



Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Ossian Transmission Infrastructure

Case Reference: EN0210006

Adopted by the Planning Inspectorate (on behalf of the Secretary of State)
pursuant to Regulation 10 of The Infrastructure Planning (Environmental
Impact Assessment) Regulations 2017

03 April 2025

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1. INTRODUCTION

- 1.0.1 On 24 February 2025, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Ossian Offshore Windfarm Limited (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Ossian Transmission Infrastructure (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.
- 1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:
- <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0210006/documents>
- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice pages, including '[Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

['Nationally Significant Infrastructure Projects: Advice pages'](#)

This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.0 Description of the Proposed Development

(Scoping Report Section 4)

ID	Ref	Description	Inspectorate's comments
201	n/a	Options	The scoping report includes several elements of the proposed development that remain under consideration, including the locations of the onshore converter stations, the cable routes and the methods that could be used in cable installation both onshore and offshore. The applicant is directed to the comments from consultation bodies in appendix 2 of this scoping opinion. The ES should identify how this advice has been considered, particularly in relation to the development of options and mitigation measures. 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. The description of the proposed development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations. The need and justification to support the level of flexibility sought must be explained in the ES, including how it has been taken into account in the assessments through relevant parameters (temporal and spatial) and a defined worst-case for resulting environmental effects. It will be essential to ensure consistency throughout the ES and any other relevant assessments supporting the application from which the ES draws. It should be noted that if the proposed development materially changes prior to submission of the DCO application, the applicant may wish to consider requesting a new scoping opinion.
202	Paragraph 3.1.1.6	Definitions of offshore / onshore / intertidal boundaries	The scoping report divides the proposed development into an 'Offshore' 'Onshore' and 'Intertidal' scoping boundaries which are defined in paragraph 3.1.1.6. Aspect assessments are however only divided into 'offshore' and 'onshore' topics, with additional descriptions of the 'landfall' area, or landward of Mean High Water Springs (MHWS) / Low Water Springs (MLWS). The ES should review the spatial areas considered in each aspect chapter so it is clear what activities fall within each defined area and that these terms are

ID	Ref	Description	Inspectorate's comments
			used consistently across the ES. Where aspect assessments cross between 'offshore' and 'onshore' areas, it should be clear where the assessment of effects for the intertidal / landfall area can be found to avoid gaps in the assessment. This should be supported by figures at an appropriate scale.
203	n/a	Mean High Water Springs definition	With reference to ID 2.0.2 of this scoping opinion, the applicant is also directed to the response from the Marine Management Organisation which sets out the definition of Mean High Water Springs (MHWS) for use in the ES.
204	Paragraph 4.5.2.3	Cable protection	The ES should explain the worst-case scenario for cable protection and include the assumptions used that the worst-case scenario is based on. The ES should also quantify the maximum volume of material that would be required for cable protection.
205	Paragraph 4.5.2.5	Options for offshore export cable laying	The scoping report sets out 6 different methods for cable laying that may be used to bury the offshore export cables and indicates (paragraph 4.5.2.7) that these may be further refined at the final design stage post-consent. Every effort should therefore be made to reduce the list of possible options in the ES. Where options remain, any differences in the potential working methods for cable burial, including the types and numbers of cable laying vessels and/ or the nature of vessel movements that could arise should be defined and assessed. The reasons for the selection of the preferred methods should also be defined, including a comparison of the environmental effects.
206	Section 4.6.3	Landfall design parameters	The ES should include parameters for the proposed 6 underground joint bays and the associated area of land above ground that would be required for inspection covers.
207	n/a	Construction of the onshore converter stations	The scoping report does not describe how the onshore converter stations would be constructed. This should be explained within the ES with reference to (but not limited to) matters such as timing, methods, traffic movements and access.
208	Paragraph 4.6.2.3	Landfall construction	The scoping report notes the landfall connection may be constructed through either trenched or trenchless methods. The ES should set out the potential construction and decommissioning activities that could be employed for the construction of the landfall

ID	Ref	Description	Inspectorate's comments
		Construction compounds	where options remain, including (but not limited to) the locations and extent of construction working areas and compounds, vehicle access to the coast, and whether offshore activities or working areas could be required. These matters should be assessed in relevant aspect chapters, where significant effects are likely to occur.
20.9	Paragraph 4.7.2.12	Installation of foundations	The ES should describe the types and depths of foundations for the onshore converter stations and those details taken into account in the assessment of effects. Where piling is likely to be required, the methods and numbers of piles should also be defined, or assumptions made to inform assessment based on a worst-case scenario.
20.10	n/a	Demolition	The ES should identify and assess demolition of any existing structures where this is identified as required.
20.11	Paragraph 4.8.1.2	Seabed preparation Landfall preparation	The scoping report notes the requirement for seabed preparation activities in advance of cable installation, the nature and extent of which are yet to be confirmed. The ES should set out the extent of any seabed preparation activities, including the locations, methods to be used and the likely volumes of materials and their proposed disposal routes where boulder and/ or sand wave clearance is required. Equally, the ES should describe the activities required at landfall and whether dredging or other preparatory works would be required. The ES should identify the worst-case footprint of seabed disturbance that would arise from offshore construction activities.
20.12	Paragraph 4.8.3	Decommissioning	The scoping report states that onshore and offshore cables may be left in-situ, but there is a possibility that they may be removed at the end of the minimum operational lifetime of 35 years. The Inspectorate notes that a decommissioning plan will be prepared prior to commencement of any decommissioning activities. However, in order to ensure that all likely significant effects associated with the proposed development are included in the ES, the ES should include an assessment of decommissioning effects based on a reasonable worst-case scenario.

2.1 EIA Methodology and Scope of Assessment

(Scoping Report Section 5)

ID	Ref	Description	Inspectorate's comments
211	Section 1.5	Structure of the ES	The Inspectorate notes the applicant intends to prepare an ES that covers both the proposed development and a separate marine licence application in Scotland. The ES project description should be structured to ensure that it is clear which elements are to be consented within the DCO. The aspect assessment should then also clearly identify the effects associated with the works that would be permitted by any DCO. This is to ensure that the examining authority/ Secretary of State can understand the effects associated with the proposed development and the requirements for any mitigation secured within the DCO. Where it is not possible to make a distinction between effects associated with the DCO in England and the marine licence in Scotland (such as for mobile species that may occur in both Scottish and English waters) this should also be clearly stated in the ES and the approach to the assessment supported by appropriate reasoning.
212	Table 5.3.1	Planning Inspectorate guidance	The applicant is also encouraged to review the Planning Inspectorate's guidance note: Nationally Significant Infrastructure Projects: Advice on Preparing Applications for Linear Projects (2025).
213	Paragraph 5.4.4.1	Baseline environment	The scoping report indicates that the ES will use both existing data collected through other transmission infrastructure projects and data collected by the applicant specifically for the proposed development. The Inspectorate notes that some data sources, such as those identified in Table 6.3.4 for benthic, subtidal and intertidal ecology, are over five

ID	Ref	Description	Inspectorate's comments
			years old. The ES should include an explanation of the applicability of these data. Where the baseline is not updated, an explanation of how it is considered to remain representative of the current state of the environment should also therefore be provided. This should be supported by evidence of discussion and agreement with relevant consultation bodies.
214	Paragraph 5.4.5.2	Maximum Design Scenario	The Inspectorate notes the intention to define a MDS within the ES and that this provides a worst-case assessment. Where options remain, the scoping report states that this would be the scenario that would give rise to the greatest effect. The Inspectorate refers to section 2.0 of this scoping opinion for its comments in relation to defining options and the parameters based approach. Options and the MDS should not be so wide ranging as to represent development with very different environmental effects.
215	Paragraph 5.4.6.2	Assessment years	No details of the assessment years are identified in the scoping report. These should be set out within the ES with an explanation for their selection, including where different assessments make use of additional assessment years in relevant aspect chapters.
216	Paragraph 5.5.2.17	Significance of effect	The scoping report explains how significance of effects would be defined and that significance levels will be defined for each aspect, which will include specific aspect-based guidance. Not all chapters are however clear on what level of effect would constitute a significant effect nor set out any aspect specific levels of magnitude/ receptor sensitivity. The ES should explain clearly how significance has been determined for each aspect chapter or be clear how the methodology aligns with the significance of effects set out in the overarching methodology.
217	n/a	Receptors	The ES should ensure that all relevant designated sites are included within the assessment. The applicant's attention is drawn to responses

ID	Ref	Description	Inspectorate's comments
			from Natural England and NatureScot (appendix 2 of this scoping opinion) in this regard.
218	Section 5.7	Cumulative effects assessment (CEA)	The ES should explain the reasons for the selection of study area(s) associated with the CEA for both on and offshore elements of the proposed development. This should take account of the possible zone of influence and relevant guidance. The list of developments proposed for the CEA should be consulted on, and where possible agreed, with local planning authorities, highways authorities and other relevant consultation bodies. The applicant's attention is drawn to the responses of Lincolnshire County Council, Anglian Water, Natural England and others in appendix 2 of this scoping opinion that contain comment on other proposed developments for consideration. The ES should include information on the locations of the developments included in the CEA and the distance from the proposed development supported by a figure depicting the locations and extent of the identified cumulative developments.
219	Section 5.9 Appendix 5.1	Transboundary	The Inspectorate notes the applicant's transboundary screening provided in appendix 5.1 of the scoping report. The Inspectorate will be undertaking a transboundary screening on behalf of the Secretary of State in due course.
2110	Tables 11.2.3 and 11.2.4	Scoped in and scoped out effects - consistency	The Inspectorate notes there are some inconsistencies between the effects scoped in/ out within aspect tables and those set out in the summary tables in scoping report chapter 11. The applicant should ensure that where summary tables are used, that the content is consistent with the relevant aspect chapters.

