Agency	We note that the species surveys will conclude in 2024, and the onshore element of the project will commence in 2026 and end in 2032 (including Phase One and Phase Two). Please note, the CIEEM Advice Note 'On the lifespan of ecological reports & surveys' states that the results of most ecological surveys are valid between 12-18	Noted. The need for pre-commencement surveys for some species is addressed in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES.

Stakeholder	Summary of Response	Formal response
	months. If construction commences 18 months following the survey dates, some or all of the ecological surveys may need to be updated, due to the transitory nature of some species (such as bats).	
Environment Agency	BNG will become a legal requirement for NSIPs in November 2025. It is positive to read that the applicant intends to deliver at least 10% BNG, but we would encourage the applicant to provide additional gain wherever possible. The applicant should use the latest statutory version of the biodiversity metric tool to calculate BNG. The applicant should submit a Biodiversity Gain Plan, outlining how the project will deliver BNG. We note the intention to deliver BNG through hedgerow enhancement, boundary planting, woodland planting and species rich-grasslands, but would also encourage consideration of the potential for enhancements around watercourses.	The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicants have engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit. Approach to biodiversity enhancement is set out in Volume 1, Chapter 3: Project Description and Volume 2, Chapter 1: Onshore Ecology and Nature Conservation. This includes habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and breeding birds. This approach is also present in habitat creation areas to be formed in blocks to either side of the Torridge Estuary and further hedgerow enhancements along the HVDC cable route.
Environment Agency	Devon County Council has been appointed the responsible authority to develop the Local Nature Recovery Strategy. According to the latest project plan (October 2023), the Devon LNRS is currently producing the local habitat map, which will be published in Summer 2024. When complete the applicant should refer to the Devon local habitat map to inform decisions on where to site BNG delivery and any biodiversity enhancements.	Noted. Devon Local Habitat Map contains references to priority habitats (Priority Habitats (South) (England) @ Natural England. These habitats have been recorded within the Phase 1 habitat survey results and plan.
Environment Agency	Any biodiversity enhancements around waterbodies should complement the local environmental objectives and programme of measures within the RBMP. The applicant should refer to the Catchment Restoration Plan produced by the North Devon Catchment Partnership, which was produced to support delivery of the Environmental Objectives of the South-West River Basin Management Plan. The applicant could support the delivery of local projects such as the Woods 4 Water project led by North Devon Biosphere Reserve, or	Noted. The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicants have engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit. Approach to biodiversity enhancement is set out in Volume 1, Chapter 3: Project Description and Volume 2, Chapter 1: Onshore Ecology and Nature Conservation.

Stakeholder	Summary of Response	Formal response
	assist with catchment challenges such as controlling Himalayan balsam.	
Environment Agency	The River Basin Management Plan cites groundwater pollution as a concern; therefore the applicant should take particular care with regards to enacting pollution prevention measures.	As part of the Outline On-CEMP (document reference 7.7), an Outline Pollution Prevention Plan has been developed as part of the DCO application. In terms of managing pollution during decommissioning, an onshore decommissioning plan(s) would be produced prior to decommissioning as detailed within Volume 1, Appendix 3.1: Commitments Register.
Environment Agency	**Data Sources:** The Environment Agency holds data on fish, invertebrates and macrophytes, which are available to view on the EA Ecology & Fish Data Explorer. Additional ecological data can be obtained from the Devon Biological Records Centre, or Devon County Council's 'Environment Viewer'.	The EA NFPD transitional & coastal water fish surveys have been utilised to identify the fish communities present within the Taw-Torridge estuary (section 2.5 of Volume 3, Chapter 2). The EA NFPD freshwater fish surveys have been utilised to identify the presence of diadromous fish species across the Devon and Cornwall coast (section 2.5 of Volume 3, Chapter 2).
Environment Agency	**Hydrology and Flood Risk:** The study area for onshore effects will focus on the area landward of Mean High Water Springs. Designated bathing waters tend to be located below this point and there does not appear to be reference to the potential impact of the project on designated bathing waters within the scoping report. "Westward Ho!" designated bathing water is located to the Northeast of the proposed landfall location. Both onshore and offshore works could have the potential to impact this protected site. Potential risks to designated bathing waters should be incorporated into further assessments for both onshore and offshore works. We also recommend recognising The Bathing Water Regulations 2013 within the list of relevant legislation	Westward Ho! Designated bathing waters and Torridge Estuary designated shellfish waters are located outside of the Zone of Influence and thus have not been assessed. However, mitigation measures adopted as part of the Proposed Development will ensure no degradation to WFD waterbodies will occur. Mitigation measures are presented within Volume 2, Chapter 3: Hydrology and Flood Risk.
Environment Agency	**Hydrology and Flood Risk:** Table 7.4.1 lists the data sources which will be used to form the baseline assessment for hydrology and flood risk. The data sources listed will not provide information on permitted sites, discharges or abstractions. Knowledge of permitted activities within the study area is required to	Volume 2, Chapter 3: Hydrology and Flood Risk of the ES is supported by Volume 2, Appendix 3.3: Surface water abstraction licences, discharge consents and pollution incidents, with data sourced from the EA's public register.

Stakeholder	Summary of Response	Formal response
	accurately describe the baseline environment and subsequently understand the risks posed by the project. We recommend incorporating the Environment Agency's Public Register as a data source for regulated sites, permitted discharges and licenced abstractions within the study area.	
Environment Agency	**Hydrology and Flood Risk:** Section 7.4.18 lists a few designated areas that may intersect with the project. However, there is currently no reference to the Jennetts Reservoir and Gammaton Lower Reservoir nitrate vulnerable zones that the project intersects with. There is also no mention of the Torridge Estuary designated shellfish water which is downstream of the proposed watercourse crossing. If these areas are not included in the baseline conditions, then impacts to the water environment may not be properly understood. Mobilisation of sediment into either lake waterbodies could have a more significant long-term impacts than compared to discharges into a more dynamic watercourse such as the sea. These designations should be incorporated into the baseline conditions and subsequent assessment.	Nitrate Vulnerable Zones and Designated Shellfish Waters have been identified as receptors and assessed within Volume 2, Chapter 3: Hydrology and flood risk of the ES. 'The impact of contaminated runoff on the quality of surface water and groundwater' discusses how mitigation measures adopted as part of the Proposed Development will ensure no degradation to WFD waterbodies including Jennetts Reservoir and Gammaton Reservoirs will occur. Mitigation measures are presented within Volume 2, Chapter 3: Hydrology and flood risk of the ES.
Environment Agency	**Hydrology and Flood Risk:** The impact of contaminated runoff during construction has been scoped in for further assessment but the fate of sewage produced from welfare facilities during construction is not currently clear and should be scoped in for further assessment.	The impact of contaminated runoff on the quality of surface water and groundwater is discussed within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES. This includes contamination from sewage.
Environment Agency	**Hydrology and Flood Risk:** The impact of damage to existing water pipelines during construction has been scoped in for further assessment. However, no mention has been made regarding the impact of damage to other utilities, such as foul sewer or oil-insulated cables. Damage to any utilities within the area could result in impacts on the water environment and the survey for water pipelines should be extended to include a survey on all utilities within the area.	Volume 2, Chapter 3: Hydrology and Flood Risk of the ES includes an assessment of the impact to water supply and drainage infrastructure, including clean water and sewers. It is expected a utilities survey will be undertaken at design stage to establish the location of below ground services including oil insulated cables prior to construction activities begin to reduce the impact of potential damage to underground services.

Stakeholder	Summary of Response	Formal response
Environment Agency	The scoping report confirms that the applicant will produce a Construction Environmental Management Plan (CEMP) to reduce the risk of potential effects on water quality during construction. Large construction sites often cause pollution due to the production of an insufficient CEMP or the failure of contractors to follow the CEMP. To reduce this risk, the EA recommends ensuring that the CEMP includes pollution prevention measures that can withstand significant heavy rainfall events. Additionally, we recommend the inclusion of monitoring, reporting, and reviewing procedures to ensure the project team and principal contractor have sufficient oversight of the contractors that they employ.	A final On-CEMP(s) would be developed in accordance with the submitted Outline On-CEMP (document reference 7.7). The Outline On-CEMP includes the Outline Pollution Prevention Plan as an Appendix which details measures to ensure the effective management of pollution.
Environment Agency	The Environment Agency supports the proposal to secure the requirement to obtain regulatory consent for water discharge activities within the CEMP. We would like to provide the applicant with the following advice regarding water discharge activity permits: • Unless an exemption applies, a permit is required to carry out a water discharge activity. Examples of water discharge activities include discharges of trade effluent (i.e. from dewatering), sewage (during construction and operationally) and surface water run-off from areas of exposed soil. • A permit may not be required for small-scale sewage discharges which can meet the general binding rules. • The timeframes to determine permit applications can be significant. To avoid the risk of delays to the project we would encourage the applicant to engage with the Environment Agency's pre-application service at the earliest opportunity.	This advice has been noted. Consents/permits will be obtained for any works (e.g. discharge of water, dewatering) that may impact surface water or groundwater. This is set out within the Outline On-CEMP (document reference 7.7). Further information regarding mitigation measures relating to dewatering is detailed within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.
Environment Agency	The project description describes below ground work during construction phases for buried cables and for onshore infrastructure and converter site. There are no references to de-watering in the report however it can often be required for construction below ground. Dewatering activities can extend to the removal of water from excavations or more significant pumping of groundwater to lower local	Noted. Mitigation measures relating to dewatering to be adopted as part of the Proposed Development is presented within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES. The potential impact of dewatering activities on reduce groundwater quantity or quality in aquifer units is considered within Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions, of the ES.

Stakeholder	Summary of Response	Formal response
	water levels for an excavation. These activities were previously exempt from requiring an abstraction license. A permit may now be required for activities that don't meet the conditions specified within the regulatory position statement on temporary dewatering from excavations to surface water.	
Environment Agency	The WFD is referenced throughout the report and water bodies are identified in the Hydrology and Flood Risk section (Table 7.4.2). However, the scoping report only refers to a more detailed WFD assessment in the context of the impact of suspended contaminated sediments (table 8.9.6). The potential to contribute toward the achievement of the aims and objectives established by the WFD should be considered more fully for biological and physicochemical WFD elements as well as hydromorphological. Planning Inspectorate (2017) guidance entitled Advice Note 18: The Water Framework Directive provides an outline methodology for WFD as part of the DCO process.	Volume 2 Appendix 3.2: Onshore Water Framework Directive Assessment of the ES has been produced which has screened in the following key impacts. • The impact of contaminated runoff on the quality of waterbodies during construction and decommissioning phases. • The impact of habitat disturbance during construction, operation and maintenance and decommissioning phases. • The impact to flows/quantity, physical processes and hydromorphology of waterbodies during construction, operation and maintenance and decommissioning phases.
Environment Agency	In addition to the watercourse cable crossings, we would expect any element of the development to have at least an 8m setback from any watercourses.	Mitigation measures adopted as part of the Proposed Development are presented within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES which details the proposed easements between temporary working areas and watercourses, including 8 m from the banks of ordinary watercourses and 16 m from the tidal EA Main River and the landward toe of associated flood defences.
Environment Agency	The applicant must demonstrate that the proposals are safe and will not result in any damage to flood assets. For cable crossings this will require consideration of an appropriate depth below any watercourse or flood defences. Of particular concern is the impact on the River Torridge and its associated flood defences. The depth of the cable crossing will depend on where the applicant determines the river bed level to be (accounting for the silt deposited as a result of the river's tidal influence). We would like to encourage early discussions on the location of any cable crossings for the River Torridge. We would recommend condition surveys and accurate location plans be	The trenchless crossing depth will be determined by the depth of suitable rock as identified during supplementary ground investigation surveys. The anticipated crossing depth underneath watercourses is as follows: • 5 m for Kenwith Stream; • 9 m for the tributary of Jennetts Reservoir; and • 15 m for the River Torridge. The trenchless crossing depth for all other watercourse crossings is to be ascertained at detailed design stage and a factor of safety

Stakeholder	Summary of Response	Formal response
	produced for any flood defences within the vicinity of the proposed development.	incorporated within engineering calculations to account for climate change impacts to peak watercourse flows and rates of incision. Further detail on this mitigation measure is provided within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES. Regarding the potential impact on the River Torridge and associated flood defences, the impact of increased flood risk arising from damage to existing flood defences' is discussed within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES. A FRAP was submitted for geotechnical investigations within the River Torridge to ascertain the level of the hard bed and inform the depth of HDD below the Main River.
Environment Agency	We would expect assessment justifying the offshore cable depth, taking into account wave action and ensuring that the cable depth will not be impacted by mobilisation of the seabed throughout the lifetime of the development.	It is unlikely that the cable depth will be impacted by sediment mobilisation as a result of wave action. The water depth is considered to be significant enough (along the majority of the OCC) that the wave influence at the bed will be insignificant. Refer to Volume 3, Chapter 8 of the ES for more evidence that this assumption is appropriate.
Environment Agency	In accordance with paragraph 5.6.7 of National Policy Statement EN-1, the Environmental Statement should 'assess the impact of the proposed project on coastal processes and geomorphology, including taking account of potential impacts from climate change. If the development will have an impact on coastal processes the applicant must demonstrate how the impacts will be managed to minimise adverse impacts on other parts of the coast'. Furthermore, paragraph 5.6.11 states 'the Secretary of State should be satisfied that the proposed development will be resilient to coastal erosion and deposition, taking account of climate change, during the project's operational life and decommissioning period'.	Volume 2, Chapter 3: Hydrology and Flood Risk of the ES demonstrates the Landfall is located within Flood Zone 1 throughout the operational lifetime of the development. The Shoreline Management Plan, also defined and detailed within the FRA further classifies the section of shoreline the Landfall is taken from to not have any active intervention between 2005 and 2105 due to its assessed stability.
Environment Agency	The impact of construction and decommissioning vibrations on watercourses and flood defences should be considered for inclusion within the Environmental Statement, accompanied by an appropriate monitoring plan.	This impact is discussed within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES 'The impact of increased flood risk arising from damage to existing flood defences'.
Environment Agency	The potential for increase in flood risk due to the displacement of fluvial flood waters (loss of floodplain storage and impact on floodplain	As assessed within Volume 2, Appendix 3.1: Flood Risk Assessment of the ES, extents of Flood Zone 3 at the Landfall are considered to be

Stakeholder	Summary of Response	Formal response
	flow routes) where infrastructure is placed within the 1 in 100 year (plus an allowance for climate change) flood extent during construction, operation and decommissioning phases. If no impact is expected, then the applicant should provide justification.	tidal in nature. Extents of Flood Zone 3 across the remainder of the study area are associated with fluvial flows from small ordinary watercourses. Due to data availability, the extent of Flood Zone 3b is informed by the extent of Flood Zone 3. Permanent development includes the Converter Stations and their associated access and egress Proposed permanent development is located within Flood Zone 1. Aside from highways improvements, all temporary and permanent elements of the Proposed Development are located within Flood Zone 1 aside from cables which pass underneath extents of Flood Zones 3 via HDD. HDD compounds which include the entry and exit pits are all located within Flood Zone 1. In regards to highways improvements located within Flood Zone 3, these elements of development relate to junction upgrades and road widening and are expected to tie into existing ground levels. As such, no floodplain displacement will occur and no floodplain compensation will be required.
Environment Agency	Assessment as to how the proposed development will remain operational during tidal or fluvial flooding throughout its lifetime. Please note that in accordance with paragraph 5.8.11 of National Policy Statement EN-1, the Secretary of State should be satisfied that 'in flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere'. In addition, given that the proposed converter stations are likely to be operated 24/7 by staff on-site, it is important that 'the project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development'. If all elements of the proposed development, including any temporary works needed for construction and decommissioning, are to be located outside of the fluvial and tidal floodplain then this should be confirmed. If this is not the case, we would recommend the above be scoped into the	Permanent development includes the converter stations and their associated access and egress proposed permanent development is located within Flood Zone 1. All temporary and permanent elements of the Proposed Development are located within Flood Zone 1 aside from cables which pass underneath extents of Flood Zones 2 and 3 via HDD. HDD compounds which include the entry and exit pits are all located within Flood Zone 1.

Stakeholder	Summary of Response	Formal response
	assessment unless an appropriate justification can be provided as to why this will not be appropriate.	
Environment Agency	Assessment of the impact of climate change on fluvial and tidal flood risk, with specific reference to the climate change allowances for peak river flow and sea level rise referenced in the government guidance 'Flood risk assessments: climate change allowances'. Additionally, with reference to Scoping Report Section 8.9.17, page 380 and Section 8.9.35 page 388, please consider whether future wave conditions need to be assessed, particularly for the decommissioning phase of the development.	RPS submitted two technical notes to the EA in May and October 2024 detailing flood risk data limitations, the assessment approach of flood risk to the development and anticipated impacts from an increase in peak river flow and sea level rise as a result of climate change. The EA agreed to the approach which has since been incorporated within the FRA and has been submitted as part of the DCO application. Climate change allowances for peak river flow sea level rise are noted within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES, 'Future Baseline Conditions'. Climate change allowances are also discussed within Volume 2, Appendix 3.1: Flood Risk Assessment of the ES.
Environment Agency	Please also consider the following guidance: Using Modelling for Flood Risk Assessments Guidance (December 2023). Available online: Using modelling for flood risk assessments - GOV.UK (www.gov.uk).	Noted. This guidance has been reviewed during the preparation of Volume 2, Appendix 3.1: Flood Risk Assessment of the ES.
Environment Agency	Reference to OS Digital Terrain Model (DTM) 50, please be aware there is also full coverage of 1 metre horizontal resolution composite Lidar data dated 2022 for the cable corridor which is available at https://environment.data.gov.uk/survey.	Noted.
Environment Agency	Hydrology & Flood Risk: the Surf Zone dataset 2019 may also be of use which is available here. https://environment.data.gov.uk/dataset/77e6f743-d708-4909-a80f-9510b7dbaa16. This may also be of relevance to Table 8.9.1 Desk Based baseline data sources – Physical Processes, on page 378 of the scoping report.	Noted - included within the Baseline Environment section of the Physical Processes ES chapter (Volume 3, Chapter 8 of the ES).
Environment Agency	The Flood Estimation Handbook (FEH) Webservice available at: Home Page - FEH Web Service (ceh.ac.uk) may also be of interest, particularly when evaluating fluvial flood risk associated with some of the Ordinary Watercourses within the cable corridor route which have no associated Flood Zone mapping.	Noted. The FEH webservice has been used to inform the environmental baseline of this chapter.

Stakeholder	Summary of Response	Formal response
Environment Agency	Section 7.4.19 page 149 "*The EA Flood Zones refer to the probability of flooding from rivers and sea in a given year, assuming no defences are in place and accounting for climate change*". Please note, this statement is not correct, the flood zones do not account for climate change.	Noted, grammatical error updated within Volume 2, Appendix 3.1: Flood Risk Assessment of the ES for the Onshore HVDC Cable Corridor which passes through areas of Flood Zone 3.
Environment Agency	Table 7.4.4 Impacts proposed to be scoped into the assessment for hydrology and flood risk page 153 "*Baseline flood risk within the hydrology and flood risk study area for the Proposed Development will be determined using desk based analysis of flood risk mapping data published by the EA*". Please bear in mind that it is important to check that any data used is suitable for your requirements and is representative of current baseline conditions and guidance. Please refer to the guidance on Using Modelling for Flood Risk Assessments for further details available online at: Using modelling for flood risk assessments - GOV.UK (www.gov.uk).	RPS submitted two technical notes to the EA in May and October 2024 detailing flood risk data limitations, the assessment approach of flood risk to the development and anticipated impacts from an increase in peak river flow and sea level rise as a result of climate change. The EA agreed to the approach which has since been incorporated within Volume 2, Appendix 3.1: Flood Risk Assessment of the ES and has been submitted as part of the DCO application.
Environment Agency	Section 8.9.3 Guidance Documents page 375. There may be elements within the Environment Agency's Coastal Standards Technical Report LIT 56561 (2022) which are of use. Particularly regarding future wave conditions and climate change allowances.	Noted - included within the Baseline Environment section of the Physical Processes ES chapter (Volume 3, Chapter 8 of the ES).
Environment Agency	Table 8.9.1 Desk based baseline data sources – Physical Processes page 378. The Coastal Flood Boundary (CFB) 2018 dataset may be of use and provides information on extreme sea levels.	Noted - included within the Baseline Environment section of the Physical Processes ES chapter (Volume 3, Chapter 8 of the ES).
Environment Agency	Table 8.9.1 Desk based baseline data sources – Physical Processes page 378. The NCERM (National Coastal Erosion Risk Mapping) may be of interest. This is currently out for consultation for NCERM2, however, the original NCERM data can be found here: National Coastal Erosion Risk Mapping (NCERM) - National (2018 - 2021) - data.gov.uk	Noted - included within the Baseline Environment section of the Physical Processes ES chapter (Volume 3, Chapter 8 of the ES).
Environment Agency	Table 8.9.5 Sea Level Rise Allowance Table. Page 388. No further action required, just to confirm, the sea level rise projections presented in this table look reasonable based on a check of area	No further action required.

Stakeholder	Summary of Response	Formal response
	51.06-4.25 within the Sea Level anomalies for marine projections UKCP18 dataset.	
Environment Agency	**The Sequential Test** Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures such as flood defences. In line with paragraph 161 of the NPPF, 'all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property'. Paragraph 162 of the NPPF states that development 'should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The sequential approach should be used in areas known to be at risk now or in the future from flooding'. The Sequential Test is not required as part of the EIA scoping, however it should be adequately applied and evidenced within the flood risk chapter of the EIA.	The Sequential Test and Exception Test has been undertaken within the Volume 2, Appendix 3.1: Flood Risk Assessment of the ES for the Onshore HVDC Cable Corridor which passes underneath of Flood Zone 3 and highway improvements located within Flood Zone 3. The Sequential Test and Exception Test have been deemed to have been passed for the Converter Site and due to being located within Flood Zone 1 and assessed to have a low risk of flooding from all sources.
Environment Agency	**Flood Zone 3b** Flood Zone 3b has not been referred to in the scoping report, but would be important to consider in the EIA. The Local Authority's SFRA should define the extent of Flood Zone 3b. In accordance with paragraph 5.8.14 of NPS EN-1 Where essential energy infrastructure has to be located in Flood Zone 3b it should only be consented if the development will not result in a net loss of floodplain storage and will not impede water flows.	As assessed within Volume 2, Appendix 3.1: Flood Risk Assessment of the ES, extents of Flood Zone 3 at the Landfall are considered to be tidal in nature. Extents of Flood Zone 3 across the remainder of the study area are associated with fluvial flows from small ordinary watercourses. Due to data availability, the extent of Flood Zone 3b is informed by the extent of Flood Zone 3. Permanent development includes the Converter Stations and their associated access and egress Proposed permanent development is located within Flood Zone 1. Aside from highways improvements, all temporary and permanent elements of the Proposed Development are located within Flood Zone 1 aside from cables which pass underneath extents of Flood Zones 3 via HDD. HDD compounds which include the entry and exit pits are all

Stakeholder	Summary of Response	Formal response
		located within Flood Zone 1. In regards to highways improvements located within Flood Zone 3, these elements of development relate to junction upgrades and road widening and are expected to tie into existing ground levels. As such, no floodplain displacement will occur and no floodplain compensation will be required.
Environment Agency	**Flood Risk Activity Permits** Please note that the Environmental Permitting (England and Wales) Regulations 2016 require a flood risk activity permit (FRAP) or exemption to be obtained for any activities which will take place: • On or within 8m of a main river (16 metres if tidal) • On or within 8m of a flood defence structure or culverted main river (16m if tidal) • On or within 16m of a sea defence • Involving quarrying or excavation within 16m of any main river, flood defence (including a remote defence) or culvert • In the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission.	Noted. Mitigation measures to be adopted as part of the Proposed Development, relating to hydrology and flood risk are presented within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.
Environment Agency	If any works are likely to require a FRAP we recommend early consideration of the potential for disapplication of the EPR and the use of Protective Provisions under the DCO.	Discussions relating to ground investigation of the River Torridge are currently being undertaken with the EA in preparation of a bespoke FRAP submission.
Environment Agency	Construction/Decommissioning Environment Management Plan We would expect to be consulted on the Construction Environment Management Plan and the Decommissioning Environment Management Plan which should include: • A flood emergency response plan • Plans for the storage of construction materials (outside of the flood zone) • Flood defence vibration monitoring	An Outline On-CEMP has been submitted as part of the DCO application (document reference 7.7).

Stakeholder	Summary of Response	Formal response
	• Surveys for any works close to a flood defence to better understand defence's geometry, condition, composition and structure • Details of construction phasing to ensure there is no loss in flood storage at any point during construction.	
Environment Agency	**Chapter 7.5: Hydrogeology, Geology and Ground Conditions:** We are satisfied with the matters that are proposed to be scoped in and out of the Environmental Impact Assessment	Noted.
Environment Agency	Paragraph 4.6.19 states that an outline operational drainage strategy will be submitted with the application for DCO. It does not make reference to pollution prevention measures, although pollution prevention is mentioned in the construction drainage design. It is important that pollution prevention is considered in all relevant elements of the scheme, both during construction and operation.	An Outline Pollution Prevention Plan has been included as part of the Outline On-CEMP (document reference 7.7) submitted as part of the application for development consent. Furthermore, pollution prevention measures will be incorporated into the operational drainage strategy. Mitigation measures to be adopted as part of the Proposed Development is presented within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.
Environment Agency	4.6.21 states that foul drainage may be collected in a septic tank. The applicant is advised to engage early with the Environment Agency regarding the possible need for a permit if a septic tank is taken forward as the chosen option.	Foul drainage proposals are discussed in further detail within Volume 1, Chapter 3: Project Description of the ES.
Environment Agency	Paragraphs 4.6.37 to 4.6.40 detail the plans to perform cut and fill works within the scheme. The installation of the cables will also involve excavation of material. Where these works takes place in land affected by contamination the management of waste will need to be carefully managed. Further information about the CL:AIRE Definition of Waste Code of Practice is provided at the end of this response in the event that the excavation works are carried out under that scheme.	The CL:AIRE Definition of waste code of practice has been considered in the Outline On-CEMP (document reference 7.7).
Environment Agency	Horizontal directional drilling (HDD) may be used to aid installation of the cables. This could involve the use of drilling muds and their use may require risk assessment to ensure they do not pose a risk to controlled waters. This is important within the Secondary A aquifer and any other groundwater receptors that may be identified during the next	Mitigation measures relating to the proposed HDD (or other trenchless crossing) sites are detailed within the Outline On-CEMP (document reference 7.7). An Outline Bentonite Breakout Plan has also been submitted as part of the DCO application (document reference 7.20).

Stakeholder	Summary of Response	Formal response
	stage of assessment (for example, private water supplies). The proposed use of directional drilling techniques should therefore be included in the CEMP.	
Environment Agency	We welcome the inclusion of pollution prevention measures in the proposed Construction Environmental Management Plan (CEMP) and will review this when it becomes available.	Noted, this is included in the Outline On-CEMP (document reference 7.7).
Environment Agency	Paragraphs 7.5.14 to 7.5.16 list potential sources of contamination within the study area, including 2 historic landfill sites and table 7.5.4 goes on to state that the impact of ground contamination to controlled water receptors during construction and decommissioning will be scoped in for assessment. The suggested approach to the assessment is acceptable.	Noted.
Environment Agency	**Environmental permits** The Environment Agency supports the proposal to secure the requirement to obtain regulatory consent for water discharge activities within the CEMP. We would like to provide the applicant with the following advice regarding water discharge activity permits: Dewatering activities can extend to the removal of water from excavations or more significant pumping of groundwater to lower local water levels for an excavation. These activities were previously exempt from requiring an abstraction license. Since 01 January 2018, new planned dewatering operations above 20 cubic meters a day will require a water abstraction license from us, prior to the commencement of dewatering activities at the site if they do not meet the criteria for exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. It may also require a discharge permit if it falls outside of our regulatory position statement for de-watering discharges. There is water availability for consumptive abstraction in North Devon	This advice has been noted. Consents/permits will be obtained for any works (e.g. discharge of water, dewatering, water abstraction) that may impact surface water or groundwater. This is set out within the Outline On-CEMP (document reference 7.7). Further information regarding mitigation measures relating to dewatering is detailed within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.

Stakeholder	Summary of Response	Formal response
	catchments, more details can be found in the Abstraction Licensing Strategy. If any dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted. Examples of (consumptive) intervening uses include: dust suppression; mineral washing; washing down machinery and potable supply. Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning for further advice on whether a licence will be required. The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found here, Discharges to surface water and groundwater: environmental permits - GOV.UK (www.gov.uk)	
Environment Agency	**Waste on Site:** Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.	Noted. An Outline Site Resource and Waste Management Plan is appended to the Outline On-CEMP (document reference 7.7) submitted as part of the application for development consent.
Environment Agency	The Environment Agency recommends that developers should refer to our: • Position statement on the Definition of Waste: Development Industry Code of Practice and; • website at https://www.gov.uk/government/organisations/environment-agency	Noted

Stakeholder	Summary of Response	Formal response
Environment Agency	**Waste to be taken off site:** Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.	Noted. An Outline Site Resource and Waste Management Plan is appended to the Outline On-CEMP (document reference 7.7) submitted as part of the application for development consent.
Environment Agency	If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12 month period the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/government/organisations/environment-agency for more information.	Noted. An Outline Site Resource and Waste Management Plan is appended to the Outline On-CEMP (document reference 7.7) submitted as part of the application for development consent.
Environment Agency	**Environment Agency land interest:** There are two sites of EA land interest within or near the scoping boundary: • EA Alverdiscott Depot sits approximately 65m outside the scoping boundary line at SS4693925927 • Fisheries interests at Gammaton Reservoirs SS4873524781 It is unlikely that the proposals will impact on either of these sites, but location plans are available if required.	Noted - Surface water quality including Gammaton Reservoirs is considered within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES.
Exmoor National Park Authority	Lighting has potential to impact on Exmoor National Park through the creation of light domes above the construction and operational sites. Lighting has been scoped into the EIA but is not specific on how this will be measured/assessed or from where. Para 4.6.23 does mention mitigation but quite how many lights will be required, at what output and height and for what duration at night time is something that could have wide ranging effects. Hinckley lies at just over 14km distance and the light dome is impacting on the quality of	Light pollution/night-time effects are considered at a high level within Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. The Exmoor National Park lies approximately 21.5 km from the Converter Site at the closest point. During construction, core working hours would be restricted to Monday to Friday 07:00-19:00 and Saturday 07:00-13:00. However, there would be some continuous working hours (i.e. Horizontal Directional Drilling (HDD) works) requiring night time working. These night time works would be short-term and