3. ENVIRONMENTAL ASPECT COMMENTS - OFFSHORE

3.0 Physical processes

(Scoping Report Section 6.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
301	Table 6.2.3	Impacts to sediment transport pathways due to the presence of the infrastructure – during construction and decommissioning.	The scoping report seeks to scope out impacts during construction and decommissioning from sediment transport pathways. The Inspectorate notes that this will be scoped in for the operation and maintenance phases, and therefore the Inspectorate considers this matter can therefore be scoped out of further assessment in the ES during construction and decommissioning on the basis that the infrastructure would only be present during the operational phase.
302	Tables 6.2.4 and 11.2.2	Temperature increase of the cable due to resistance in the cable – during operation and maintenance.	The scoping report seeks to scope out effects from increases in temperature during the operation of the cable due to resistance in the cable, on the basis that any temperature changes would be local to the immediate environment surrounding the cable and no significant effects would be anticipated. The Inspectorate agrees that due to reasoning provided, it is unlikely that this would result in significant effects. This matter can therefore be scoped out of further assessment in the ES.

ID	Ref	Description	Inspectorate's comments
303	Paragraph 6.2.5	Mitigation measures	The scoping report states that where cable burial is not possible, cable protection measures will be used. The scoping report does not explain the types of cable protection measures that may be used or potential impacts on physical processes. If cable protection measures are required, these should be set out in the ES, and any likely significant effects from the use of such measure(s) identified.

ID	Ref	Description	Inspectorate's comments
304	n/a	Definitions	The Inspectorate notes that effects on coastal processes and water quality are covered in several chapters of the scoping report, including physical processes. The ES should ensure there is cross reference and consistency between related aspect chapters, including reviewing the study areas, definitions and the figures used to support the assessments. Please also see ID 2.0.2 of this scoping opinion for the Inspectorate's comments on the differences between onshore, offshore and intertidal areas.

3.1 Benthic Subtidal and Intertidal Ecology

(Scoping Report Section 6.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
311	Tables 6.3.6 and 11.2.2	Thermal emissions from operational cables – all phases.	The scoping report seeks to scope out effects from thermal emissions from operational cables on the basis that any temperature changes would be low and highly localised. Given the information provided in the scoping report, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.
312	Tables 6.3.6 and 11.2.2	Accidental release of pollutants – all phases.	The scoping report seeks to scope out effects from the accidental release of pollutants on the basis that an Environmental Management Plan (EMP) and a Marine Pollution Contingency Plan (MPCP) will be in place to minimise potential for the release of pollutants and will contain mitigation measures in the event that pollution incidences do occur. On this basis, the Inspectorate agrees to scope this matter out, noting that the applicant has committed in paragraph 4.8.1.11 to provide an outline of these plans and a commitments register. The ES should provide details of the proposed mitigation measures to be included in the EMP and MPCP and identify how these plans are to be secured.
313	Tables 6.3.5, 6.3.6 and 11.2.2	Colonisation of hard structures during construction and decommissioning.	Table 6.3.5 states that colonisation of hard structures will be scoped in for the operational phase and scoped out for construction and decommissioning. Table 6.3.6 states it will be scoped out for the construction phase on the basis that whilst some colonisation may occur, it will be minimal. Table 6.3.6 does not state whether this is to be scoped out for the decommissioning phase. The Inspectorate agrees that this matter may be scoped out for the construction phase, given the justification provided. However, the Inspectorate does not agree this matter can be scoped out for the decommissioning phase. Accordingly, the ES should include an assessment of this matter or the information referred to

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			demonstrating agreement with the relevant consultation bodies and the absence of an LSE.
314	Tables 6.3.5, 6.3.6 and 11.2.2	EMFs from subsea electrical cabling during construction and decommissioning.	The Inspectorate agrees to scope out impacts from EMF during construction and decommissioning as the cables will not be live and therefore there would be no pathway for effect. It is noted that effects on fish from EMF during operation is scoped in. Where this may affect commercial fisheries, appropriate cross reference should be included in the ES.
315	Tables 6.3.5 and 11.2.2	Temporary habitat loss and disturbance of habitats during operation and maintenance.	The scoping report seeks to scope out impacts from temporary habitat loss during operation and maintenance on the basis that minimal activities are anticipated to take place during this phase and would be limited to activities such as minor repairs or cable burial. No details are provided to explain how minor repairs or cable reburial would be undertaken and therefore the Inspectorate does not agree to scope this matter out for benthic and subtidal ecology. The applicant's attention is drawn to the response from Natural England (Appendix 2 of this opinion).
316	Tables 6.3.5 and 11.2.2	Increased Suspended Sediment Concentrations (SSC) and associated sediment deposition during operation and maintenance.	The scoping report seeks to scope out impacts from SSC during operation and maintenance on the basis that minimal activities associated with sediment deposition are anticipated to take place during this phase and would be limited to activities such as minor repairs or cable burial. No details are provided to explain how minor repairs or cable reburial would be undertaken nor the duration of effects and therefore the Inspectorate does not agree to scope this matter out. The ES should consider potential indirect effects associated with sediment deposition. The applicant's attention is drawn to the responses from Natural England and NatureScot (Appendix 2 of this opinion).
317	Table 6.3.5	Changes in physical processes –	The scoping report seeks to scope out changes in physical processes during construction and decommissioning on the basis that this will only be of relevance during the operational phase. On this basis, the Inspectorate agrees this may be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		construction and decommissioning	

ID	Ref	Description	Inspectorate's comments
318	Table 6.3.5	Impacts from EMF during operation	The scoping report states that the approach will be to clearly qualitatively present the maximum spatial scale of impacts. The ES should also include modelling to inform the assessment and consideration of cumulative impacts with other wind farms should be included. The applicant's attention is drawn to the response from NatureScot (Appendix 2) in this regard.
319	Section 5.3.5	Mitigation measures	The scoping reports explains that a number of plans will be developed which will include mitigation relevant to benthic ecology. Listed are: • Code of Construction Practice • Construction Method Statement • Cable Plan – to be informed by a Cable Burial Assessment. The ES should explain what mitigation measures are to be included in the various documents and also if monitoring for effectiveness of proposed mitigation is required.
3110	Section 6.3.9	Next steps	The applicant should also seek to agree the baseline data collection, in relation to both the use of data derived from other projects and the scope of surveys to be completed by the applicant. This should include consideration of the scope of the water quality surveys, identified in scoping report section 6.11 as part of the proposed data collection.