Stakeholder	Summary of Response	Formal response
	the night sky seen from the National Park, especially from the elevated ground in the eastern parts of the National Park and the south Wales coast is between 18-c40 miles and produces light domes affecting the night sky seen from Exmoor. Consequently, we would request that potential effects of construction and operational lighting on the National Park is provided in the ES, given the status of the National Park as an international dark sky reserve. Locations such as the elevated ridge running along the south-west and west of the National Park and the high coast cliffs may potentially be affected. Should you wish to discuss this further, Julia Layzell, who is Exmoor National Park Authority's Future Landscapes Officer, would be pleased to provide assistance.	temporary. The Outline On-CEMP (document reference 7.7) includes details regarding construction lighting measures. Construction site lighting would only operate when required and would be designed, positioned and directed to avoid unnecessary illumination of adjacent properties, sensitive ecological receptors and users of public footpaths. Where necessary, light shield guards would be used to prevent light spill. Operational lighting at the Converter Site would be designed in accordance with the Design Principles (document reference 7.4), as well as the latest guidance and legislation. The operational lighting would be designed to avoid illumination of areas beyond the operational site. This would include directional lighting to minimise overspill into the surrounding landscape.
Forestry Commission	7.2.21 – A reference to Ancient Woodland and Veteran Trees would be needed, as this will require significantly more surveying capacity and as referenced below to appropriately assess Root Protection Area's.	The tree survey for the Proposed Development area is presented at Volume 4, Appendix 2.6: Tree Survey and Arboricultural Impact Assessment, of the ES. It identifies that no Veteran Trees or trees within Ancient Woodland are proposed for removal. Overall, the Arboricultural Impact Assessment indicates that there would be minimal impact on trees.
Forestry Commission	Regarding Biodiversity Net Gain – There are key opportunities in the Eastern areas of the site maps, South of Gammaton Moor for Woodland expansion. This could extend from the screening required around the substation site and enhance the scale and connectivity of the relatively fragmented woodland habitats situated in that area. This could be key as it would be enhancing areas of Grade 4 agricultural land bringing significant biodiversity improvements.	The Outline LEMP (document reference 7.10) includes the Illustrative Landscape and Ecological Strategy Plan, which details the woodland that would link various small copses/woodlands in the area, to increase connectivity, and expand woodland cover in the area. Further details are provided within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation, of the ES.
Forestry Commission	We note that in this application, there is potential impacts on the northern limits of the Pixey Copse. This site is a recognised and mapped Ancient Semi-Natural Woodland (ASNW). As stated previously with the several references to how essential ancient woodland is as an 'irreplaceable habitat'.	The tree survey for the Proposed Development area is presented at Volume 4, Appendix 2.6: Tree Survey and Arboricultural Impact Assessment, of the ES. It identifies that no Veteran Trees or trees within Ancient Woodland are proposed for removal. Overall, the Arboricultural Impact Assessment indicates that there would be minimal impact on trees. As detailed within Volume 1, Appendix 3.1: Commitments Register,

Stakeholder	Summary of Response	Formal response
		where possible, protected and unprotected areas of woodland, mature and protected trees (i.e. veteran trees), as well as other ecologically sensitive habitats have and would be avoided.
Forestry Commission	With section 9.2.15 within the scoping report referring to impacts to woodland, the project should look to avoid the ancient woodland situated at Pixey Copse, Pillmouth Wood, and Thorne Wood/Bidd Copse, considering more significantly the irreplaceable ecology represented in the site rather than just GHG.	The design of the Proposed Development includes the sensitive routeing and siting of infrastructure to avoid disturbance to woodland, where possible. This is detailed in Volume 1, Appendix 3.1: Commitments Register of the ES. Measures to prevent indirect impacts on woodland are set out in the Outline On-CEMP (document reference 7.7) and Outline LEMP (document reference 7.10) submitted as part of the DCO application.
Forestry Commission	4.9.18 – As stated, HDD or similar trenchless methods should be used to mitigate significant impacts and disturbance to the ground flora and fauna. When using this method, we would hope a Root Protection Area (RPA) would be appropriately calculated and executed to ensure minimal impact on the woodland. The Ancient Tree Forum, Woodland Trust and other literature suggests ancient woodlands and veteran trees need the have larger RPA's. The consensus suggest it should be whichever is greater of: • an area with a radius which is 15 times the diameter of the tree, with no cap • 5m beyond the crown. This is informed and underpinned from the guidance from the Forestry Commission and Natural England. This can be specifically identified using radar technologies that can detect woody roots around 2cm thick from above ground. This doesn't include the fine roots and wider mycorrhizal networks that would extend even further. For sites where there are ancient woodland and veteran trees and alternative routes for cable can't be done this method would be suggested next and trenchless methods placed appropriately below the identified Root Protection Area.	The tree survey for the Proposed Development area is presented at Volume 4, Appendix 2.6: Tree Survey and Arboricultural Impact Assessment, of the ES. Furthermore, the Outline On-CEMP includes an Outline Arboricultural Method Statement (document reference 7.7, Appendix E) that would be developed further prior to construction. This outlines the relevant measures to be implemented to ensure the protection of trees during construction.

Stakeholder	Summary of Response	Formal response
Forestry Commission	With this in mind, and particularly in the context of the Climate Emergency being declared throughout the country, we believe that this is a landscape that could absorb and benefit from more woodland creation, for both conservation and production, with good landscape design and according to the principles of the UK Forestry Standard.	Woodland creation, particularly where this forms connective links between existing woodland, have been considered as part of the biodiversity mitigation and enhancement. Further details are provided in Volume 1, Chapter 3: Project Description of the ES, as well as the Outline LEMP (document reference 7.10).
Forestry Commission	Monitoring would be essential in all aspects of the project and a commitment to continued monitoring to ensure woodland establishment, with appropriate restocking regimes each year. Establishing Woodland Management Plans for any woodland creation would be expected.	An Outline LEMP has been submitted as part of the DCO application (document reference 7.10), which provides detail on the monitoring and maintenance during planting establishment.
Historic England	Our primary concern in relation to this proposal is the impact of the development upon the significance of designated heritage assets and non-designated heritage assets, both from construction and within the area surrounding the development.	An assessment of direct and indirect impacts to heritage assets is provided in Volume 2, Chapter 2: Historic Environment of the ES. Furthermore, the Settings Assessment is presented in Volume 2, Appendix 2.4 of the ES.
Historic England	It will be essential that any tabular approach to heritage assessment using Design Manual for Roads and Bridges (ORMS) - which is often not ideal in relation to heritage - is complemented and supported by a reasoned, narrative discussion of the significance of any heritage assets affected and the level of impact and harm. This should preferably be informed by the approaches contained in Historic England guidance, and will be necessary to meet the policies within Chapter 5.9 (Historic Environment) of the Overarching National Policy Statement for Energy (EN-1).	In addition to the matrix-based approach set out in the Scoping Report, the assessment of individual impacts is also articulated in an accompanying narrative setting out the significance of any heritage assets affected and the level of impact and harm, and duly cognisant of the relevant Historic England guidance. This information is presented within Volume 2, Appendix 2.4: Settings Assessment of the ES. This approach has proved acceptable to Historic England in recent similar DCO applications.
Historic England	**EIA Methodology:** Could the assessment identify opportunities for enhancements as well as mitigation measures?	An Outline Onshore WSI (document reference 7.8) has been submitted with the application for development consent. Where possible, opportunities for knowledge sharing and skills building in the field archaeology will be explored.
Historic England	In relation to heritage it will be important that the assessment of significance of effects using a tabular approach is adequately supported by careful analysis and commentary on the historic significance of any heritage assets that are affected and how development would impact on that significance, e.g. following Historic	As set out in Volume 2, Chapter 2: Historic Environment of the ES, the evaluation of receptor sensitivity, impact magnitude and significance of effect has been informed by professional judgement and is underpinned by narrative to explain the conclusions reached. A list of the relevant guidance documents, including those mentioned by

Stakeholder	Summary of Response	Formal response
	England guidance such as (both of which are listed in section 7.3 Historic Environment): • Good Practice Advice in Planning 2: Managing Significance in Decision-Taking in the Historic Environment • Good Practice Advice in Planning 3: The Setting of Heritage Assets • Good Practice Advice in Planning (GPA) 12: Statements of Heritage Significance	Historic England, can be found in Volume 2, Chapter 2: Historic Environment section 2.2 of the ES and also in Volume 2, Appendix 2.1: Historic Environment Desk-Based Assessment of the ES.
Historic England	We welcome inclusion of an assessment of impacts on the Historic Environment as part of the onshore assessment.	Noted.
Historic England	Historic Environment - Legislative and Policy context - we suggest that the following are also reviewed: • European Landscape Convention • The Convention for the Protection of the Architectural Heritage of Europe • The European Convention on the Protection of Archaeological Heritage	Relevant legislative and guidance documents utilised in the preliminary assessment, including those identified by Historic England, are set out Volume 2, Chapter 2: Historic Environment of the ES.
Historic England	Historic environment study area - how will this take account of potential impacts associated with utilities diversions and temporary haul roads as mentioned at 4.4.2 and 4.4.3?	The study areas identified in Volume 2, Chapter 2: Historic Environment of the ES and presented on Volume 2, Figure 2.1 of the ES cover all elements of the Proposed Development with the potential for impacts on heritage assets. These include temporary elements such as utility diversions, haul roads and construction compounds.
Historic England	Table 7.3.1 Baseline data sources - this should include consideration of any historic landscape and seascape characterisation relevant to the area.	A brief summary of the baseline historic environment within the study area is provided in Volume 2, Chapter 2: Historic Environment of the ES; greater detail regarding historic landscape characterisation is presented within Volume 2, Appendix 2.1: Historic Environment Desk-Based Assessment of the ES. Historic seascape characterisation is addressed in Volume 3, Chapter 7: Marine Archaeology and Cultural Heritage of the ES.

Stakeholder	Summary of Response	Formal response
Historic England	Will this assessment take account of potential impacts associated with utilities diversions and temporary haul roads as mentioned at 4.4.2 and 4.4.3?	The study used in the assessment cover all elements of the Proposed Development with the potential for impacts on heritage assets. These include temporary elements such as utility diversions, haul roads and construction compounds.
Historic England	Table 7.3.4 Impacts proposed to be scoped out: While we accept that certain heritage impacts are likely to occur primarily as a result of construction activity, it will be important to accurately recognise whether these are permanent (as is likely to be the case with buried archaeology) or temporary impacts. While setting impacts as a result of vegetation loss during construction is usually treated as temporary, it should be noted that in the case of impacts associated with the loss of mature trees, mitigating planting could take many years to be fully effective.	The assessment methodology identified in Volume 2, Chapter 2: Historic Environment of the ES is sufficiently nuanced to allow for recognition of different impacts as a result of construction. The issue of time delay when dealing with planted mitigation is noted, and is reflected in the assessment set out in Volume 2, Chapter 2: Historic Environment of the ES.
Historic England	We welcome the recognition that Landscape and Visual Impact Assessment and noise have interrelationships with a heritage assessment.	Noted.
Historic England	As far as Heritage Impact Assessment methodology, DMRB should not be seen as industry standard, as it is not appropriate for most cases and we would not expect it for this if it wasn't NCIP/EIA. For EIA there is a requirement for the differing headings and a tabular approach, but the terrestrial impacts here are so few we still expect a fully GPA3 and GPA12 (as referenced above) compliant reasoned narrative discussion of affected Scheduled Monuments. Identifying significance, impact and harm, based upon an approach that describes 'what is it and how is it affected'. We cannot overstate the need for this, as purely tabular assessments are limited in scope and poor in practice - and the Applicant should be made aware of this. We feel that DMRB tables are a tool and should be an appendix to the main discussion/HIA.	In addition to the matrix-based approach set out in the Design Manual for Road and Bridges, the assessment of individual impacts is also articulated in an accompanying narrative setting out the significance of any heritage assets affected and the level of impact and harm, and duly cognisant of the relevant Historic England guidance. This information is presented within Volume 2, Appendix 2.4: Settings Assessment of the ES. This approach has proved acceptable to Historic England in recent similar DCO application.
Historic England	Photographic visualisations should be 75-80mm single image where required for Scheduled Monuments.	Any visualisations required to assist with the assessment of impacts on Scheduled Monuments have been prepared in accordance with the technical standards published by the Landscape Institute. The

Stakeholder	Summary of Response	Formal response
		visualisation image prepared in relation to the Scheduled Monument at Higher Kingdon (see Figures 5 to 7 in Volume 2, Appendix 2.4: Settings Assessment of the ES) has been produced using a 50 mm single image.
Historic England	In terms of Scheduled Monuments, the Applicant needs to consider Hallsannery limekiln and the Roman site at Alverdiscott. This is equally important in relation to associated development and expansion. The Applicant should also be made aware that they will need to avoid these Scheduled Monuments as Scheduled Monument Consent is unlikely to be forthcoming.	The assessment has considered these Scheduled Monuments. No physical impacts on the Scheduled Areas themselves are anticipated. The setting of a heritage asset makes a contribution to its heritage significance, and this has been assessed on an asset by asset basis. The results of this assessment are presented within Volume 2, Appendix 2.4: Settings Assessment of the ES.
Historic England	In addition, we recommend that the Project continue to engage with the Local Authority throughout the pre-application, application and examination process to ensure all works which have the potential to impact upon archaeology and the preservation of archaeological remains: such as road junction improvements, haul roads, temporary and permanent utilities or utility diversions, landscaping, drainage, ecological mitigation and offsetting etc. are adequately and appropriately managed.	There has been extensive liaison with the archaeological advisors to the Local Authority throughout the course of the assessment.
Historic England	At present we consider that the impacts included within table 8.8.2 present a good starting point in which to inform any subsequent EIA. Additionally, that the impacts scoped in or out are acceptable. However, as explained within the Historic England guidance document The Setting of Heritage Assets (Good Planning Advice in Planning 3), impacts to the setting and the significance of heritage assets such as scheduled monuments or Protected Wreck Sites - that are periodically, partly or wholly submerged - are equally applicable in some rare cases. Which in respect to the project's development infrastructure may present such instances where the extent of cable burial is not altogether possible.	The known protected wrecks and scheduled monuments within the marine or intertidal environment within the study area are identified in the baseline in Volume 3, Chapter 7 and considered within the ES.
Historic England	Regarding only the archaeological science elements of the proposed offshore works, consideration of the potential impact of	Noted

Stakeholder	Summary of Response	Formal response
	geomorphological changes is welcomed, as is the assessment of potential impacts through physical process modelling.	
Historic England	The Scoping report explains in summary (within table 8.8.1 and 8.8.27) the EIA's marine archaeology and cultural heritage assessment will be informed by the interpretation of the geophysical and geotechnical survey data. Principally through Multibeam Bathymetry, Sidescan Sonar, Magnetometer and Sub-bottom Profiling geophysical techniques. With reference to up to date standards and guidance included. Whilst we welcome this approach, to support a clear characterisation level of seabed impacts, if this data is to be solely used for the purposes of the final route design, it runs the risk of being insufficient to inform a more iterative approach to gathering important information about impacts to the historic environment. Therefore, the PEIR archaeological assessment technical reports included at the stage of the pre-application should be given the complete autonomy to issue recommendations as to where such acquired data is insufficient, lacking in resolution or demonstrating gaps in coverage. Such that plans for schemes of further work can be effectively captured within supporting documentation attached to any consent granted. I.e. through an Outline Offshore Written Scheme of Investigation (WSI).	Any insufficient data in the geophysical and geotechnical surveys have been identified and recommendations have been made where warranted to ensure that potential remains and associated impacts are accurately identified, characterised, and mitigated. This is included within the ES in Volume 3, Chapter 7 and as part of the OOWSI (Volume 3, Appendix 7.5: Outline Offshore Archaeology Written Scheme of Investigation, of this ES).
Historic England	We note and welcome the alluded to known and recorded nature of maritime and aviation related archaeology within the study area. Such as paragraph 8.8.15. However, we feel the potential for unrecorded sites in or close to the development area is very high. The justification for this uncertainty is given the marine historic environment comprises more than those sites that are currently recorded with in accessible marine datasets. As an example, the seabed around Cornwall contains approximately 4,500 shipwrecks, of which 85% are unaccounted for wrecked, foundered and stranded vessels. Therefore, it is quite possible should this project progress to consent and construction, such sites may well be encountered, and requiring an effective management response. Furthermore, below the seabed	The potential for marine archaeological remains to be present within the study area is presented in the desk-based assessment (Volume 3, Appendix 7.1: Marine Archaeology Desk-based Assessment, of this ES).