3.2 Fish and Shellfish Ecology

(Scoping Report Section 6.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Tables 6.4.7 and 11.2.2	Accidental release of pollutants – all phases.	The scoping report seeks to scope out impacts on fish and shellfish from the accidental release of pollutants on the basis that the risk will be mitigated through the implementation of an Environmental Management Plan (EMP) and a Marine Pollution Contingency Plan (MPCP). These plans will be in place to minimise potential for the release of pollutants and will contain mitigation measures in the event that pollution incidences do occur. On this basis, the Inspectorate agrees to scope this matter out, provided the ES includes an outline of these plans providing details of the proposed mitigation measures and identifies how these plans are to be secured.
322	Tables 6.4.7 and 11.2.2	Underwater sound from Unexploded Ordnance (UXO) clearance – all phases	The scoping report states that any potential requirement for clearance of UXO will be managed through a separate Marine Licence application through the Marine Management Organisation (MMO). On this basis, the Inspectorate agrees this matter may be scoped out from further assessment in the ES. However, please see ID 4.13.8 of this scoping opinion for the Inspectorate's comments on UXO.
323	Tables 6.4.7 and 11.2.2	Underwater sound from vessels – all phases.	The scoping report seeks to scope out effects from underwater sound from vessels during all stages on the basis that subsea vessel noise is not likely to present a significant change in the marine environment from existing baseline noise levels. No information has been presented about the predicted noise levels from the different types of vessels which will be used, where this will be located and how sensitive to noise the receptors are. The Inspectorate therefore does not agree at this stage that this matter may be scoped out. for the operational phase. Accordingly, the ES should include an assessment on noise impacts to fish species, or the information referred to demonstrating agreement with the relevant consultation bodies and that significant effects are unlikely to occur.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
324	Tables 6.4.7 and 11.2.2	Long-term habitat loss (for species with fully pelagic lifecycles) - all phases.	The scoping report seeks to scope out effects on fully pelagic species due to long term habitat loss. The justification provided states that fully pelagic species will not be significantly affected by long term habitat loss to the seabed owing to their habitation within the water column and therefore having a wide availability of alternative habitat. The scoping report does not specify what it considers to be fully pelagic fish species, but the Inspectorate understands these are species which live and spawn in the water column. On this basis the Inspectorate agrees to scope out effects from long term habitat loss on fish species with fully pelagic lifecycles, however the ES should specify which species this is referring to.
325	Tables 6.4.7 and 11.2.2	All impacts on basking shark – all phases.	The scoping report seeks to scope out effects on basking shark on the basis that only four sightings have been reported in the last 10 years. The Inspectorate agrees that this matter can be scoped out of further assessment in the ES'
326	Tables 6.4.7 and 11.2.2	Thermal emissions from operational cables – all phases.	The scoping report seeks to scope out effects from thermal emissions from operational cables on the basis that any temperature changes would be low and highly localised. Given the information provided in the scoping report, including reference to burial depth and the potential for the use of cable protection, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.
327	Tables 6.4.6, 6.4.7 and 11.2.2	Colonisation of hard structures - construction	Table 6.4.6 states that colonisation of hard structures will be scoped in for the operational phase and scoped out for construction and decommissioning. Table 6.4.7 states it will be scoped out for the construction phase on the basis that whilst some colonisation may occur, it will be minimal. Table 6.4.7 does not state whether this is to be scoped out for the decommissioning phase. The Inspectorate considers that there is potential for colonisation of hard structures during construction, noting construction methods are not yet fully defined. Accordingly, the ES should include an assessment of this matter for the construction and

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			decommissioning stages. Where there is evidence demonstrating agreement with the relevant consultation bodies that significant effects are unlikely, however, this can be set out in the ES.
328	Tables 6.4.7 and 11.2.2	Temporary habitat loss and disturbance of habitats (for species with fully pelagic lifecycles) – during operation and maintenance	The scoping report seeks to scope out effects on fully pelagic species due to temporary habitat loss during the operation and maintenance phase on the basis that any activities would be minor repairs or cable reburial. The scoping report does not specify what it considers to be fully pelagic fish species, but the Inspectorate understands these are species which live and spawn in the water column. On this basis the Inspectorate agrees to scope out effects from long term habitat loss on fish species with fully pelagic lifecycles, however the ES should specify which species this is referring to.
329	Tables 6.4.7 and 11.2.2	Underwater sound impacting fish and shellfish receptors – during operation and maintenance	The scoping report seeks to scope out effects from underwater sound impacting fish and shellfish receptors during operation and maintenance on the basis impacts may only arise through minor repair work and potential cable reburial. However, no information is provided to explain the noise outputs which may be anticipated from operational activities and how any sensitive receptors may be affected. The potential for cumulative effects with operation and maintenance of the array area has not yet been explored, but it is noted that this will take place. 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 (LSE).
3210	Tables 6.4.6, 6.4.7 and 11.2.2	Increased SSCs and associated sediment deposition – construction,	Table 6.4.7 of the scoping report seeks to scope out impacts on fish and shellfish from increased SSC during operation and maintenance. Table 6.4.6 states this will be scoped in for the construction and decommissioning phases. Table 11.2.2 includes this as a matter to be scoped out for the construction phase. It is assumed there is an error in

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		operation and maintenance.	Table 11.2.2 and the Inspectorate agrees with the approach included in Table 6.4.6 that effects during construction should be scoped in. The Inspectorate considers that activities undertaken during operation and maintenance may increase risks to some fish and shellfish species from increased sediments and smothering. Therefore, 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 an LSE.
3211	Tables 6.4.7 and 11.2.2	EMFs from subsea electrical cabling – construction and decommissioning.	The Inspectorate agrees to scope out impacts from EMF during construction and decommissioning as the cables will not be live and therefore there would be no pathway for effect.
3212	Table 6.4.6	Temporary habitat loss and disturbance of habitats (shellfish and marine species with a demersal life stage) – operation and maintenance.	The scoping report seeks to scope out impacts from temporary habitat loss and disturbance of habitats (demersal) during operation and maintenance. No justification is provided. The Inspectorate considers this should be scoped in and information provided with regards to the activities which may occur during operation which may result in temporary habitat loss, such as types and duration of any repair works.
3213	Table 6.4.6	Underwater sound from pre-construction site investigation surveys and removal of infrastructure impacting fish and shellfish receptors – operation and maintenance.	The Inspectorate agrees to scope out impacts from underwater sound from pre-construction site surveys as these effects are assessed for the construction and decommissioning phases.

ID	Ref	Description	Inspectorate's comments
3214	Paragraphs 6.4.2.3 and 6.4.2.4	Surveys	The scoping report states that no site-specific surveys have been undertaken to provide characterisation of habitats and species assemblages in the fish and shellfish ecology study area. The scoping report seeks to rely on surveys undertaken to inform the benthic ecology assessment. It is noted that the study area for benthic ecology (as shown on Figure 6.3.1) is smaller than the study area for fish and shellfish. It is therefore not clear how the benthic surveys can be relied upon for the fish and shellfish assessment. Furthermore, many studies which are included in the scoping report to inform the baseline were completed between 1998 and 2012. (Figures 6.4.3 to 6.4.7). 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.
3215	Table 6.4.6	Impacts from EMF during operation.	The ES should also include modelling to inform the assessment and consideration of cumulative impacts with other wind farms should be included. The applicant's attention is drawn to the response from NatureScot (Appendix 2) in this regard.
3216	Section 6.4.9	Next Steps	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.
3217	n/a	Effects on European eel <i>Anguilla anguilla</i>	The ES should include consideration of potential effects on European eel from excavations of the seabed near the coast. The baseline, approach to assessment and mitigation measures should be discussed and where possible agreed with relevant consultation bodies.

3.3 Marine Mammals

(Scoping Report Section 6.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Table 6.5.3	Injury and disturbance from subsea noise generated during UXO clearance – during operation	The Inspectorate agrees to scope out this matter as there would be no pathway for effect during the operational phase.

ID	Ref	Description	Inspectorate's comments
332	Section 6.5.2	Study area	The marine mammal study area is defined as the area encompassing the Offshore Scoping Boundary plus a buffer of 4km. This distance was informed by data which showed a 4km displacement for harbour porpoise from construction vessels during construction of offshore windfarms. The Inspectorate advises that the applicant should seek to agree the extent of the study area with relevant consultees and draws the applicant's attention to the response from Natural England (appendix 2 of this scoping opinion) in this regard.
333	Section 6.5.5	Mitigation measures	The scoping report refers to a number of management plans by which mitigation measures for marine mammals would be secured. The ES should explain what mitigation measures are to be included in the various documents and also if monitoring for effectiveness of proposed mitigation is required.
334	Section 6.6.3	Baseline	It is not clear from the scoping report whether the applicant intends to carry out its own baseline surveys for marine mammals. The Inspectorate directs the applicant's attention to comments by Natural England (appendix 2 of this scoping opinion) with regards for the need for a minimum of 24 months of survey effort for marine mammals.