Stakeholder	Summary of Response	Formal response
	surface important evidence of prehistoric landscapes and associated artefacts dating to past human activity may also exist, yet to be mapped and yet to be understood and shared with the wider community.	
Historic England	We note that as a form of 'embedded mitigation' the "micro-routing of the cable corridor will be undertaken where possible and archaeological exclusion zones applied to avoid direct impacts on cultural heritage assets and submerged land surfaces beneath marine sediments where possible". As such, there are some points the Environmental Statement (ES) should look to consider in further detail on this provision. The first being that, as illustrated in figures 8.6.2: 'Navigational features and 8.7.4: 'Subsea cables', there is a high level of seabed coverage in or close to the proposed route already being utilised. As a result, affording effective micro-routing may require careful planning, with survey data and other strategies of investigation important in identifying any constrictive area issues early on. Secondly, whilst in many cases the use of a full suite of high-resolution geophysical survey methods can provide confidence as to the extent of an archaeological exclusion zone. There are always some instances where, due to a range of factors (e.g. wrecking process or subsequent clearance activities) where the fu ll extent of a wreck sites remains uncertain. With some outlying geophysical anomalies, which may seem less significant, in fact on closer inspection forming part of a broader wreck assemblage. It is therefore through the referenced (forthcoming) ES and supporting WSI, that mechanisms for targeting and adapting to these cases should be coherently considered.	Noted. The extent of archaeological exclusion zones has been conservatively determined where uncertainty exists by experienced marine archaeologists. This is reported in the ES chapter in Volume 3, Chapter 7 and in Volume 3, Appendix 7.2: Archaeological assessment of geophysical survey data of the ES and has informed the OOWSI, which is presented as Volume 3, Appendix 7.5 of the ES. Micro-routing of the route will take into account any areas of constriction and the mitigation strategy in those areas will be carefully designed to minimise impact to the assets.
Historic England	A draft offshore Outline archaeological WSI should be included at the PEIR stage. Thereby providing a systematic link with the impacts identified, with the description of resulting measures of evaluation and mitigation (or offsetting) through targeted schemes of investigation, set out clearly (and in good time) between any potential consent and	An OOWSI was included in the PEIR and comments from HE on the draft has been incorporated into the updated OOWSI which is presented as Volume 3, Appendix 7.5 of the ES (which was drafted following the completion of the baseline archaeological review of the

Stakeholder	Summary of Response	Formal response
	seabed preparations. Specifically, these schemes of investigation will need to evaluate and further characterise features of the known or unknown historic environment - through ground truthing surveys - that may present a potential seabed constraint. Which we wholly recommend utilise onboard archaeological expertise during such surveys, to maximise the information outputs.	geophysical data, and geoarchaeological review of the geotechnical data).
Historic England	In doing so we feel the is will align closely with the stated policy provisions of EN-1, paragraph 5.9.13 whereby the "applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment". And paragraph 5.9.19 "Where there is a high probability (based on an adequate assessment) that a development site may include, as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets . .. ".	The stage 1 and stage 2 geoarchaeological review of the geotechnical borehole logs forms Volume 3, Appendix 7.3 of this ES. The review includes recommendations for further investigation where necessary and further mitigation activities. The OOWSI is presented as Volume 3, Appendix 7.5 of the ES, which presents the framework for further archaeological works required post-consent.
Historic England	This we feel also fits closely to the EN-3 provision we would like to see considered appropriately in an ES assessment, to "also include the identification of any beneficial effects on the marine historic environment, for example through improved access or the contribution to new knowledge that arises from investigation" - paragraph 3.8.191.	
Historic England	To do this we request that input of archaeological expertise (to accredited standards and utilising a range of appropriate specialists where necessary), to maximise design and survey planning opportunities, needs to be fully confirmed throughout the ES and Outline WSI.	
Historic England	Specifically, as noted above, an experienced offshore/onshore geoarchaeologist is necessary to fully assess the submerged prehistoric potential, based upon a comprehensive ground model (of sub-surface deposits).	

Stakeholder	Summary of Response	Formal response
Historic England	In order to consider the potential impact on the geoarchaeological and palaeoenvironmental significance of deposits, the heritage assessment should include a detailed geoarchaeological and palaeoenvironmental desk based assessment which considers recent palaeoenvironmental studies with in the Taw Torridge estuary, this should be supported by a review of current, previous and any intended geotechnical assessment or targeted geoarchaeological boreholes. With clear reference to applicable Historic England guidance.	The research and fieldwork undertaken to date have not identified any deposits of geoarchaeological or palaeoenvironmental interest that could be impacted by the Proposed Development. The onshore High Voltage Direct Current (HVDC) Cables will be installed beneath the River Torridge using trenchless technology such as Horizontal Directional Drilling (HDD) which will avoid deposits of geoarchaeological or palaeoenvironmental interest in this area.
Historic England	With respect to measures to mitigate impacts to known and potential archaeological features and deposits within the intertidal, nearshore and punch-out area onshore, a full strategy to assess and survey this area needs to be discussed and agreed upon with Historic England and the Local Authority ahead of any PEIR submission.	Works within the nearshore and intertidal areas fall within the offshore part of the Proposed Development and are addressed within Volume 3, Chapter 7: Marine Archaeology and Cultural Heritage of the ES. Works within the onshore landfall area are addressed within Volume 2, Chapter 2: Historic Environment of the ES. Archaeological surveys in this area have been carried out in accordance with methodologies agreed with the archaeological advisors to the Local Authority.
JNCC	We note that the project passes through the following sites designated for nature conservation: • East of Haig Fras Marine Conservation Zone (MCZ); • South-West Approaches to Bristol Channel MCZ; • Lundy Sand Special Area of Conservation (SAC); • Lundy MCZ; • Bristol Channel Approaches SAC; • North West of Lundy MCZ; and • Bideford to Foreland Point MCZ. The East of Haig Fras MCZ is an offshore site and so JNCC is the responsible agency for this site. The South West Approaches to the Bristol Channel MCZ and Bristol Channel Approaches SAC are jointly managed sites between Natural England, Natural Resources Wales (in the case of Bristol Channel Approaches SAC) and JNCC. JNCC defer to Natural England for comments on the remaining sites as they are the responsible agency.	<u>Benthic Ecology</u> Designated sites with benthic ecology features which overlap with the Benthic Ecology Study Area are presented in Volume 3, Chapter 1 of the ES and are: • Taw-Torridge Estuary SSSI; • Lundy SAC; • Bideford to Foreland Point MCZ; • South West Approaches to Bristol Channel MCZ; and • East of Haig Fras MCZ The only feature of Lundy MCZ is spiny lobster which is mentioned in Volume 3, Chapter 1, but a footnote has been added to indicate it is covered by the Fish and Shellfish ES chapter. <u>Marine Mammals</u> Natural England has been consulted on the Proposed Development and Natural Resources Wales has been consulted regarding the Bristol

Stakeholder	Summary of Response	Formal response
		Channel Approaches SAC. Further engagement has been undertaken with the JNCC post scoping, e.g. as part of the Section 42 consultation process (including direct consultation meetings). After consultation, no further information was required for the ES. The JNCC have confirmed the requirement to assess impacts on conservation objective 3 (i.e. 'The condition of supporting habitats and processes, and the availability of prey is maintained'), which is undertaken within the HRA RIAA (document reference 7.16) which is submitted alongside the ES.
JNCC	Whilst reviewing the Scoping Report we found some of the figures in chapters difficult to understand as the text was too small. For example, the legend on Figure 8.2.3 cannot be read as the text is too small.	Noted. Figures have been provided separately to the main document for the ES which means they can be more readily enlarged making text easier to read.
JNCC	We note that the Applicant has allowed for a 500m corridor within which they aim to microroute the cable following interpretation of geophysical and geotechnical survey results. We would encourage the Applicant to consider surveying and potentially micro-routing outside of this 500m corridor if sensitive habitat is found to cover the width of this 500m corridor. In some situations, the habitat extent may only extend to just outside the cable corridor and so microrouting just outside of the corridor could be plausible.	The potential presence of sensitive habitats including potential Annex I geogenic reefs (i.e. bedrock reefs and stony reef) and biogenic reef (Sabellaria spinulosa reef) was determined across the proposed cable route based on outputs of geophysical surveys and DDV surveys. Results found that where these habitats were identified, they did not span the 500 m width of the Offshore Cable Corridor. Therefore, it is anticipated that micro-routing around these sensitive habitats will be possible within the cable corridor.
JNCC	We agree with the Applicant's proposed approach to cable crossings detailed in section 4.7. Allowing a corridor width of 1500m in some locations will allow for a higher likelihood of crossings being at 90o and will allow more options to micro route, so decrease the likelihood of crossings (and cable routing) occurring at locations of sensitive habitat where rock protection measures would cause additional detriment to the benthic environment.	No further action
JNCC	JNCC agree with the Applicant using CIEEM Guidelines for Ecological Impact Assessment for Terrestrial, Freshwater and Coastal Environments (2018) for the benthic ecology assessment. We would also recommend that the Applicant uses 'Nature conservation considerations and environmental best practice for subsea cables for	The updated CIEEM (2018) guidelines have been referred to within the ES. This has been referenced as 'CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (version 1.2 – Updated April 2022)' within the reference list.

Stakeholder	Summary of Response	Formal response
	English inshore and UK offshore waters' (Natural England and JNCC, 2022).	The guidance 'Nature conservation considerations and environmental best practice for subsea cables for English inshore and UK offshore waters' (Natural England and JNCC, 2022) has been used to inform the assessment of potential impacts in Volume 3, Chapter 1: Benthic Ecology of the ES.
JNCC	JNCC agrees with the proposed study area for benthic ecology being determined based on the pathway for effect that is likely to have the greatest spatial extent, which will be suspended sediment carried in plumes as a result of cable burial activities. We also agree with this being based on physical processes understanding and would recommend sediment plume modelling be undertaken as a basis for the study area taken forward in the assessment.	The Study Area is presented in paragraph Volume 3, Chapter 1 and Volume 3, Figure 1.1, of the ES. A study area of up to 15.2 km has been used for the cable route. This is a precautionary distance fully encompassing the ZoI for suspended sediment dispersion (maximum distance of 3.9 km along the majority of the cable route and 15.2 km at Bideford Bay) which is the impact with the greatest ZoI (refer to Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES). The methods for the semi-empirical approach used to estimate the ZoI for suspended sediment dispersion have been provided to NE, the MMO and JNCC for comment (methods and results are in Volume 3, Appendix 8.1: Sediment Dispersion Technical Note). These consultation bodies have confirmed that they deem this semi-qualitative assessment (which are presented as a worst-case estimate of likely sediment transport distances), as a sufficient level of 'modelling' to inform the ES.
JNCC	We note that the applicant has not included the Cefas OneBenthic Baseline Tool within the desk-based data sources to be used in the assessment, but this source is used to describe the benthic baseline within the chapter. We would recommend the Applicant includes all desk-based data sources to be used to inform the assessment be included here.	The Cefas OneBenthic Baseline Tool has been used to inform the baseline and results from the OneBenthic Baseline Tool are presented in Volume 3, Chapter 1 of the ES. The OneBenthic Tool has been referenced as a data source in this ES Chapter.
JNCC	JNCC are grateful for this early information provided by site-specific surveys of the cable corridor. We would like to highlight that sampling effort should be thorough enough so as to adequately characterise the	Site-specific subtidal benthic surveys were conducted by GEOxyz between August and October 2023 (Volume 3, Appendix 8.4: GEOxyz Environmental Report). The survey design consisted of a total of 61 camera transects and 51 grab sample stations covering the length of

Stakeholder	Summary of Response	Formal response
	benthic environment and understand all potential impact pathways that may present themselves throughout the whole cable corridor.	the Offshore Cable Corridor. Sampling locations were informed by geophysical survey. Data was obtained for the distribution of seabed habitats and associated fauna within the survey area, including assessment of the presence or absence of potential habitats/species of conservation importance including Annex I habitats. Additionally, water profiling was also conducted at each target location. Reports outlining methods and survey results have been provided to NE and JNCC for information with any responses highlighted in Volume 3, Chapter 1 of the ES. An intertidal survey has been conducted to provide additional data for the intertidal environment in the vicinity of the HDD works to inform the assessment in the ES, the results of which are included in Volume 3, Appendix 1.1: Offshore Intertidal Survey Report of the ES.
JNCC	JNCC also recommends that adequate geotechnical sampling is undertaken to ensure confidence in the successful burial of the cable for the lifetime of the asset (taking account of potential changes in climate). This will minimise the requirement for future intervention and reduce the likelihood of any subsequent cable protection measures needed in the future. Providing sufficient survey evidence as justification for the amount of rock dump being applied for at the Marine Licence stage will reduce the risk during the application process as it will reduce the footprint of direct habitat loss and the pressure on the benthic environment caused by permanent rock deposits.	Extensive geotechnical sampling has been undertaken along the length of the Offshore Cable Corridor. The geotechnical survey results have informed the Burial Assessment Study (BAS). The outline Cable Burial Risk Assessment (CBRA) is included as Volume 1, Appendix 3.4 of the ES.
JNCC	We would be grateful to be able to review the full survey reports from the site-specific surveys carried out for this application once these become available. This would allow more time for JNCC to process the information within these reports. If possible, we would welcome the opportunity to be able to review the project Cable Burial Risk Assessment (CBRA) once this becomes available. This would provide	Full survey reports have been provided to JNCC (and other regulatory bodies). The outline Cable Burial Risk Assessment (CBRA) is included as Volume 1, Appendix 3.4 of the ES.

Stakeholder	Summary of Response	Formal response
	valuable supporting information on the requirements for any proposed cable protection.	
JNCC	**Designated sites:** JNCC agrees with the designated sites for benthic features that have been scoped into the assessment. We defer to Natural England in regard to comments on Lundy Sand Special Area of Conservation (SAC), Braunton Burrows SAC, Hartland Point to Tintagel Marine Conservation Zone (MCZ) as they are these sites' responsible agency. For the East of Haig Fras MCZ, JNCC is the responsible agency for this site and the South West Approaches to the Bristol Channel MCZ is jointly managed by JNCC and Natural England. We have therefore focused our comments on these two sites. The applicant has highlighted the designated features for these sites which are benthic species and habitats. We would recommend that the Applicant reviews the site information and Conservation Objectives available on JNCC's website in order to assess the impact the project might have on these sites. Whilst the cable corridor does not directly cross either of these sites there is potential for activities to affect designated features through impact pathways such as sediment plumes caused during construction and operation and maintenance. JNCC would therefore expect these impacts to be assessed during the subsequent EIA stages.	Consideration of protected sites for assessment for benthic ecology has been based on a distance between 5 km and 15.2 km, which is a precautionary distance fully encompassing the ZoI for suspended sediment dispersion which is the impact with the greatest ZoI (refer to Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES). A RIAA has been submitted alongside the ES (document reference 7.16). An MCZ Assessment has been submitted alongside the ES (7.15).
JNCC	**Subtidal Benthic Ecology:** JNCC agrees with the applicant's proposed approach of determining the full extent of the areas showing characteristics of Annex I reefs during the subsequent EIA process by undertaking further assessments. We wish to clarify if these assessments at the EIA stage will involve further sampling of the area to determine the extent of these habitats as this may provide options for micro-routing around the habitat. If so, we would recommend survey effort is not restricted to the cable corridor as it may be that the habitat extent does	The potential presence of sensitive habitats including potential Annex I geogenic reefs (i.e. bedrock reefs and stony reef) and biogenic reef (Sabellaria spinulosa reef) was determined across the proposed cable route based on outputs of geophysical surveys and DDV surveys. Results found that where these habitats were identified, they did not span the 500 m width of the Offshore Cable Corridor. Therefore, it is anticipated that micro-routing around these sensitive habitats will be possible within the Offshore Cable Corridor. It is considered that data available are sufficient to inform micro-routing.