3.4 Offshore Ornithology

(Scoping Report Section 6.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
341	Tables 6.6.4 and 11.2.2	Impacts due to the accidental release of pollutants – all phases	The scoping report seeks to scope out impacts on offshore ornithology from the accidental release of pollutants on the basis that the risk will be mitigated through the implementation of an EMP and a MPCP. These plans will be in place to minimise potential for the release of pollutants and will contain mitigation measures in the event that pollution incidences do occur. On this basis, the Inspectorate agrees to scope this matter out, though the ES should provide details of the proposed mitigation measures to be included in the EMP and MPCP and identify how these plans are to be secured.
342	Tables 6.6.4 and 11.2.2	Injury due to collision with infrastructure or vessels – all phases.	The scoping report seeks to scope out effects on offshore ornithology from collision to infrastructure vessels. The scoping report explains that none of the offshore transmission infrastructure will be on the water surface and the Inspectorate agrees that on that basis, this matter can be scoped out of further assessment in the ES. The scoping report also seeks to scope out collision risk from vessel movements on the basis that birds would be able to see vessels so there is a low risk of collision. Given the justification provided in the scoping report, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.
343	Tables 6.6.4 and 11.2.2	Barriers to movement – all phases	The scoping report seeks to scope out effects on offshore ornithology from barrier to movement. The scoping report explains that none of the offshore transmission infrastructure will be on the water surface therefore there is no potential for barriers to movement for all bird species. Given the justification provided in the scoping report, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
344	Table 6.6.3	Indirect impacts from underwater noise affecting prey species - operation	The scoping report states that indirect impacts from underwater noise affecting prey species will be assessed for the construction and decommissioning phases and it will not be assessed for the operational phase. The Inspectorate agrees that noise effects in the operational phase are unlikely to be significant and therefore agrees this matter may be scoped out of further assessment in the ES.

ID	Ref	Description	Inspectorate's comments
345	Section 6.6.3	Baseline	It is not clear from the scoping report whether the applicant intends to carry out its own baseline surveys for offshore ornithology. The Inspectorate directs the applicant's attention to comments by Natural England (appendix 2 of this opinion) with regards for the need for a minimum of 24 months of survey effort for offshore ornithology.

3.5 Commercial fisheries

(Scoping Report Section 6.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
351	Tables 6.7.4 Table 11.2.2 Paragraph 6.7.5.1	Long term loss of fishing grounds – all phases.	The scoping report seeks to scope out effects from long term loss of fishing grounds, explaining that mitigation measures will be incorporated (as set out in paragraph 6.7.5.1) to ensure any impacts will not be significant. This includes burial of cables, where possible, development and adherence to and Operation and Maintenance Programme (OMP) and a Cable Plan which would be informed by findings of a Cable Burial Risk Assessment. On the basis of the information provided in the scoping report, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES. An outline of the cable burial risk assessment should be included within the ES.

ID	Ref	Description	Inspectorate's comments
352	n/a	n/a	n/a

3.6 Shipping and Navigation

(Scoping Report Section 6.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
361	Table 6.8.2	Reduction in under-keel clearance – construction and decommissioning	The presence of external cable protection may increase under-keel interaction risk via reduction of water depth. The Inspectorate agrees that as this matter is scoped in for the operation and maintenance phase that this matter can be scoped out of further assessment during construction. However, the Inspectorate notes that cables could be left in-situ following decommissioning (paragraph 4.8.3.3) and as such, consideration of potential effects during this phase should be scoped in.
362	Table 6.8.2	Anchor interaction with subsea cables - construction and decommissioning	The presence of the offshore export cables may lead to an increase in the risk of anchor interaction. The Inspectorate agrees that as this matter is scoped in for the operation and maintenance phase that this matter can be scoped out of further assessment during construction. However, the Inspectorate notes that cables could be left in-situ following decommissioning (paragraph 4.8.3.3) and as such, consideration of potential effects during this phase should be scoped in.
363	Table 6.8.2	Interference with navigation, communications, and position-fixing equipment -	The offshore export cables may impact equipment onboard vessels, including potential effects of electromagnetic interference from cables. The Inspectorate agrees that as this matter is scoped in for the operation and maintenance phase that this matter can be scoped out of further assessment during construction and decommissioning phases, when cables would not be live.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		construction and decommissioning	

ID	Ref	Description	Inspectorate's comments
364	Paragraph 6.8.3.2	Baseline	It is noted that seasonal traffic data has been collected which includes 14 days in winter and 14 days in summer. The applicant's attention is drawn to the response from the Maritime and Coastguard Agency (appendix 2 of this scoping opinion) with regard to the recommendation for the use of further Automatic Identification System data being collected.
365	n/a	Major accidents and disasters	Refer to section 4.13 of this scoping opinion for the Inspectorate's comments on the assessment of major accidents and disasters in relation to shipping and navigation.

3.7 Marine archaeology

(Scoping Report Section 6.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.1	Tables 6.9.3 and 11.2.2	All impacts within the marine archaeology study area in Scottish waters – all phases.	Given the nature of the proposed development and the information provided in the scoping report, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.
37.2	Tables 6.9.2 and 11.2.2	Increased Suspended Sediment Concentrations (SSCs) and associated sediment deposition leading to indirect impacts on marine archaeology receptors in the marine archaeology study area – operation and maintenance.	The scoping report seeks to scope out effects on marine archaeology from increased SSCs as effects are expected to be minimal, arising only as a result of minor repairs or cable reburial events. No details are provided to explain how minor repairs or cable reburial would be undertaken nor the duration of effects and therefore the Inspectorate does not agree to scope this matter out. The ES should consider potential indirect effects associated with sediment deposition. However, where further evidence demonstrates agreement with relevant consultation bodies that significant effects are unlikely to occur, this matter would not then require assessment within the ES.
37.3	Tables 6.9.2 and 11.2.2	Direct damage to maritime archaeology receptors in the marine archaeology study area – operation,	The scoping report considers that maintenance activities during operation such as cable repair, and/ or replacement of cable protection, and any decommissioning phase activities, would all take place within the footprint of the impacts from the construction phase. Direct damage to archaeology receptors is therefore proposed to be scoped out of the assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		maintenance and decommissioning.	Given the early stage of the proposed development, details of cable laying and protection and the means of ensuring that direct damage remains within a defined construction footprint are not yet confirmed. The Inspectorate considers that this matter cannot be scoped out of the assessment at this stage. However, where further details have been developed at the time of the ES and/ or agreement is reached with consultation bodies on the extent and nature of operation, maintenance and decommissioning activities and their potential impacts (such as through the submission of an outline decommissioning plan), the Inspectorate agrees that this matter would not then require assessment within the ES.

ID	Ref	Description	Inspectorate's comments
374	n/a	n/a	n/a

3.8 Infrastructure and other sea users

(Scoping Report Section 6.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
381	Table 6.10.5	Alterations to sediment transport pathways affecting aggregate extraction areas – construction and decommissioning.	Table 6.10.5 of the scoping report explains that the physical presence of any cable protection may interrupt sediment pathways and this will be assessed for the operational phase. Given the lack of pathway for effect during the construction and decommissioning phases, however, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.
382	Tables 6.10.6 and 11.2.2	Interference with offshore microwave fixed communication links – all phases.	The scoping report seeks to scope out this matter on the basis that there is no proposed surface infrastructure associated with the offshore transmission infrastructure, therefore there will be no interference with microwave fixed communication links between offshore oil and gas platforms. Given the information provided in the scoping report, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.
383	Tables 6.10.6 and 11.2.2	Interference with Practice and Exercise Areas (PEXAs) – all phases	The scoping report seeks to scope out this matter on the basis that there is no proposed surface infrastructure associated with the offshore transmission infrastructure, therefore it is proposed that there will be no interference with Military Practice and Exercise Areas (PEXA). The Inspectorate considers that given the stage of the proposed development and the presence of several PEXAs within the study area, that this matter cannot be scoped out of the assessment at this stage. The ES should also include consideration of the presence of unexploded ordnance associated with PEXAs.

ID	Ref	Description	Inspectorate's comments
384	Paragraph 6.10.8.4	Assessment of effects	The scoping report states that the methodology for infrastructure and other sea users would make use of the results from other chapter assessments in the ES and follow the overarching methodology set out in scoping report section 5. The approach and definition(s) of significance should be clarified in the ES, particularly where different aspect chapters may have adopted different methodologies.

3.9 Water quality (offshore)

(Scoping Report Section 6.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
391	Table 6.11.2	Alteration of sediment transport and pathways due to infrastructure presence at the proposed landfall – construction and decommissioning.	The Inspectorate agrees to scope out impacts from the alteration of sediment transport and pathways during construction and decommissioning as the cable protection would not be in place and therefore there would be no pathway for effect. On this basis, the Inspectorate agrees that this matter can be scoped out of further assessment for these phases. However, the applicant should refer to the Inspectorate's comments about decommissioning in ID 2.0.12 of this scoping opinion.
392	Tables 6.11.3 and 11.2.2	Sediment transport and pathways due to infrastructure presence within the water column – all phases.	The scoping report seeks to scope out effects on sediment transport from the presence of infrastructure as cable presence is not considered likely to affect wave or tidal regimes. The Inspectorate notes that this matter is scoped into the assessment of physical processes and benthic ecology. On that basis, and in the absence of agreement with relevant consultation bodies, the Inspectorate considers this matter cannot be scoped out of the assessment at this stage.
393	Tables 6.11.3 and 11.2.2	Risk of introduction and spread of Invasive non-native species (INNS) – all phases (vessel movements).	The scoping report seeks to scope out risks of the introduction and spread of INNS from vessel movements on the basis that the risk will be mitigated through the implementation of post-consent management plans and compliance with International guidelines. On this basis, the Inspectorate agrees to scope this matter out, though the ES should provide an outline of the plans and guidelines that would be used, proposed mitigation measures and identify how these plans are to be secured.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
394	Tables 6.11.3 and 11.2.2	Risk of accidental pollution – all phases.	The scoping report seeks to scope out risks from accidental pollution on the basis that the risk will be mitigated through the implementation of post-consent management plans. These plans will be in place to minimise potential for the release of pollutants and will contain mitigation measures in the event that pollution incidences do occur. On this basis, the Inspectorate agrees to scope this matter out, provided the ES includes an outline of the plans used to prevent all potential accidental pollution incidents, the mitigation measures to reduce or avoid pollution events from occurring and identifies how these plans are to be secured.
395	Tables 6.11.3 and 11.2.2	Impact on achievement of Good Environmental Status (GES) – all phases.	The scoping report seeks to scope out this matter on the basis that the proposed development is unlikely to affect the achievement of GES. The Inspectorate notes in paragraph 6.11.3.7 that there is potential however for sediment disturbance to occur during construction, operation and decommissioning activities and that near-shore environments generally have higher metal concentrations in sediments that could be resuspended during these activities. On that basis, and in the absence of further details and/ or agreement with relevant consultation bodies, the Inspectorate does not agree that this matter can be scoped out of the assessment at this stage.
396	Table 6.11.3	All impacts within the water quality study area in Scottish Waters	The Inspectorate agrees that this matter can be scoped out of further assessment in the ES.
397	Table 6.11.3	Bathing water quality	The scoping report seeks to scope out effects on bathing water quality from sources of <i>Escherichia coli</i> and intestinal enterococci as the proposed development would not give rise to sources of this type of contamination. The Inspectorate agrees that this matter can be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
398	Paragraphs 6.11.4.4 6.11.99	Next steps	The applicant should also seek to agree the scale and nature of benthic water quality surveys, which are stated to be proposed in conjunction with the 2025 benthic ecology surveys, with relevant consultation bodies. Appropriate cross reference between these two aspect assessments should also therefore be made.

4. ENVIRONMENTAL ASPECT COMMENTS - ONSHORE

4.0 Geology, hydrogeology and ground conditions

(Scoping Report Section 7.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
401	Table 7.2.11 and 11.2.4	Land instability and geohazards due to earthworks on end users, buildings and infrastructure – construction and decommissioning phases	The scoping report seeks to scope out land instability and geohazards due to earthworks on the basis that these would be managed through the EIA process at the design phase, following desk studies and ground investigation works. The Inspectorate agrees with this approach and that this matter can be scoped out of the assessment.
402	Table 7.2.11 and 11.2.4	Ground contamination impacts on construction workers – construction and decommissioning phases	The scoping report seeks to scope out effects of ground contamination on construction workers on the basis that pollutant linkages would be managed by appropriate health and safety measures, and standard mitigation measures would be in place to avoid, prevent and reduce potential impacts. An outline CoCP would also be submitted with the application for development consent. The Inspectorate considers that given the stage of the proposed development and as details on the onshore route and likely construction activities are not yet defined, that potential for construction workers to be exposed to contaminants should be assessed in the ES. Details of the measures to address potential effects should also be explained in the ES and an outline of the CoCP provided. The ES should include an assessment or demonstrate agreement with consultation bodies that significant effects are unlikely to occur.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
403	Table 7.2.11 and 11.2.4	Potential introduction of contaminants through use and refuelling of construction plant, and handling of construction material and wastes on human health and the environment – construction and decommissioning phases	The scoping report seeks to scope out effects from the potential introduction of contaminants on the basis that a CoCP and Site Waste Management Plan (SWMP) would be in place to manage the storage and handling of construction materials, excavated soils and wastes, and an emergency response/plan with suitable response training would be established. The Inspectorate considers that given the stage of the proposed development and as details of the wastes and materials that could affect human health and the environment, , that this matter should be assessed in the ES. Details of the measures and controls to be included in the CoCP, SWMP and emergency response/plan and how these controls and plans are to be secured should also be provided.
404	Table 7.2.11 and 11.2.4	Storage of materials and wastes leading to the generation of potentially contaminated runoff on human health and the environment - construction and decommissioning phases	The scoping report seeks to scope out effects from the potential introduction of contaminants on the basis that an outline CoCP and SWMP would be in place to manage the storage and handling of construction materials, excavated soils and wastes, and an emergency response/plan with suitable response training would be established. The Inspectorate considers that given the stage of the proposed development and as details of the wastes and materials that could affect human health and the environment, , that this matter should be assessed in the ES. Details of the measures and controls to be included in the CoCP and SWMP and how these controls and plans are to be secured should also be provided.
405	Table 7.2.11 and 11.2.4	Discovery and disturbance of unforeseen contamination on human health and the	The scoping report seeks to scope out effects of unforeseen contamination on the basis that a watching brief (within the outline CoCP) would be in place to minimise the risk of disturbance and mobilisation of unforeseen contamination, and materials suspected to be contaminated would be handled and stored separately in line with an agreed discovery strategy or equivalent measure

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		environment – construction and decommissioning phases	As above (ID 4.0.4 and 4.0.5), the Inspectorate considers that limited details have been supplied of the measures and controls to be included in the CoCP, SWMP and any emergency response/plans. The Inspectorate does not agree that this matter can be scoped out of the assessment at this stage.
406	Table 7.2.11 and 11.2.4	Accidental spills/pollution into the environment – operation and maintenance phase	The scoping report seeks to scope out effects from the accidental spills/pollution into the environment on the basis that the operational and maintenance related activities are unlikely to require the transportation or storage of significant volumes of harmful substances. Given the nature of the proposed development and the information provided in the scoping report, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.
407	Table 7.2.11 and 11.2.4	Heat generated by Onshore Export Cables on groundwater quality - operation and maintenance phase	The scoping report seeks to scope out effects from heat generated during the operation of the onshore export cables on groundwater quality on the basis that any heat dissipated would be localised and confined to the immediate environment. The Inspectorate notes that the scoping report states levels of heat loss are dependent on cable voltages and final design and as such, in the absence of this information, this matter cannot be scoped out of the assessment at this stage. i The ES should also consider the potential for heat generated by onshore export cables to affect soils, once final details of the design and cable voltage are known.
408	Table 7.2.11 and 11.2.4	Existing ground contamination on end users and buildings - operation and maintenance phase	The scoping report seeks to scope out effects from existing ground contamination on end users and buildings on the basis that any pre-existing ground contamination would have been identified and remediated during the construction phase, and that buildings for the Onshore Converter Stations would be designed in accordance with the relevant building regulations. On this basis, the Inspectorate agrees to scope this matter out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
40.9	Table 7.2.10, 7.2.11, 11.2.3 and 11.2.4	Loss or partial loss/damage to designated geological sites – operation and decommissioning phases	Table 7.2.10 of the scoping report seeks to scope out the loss or partial loss/damage to designated sites for the operation and decommissioning phases. However, no details are provided regarding the nature of the designated sites and whether the permanent presence of any infrastructure and any operation and maintenance activities could give rise to significant effects. This should be confirmed in the ES and an assessment provided, where significant effects are likely to occur.
40.10	Table 7.2.10, 7.2.11 and 11.2.4	Mobilisation of any existing areas of contamination causing deterioration of groundwater quality in underlying aquifer units – operation phase	Table 7.2.10 of the scoping report seeks to scope out the mobilisation of any existing areas of contamination causing deterioration of groundwater quality in underlying aquifer units for the operation phase. The Inspectorate agrees to scope this matter out for the operation phase on the basis that these effects would occur during construction and/ or decommissioning and as paragraph 4.8.2.7 identifies only infrequent on-site inspections to existing structures are likely during operation.
40.11	Table 7.2.10, 7.2.11 and 11.2.4	Mobilisation of any existing contamination on off-site human receptors – operation phase	Table 7.2.10 of the scoping report seeks to scope out the mobilisation of any existing areas of contamination on off-site human receptors for the operation phase. The Inspectorate agrees to scope this matter out for the operational phase on the basis that minimal activities are anticipated, and these effects would occur during construction and/ or decommissioning and as paragraph 4.8.2.7 identifies only infrequent on-site inspections to existing structures are likely during operation.
40.12	Table 7.2.10, 7.2.11 and 11.2.4	Changes in groundwater levels, flow or quality on other sensitive groundwater dependent sites and groundwater abstraction – operation	Table 7.2.10 of the scoping report seeks to scope out changes in groundwater levels, flow or quality on other sensitive groundwater dependant sites and groundwater abstraction for the operation and decommissioning phases. The Inspectorate agrees to scope this matter out for the operation phase on the basis that minimal activities are anticipated to take place during this phase and as paragraph 4.8.2.7 identifies only infrequent on-site inspections to existing structures are likely during