Stakeholder	Summary of Response	Formal response
	not extend far outside of the corridor boundaries and could present opportunities for cable micro-routing and reduced rock dump for cable protection.	
JNCC	JNCC agrees with the applicant's proposed approach to consideration of future baseline conditions including the potential for future designation of sites and climate change impacts. Weather extremes will be of particular relevance to cable burial and we urge the applicant to take this into consideration during the EIA stages of the application.	Noted
JNCC	JNCC agree with the applicant scoping all benthic impacts listed in Table 8.2.5 into the assessment and acknowledge that effects related to UXO clearance works will be covered in a separate licence application if necessary. In regard to the impact 'direct habitat loss', if the cable is buried then we agree that direct habitat loss will not occur during the operational phase of work. However, if the cable cannot be buried and cable protection measures are needed then permanent direct habitat loss will still occur during the operational phase. If the cable cannot be buried, cable protection material would be present and will permanently reduce the area of natural habitat that is available for colonisation.	The effect of 'Long term habitat loss/change' has been assessed for the operational phase in Volume 3, Chapter 1 of this ES. This represents a worst case scenario with all cable protection measures in place and any effects during construction would be reduced in comparison.
JNCC	JNCC agrees with the applicant's proposed approach to assessing the impact of works on benthic ecology. We would recommend that the applicant uses the Marine Evidence based Sensitivity Assessment (MarESA) on the Marine Life Information Network website to help with understanding of the sensitivity of receptors identified during desk-based reviews and site-specific surveys to the impact pathways identified in Table 8.2.5.	The assessment in Volume 3, Chapter 1 of the ES has used the MarESA on the Marine Life Information Network website to identify the sensitivity of key receptors to various impacts (pressures).
JNCC	The applicant includes mitigation measures as one of the iterative steps involved in the assessment approach. We would recommend the applicant applies the mitigation hierarchy to their assessment approach (avoid, minimise, rectify, reduce, offset). For example, JNCC would recommend micro-routing a cable around Annex I stony habitat in the first instance in order to avoid additional rock dump and would expect survey evidence as justification as to why this isn't being	Mitigation measures are presented in Volume 3, Chapter 1 of this ES and the mitigation hierarchy has been applied to the assessment approach, Where Annex I habitats are present the first option to be considered will be micro-routing of the cable.

Stakeholder	Summary of Response	Formal response
	proposed before any measures to offset significant impacts are considered.	
JNCC	JNCC agree with approach taken to identify marine mammal study areas. It would be beneficial if territorial waters were marked on Figure 8.5.1 to demonstrate whether proposed cable route enters Welsh territorial waters. This is of particular interest for where the route passes through the Bristol Channel Approaches SAC, as this site is jointly managed by JNCC, Natural England and Natural Resources Wales.	Figure 8.5.1 Cetacean Study Area (Volume 3, Figure 4.1 in the ES) has been updated to show the boundaries of the relevant territorial waters.
JNCC	JNCC agree with the impacts scoped into the assessment (Table 8.5.5) however we disagree with scoping out auditory injury and indirect impacts to prey, as the regulator will need to understand the potential impacts of both in order to undertake their HRA for the Bristol Channel Approaches SAC.	The impacts on fish and shellfish receptors have been assessed in Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES, as not significant. This is in agreement with the assessment at scoping and PEIR phase to scope out indirect impacts resulting from impacts on prey species of marine mammals and sea turtles, hence no consideration was given in the PEIR. The Applicant consulted further with the relevant consultation bodies on the above and has included impact assessment of indirect effects on prey species to marine mammals and sea turtles in Volume 3, Chapter 4 of the ES. Consideration of the implications for the marine mammal populations of the Bristol Channel Approaches SAC has been undertaken in the HRA RIAA (document reference 7.16) which is submitted alongside the ES. The HRA RIAA is relevant to the harbour porpoise only, as it is the only species of marine mammal that is a qualifying feature of the site. The HRA RIAA also includes consideration of Conservation Objective 3 (i.e. 'The condition of supporting habitats and processes, and the availability of prey is maintained').
JNCC	Marine Mammals - JNCC are content with the approach proposed in Table 8.5.7, however it would be beneficial to understand where the percentages that are included have come from and what will happen if	The Probability ratings and percentages indicated are based on former guidance from IEEM (2010), in which these values were suggested based on conventions for quantifying statistical significance. However, we accept it is more common and appropriate to align to the qualitative

Stakeholder	Summary of Response	Formal response
	it is not possible to estimate the likelihood of an effect occurring as a percentage?	description approach as per 2018 ECIA guidelines in which professional judgement is applied to determine likelihood of impact. Professional judgement has been applied in the assessment undertaken in the ES.
JNCC	Marine Mammals - In table 8.5.8 there is not mention of European Protected Species (EPS) and we would recommend they are included here.	EPS has been added to the relevant table in Volume 3, Chapter 4 in the ES.
JNCC	Marine Mammals - JNCC are content with the approach proposed in table 8.5.10, however, we note that all categories assume there will be a recovery should impacts occur. What would happen if this were not to be the case?	As requested by the JNCC, magnitude will be revised to include likely reversibility and permanence/recovery in the ES.
JNCC	Offshore Ornithology - JNCC do not agree that offshore ornithology is scoped out of an Environmental Impact Assessment. We agree with the method used to assess impacts to offshore ornithology as outlined in Appendix C, and we agree that the impacts from the works are likely to be small. However, this assessment of potential impacts to offshore ornithology should be presented within an Environmental Impact Assessment, not at the scoping stage.	Noted and potential effects considered within the ES. Further consultations undertaken with the JNCC prior to PEIR allowing scoping opinion comments to be discussed, with the outputs from these discussions considered in this ES chapter.
JNCC	In paragraph 11.2.6 the Applicant states that "Although it is likely that several seabird species will forage within the study area, the potential for direct impacts during construction, operation and maintenance, and decommissioning are considered (with high confidence) to be of negligible significance, and this is scoped out of further consideration in the EIA. This is consistent for example, with the approach that is used to assess the impact arising from export cables associated with offshore wind farms." We do not agree that the scoping out of offshore ornithology impacts is consistent with export cables associated with offshore wind farms, or that this is a rationale for scoping out offshore ornithology for this project. We advise that the assessment of potential impacts to offshore ornithology should be carried out within the Environmental Impact Assessment, not at the scoping stage.	Noted. The offshore ornithology assessment is presented within the PEIR and ES i.e. it is now scoped in for completeness.

Stakeholder	Summary of Response	Formal response
JNCC	"Although large numbers of birds are known to be present in the Celtic Sea, particularly during the breeding season, none of the data sources consulted indicate that the study area is of particular importance for any species listed in comparison to the surrounding habitat outside the study area" We disagree with this statement as the presence of large numbers of birds would suggest that the area is important for seabirds.	It is acknowledged that the Celtic Sea (where the Offshore Cable Corridor is located) supports large numbers of birds, particularly during the breeding season. However, the desk study does not indicate that the study area is of greater importance than the surrounding habitats. This is discussed in detail within Volume 3, Chapter 9 of the ES. JNCC were consulted further to discuss scoping opinion responses, with a meeting in April 2024. During this meeting JNCC agreed that the Offshore Cable Corridor does not constitute an area of greater importance than the surrounding / wider Celtic Sea.
JNCC	Table 5 of Appendix C states "Potential impacts would be highly localised and for a limited, short-term duration and only last as long as vessels are present within c.2 km of any area". Yet it is also stated that installation vessels and up to 20 guard vessels will be present 24/7 for 9 months in 2028 and the same in 2030. Therefore, multiple vessels will be present constantly for two whole breeding season and parts of two non-breeding seasons.	Although installation and guard vessels will be present for up to 9 months, this would be transient, and vessels would be present within a discrete area for a very short duration. Works will be carried out linearly, with vessels moving along the 370 km route during the proposed 9-month duration. The proposed cable laying vessel speed is estimated at 400-500 m per hour, while the trenching vessels present would move at a slower speed of approximately 150 m per hour. JNCC were consulted further to discuss scoping opinion responses during a meeting in April 2024. JNCC acknowledged the transient nature of any vessel disturbance. JNCC suggested that indicative estimates of the area(s) over which vessels may be operating would be useful in considering any potential disturbance effects. Additional consultation was undertaken with Natural England to discuss potential impacts on Lundy SSSI, as detailed in Volume 3, Chapter 9 of the ES. During a meeting, APEM outlined additional baseline vessel movement assessments (undertaken by Anatec) which demonstrated that an additional three project vessels (one CLV and two guard vessels) within 20 km of Lundy for a limited duration (of circa 11 days) was not significant in the context of baseline traffic, which included frequent transit of very large cargo vessels much closer to Lundy than the

Stakeholder	Summary of Response	Formal response
		Proposed Development. As Lundy is more than 4 km from the Offshore Cable Corridor, there is no pathway for impacts on breeding birds, only foraging seabird species, that are likely to be habituated to the baseline vessel movements and have a very large foraging range. Natural England agreed that the additional disturbance which would arise from the Proposed Development was not significant, and that additional mitigation would not be required. Details on baseline shipping movements across the entire OCC is available within Volume 3, Chapter 5: Shipping and Navigation of the ES.
JNCC	We agree with the method used to assess impacts to offshore ornithology as presented in Appendix C, and the outcome of the assessment which suggest that impacts from the works are likely to be small. However, this assessment of potential impacts to offshore ornithology should be presented within an Environmental Impact Assessment, not at the scoping stage.	Noted. JNCC have been consulted further to discuss scoping opinion responses. JNCC reiterated that EIA methods used (for e.g. describing magnitude) are appropriate and welcomed the inclusion of offshore ornithology as a full ES chapter.
Littleham and Landcross Parish Council	The aim to deliver 10% biodiversity net gain is discussed in Section 4.9.46 and is supported.	Noted
Littleham and Landcross Parish Council	Section 4.6.18 details proposals at the Alverdiscott connector site, but 4.6.101, which deals with the cable corridor, suggests restoration only to previous land use with no mention of biodiversity net-gain, except for hedgerows which have been disturbed. Littleham and Landcross Parish Council is committed to increasing biodiversity in the parish and considers that this does not fulfil the requirements for 10% net-gain and lacks ambition. For mitigation, the EIA should include opportunities for working with landowners along the cable route to ensure biodiversity net gain. This is a major opportunity to provide a wildlife corridor from the coast to the Torridge and beyond, which should not be missed.	Information regarding Biodiversity Net Gain is provided in Volume 1, Chapter 3: Project Description, of the ES.

Stakeholder	Summary of Response	Formal response
Littleham and Landcross Parish Council	The cable route also provides an opportunity to create a footpath/cycle path/bridleway from the SW Coast Path to the Tarka Trail - this would be a major community benefit contributing to social and economic well-being and active travel in the area. This would be a major positive impact and should be considered.	The mitigation measures are provided in Volume 2, Chapter 8: Land Use and Recreation of the ES The Outline PRoW An Outline Public Rights of Way Management Plan (document reference 7.11) has been submitted as part of the DCO application to limit the disruption to PRoWs and other recreational routes during the construction of the Proposed Development.
Marine Management Organisation	The MMO notes the requirement for "other", and "temporary" works. Any additional works or activities in the marine area which are licensable under the 2009 Act should be notified to the MMO at the earliest opportunity and the impacts of such activities considered in the Environmental Impacts Assessment ("EIA") process. Further information regarding marine licensing can be found on the MMO's website: Do I need a marine licence? - GOV.UK (www.gov.uk)	Noted; all works or activities in the marine area which are licensable under the 2009 Act will be notified to the MMO at the earliest opportunity.
Marine Management Organisation	Section 1.4 of the Report sets out the purpose, approach and structure of the Report and the EIA process, in line with the EIA Regulations. The MMO supports the approach taken by the Applicant, despite none of the components which make up the Proposed Development being explicitly identified under Schedule 1 or 2 of EIA Regulations.	Noted - The purpose, approach and structure of the ES are outlined within Volume 1, Chapter 1: Introduction of the ES. Further details on the approach and methodology for the EIA are detailed within Volume 1, Chapter 5: EIA Methodology of the ES.
Marine Management Organisation	Section 2.2 of the Report notes the relevant key pieces of legislation associated with the Proposed Development, including the Marine and Coastal Access Act 2009 (the "2009 Act"). The MMO welcomes the Applicant's intention to discuss the approach and provisions around marine licensing and would encourage timely pre-application contact with the MMO to agree the drafting of a deemed marine licence ("DML").	Noted
Marine Management Organisation	The relevant Marine Plan for the location of the Proposed Development is the South West Marine Plans. The MMO expects the Applicant to clearly demonstrate how all relevant marine plan policies have been considered, as well as providing a statement noting whether the Proposed Development is compliant with the marine plan.	The South West Inshore and Offshore Marine Plan have been taken into account in the ES, with further details provided in Volume 3, Chapter 4 of the ES. The Proposed Development is compliant with the marine plan.

Stakeholder	Summary of Response	Formal response
Marine Management Organisation	Paragraph 4.7.25 of the Report notes that Unexploded Ordnance (UXO) clearance may be required, and that such works would be subject to a separate consenting process at the time that such need is identified. The MMO supports this approach and notes that UXO investigation and clearance activities are licensable under the 2009 Act. Please note, all UXO clearance campaign activities will be subject to separate marine licence application/s. The MMO currently recommend the "two-licence" approach, where one licence should be obtained for surveying and a second licence for clearance.	The MMO confirmed their preference that UXO assessment and licensing should be undertaken as a two-stage marine licence process separate to the EIA. (This approach is understood to be in the process of becoming mandatory.) The two stages would consist of initial marine licence for UXO survey and separate marine licence for site specific clearance (where identified as necessary). As discussed, this process allows a feature specific response to be developed, which could not be assessed in advance. UXO clearance would be undertaken under a separate marine licence, as agreed by MMO should the requirement for UXO clearance be required.
Marine Management Organisation	Section 6 of the Report sets out consultation and engagement undertaken to date, and next steps. The MMO welcomes ongoing engagement with the Applicant and will ensure comments are provided on the Preliminary Environmental Information Report ("PEIR") once this is available.	Noted.
Marine Management Organisation	Due to timing constraints involved in providing this response, the MMO has been unable to seek the views of our scientific advisors at the Centre for Environment, Fisheries and Aquaculture Science ("Cefas"). As such, this response does not include any comments regarding the study area, baseline environment, key receptors/sensitivities and potential likely significant effects, measures adopted or proposed assessment methodology as set out within the Report.	Noted
Maritime & Coastguard Agency	The development area carries a significant amount of through traffic to major ports, with a number of important international shipping routes in close proximity, including the Traffic Separation Scheme (TSS) South of the Scilly Isles, West of the Scilly Isles and the TSS off Lands End. Attention needs to be paid to changes in vessel routing, particularly in heavy weather ensuring shipping can continue to make safe passage without large-scale deviations, and any reduction in navigable depth referenced to chart datum.	Vessel traffic, including routeing and the TSSs are highlighted within the discussion of the baseline environment presented in Volume 3, Chapter 5 of the ES. The displacement of vessels from established routes and reduction in navigable depth are considered in the impact assessment presented in this chapter.