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		and decommissioning phases	operation. However, the Inspectorate does not agree at this stage that this matter can be scoped out for the decommissioning phase on the basis that decommissioning activities could involve similar actions to the construction phase. An assessment of these effects should also therefore be considered for the decommissioning phase, where significant effects are likely to occur.
40.13	Table 7.2.10, 7.2.11 and 11.2.4	Creation of preferential contaminant pathways to groundwater resources – operation and decommissioning phases	Table 7.2.10 of the scoping report seeks to scope out the creation of preferential contaminant pathways to groundwater resources for the operation and decommissioning phases. The Inspectorate agrees to scope this matter out for the operational phase on the basis that the effects related to the installation of foundations to support ground infrastructure and trenchless crossings would most likely only occur during the construction phase. However, the Inspectorate does not agree at this stage that this matter can be scoped out for the decommissioning phase, on the basis that decommissioning activities could involve similar actions to the construction phase. An assessment of these effects should also therefore be considered for the decommissioning phase, where significant effects are likely to occur.
40.14	Table 7.2.10, 7.2.11 and 11.2.4	Sterilisation of safeguarded mineral reserves – operation and decommissioning phases	Table 7.2.10 of the scoping report seeks to scope out the sterilisation of safeguarded mineral reserves for the operation and decommissioning phases. The Inspectorate agrees to scope this matter out for the operation and decommissioning phases of the proposed development as sterilisation of safeguarded mineral reserves would have occurred as a result of the construction of the proposed development.
40.15	Table 7.2.10, 7.2.11 and 11.2.4	Ingress and accumulation of ground gases within buildings which may cause asphyxiation/explosive	Table 7.2.10 of the scoping report seeks to scope out the ingress and accumulation of ground gases within permanent structures/ buildings which may cause asphyxiation/ explosive risks for the construction and decommissioning phase. The Inspectorate agrees to scope this matter out of the construction and decommissioning phases on the basis that permanent presence of buildings will be assessed for the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		risks – construction and decommissioning phases	operation phase, and any sources of potential gas would be identified through a detailed desk study, a Conceptual Site Model (CSM) and a ground Investigation. Additionally, gas protection measures would be managed by appropriate gas protection measures in accordance with the relevant regulations. The ES should provide details of the gas protection mitigation measures to be included and identify how these are to be secured.

ID	Ref	Description	Inspectorate's comments
4.016	Paragraph 7.2.2.1	Proposed study area	The scoping report states that the study area “will comprise a buffer of 250 m around the land to be temporarily or permanently required for the Ossian Transmission Infrastructure landward of MHWS” which “enables the identification of on-site sources (i.e. within the study area) and off-site sources (i.e. outside the study area) of potential contamination and other factors which may influence ground conditions”. Figures 7.2.1 and 7.2.2 do not show the proposed study area and figure 7.2.2 identifies receptors wider than the scoping boundary. The final study area should be based on an understanding of the likely contamination/impact pathways that exist, informed by the baseline data collection. The ES should also confirm the guidance that has been used to support the choice of study area and should consistently present study areas on relevant figures.
4.017	Table 7.2.10	Geological Sites of Special Scientific Interest (SSSIs)	The potential for the proposed development to affect SSSIs should consider both direct and indirect impacts and make use of the impact risk zones when determining the potential for a likely significant effect.
4.018	n/a	Decommissioning of infrastructure cabling left in-situ	The applicant's attention is drawn to the Environment Agency's response (appendix 2 of this opinion) in relation to cable decommissioning.

ID	Ref	Description	Inspectorate's comments
40.19	n/a	Groundwater abstractions	The applicant's attention is drawn to the consultation response from the Environment Agency (appendix 2 of this opinion) in relation to omitted licenced groundwater abstractions and deregulated abstractions within the search area from table 7.2.4 and figure 7.2.2 of the scoping report.

4.1 Hydrology and flood risk

(Scoping Report Section 7.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
411	Table 7.3.5	Damage to flood defences – decommissioning phase	The scoping report seeks to scope out the effects on existing flood defences during decommissioning. The Inspectorate notes in paragraph 4.8.3.7 that after decommissioning, cables would either be recovered or left in-situ to avoid environmental disturbance. Given the stage of the design and as measures are not yet defined, the ES should consider the potential effects of damage to flood defences following decommissioning, where there is potential for changes in coastal processes and coastal erosion risking exposure of cables following decommissioning.
412	Table 7.3.6 and 11.2.4	Impact of damage to existing water supply, drainage infrastructure and agricultural field drainage – construction phase	The scoping report seeks to scope out the effect of damage to existing water supply, drainage infrastructure and agricultural field drainage on the basis of measures being incorporated into the site selection process to identify the location of existing infrastructure as far as practicable. For water supply infrastructure, consultation with Anglian Water, pre-commencement surveys, and agreed buffers and methodologies is proposed. Construction drainage measures in the outline CoCP are proposed to ensure flood risk is not increased off-site, and land temporarily used for construction will be restored. Given the early stage of the proposed development and noting comments from South Holland Internal Drainage Board (appendix 2 of this scoping opinion) of the extent of existing drainage infrastructure, the Inspectorate does not agree that these matters can be scoped out of the assessment at this stage.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.13	Table 7.3.6 and 11.2.4	Impact of contaminated runoff on quality of surface water receptors – construction phase	The scoping report seeks to scope out the effect of contaminated runoff on the quality of surface water receptors on the basis that a CoCP would be in place to minimise the risk of spillage and to ensure that runoff is controlled in line with the latest guidance The Inspectorate notes the early stage of design and details of the construction activities and does not agree to scope this matter out at this stage. Details of the control measures to be included in the CoCP and how these controls are to be secured should also be presented in the ES.
4.14	Table 7.3.6 and 11.2.4	Impact of increased flood risk arising from additional surface water runoff associated with the Onshore Export Cables and Landfall– operation and maintenance phase	The scoping report seeks to scope out the effect of increased flood risk arising from additional surface water runoff on the basis that that the joint bays and export cables would be buried underground and there would be a small increase in impermeable land due to the installation of ground-level inspection covers. Therefore, there would be a minimal impermeable footprint which would not induce excess runoff. No details of the locations of the joint bays and size of inspection covers is provided in the scoping report. However, the Inspectorate notes from scoping report tables 4.7.2 and 4.7.3 that these could be required every 500 to 100m along the export cable route. In the absence of further details, the Inspectorate does not consider that this matter can be scoped out of the assessment at this stage, therefore.
4.15	Table 7.3.6 and 11.2.4	Impact of increased flood risk from watercourse crossing, watercourse diversions or impacts on flood defences –	The scoping report seeks to scope out the effect of increased flood risk from watercourse crossing, watercourse diversions or impacts on flood defences on the basis that no activities are proposed during the operation and maintenance phase that could require any further crossings or diversions. The Inspectorate notes that this matter is included within the scope of the assessment during the construction phase. On this basis and given that no crossings or diversions are proposed during operation and maintenance, this matter can be scoped out of further assessment in the ES for those phases.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		operation and maintenance phase	
4.16	Table 7.3.6 and 11.2.4	Impact of contaminated runoff on quality of surface water – operation and maintenance phase	The scoping report seeks to scope out the effect of contaminated runoff on the quality of surface water on the basis that operational activities are unlikely to generate contaminated runoff, maintenance related activities would be done remotely, and cables would only require infrequent on-site inspections and corrective maintenance activities. An Outline Drainage Strategy is proposed to control run-off as part of the design of the Onshore Converter Station and secured in the DCO. The Inspectorate notes that details of the operation and maintenance activities are not yet defined. The ES should therefore include an assessment of these effects, or evidence of agreement with consultation bodies that significant effects are unlikely to occur. The ES should provide details of the Outline Drainage Strategy control measures to be included.
4.17	Table 7.3.6 and 11.2.4	Impact of damage to agricultural field drainage, existing water supply and drainage infrastructure – operation and maintenance phase	The scoping report seeks to scope out the effect of damage to agricultural field drainage, existing water supply and drainage infrastructure on the basis that activities related with the operation and maintenance phase would not result in any further impact on water supply or drainage infrastructure. On this basis and given that no crossings or diversions are proposed during operation and maintenance, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES for those phases. Please refer to ID 4.1.2 of this opinion for the Inspectorate's comments on the effects from damage to drainage infrastructure.
4.18	Table 7.3.6	Impact of increased flood risk from additional surface water runoff –	The scoping report seeks to scope out the effect of increased flood risk from additional surface water runoff associated with the onshore converter stations but no justification is provided. It is noted however that this matter is scoped in for the operation phase.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		construction and decommissioning phases	The Inspectorate does not therefore agree that this matter can be scoped out for the construction and decommissioning phase of the assessment given the locations and design of these stations are not yet defined.
4.1.9	Table 7.3.6 and 11.2.4	Impact of increased flood risk from watercourse crossings, watercourse diversions or flood defences - decommissioning phase	The scoping report seeks to scope out the effect of increased flood risk from watercourse crossings, watercourse diversions or flood defences on the basis that the decommissioning related activities would be the reverse of the construction related activities and therefore impacts would be of a similar nature to or no worse than that those assessed for the construction phase. The Inspectorate notes that the scoping boundary contains numerous watercourses that could be crossed or diverted and has potential to affect land drainage with the installation (and removal) of cables. Details are also not yet available of the proposed decommissioning and there is potential for changes to main rivers, flood defences and beach assets as a result of decommissioning activities. As such, the Inspectorate does not agree that this matter can be scoped out of the assessment at this stage. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies (the applicant's attention is drawn to the response of the Environment Agency in appendix 2 of this opinion), the Inspectorate is not in agreement to scope this matter out of further assessment.
4.1.10	Table 7.3.6 and 11.2.4	Impact of damage to agricultural field drainage, existing water supply and drainage infrastructure - decommissioning phase	The scoping report seeks to scope out the effect of damage to agricultural field drainage, existing water supply and drainage infrastructure on the basis that the decommissioning related activities would be the reverse of the construction related activities and therefore impacts would be of a similar nature to or no worse than that those assessed for the construction phase. The Inspectorate notes that the scoping boundary contains numerous watercourses that could be crossed and has potential to affect land drainage with the installation of cables. Details are also not yet available of the proposed decommissioning

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			or onshore decommissioning plan. As such, the Inspectorate does not agree that this matter can be scoped out of the assessment at this stage. The applicant's attention is drawn to the response of the Environment Agency and South Holland Drainage Board's comment (appendix 2 of this opinion) regarding the potential impact of damage to existing agricultural field drainage during the decommissioning phase.
4.1.11	Table 7.3.6 and 11.2.4	Impact of contaminated runoff on quality of surface water and ground receptors - decommissioning phase	The scoping report seeks to scope out the effect of contaminated runoff on quality of surface water and ground receptors on the basis that the decommissioning related activities would be the reverse of the construction related activities and therefore impacts would be of a similar nature to or no worse than that those assessed within the construction phase. It is noted that an Onshore Decommissioning Plan is to be developed prior to decommissioning and would be in accordance with the latest available guidance, legislation and new technologies. On this basis, the Inspectorate agrees to scope this matter out. The ES should however provide details of the Onshore Decommissioning Plan (where possible) and how these are to be secured.
4.1.12	Table 7.3.6 and 11.2.4	Impact on water resources – all phases	The scoping report seeks to scope out the effect on water resources for all phases, on the basis that during construction, temporary tankers would be used. During operation and maintenance phase, water demand would be negligible as works would be limited in frequency and scope and monitoring would occur remotely. For the decommissioning phase, works would be controlled through the Onshore Decommissioning Plan. The Inspectorate considers that further information should be provided in the ES on water supply and availability to demonstrate the extent and nature of the water resource requirements of the proposed development in all phases. An assessment of effects on water resources should therefore be supplied, where significant effects are likely to occur. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies (the applicant's attention is drawn to the responses of the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Environment Agency and Anglian Water in appendix 2 of this scoping opinion), the Inspectorate is not in agreement to scope this matter out of further assessment.

ID	Ref	Description	Inspectorate's comments
4.1.13	Table 7.3.4	Flood and coastal flood risk data	The Environment Agency has published new flood and coastal erosion risk data in 2025 following the release of its "National assessment of flood and coastal erosion risk in England 2024". Further updates are also expected to follow. The applicant should ensure that assessments take account of updated data sets as these become available through Defra's Data Services Platform. Where relevant, the applicant is encouraged to liaise with the EA to determine the implications for project design and the scope of assessments.
4.1.14	Paragraph 7.3.2.1	Study area – surface water receptors	The scoping report states that a 250m buffer has been applied for surface water receptors for land temporarily or permanently occupied during construction, operation, maintenance and decommissioning of the Landfall and Onshore Export Cable Corridor. This buffer of 250m is stated to be appropriate for data collection taking into account the likely zone of influence (Zol) on hydrological receptors but may be extended where hydrologically connected catchments are identified. The ES should clearly define and justify the final extent of the study area with reference to the potential Zol, taking into account any receptors where there is potential for hydraulic connectivity with the proposed site. Any use of professional judgement should be fully justified in the ES. Effort should also be made to agree the final study areas with relevant consultation bodies.
4.1.15	Paragraph 7.3.2.1	Study area – flood risk receptors	The scoping report states that a 1km buffer has been applied for flood risk receptors from the Onshore Converter Stations. This buffer of 1km is stated to have been chosen to identify any existing receptors, assets or infrastructure that have the potential to be affected by flood risks due to the Stations.

ID	Ref	Description	Inspectorate's comments
			The ES should consider the ZOI from the proposed development in determining the study areas including taking account of hydrological links to waterbodies, together with a justification for their selection.
4.1.16	Paragraphs 7.3.3.8 to 7.3.3.10 Table 7.3.2	Flood Zone 3	Where relevant, the ES and FRA should differentiate between Flood Zones 3a and 3b in order to determine which parts of the site are located in areas considered as 'high probability of flooding' and 'functional floodplain'. The ES should also include a figure to illustrate the extent of Flood Zones 3a and 3b.
4.1.17	n/a	Water sampling	The scoping report does not refer to sampling or analysis of existing surface water or groundwater receptors within the study area that would be undertaken to inform the assessment of effects from contaminated runoff. The Inspectorate advises that effort should be made to seek to agree the requirements and scope of any water sampling and analysis with relevant consultation bodies, including the EA.
4.1.18	n/a	Watercourses - Horizontal Directional Drilling (HDD)	The ES should consider the potential for significant effects on water quality associated with the risk of sediment mobilisation or pollution risks from accidental releases of drilling fluids during cable laying using HDD. The ES should set out any measures to protect water quality such as through a CoCP and how these would be secured.
4.1.19	n/a	Sewer flooding	The ES should include an assessment of sewer flooding from changes to surface water drainage.
4.1.20	n/a	Water Resources Assessment (WRA)	The applicant's attention is drawn to the response of Anglian Water's comment (appendix 2 of this opinion) relating to the preparation of a WRA which should consider water resources and efficiency.
4.1.21	n/a	Cumulative assessment	The applicant's attention is drawn to the response of the South Holland Drainage Board's comment (appendix 2 of this opinion) regarding projects which should be included in the cumulative assessment for hydrology and flood risk.

ID	Ref	Description	Inspectorate's comments
4.1.22	n/a	Proposed development lifetime	The scoping report notes that there is potential for the operational lifetime to be extended beyond the anticipated 35 years (scoping report paragraph 4.8.2.2) The assessment of flood risk should consider this worst-case position of a possible extension.
4.1.23	n/a	Watercourse diversions	The proposed scope of the assessment includes changes to flood risk associated with potential watercourse diversions, however it is not clear whether other potential effects associated with watercourse diversions (effects on ecology, heritage, landscape for example) have been considered in the assessment. This should be addressed in the ES, where significant effects are likely to occur.