Stakeholder	Summary of Response	Formal response
Maritime & Coastguard Agency	The Environmental Statement (ES) will consider the potential impacts of the construction, operation, maintenance and decommissioning phases of the proposed development and will follow the IMO Formal Safety Assessment methodology, which we welcome. The information from the Navigation Risk Assessment (NRA) will feed into the shipping and navigation chapter of the ES. The ES should supply detail on the possible impact on navigational issues for both commercial, fishing and recreational craft, specifically: • Collision Risk • Navigational Safety • Visual intrusion and noise • Risk Management and Emergency response • Marking and lighting of site and information to mariners • Effect on small craft navigational and communication equipment • The risk to drifting recreational craft in adverse weather or tidal conditions • The likely squeeze of small craft into the routes of larger commercial vessels.	An assessment of the impacts carried out in line with the IMO Formal Safety Assessment methodology is presented in Volume 3, Chapter 5 of the ES. An NRA has been carried out and is included in Volume 3, Appendix 5.1: Navigational Risk Assessment of the ES. The assessment covers all listed items where considered relevant to a subsea cable project.
Maritime & Coastguard Agency	The MCA welcomes the commitment in section 8.6.44 to undertake an NRA including a baseline study which will summarise the navigational features, historical incident data, vessel activity including anchoring and fishing activity, and any other navigational data available. The NRA should establish how the phases of the project are managed to a point where risk is reduced and considered to be 'as low as reasonably practicable' (ALARP). The MCA would also welcome a hazard identification workshop to bring together relevant navigational stakeholders for the area to discuss the potential impacts on navigational safety associated with the proposed development.	An NRA has been carried out and is included in Volume 3, Appendix 5.1: Navigational Risk Assessment of the ES. A summary of the shipping and navigation baseline is presented in Volume 3, Chapter 5 of the ES. Consultation with key stakeholders has been undertaken to discuss the potential impacts on navigational safety associated with the Proposed Development. It was agreed in consultation with the MCA that separately consulting navigational stakeholders was suitable in place of a hazard identification workshop.
Maritime & Coastguard Agency	There are other works to facilitate the development, including permanent road improvement works, temporary and permanent utility connections, permanent utility diversions and temporary construction compounds, drainage and access, and HDD under the River Torridge.	The Proposed Development will undertake HDD below MHWS at the River Torridge crossing. There are not anticipated to be any interactions between the construction, operation and maintenance, and decommissioning phases of the project on OMU in the River Torridge

Stakeholder	Summary of Response	Formal response
	It should be confirmed by the applicant whether there are any proposed works / activities undertaken below the Mean High-Water Spring within the River Torridge as a result of these aspects. For example, we note the use of a jack-up vessel for the HDD works near the landfall. The impact on any other marine users for the selected location should also be considered.	below MHWS. The use of the jack-up vessel offshore (to facilitate the offshore HDD exit) has been included in the construction phase assessment of impacts resulting from increased vessel movement in Volume 3, Chapter 6 of the ES.
Maritime & Coastguard Agency	Attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary. Where cable protection measures are required e.g., rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and at cable crossings where potential impacts on navigable water increase. Where this is not achievable, the applicant must discuss further with the MCA.	Reduction in under keel clearance due to the implementation of external cable protection is considered within the impact assessment presented in Volume 3, Chapter 5 of the ES. Compliance with the MCA guidance on the reduction in water depths is included within the mitigation measures adopted as part of the Proposed Development.
Maritime & Coastguard Agency	We note the intention for the cables to be buried along the total length of the route (approximately 370 km) with the exception of crossings, with an intended burial depth of up to 1.5m. There may be areas where the route crosses very hard seabed and/or boulders where burial (or full depth burial) is not possible. In these areas, cable protection would be required. As the design progresses, further assessments may be required in order to assess the subsea cables protection against shipping and fishing activities (anchoring and trawling). The MCA welcomes the development and review of the Cable Burial Risk Assessment (CBRA) which will inform detailed understanding of the burial details along the Offshore Cable Corridor in the ES. The CBRA should take into consideration location specific factors such as ground conditions (i.e., ability to bury), intensity of shipping and fishing activity.	An outline Cable Burial Risk Assessment (CBRA) is included as Volume 1, Appendix 3.4 of the ES. Based on the initial assessment of the geotechnical and geophysical survey data as part of a Burial Assessment Study (BAS) the cables will be buried along the entire route. For 220 km of the route it is anticipated that the cables will be protected by trenching and covered by natural sediments. It is anticipated that additional protection would be required along approximately 150 km of the route. The potential impacts of additional protection against shipping and fishing activities has been considered as part of the assessments within Volume 3, Chapter 3: Commercial Fisheries and Volume 3, Chapter 5: Shipping & Navigation of the ES.
Maritime & Coastguard Agency	Safe realistic under keel clearance (UKC) assessment should be undertaken for the maximum drafts of vessel both observed and anticipated. The MCA's Under Keel Clearance Policy paper can be	An assessment of the reduction in under keel clearance due to the presence of external cable protection has been undertaken and is presented in the impact assessment presented in Volume 3, Chapter 5

Stakeholder	Summary of Response	Formal response
	found at the following link: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/373456/Under_Keel_Clearance_paper_May_14_-_FINAL.pdf	of the ES. Vessel draughts both within the study area and specific to shallow waters have been considered within this. Compliance with the MCA guidance on the reduction in water depths is included within the mitigation measures adopted as part of the Proposed Development.
Maritime & Coastguard Agency	A study should be undertaken to establish the electromagnetic deviation, affecting ship compasses and other navigating systems, of the high voltage cable route to the satisfaction of the MCA. On receipt of the study, the MCA reserves the right to request a deviation survey of the cable route post installation. There must be no more than a 3-degree electromagnetic compass deviation for 95% of the cable route and for the remaining 5% of the cable route there must be no more than a 5 degree electromagnetic compass deviation. If the MCA requirement cannot be met, a post installation actual electromagnetic compass deviation survey should be conducted for the cable in areas where compliance has not been achieved. We note this has been scoped in for the operational phase of the project, which we welcome.	A review of the impacts associated with electromagnetic interference with compasses is presented in Volume 3, Appendix 5.1: Navigational Risk Assessment of the ES and in Volume 3, Chapter 5 of the ES. Due to the bundling of the cables, and the distance between the cables and vessels, there are not anticipated to be any effects on compass deviation.
Maritime & Coastguard Agency	We note that there are no potential impacts on shipping and navigation that have been scoped out for the ES, which the MCA welcomes. The MCA will of course provide full consideration of the detailed proposals, along with the supporting Navigation Risk Assessment which may highlight further areas for consideration and risk mitigation measures.	When final design engineering is complete, if it cannot be demonstrated that magnetic effects are within the required limits, a post lay compass deviation assessment will be carried out. This will be included as a consent condition.
Defence Infrastructure Organisation	With respect to t he sect ion on Military Activities and Munitions (p.345), the statement in para 8.7.31 correctly refers to the complex of FOST Exercise Areas and Danger Areas. "8.7.31 The Proposed Development is located within a broad Military Practice area that extends to cover the majority of the offshore south west extent of the UK EEZ, and passes through military exercise airspace off the northern coast of Cornwall, Devon and the Isles of Scilly (South West Marine Plan, 2021)". These include X5001 Southern Fleet Exercise Area, X4920 Alfa One and D064C/B South West MDA, operating between 5000-66000ft. The	Assessment of impacts resulting from the Proposed Scheme of MoD activities has been conducted in Volume 3, Chapter 6 of the ES for each stage of the project. Consultation with the MoD has been undertaken as part of the statutory consultation phase of the DCO application. A summary of consultation details is presented in Volume 3, Chapter 6 of the ES.

Stakeholder	Summary of Response	Formal response
	route appears to pass t through/beneath the above and any cable installation development scheme would need to take the ongoing use of the areas for defence purposes into account.	
Defence Infrastructure Organisation	The statements in para 8.7.32 and associated figures seem to be broadly accurate - however their identification of D00l - Trevose Head as an Army Danger Area is incorrect - it is operated by the Navy and support air to surface gunnery etc (see the UK AIP as a valid data source on the extent/management of MOD designated Danger Areas (ref ENR 5.1).	The D001 – Trevose Head Navy Danger Area has been amended within Volume 3, Chapter 6 of the ES to identify the MoD receptor more accurately. Specific consultations with DIO have been undertaken post PEIR.
Defence Infrastructure Organisation	Please note, there are other defence interests in the locality relating to navigational interests and isn't installations that are not defined in the public domain. The MOD will be able to provide specific advice, as may be necessary, on the proposed cable installation when more detailed information becomes available.	Consultation with the MoD has been conducted to identify areas of MoD activity which are not on the public record and may be impacted by the proposed development. A summary of consultation responses has been presented in Volume 3, Chapter 6 of the ES.
Defence Infrastructure Organisation	The onshore section runs for 14.5km from landfall South of Westwood Ho! to an existing substation at Alverdiscott. This falls wit hin safeguarding zones for RM Chivenor. The substation buildings are likely to be between 26-30m tall. Chivenor is no longer an operational aerodrome since the MOD ceased to conduct SAR ops, however, MOD requests to be included in any consultation when more detailed information becomes available.	Noted.
Natural England	**General Principles:** Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment.	The ES has been submitted alongside the application for development consent in accordance with the 2017 EIA Regulations and Planning Inspectorate Advice Note Seven.
Natural England	**Cumulative and In-Combination Effects:** The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.	The potential cumulative impacts of the Proposed Development have been considered with the identified projects and plans as set out in Volume 1, Appendix 5.3: CEA Screening Matrix of the ES. Topic specific assessment of the potential cumulative effects have been

Stakeholder	Summary of Response	Formal response
		completed within the technical chapters set out in Volume 2, Volume 3 and Volume 4 of this ES.
Natural England	An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information): a. existing completed projects b. approved but uncompleted projects c. ongoing activities d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.	The potential cumulative impacts of the Proposed Development have been considered with the identified projects and plans as set out in Volume 1, Appendix 5.3: CEA Screening Matrix of the ES. Topic specific assessment of the potential cumulative effects have been completed within the technical chapters set out in Volume 2, Volume 3 and Volume 4 of this ES.
Natural England	Plans or projects that Natural England are aware of that might need to be considered in the ES: • White Cross offshore wind farm (onshore project) • The Crown Estate Round 5 Celtic Sea Flow	Cumulative projects and plans have been set out within Volume 1, Appendix 5.3: CEA Screening Matrix of the ES, including the White Cross Offshore Wind Farm (onshore project) and The Crown Estate Round 5 Celtic Sea project development areas.
Natural England	Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.	Noted - local (county and district level) landscape studies have been used to develop the landscape, seascape and visual baseline presented in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES.
Natural England	Natural England would like to sign post the applicant to our joint advice with JNCC on subsea cable projects for high level advice for environmental considerations that are essential for cable operations across English inshore waters and UK offshore waters: Environmental	This guidance has been used to inform the assessment of potential impacts.

Stakeholder	Summary of Response	Formal response
	considerations for offshore wind and cable projects - Nature conservation considerations and environmental best practice for subsea cables for English Inshore and UK offshore waters, Sept 22.pdf - All Documents (sharepoint.com)	
Natural England	**Biodiversity and Geodiversity:** The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.	Potential impacts on sites and features of nature conservation interest are addressed within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES. The Proposed Development is not currently subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicants have engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit. The approach to biodiversity enhancement is detailed within Volume 1, Chapter 3: Project Description and Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES.
Natural England	Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).	The onshore ecology and nature conservation assessment has been undertaken in accordance with the 'Guidelines for Ecological Impact Assessment in the UK and Ireland Terrestrial, Freshwater, Coastal and Marine' (CIEEM, 2022). This is detailed within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES.
Natural England	The development site is within or may impact on the following Habitats/internationally designated nature conservation sites: Marine sites: • Bristol Channel Approaches Special Area of Conservation (SAC) • Lundy SAC • Isles of Scilly Complex SAC • Severn Estuary SAC/Ramsar Terrestrial sites:	<u>Benthic</u> Of these sites listed, the only site with benthic ecology features within the Benthic Ecology Study Area is Lundy SAC. Braunton Burrows is outside the Study Area. The Annex I habitat which is the primary reason for site selection for Lundy SAC is 'Reefs' (1170) Annex I habitats present as qualifying features, but not a primary reason for site selection are: 'Sandbanks which are slightly covered by sea water all of the time' (1110), and 'Submerged or partly submerged sea caves' (833).

Stakeholder	Summary of Response	Formal response
	• Braunton Burrows SAC Based on the information provided, Natural England's advice is that the proposed cable route is unlikely to have a significant effect on terrestrial European sites and can therefore be screened out from requiring further assessment. (Discretionary Advice Service 17671-358612 dated 03/08/2021).	Potential effects on Lundy SAC are covered in Volume 3, Chapter 1 and a RIAA submitted alongside the ES (document reference 7.16). <u>Fish & Shellfish</u> The Severn Estuary SAC contains a number of diadromous fish features, which have been identified in Volume 3, Chapter 2 of the ES. It should be noted that the Severn Estuary SAC is outside the Study Area and therefore the ZoI. However, the designated features of the Severn Estuary SAC have been considered as IEFs due to a proven level of connectivity. The other marine sites listed are not directly relevant to the Fish and Shellfish assessment. Conservation objective 3 for the Bristol Channel Approaches SAC (i.e. 'The condition of supporting habitats and processes, and the availability of prey is maintained') may be relevant dependent on any effects on fish (prey species to harbour porpoise). The results of the fish and shellfish impact assessment (reported within this ES chapter) informs the conservation objective 3 assessment which is presented in the HRA Report to Inform Appropriate Assessment (RIAA) (document reference 7.16). <u>Marine Mammals</u> All SACs with marine mammals as qualifying features have been considered in the ES. Consideration of conservation objective 3 of the Bristol Channel Approaches SAC (i.e. 'The condition of supporting habitats and processes, and the availability of prey is maintained') is made in the HRA RIAA (document reference 7.16) which is submitted alongside the ES.

Stakeholder	Summary of Response	Formal response
Natural England	You should also consider where applicable our advice on the environmental considerations and use of data and evidence to support offshore wind and cable projects in English waters – see: Environmental considerations for offshore wind and cable projects - Home (sharepoint.com). This includes Natural England and Joint Nature Conservation Committee (JNCC)'s shared advice on 'Nature conservation considerations and environmental best practice for subsea cables in English inshore and UK offshore waters.' The outputs of Natural England's project 'Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards' are also provided.	This guidance has been used to inform the assessment of potential impacts.
Natural England	The development site is within or may impact on the following Sites of Special Scientific Interest: • Mermaid's Pool to Rowden Gut Site of Special Scientific Interest (SSSI) • Taw Torridge Estuary SSSI • Lundy SSSI The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.	<u>Benthic</u> The Taw-Torridge Estuary SSSI has been included as it has some intertidal and subtidal benthic habitat features. The Lundy SSSI encompasses terrestrial areas and the intertidal zone only, so has not been included in the assessment for benthic ecology. Mermaid's Pool to Rowden Gut SSSI is designated for its geological interest. Therefore, it has not been included in the assessment for benthic ecology. <u>Fish & Shellfish</u> A suite of fish and shellfish receptors have been identified as IEFs and assessed in Volume 3, Chapter 2 of the ES, including several of which are features of special interest for Taw Torridge Estuary SSSI (i.e. salmon, sea trout, European eel). Reference has been made to the Taw-Torridge Estuary throughout the impact assessment, particularly with respect to the distance from the ZoI for those impacts that are not restricted to the Offshore Cable Corridor (i.e. propagation of underwater noise and suspended solids). <u>Ornithology</u> Potential effects on Lundy SSSI have been discussed in a further meeting with Natural England on 12/08/24. It has been agreed with Natural England that additional mitigation is not necessary based on the

Stakeholder	Summary of Response	Formal response
		current levels of baseline disturbance and the very limited potential for effects as detailed in Volume 3, Chapter 9 of the ES. <u>Hydrology and Flood Risk</u> Receptors that are assessed within Volume 2 Chapter 3: Hydrology and Flood Risk of the ES are presented within Table 3.24. Lundy SSSI is located outside of the Zone of Influence and thus have not been assessed. However, please see 'The impact of contaminated runoff on the quality of surface water and groundwater' which discusses how mitigation measures adopted as part of the Proposed Development will ensure no degradation to WFD watercourses will occur. Mitigation measures are presented within Volume 2 Chapter 3: Hydrology and Flood Risk of the ES . <u>Geology, Hydrogeology and Ground Conditions</u> Mermaid's Pool to Rowden Gut Site of Special Scientific Interest (SSSI) falls within the study area of this Chapter. The potential for impact or damage to Mermaid's Pool to Rowden Gut SSSI is provided in Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES. <u>Air Quality</u> With regards to dust, the impacts have been considered on all designated ecological sites within the study area, as detailed within Volume 2, Chapter 7: Air Quality of the ES. However, Mermaids Pool to Rowden Gut SSSI is a geological site and thus, not sensitive to dust. Lundy and Taw Torridge Estuary SSSIs are located outside of the air quality study area .
Natural England	Mermaid's Pool to Rowden Gut SSSI is notified for its geological interest. The approach for the cable route landfall at the coast at this site is to use Horizontal Directional Drilling (HDD) to take the cables from the cliff top to the seabed. As HDD does not involve surface excavation across the foreshore or surface laying of cables Natural	Noted, no further action required

Stakeholder	Summary of Response	Formal response
	England consider the impact on the Mermaid's Pool to Rowden Gut SSSI from HDD to be negligible.	
Natural England	If there is a need to drill exploratory cores into the rock on the foreshore as part of geological investigations prior to HDD, consideration will need to be given to how the bore holes themselves / work on the foreshore would avoid damage to the SSSI interest. Faults and fractures in the geology should be expected.	A Method Statement will be agreed within Natural England prior to works commencing.
Natural England	It is important to note that whilst the rate of coastal erosion and cliff recession is low at the landfall, any proposal in the longer term to introduce coastal protection for the landfall site is unlikely to be acceptable.	Noted.
Natural England	The Taw Torridge Estuary SSSI is notified for its overwintering bird interest and intertidal habitats. The composition of the SSSI bird assemblage alters through time as species populations fluctuate. Therefore, any native wetland bird species (in practice waders and wildfowl) present from September to March inclusive will be a legitimate part of the bird assemblage.	Noted. Migratory and wintering bird information is provided in Volume 2, Appendix 1.8: Breeding, Wintering and Migratory Bird Surveys.
Natural England	**The Taw Torridge Estuary SSSI:** The approach for the cable route upstream of the SSSI is to use Horizontal Directional Drilling (HDD) to take the cables below the River Torridge. Overwintering bird surveys are proposed and mitigation will be required for any potential disturbance identified. Measures will be required to ensure that no contamination or pollutants enter the estuary habitats as a result of the works.	The On-CEMP will include industry good practice measures to prevent the contamination and pollution of watercourses and habitats. An Outline On-CEMP (document reference 7.7) has been submitted as part of the DCO application and includes an Outline Pollution Prevention Plan. The protection of species and habitats will be done through the Outline LEMP (document reference 7.10).
Natural England	You will need to consider Marine Conservation Zones (MCZs) where appropriate. The ES should include a full assessment of the direct and indirect effects of the development on the site and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The proposal may affect the following Marine Conservation Zones: • Bideford to Foreland Point MCZ	The MCZs considered have been screened in based on the modelled maximum distance for dispersal of suspended sediments due to the works (using semi-empirical methods). Based on this distance only three MCZs have been considered in the assessment: - Bideford to Foreland Point MCZ - South West Approaches to Bristol Channel MCZ

Stakeholder	Summary of Response	Formal response
	• South West Approaches to Bristol Channel MCZ • East of Haig Fras MCZ • Lundy MCZ • Hartland Point to Tintagel MCZ • North West of Lundy MCZ • Morte Platform MCZ	- East of Haig Fras MCZ Potential effects on these MCZs are covered in Volume 3, Chapter 1 of the ES and an MCZ assessment submitted alongside the ES (document reference 7.15) with the ES.
Natural England	cable protection within marine protected areas should be avoided and where that is possible every effort should be made to mitigate the impacts. In order to achieve this, we advise that a cable burial risk assessment is undertaken as part of the application process informed by comprehensive geotechnical and geophysical surveys. If cable protection is required options that have the greatest success of removal with least impact to interest features should be taken forward. A site integrity plan could then be used to determine the risk to the conservation objectives for the site and determine the requirements for any compensation measures.	A CBRA has been provided (refer to Volume 1, Appendix 3.4: Cable Burial Risk Assessment of the ES). Burial will be the preferred option for the cable protection, and only when full target burial depth is not possible will additional protection be installed. It should be noted that the cable route will not pass through any protected sites other than the Bristol Channel Approaches SAC which is only designated for Harbour Porpoise. Therefore, direct loss of habitat is not an impact for any designated sites with benthic habitat features.
Natural England	Please note that impacts from secondary scouring around cable protection should also be factored into both marine processes and benthic assessment.	The impact 'Changes in hydrodynamic regime (scour & accretion)' has been scoped in to assessment for the operation and maintenance phase in Volume 3, Chapter 1 of the ES. Scour has currently been assessed in a qualitative way indicating that it is anticipated to be localised around any cable protection structures. The MarESA pressure that has been used for the 'Change in hydrodynamic regime (scour and accretion)' assessment is 'Water flow (tidal current) changes (local)' as there is no MarESA pressure for scour as such. Volume 3, Chapter 8: Physical Processes of the ES includes an assessment of secondary (localised) scour, building on updated modelled estimates of bed currents (refer to Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES).

Stakeholder	Summary of Response	Formal response
Natural England	The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local groups. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.	The potential impacts upon local wildlife sites, including nature reserves are considered within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation. Volume 1, Appendix 3.1: Commitments Register outlines the mitigation measures that are proposed as part of the Proposed Development. Measures specific to onshore ecology and nature conservation are detailed within Volume 2, Chapter 1 of the ES.
Natural England	Based on information available from Devon County Council Environment Viewer the proposal may affect the following local sites: • Torridge Estuary County Wildlife Site (CWS) • Kynoch Foreshore Local Nature reserve (LNR) • Hallsannery CWS • Tennacott Wood CWS • Gammaton reservoir CWS • Haddacott Moor CWS	The potential impacts upon local wildlife sites, including Local Nature Reserves and County Wildlife Sites are considered within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation. Volume 1, Appendix 3.1: Commitments Register outlines the mitigation measures that are proposed as part of the Proposed Development. Measures specific to onshore ecology and nature conservation are detailed within Volume 2, Chapter 1.
Natural England	Applicants should check to see if a mitigation licence is required using NE guidance on licencing NE wildlife licences.	When all protected species surveys are completed, and potential impacts have been assessed, guidance on the need for licensing will be followed. Where required, draft licence applications will be submitted to Natural England in relation to these draft licences.
Natural England	The ES should assess the impact of all phases of the proposal on protected species. Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.	The assessment undertaken as part of the ES has considered all phases of the Proposed Development. The potential impacts on protected species during construction, operation and maintenance, and decommissioning are considered within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES.
Natural England	Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.	The requirements for surveys are noted and addressed within individual survey reports (e.g. Volume 1, Appendix 1.1 to Appendix 1.11 of the ES). Surveys have been undertaken by suitably qualified consultants.

Stakeholder	Summary of Response	Formal response
Natural England	While Natural England agrees with the decision to scope out EMF impacts and water quality changes on marine mammals, Natural England does not agree with the scoping out of other impacts on marine mammals as detailed below.	Noted. Addressed in comments below relating to specific potential pathways.
Natural England	Natural England advise the impact of collisions with vessels on marine mammals should be scoped into the EIA.	The impact of collisions with vessels on marine mammals has been assessed in Volume 3, Chapter 4 of the ES
Natural England	Natural England advise the impact of hearing damage and auditory injury on marine mammals should be scoped into the EIA for the Bristol Channel Approaches SAC.	Hearing damage and auditory injury on marine mammals have been assessed in Volume 3, Chapter 4 of the ES.
Natural England	Natural England advise indirect impacts on marine mammals resulting from impacts on marine mammal prey species should be scoped into the EIA for the Bristol Channel Approaches.	The impacts on fish and shellfish receptors have been assessed in Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES, as not significant. This is in agreement with the assessment at scoping and PEIR phase to scope out indirect impacts resulting from impacts on prey species of marine mammals and sea turtles, hence no consideration was given in the PEIR. The Applicant consulted further with the relevant consultation bodies on the above and has included impact assessment of indirect effects on prey species to marine mammals and sea turtles in Volume 3, Chapter 4 of the ES. Consideration of the implications for the marine mammal populations of the Bristol Channel Approaches SAC has been undertaken in the HRA RIAA (document reference 7.16) which is submitted alongside the ES.. The HRA RIAA is relevant to the harbour porpoise only, as it is the only species of marine mammal that is a qualifying feature of the site. The HRA RIAA also includes consideration of Conservation Objective 3 (i.e. 'The condition of supporting habitats and processes, and the availability of prey is maintained').
Natural England	Natural England advise that indirect impacts on marine mammals resulting from changes to the seabed should be scoped into the EIA for the Bristol Channel Approaches.	An assessment of indirect impacts to marine mammals resulting from changes to the seabed is considered in Volume 3, Chapter 4 of the ES.

Stakeholder	Summary of Response	Formal response
Natural England	Natural England agree with the scoping out of impacts on offshore ornithology to this subsea cable project. However, Natural England would advise the applicant to restrict operations closest to Lundy in the months approximately May to August, when seabird breeding and foraging will be at its peak. Similarly, Natural England advise vessels should avoid fast movement around any rafts of birds encountered on the sea surface.	Noted. Natural England have been consulted further to determine potential mitigation measures which can be implemented closest to Lundy. Natural England suggested a voluntary buffer restricting vessel operations around Lundy during the breeding season and this has been considered as part of the assessment at ES stage. Potential effects on Lundy SSSI have been discussed in a further meeting with Natural England on 12/08/24 as detailed in Volume 3 Chapter 9 of the ES. It has been agreed with Natural England that additional mitigation is not necessary.
Natural England	Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download.	Noted.
Natural England	An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.	No site-specific surveys are proposed for offshore ornithology. Desk based data sources are outlined within Volume 3, Chapter 9 of the ES, which are considered sufficiently robust for Offshore Ornithology EIA purposes.
Natural England	The Environmental Statement should include details of: • Any historical data for the site affected by the proposal (e.g. from previous surveys) • Additional surveys carried out as part of this proposal • The habitats and species present • The status of these habitats and species (e.g. whether priority species or habitat) • The direct and indirect effects of the development upon those habitats and species	Noted. Historical data from previous surveys have been available and included in the environmental baseline, where relevant. Volume 2, Chapter 1: Onshore Ecology and Nature Conservation provides the baseline environment, which includes the habitats and species, and notes the status of these, where relevant. The direct and indirect effects of the development upon those habitats and species are detailed in Volume 2, Chapter 1 of the ES. Mitigation measures are outlined within the ecology chapter (Volume 2, Chapter 1 of the ES) and the commitments register (volume 1, Appendix 3.1 of the ES).

Stakeholder	Summary of Response	Formal response
	• Full details of any mitigation or compensation measures • Opportunities for biodiversity net gain or other environmental enhancement	
Natural England	For priority habitats within the cable corridor, Natural England advises that the mitigation hierarchy is used. Avoidance techniques can include micro-routing the cable around Annex I habitats that fall within the cable corridor. Where the cable corridor is too narrow to allow micro-routing around priority habitats, micro-routing outside of the cable corridor may need to be used to avoid Annex I habitats. If this is the case for the stony reef habitat as shown on slide 16 of the meeting between Natural England and Xlinks 22/02/2024, Natural England would like to see the habitat mapping surveys for the area outside of this section of the cable corridor, to understand the viability of cable routing outside of the cable corridor.	The mitigation hierarchy has been used in relation to the design of the Onshore HVDC Cable Corridor, as set out within Volume 1, Appendix 3.1: Commitments Register of the ES. In relation to this offshore route, the potential presence of sensitive habitats including potential Annex I geogenic reefs (i.e. bedrock reefs and stony reef) and biogenic reef (Sabellaria spinulosa reef) was determined across the proposed cable route based on outputs of geophysical surveys and DDV surveys. Results found that where these habitats were identified, they did not span the 500 m width of the Offshore Cable Corridor. Therefore, it is anticipated that micro-routing around these sensitive habitats will be possible within the Offshore Cable Corridor.
Natural England	The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.	The tree survey is presented at Volume 4, Appendix 2.6: Tree Survey and Arboricultural Impact Assessment, of the ES. No ancient woodland is affected by the Proposed Development. Volume 2, Appendix 2.6 identifies that no Veteran Trees or trees within Ancient Woodland are proposed for removal. The landscape mitigation, shown on the Illustrative Landscape and Ecology Plan in the Outline LEMP (document reference 7.10) includes woodland that would link the various small copses/woodlands in the area, to increase connectivity and expand woodland cover.
Natural England	The ES should use the statutory Biodiversity Metric together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.	Noted - see previous comments regarding BNG.
Natural England	Biodiversity Net Gain outcomes can be achieved on-site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link	Noted - see previous comments regarding BNG.

Stakeholder	Summary of Response	Formal response
	delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies where these are being prepared by local planning authorities.	
Natural England	The proposal is within or may impact on a nationally designated landscape, namely North Devon Coast National Landscape (defined in legislation as an Area of Outstanding Natural Beauty). The development site is also within or may impact on the Hartland Heritage Coast.	Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES considers both direct and indirect effects on the North Devon Coast National Landscape, its special qualities and the purposes of its designation. The Heritage Coast designation is neither a Heritage nor Landscape designation as its origins are in the promotion of tourism. Potential impacts on tourism have been considered within Volume 4, Chapter 3: Socio-economics of the ES.
Natural England	**North Devon Coast National Landscape:** Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.	Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES considers both direct and indirect effects on the North Devon Coast National Landscape, its special qualities and the purposes of its designation.
Natural England	The ES should set out the impacts on the Heritage Coast and opportunities for enhancement.	Noted. The Heritage Coast designation is neither a Heritage nor Landscape designation as its origins are in the promotion of tourism. Potential impacts on tourism have been considered within Volume 4, Chapter 3: Socio-economics of the ES.
Natural England	The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.	The relevant National Character Areas are detailed within Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. These have been used within the development of the baseline environment for the landscape, seascape and visual assessment.
Natural England	The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.	The assessment of landscape, seascape and visual resources has been undertaken in accordance with the methodology set out in Volume 1, Chapter 5: EIA Methodology of the ES in addition to the guidance set out in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. The methodology used for the assessment, including the significance criteria used is provided in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. A detailed explanation of the assessment methodology in accordance with Guidelines for Landscape and Visual Impact Assessment Third Edition

Stakeholder	Summary of Response	Formal response
		(GLVIA3) (Landscape Institute and Institute for Environmental Management and Assessment (IEMA), 2013) is provided in Volume 4, Appendix 2.4: Landscape, Seascape and Visual Impact Assessment Methodology of the ES.
Natural England	A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management.	The assessment of landscape, seascape and visual resources has been undertaken in accordance with the methodology set out in Volume 1, Chapter 5: EIA Methodology of the ES in addition to the guidance set out in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. The methodology used for the assessment, including the significance criteria used is provided in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. A detailed explanation of the assessment methodology in accordance with Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) (Landscape Institute and Institute for Environmental Management and Assessment (IEMA), 2013) is provided in Volume 4, Appendix 2.4: Landscape, Seascape and Visual Impact Assessment Methodology of the ES.
Natural England	For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.	Volume 4, Chapter 3: Landscape, Seascape and Visual Resources of the ES considers both direct and indirect effects on the North Devon Coast National Landscape, its special qualities and the purposes of its designation.
Natural England	We would also recommendation discussing appropriate view point locations with the AONB partnership.	We have discussed and agreed representative viewpoints with Torridge District Council's landscape consultant this includes viewpoints of the Landfall, Onshore HVDC Cable Corridor and Converter Site from within the NL. Consultation is ongoing and viewpoints will be confirmed with the relevant consultees for the ES.
Natural England	The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.	The cumulative projects selected for consideration within the landscape, seascape and visual resources chapter are listed at Volume 4, Appendix 2.4: Landscape and Visual Impact Assessment Methodology of the ES. The cumulative assessment has been undertaken and detailed within Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES.

Stakeholder	Summary of Response	Formal response
Natural England	To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code.	Landscape mitigation is described in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES and shown on the Illustrative Landscape and Ecology Strategy Plan, which is included within the Outline LEMP (document reference 7.10). The landscape mitigation responds to local landscape character area management guidelines where possible.
Natural England	The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.	Landscape mitigation is described in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES and shown on the Illustrative Landscape and Ecology Strategy Plan, which is included within the Outline LEMP (document reference 7.10). The landscape mitigation responds to local landscape character area management guidelines where possible.
Natural England	The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIPs) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.	The impacts on the views of people using PRoW, Access Land, etc. are considered in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. Other impacts of the Proposed Development on the PRoW network are covered in Volume 2, Chapter 8: Land Use and Recreation and Volume 4, Chapter 4: Human Health of the ES.
Natural England	The proposal is adjacent to the South West Coast Path National Trail and the Tarka Trail. We therefore also advise you to seek the advice of the National Trail Officer and/or the Coast Path Officer for Northern Devon to ensure adequate mitigation is secured to avoid adverse effects on the Trail. Their knowledge of the location and wider landscape setting of the development should help to confirm whether it would impact significantly on the trail. The National Trails website provides information including contact details for the National Trail Officers.	Volume 2, Chapter 8: Land Use and Recreation of the ES addresses the mitigation measures that would be implemented to reduce the disruption. The proposed mitigation measures will be discussed with the relevant stakeholders to ensure that adequate mitigation is secured to avoid adverse impacts on the Tarka Trail and other PRoWs.
Natural England	The King Charles III England Coast Path route has been approved by the Secretary of State and will follow the South West Coast Path at the	Noted.

Stakeholder	Summary of Response	Formal response
	location of the landfall. It will be known as the South West Coast Path part of the King Charles III England Coast Path.	
Natural England	Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.	Measures adopted as part of the Proposed Development to mitigate potential impacts on landscape, seascape and visual resources are provided in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. The outline landscape design is set out within the Outline LEMP (document reference 7.10) and Design Principles (document reference 7.4). The landscape mitigation responds to local management guidelines, where possible.
Natural England	Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.	Measures adopted as part of the Proposed Development to mitigate potential impacts on landscape, seascape and visual resources are provided in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. The outline landscape design is set out within the Outline LEMP (document reference 7.10) and Design Principles (document reference 7.4). The landscape mitigation responds to local management guidelines, where possible.
Natural England	The One Northern Devon Group https://onenortherndevon.co.uk/about-us/ play a strategic role in building partnerships for health and wellbeing and tackling inequalities and could advise on the local need and connections.	Noted.
Natural England	Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with the NPS for National Networks.	An Outline Soil Management Plan has been submitted as an appendix to the Outline On-CEMP (document reference 7.7)
Natural England	The degree to which soils would be disturbed or damaged as part of the development, and the extent to which agricultural land would be	This will be considered as part of the land use and recreation assessment. The proposed methodology for further surveys is provided

Stakeholder	Summary of Response	Formal response
	disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted, should be considered.	in Volume 2, Chapter 8: Land Use and Recreation of the ES chapter to ensure that the areas of permanent loss of agricultural land quality are fully assessed, subject to further discussion with Natural England.
Natural England	Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).	Noted, Volume 2, Chapter 8: Land Use and Recreation of the ES address the ALC and soil surveys.
Natural England	The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.	The potential effects of the Proposed Development on best and most versatile land are assessed in Volume 2, Chapter 8: Land Use and Recreation of the ES.
Natural England	The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise offsite impacts.	An Outline Soil Management Plan has been submitted as an appendix to the Outline On-CEMP (document reference 7.7)
Natural England	Natural England would encourage infrastructure providers to embed nature based solutions (NbS) and building resilience of the natural environment.	Noted
Network Rail	Network Rail acknowledges the potential for changes in traffic flows which may impact on the number of vehicular and pedestrian movements crossing the railway. These movement may also impact surrounding Level Crossings in the vicinity of the development site. Network Rail's position is that there shouldn't be any increase or change in usage to Level Crossings in the area. Any increase in	No railway lines will be affected by the Proposed Development.

Stakeholder	Summary of Response	Formal response
	movement across Level Crossings may increase risk and therefore mitigation methods may be required.	
Network Rail	Network Rail will wish to agree protection for the railway during the course of the construction works, for proposed construction traffic routes and otherwise to protect our undertaking and land interests. Network Rail reserves the right to produce additional and further grounds of concern when further details of the application and its effect on Network Rail's land available.	No railway lines will be affected by the Proposed Development.
Network Rail	Consideration should be given to ensure that the construction and subsequent maintenance can be carried out without adversely affecting the safety of Network Rail's land. In addition, security of the railway boundary will require to be maintained at all times.	No railway lines will be affected by the Proposed Development.
National Grid Electricity Transmission PLC	NGET has high voltage electricity overhead transmission lines, underground cables and a high voltage substation within the scoping area. The overhead lines and substation forms an essential part of the electricity transmission network in England and Wales. Substation • ALVERDISCOTT 400 kV substation • ALVERDISCOTT 132 kV substation • Associated overhead and underground apparatus including cables Overhead Lines • 4VW 400 kV OHL ALVERDISCOTT - INDIAN QUEENS - TAUNTON 1 ALVERDISCOTT - INDIAN QUEENS - TAUNTON 2	The Applicant has accepted a grid connection offer for connection of 3.6GW of electricity at Alverdiscott Substation. Alverdiscott Substation will require extension/redevelopment to accommodate this power. The design of the Alverdiscott Substation Connection Development is at an early stage but is not part of the Proposed Development. Therefore the Applicant fully expects close cooperation with NGET as the design progresses.
National Grid Electricity Transmission PLC	NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions	The Applicant expects to work closely with NGET over the design of the connecting assets.

Stakeholder	Summary of Response	Formal response
	with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.	
National Grid Electricity Transmission PLC	Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.	Noted
National Grid Electricity Transmission PLC	NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset	Noted
National Grid Electricity Transmission PLC	Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004)".	Noted
National Grid Electricity Transmission PLC	If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.	Noted
National Grid Electricity Transmission PLC	The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.	Noted
National Grid Electricity Transmission PLC	Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.	Noted

Stakeholder	Summary of Response	Formal response
National Grid Electricity Transmission PLC	If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	No tree planting is proposed beneath overhead lines.
National Grid Electricity Transmission PLC	Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.	Noted
National Grid Electricity Transmission PLC	NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.	Noted, the Proposed Development will not interfere with the NGET high voltage cables.
National Grid Electricity Transmission PLC	Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.	The construction of the Proposed Development will not interfere with the ground level above NGET cables.
National Grid Electricity Transmission PLC	We would request that the potential impact of the proposed scheme on NGET's existing and future assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.	The potential for the relocation of Overhead lines has been considered in the ES and will be taken forward to the DCO application. Consideration is given in Volume 1, Chapter 3: Project Description of the ES.
National Grid Electricity Transmission PLC	Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET.	This is noted, and the potential for the relocation of the overhead lines and other apparatus has been considered in the ES. Particularly Volume 1, Chapter 3: Project Description of the ES.

Stakeholder	Summary of Response	Formal response
National Grid Electricity Transmission PLC	Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.	The potential for the relocation of Overhead lines has been considered in the ES and will be taken forward to the DCO application. Consideration is given in Volume 1, Chapter 3: Project Description of the ES.
National Grid Electricity Transmission PLC	NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com	Consultation is ongoing with NGET. The construction of the Alverdiscott Substation Connection Development is required to facilitate the Proposed Development. The Alverdiscott Substation Connection Development is not part of the Proposed Development or the DCO application.
North Devon Council	Principally North Devon District Council would wish to support the development of Renewable Energy within or adjoining the North Devon District, in line with Strategic Policy ST16: Delivering Renewable Energy and Heat and in accordance with all other relevant National Planning Policies and Local Plan Policies which are listed in this response.	Noted.
North Devon Council	Although the development falls to be considered by Torridge District Council, given the scoping zone is in close proximity to the North Devon District Council (NDDC) border, there is moderate probability that the substation building may be viewed within NDDC district, with subsequent landscape impact, and effect on any public receptors within the zone or beyond, as identified below.	The LSVIA study area includes North Devon and direct and indirect effects on landscape and visual resources in both Torridge and North Devon Districts are assessed within Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES.
North Devon Council	There is moderate to high potential for cumulative impacts with other renewable projects in NDDC, which must be either discounted or taken into account in the determination. It is necessary to examine the transboundary and cumulative effects of the substation when/if seen within the NDDC area, and cumulating with any existing or approved renewable projects within the NDDC area (as well as those in TDC).	The cumulative projects and plans, relevant to the onshore environment, that are considered within the CEA are presented within Annex A of Volume 1, Appendix 5.3: CEA Screening Matrix. This sets out the list of projects and plans, along with the cumulative location plan.
North Devon Council	North Devon District Council would therefore ask for the following suggested cumulative impacts, viewpoints and properties to be taken into consideration in informing the EA:	The cumulative projects and plans, relevant to the onshore environment, that are considered within the CEA are presented within Annex A of Volume 1, Appendix 5.3: CEA Screening Matrix. This sets

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	Statutory protected areas: Taw and Torridge SSSI, and County Wildlife Sites. **List of established renewable energy projects in NDDC area:** • Application 71708 - Land at Litchardon Cross Newton Tracey EX31 3QE • Application 54884 – Land at Hollamoor Farm Eastacombe EX31 3NY • Application 54349 – Horsacott Farm Lydacott EX31 2PD • Application 58715 – Collacott Farm Newton Tracey EX31 3QF **Suggested Localised viewpoints:** • Hiscott, • Newton Tracey, • Horwood/Lovacott, • Eastleigh **Suggested wider elevated viewpoints:** • Codden Hill (east) • Ashford (North)	out the list of projects and plans, along with the cumulative location plan. In relation to the applications identified within the North Devon Council response: • Application 71708 is included within the CEA screening matrix. • Applications 54884, 54349 and 58715 are considered to be operational and form part of the existing baseline environment. Therefore, the applications are not considered within the CEA. Statutory protected areas such as the Taw and Torridge SSSI and County Wildlife Sites have been considered within topic chapters, including Volume 2, Chapter 1: Onshore Ecology and Nature Conservation, Volume 2, Chapter 3: Hydrology and Flood Risk, and Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES. The list of viewpoints for the landscape and visual assessment are included in Table 2.18 of Volume 4, Chapter 2: Landscape, Seascape and Visual Resources.
North Devon Council	Suggested localised properties to take into consideration at consultation phase: within NDDC area: • West Ashridge • Little Ashridge • Mutton Hall • Eastleigh • Oxenpark • Horwood • Newton Tracey (west)	Private views are not a planning matter, unless the effects have the potential to be over and above substantial adverse. It is judged that this is not the case with the Proposed Development.

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	• Higher Lovacott • Lower Lovacott • Higher Broomfield Coppice • East Barton • Properties around Potters Nod • Harefield • Marsh Farm • Boskins • West Barton House • Park Farmhouse • The Granary • West Barton Barn • The Orchard • Parsonage Farm • Old Parsonage	
North Devon Council	There are many designated heritage assets within the vicinity of the site boundary, part of which lies within North Devon Council's area. These include the highly graded listed buildings at Eastleigh, Crosspark farmhouse at Higher Lovacott, and various listed buildings in Horwood. The proposed PV farm may or may not affect the setting of these heritage assets, it would depend on the siting, this factor should be included.	Designated heritage assets potentially affected by the Proposed Development are listed in Volume 2, Chapter 2: Historic Environment of the ES and shown in Volume 2, Figure 2.2 of the ES. An asset by asset assessment of potential impacts arising from change within the settings of heritage assets is presented within Volume 2, Appendix 2.4: Settings Assessment of the ES.
North Devon Council	List of heritage assets in NDDC in proximity to the site: • Tapeley Park (Registered Park and Garden) Grade II • Church of St Michael Horwood Grade I • The Courtledge Horwood Grade II • Church Farm Cottage Horwood Grade II • The Forge Horwood Grade II Lynton House • Hoopers Cottage Horwood Grade II*	Designated heritage assets potentially affected by the Proposed Development are listed in Volume 2, Chapter 2: Historic Environment of the ES and shown in Volume 2, Figure 2.2 of the ES. An asset by asset assessment of potential impacts arising from change within the settings of heritage assets is presented within Volume 2, Appendix 2.4: Settings Assessment of the ES.

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	• Horwood house Grade II • West Barton Farmhouse Grade II • The Old Parsonage Grade II • East Barton Grade II • Stable block at east Barton Grade II • Barns at east Barton Grade II • Crosspark farmhouse Grade II • Bradavin Farm Grade II • Eastleigh Manor Grade II* • Eastleigh Manor House Grade II* • Eastleigh Manor Granary Grade II • Eastleigh Manor Barn with attached roundhouse Grade II • Shippons at Eastleigh Manor Grade II • The Pines Eastleigh Grade II • Barn at The Pines Eastleigh Grade II • 1 Rock Cottage Eastleigh Grade II • Little Pillhead Farmhouse (Webbery) Grade II. This should be presented in an appropriate Heritage Statement and it will be assessed against Policies ST15 and DM07 of the NDTLP, chapter 16 of the NPPF and the statutory duties in Section 66 and 72 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990.	
North Devon Council	Such that NDDC can comment further as a consultee at application stage, it is the opinion of the LPA that the above matters outlined should inform any ES submitted with the application, to offer a full consideration of the wider landscape and amenity impacts. This additional information required through the Scoping report can be used in the subsequent review of the ES to check that all issues have been addressed.	Noted.

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North Devon Council	There are other legislative requirements outside of the planning process which need to be adhered to throughout the development process such as Building Regulations and The Party Wall Act. These are not a consideration in the planning process however you should make yourself familiar with the requirements as this may affect your proposal.	Noted.
Torridge District Council	Table 9.3.2 of the Scoping Report identifies the impacts proposed to be scoped into assessment for landscape, seascape and visual resources. Overall, the Scoping Report includes a broad and reasonable approach to landscape considerations, particularly those likely to occur within the construction and operational phases.	Noted.
Torridge District Council	The site is elevated within the local landscape and is therefore subject to long-distance views. In addition, there could be moderate to high cumulative impacts due to the proposals relationship with other consented and implemented renewable projects in TDC. Furthermore, the consultation response by North Devon Council (NDC) is noted which argues for greater consideration of longer distance landscape impacts (i.e. from areas within NDC parishes). In this regard, it is suggested that the suggested 10km ZTV / study area may not be extensive enough to take into consideration the sensitive landscape receptors identified by NDC given some of these sit just outside of the ZTV.	The LSVIA considers direct and indirect effects on landscape and visual receptors within the 10 km LSVIA study area. Long distance receptors (e.g. Codden Hill and north of the Taw estuary) have been visited as part of landscape, seascape and visual resources study, it is judged that there is no potential for significant effects beyond 10 km.
Torridge District Council	The compound area at Abbotsham cross covers the site of a windmill identified in a heritage appraisal on the Clovelly Road South site and this will need to be recorded before any site disturbance.	Geophysical survey of the compound area at Abbotsham Cross has identified potential archaeological anomalies associated with the possible site of the windmill, forming a series of possible small enclosures (Volume 2, Appendix 2.2: Onshore Geophysical Survey Report of the ES, Site 31). These anomalies were investigated through trial trenching (Volume 2, Appendix 2.3: Preliminary Trial Trenching Report of the ES, Trenches 2 and 3) and Post-medieval pottery was recovered. A programme of further archaeological work will be agreed and incorporated within the Onshore WSI for Archaeology.
Torridge District Council	The routing and compounds where the cable crosses the river has potential to impact on the view into Bideford, and the views from	Views into Bideford, and in particular those with potential to impact upon historic assets such as Listed Buildings has been assessed within

Stakeholder	Summary of Response	Formal response
	Landcross-Tennacott are visible from the A388. The level of visual harm to the views into Bideford will need to be assessed as part of a wider heritage assessment.	the ES in line with the methodology set out in Volume 2, Chapter 2: Historic Environment of the ES. Where relevant, views into Bideford are assessed within Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES.
Torridge District Council	The impacts proposed to be scoped into the assessment for socio-economics and tourism are broadly supported, as identified in Table 9.4.2. Paragraph 9.4.6 of the Scoping Report defines the district council area as defining the Torridge tourism economy. It is important to note that given the proximity to North Devon District, impacts on a wider northern Devon tourism economy should also be considered through the Environmental Statement.	Impacts to the tourism sector, which is assessed within Volume 4, Chapter 3: Socio-economics and Tourism of the ES, considers both North Devon District and Torridge District, alongside Devon and the UK.
Torridge District Council	The impacts scoped in for housing and economic impacts are broadly supported however TDC is concerned that there is a lack of detail in regard to these points within the 'Assessment of Socio-Economic Effects' Section (paragraphs 9.4.25-9.4.31). This Section seems to have a narrow focus on economic measures without setting out how wider impacts on local labour force, the construction industry, access to housing etc will be assessed. Given this, it is considered that the Socio-Economic scope needs to be better defined and should consider effects beyond Torridge District, given the close relationship with North Devon District, and should more accurately reflect wider socio-economic components of housing and employment.	The socio-economics scope considers potential effects beyond Torridge District. The assessment considers North Devon District and North Devon District, alongside Devon and the UK. Further details on scope are provided within Volume 4, Chapter 3: Socio-economics and Tourism of the ES.
Trinity House	I can confirm that Trinity House is content with the Scoping Report and will have particular interest in the Navigation Risk Assessment and Cable Burial Risk Assessment documentation once finalised.	Noted