4.2 Onshore ecology and nature conservation

(Scoping Report Section 7.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
421	Table 7.4.6 and 11.2.4	Changes in water quality due to accidental spills – construction phase	The scoping report seeks to scope out the changes in water quality due to accidental spills on the basis that a CoCP would be in place to minimise the risk of spillage and ensure that runoff is controlled in line with the latest guidance. The Inspectorate considers that given the stage of the proposed development and as details of the onshore route and likely construction activities are not yet defined, that potential for water quality pollution should be assessed in the ES. Details of the measures to address potential effects should also be explained in the ES and an outline of the CoCP provided (please also refer to ID 4.1.18 of this scoping opinion in relation to HDD). The ES should include an assessment or demonstrate agreement with consultation bodies that significant effects are unlikely to occur.
422	Table 7.4.6 and 11.2.4	Damage to designated sites – operation and maintenance phase	The scoping report seeks to scope out damage to designated sites during the operation and maintenance phase on the basis that minimal activities are anticipated to take place and would be limited to activities such as minor repairs or maintenance, and any land affected during repairs and maintenance would be reinstated to its previous condition. Details of the repairs and maintenance and locations of the proposed development in relation to designated sites are not yet defined and as such, the Inspectorate does not agree to scope this matter out of further assessment at this stage. The ES should include an assessment or demonstrate agreement with consultation bodies that significant effects are unlikely to occur. The ES should also contain details of the relevant operation and maintenance environmental management plans that would be in place to control and manage these activities and how they would be secured.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
423	Table 7.4.6 and 11.2.4	Damage to UK Priority habitats and ancient woodlands – operation and maintenance phase	The scoping report seeks to scope out damage to UK Priority habitats and ancient woodlands on the basis that minimal activities are anticipated to take place during the operation and maintenance phase and would be limited to activities such as minor repairs or maintenance, and any land affected during repairs and maintenance would be reinstated to its previous condition. Details of the repairs and maintenance and locations of the proposed development in relation to these sites are not yet defined and as such, the Inspectorate does not agree to scope this matter out of further assessment at this stage. The ES should include an assessment or demonstrate agreement with consultation bodies that significant effects are unlikely to occur.
424	Table 7.4.6 and 11.2.4	Permanent habitat loss – operation and maintenance phase	The scoping report seeks to scope out permanent habitat loss on the basis that minimal activities are anticipated to take place during the operation and maintenance phase and would be limited to activities such as minor repairs or maintenance, and any land affected during repairs and maintenance would be reinstated to its previous condition. Details of the repairs and maintenance and locations of the proposed development in relation to habitat loss are not yet defined and as such, the Inspectorate does not agree to scope this matter out of further assessment at this stage. The ES should include an assessment or demonstrate agreement with consultation bodies that significant effects are unlikely to occur.
425	Table 7.4.6 and 11.2.4	Temporary habitat loss – operation and maintenance phase	The scoping report seeks to scope out temporary habitat loss on the basis that minimal activities are anticipated to take place during the operation and maintenance phase and would be limited to activities such as minor repairs or maintenance, and any land affected during repairs and maintenance would be reinstated to its previous condition. Details of the repairs and maintenance and locations of the proposed development in relation to these sites are not yet defined and as such, the Inspectorate does not agree to scope this matter out of further assessment at this stage. The ES should include an

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			assessment or demonstrate agreement with consultation bodies that significant effects are unlikely to occur.
426	Table 7.4.6 and 11.2.4	Killing and injury to protected species – operation and maintenance phase	The scoping report seeks to scope out the killing and injury to protected species on the basis that minimal activities are anticipated to take place during the operation and maintenance phase and would be limited to activities such as minor repairs or maintenance. Details of the repairs and maintenance and locations of the proposed development in relation to protected species are not yet defined and as such, the Inspectorate does not agree to scope this matter out of further assessment at this stage. The ES should include an assessment or demonstrate agreement with consultation bodies that significant effects are unlikely to occur.
427	Table 7.4.6 and 11.2.4	Permanent and temporary loss of habitat and fragmentation of habitats supporting protected and notable species – operation and maintenance phase	The scoping report seeks to scope out permanent and temporary loss of habitat and fragmentation of habitats supporting protected and notable species on the basis that minimal activities are anticipated to take place during the operation and maintenance phase and would be limited to activities such as minor repairs or maintenance, and any land affected during repairs and maintenance would be reinstated to its previous condition. Details of the repairs and maintenance and locations of the proposed development in relation to protected species are not yet defined and as such, the Inspectorate does not agree to scope this matter out of further assessment at this stage. The ES should include an assessment or demonstrate agreement with consultation bodies that significant effects are unlikely to occur.
428	Table 7.4.6 and 11.2.4	Changes in air quality affecting important ecological features –	The scoping report seeks to scope out changes in air quality affecting important ecological features on the basis that minimal activities and vehicle movements (no more than ten per day) are anticipated to take place during the operation and maintenance phase and activities would be limited to minor repairs or maintenance. These works would be unlikely

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		operation and maintenance phase	to generate large quantities of dust or Particulate Matter (PM) and would be managed using best practice techniques. On this basis, the Inspectorate agrees to scope this matter out. The ES should however confirm the operational vehicle types and number (with reference to thresholds within relevant guidance) and provide details of the best practice techniques for managing repair and maintenance related activities.
429	Table 7.4.6 and 11.2.4	Changes in water quality affecting important ecological features – operation and maintenance phase	The scoping report seeks to scope out changes in water quality affecting important ecological features on the basis that operational and maintenance related activities are unlikely to generate contaminated runoff. Risks are to be managed through standard mitigation measures including surface water treatment via sustainable drainage solutions and routine management schedules should be outlined in the drainage strategy. Details of the repairs and maintenance and locations of the proposed development in relation to these features are not yet defined and as such, the Inspectorate does not agree to scope this matter out of further assessment at this stage. The ES should include an assessment or demonstrate agreement with consultation bodies that significant effects are unlikely to occur. The ES also should provide details of the proposed surface water treatment via sustainable drainage solutions and the routine management schedule outlined in the drainage strategy.
4210	Table 7.4.6 and 11.2.4	Changes in hydrology quality affecting important ecological feature – operation and maintenance phase	The scoping report seeks to scope out changes in hydrology affecting important ecological features on the basis that that operational and maintenance related activities are unlikely to impact the integrity of watercourses. Given the nature of the proposed development and the information provided in the scoping report, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4211	Table 7.4.6 and 11.2.4	Noise and visual disturbances to sensitive ecological receptors – operation and maintenance phase (of the Landfall and Onshore Export Cables)	The scoping report seeks to scope out noise and visual disturbances to sensitive ecological receptors on the basis that minimal activities are anticipated to take place during this phase and would be limited to activities such as infrequent on-site inspections and corrective maintenance. Given the nature of the proposed development and the information provided in the scoping report, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.

ID	Ref	Description	Inspectorate's comments
4212	Paragraph 7.4.2.1	Study area	The scoping report proposes a study area defined as the land to be temporarily or permanently required for the transmission infrastructure landwards of MHWS plus the buffer areas of 15km and 2km for statutory internationally designated sites and statutory [nationally] designated sites, respectively. The ES should ensure the study area for each ecological receptor reflects the proposed development's potential Zone of Influence (Zoi) rather than being based on a fixed distance and take account of any impact risk zones identified for designated sites and the potential for migratory fish (paragraph 7.4.3.11) . Clear justification should be provided to support any distances applied. Efforts should be made to agree the study area(s) with relevant consultation bodies. Please also refer to ID 4.1.15 for the Inspectorate's comments on the study areas for waterbodies.
4213	n/a	Confidential Annexes	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,

ID	Ref	Description	Inspectorate's comments
			as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.
4214	Table 7.4.3.11 Table 7.4.4	Field surveys	The scoping report notes that there is potential for natterjack toad to be present at coastal sand dune locations but Table 7.4.4 does not include reference to potential surveys for this species. The scope and nature of the baseline, including the need for site surveys for this potential receptor should therefore be discussed and agreed with relevant consultation bodies once further information on the likely location and scale of the landfall is developed.
4215	Table 7.4.5	Effects on Priority Habitat / Ancient woodland	The ES should also consider potential effects on woodland habitats from fragmentation/ loss of connectivity, damage or compaction to soils and effects from changes to landscape character on priority habitats and woodland, where significant effects are likely to occur.
4216	Table 7.4.5	Lighting	The ES should consider the potential for significant effects from disturbance as a result of any construction task lighting and operational lighting at the onshore converter stations (identified in scoping report chapter 4) on light sensitive species such as bats. An assessment should be provided, where significant effects are likely to occur. The applicant's attention is drawn to the Canal and River Trust's comments relating to construction lighting along the cable route corridor (appendix 2 of this opinion).
4217	7.4.3.11	Effects from HDD – construction and operation	Where cables are laid beneath these watercourses using HDD, the ES should assess the potential effects from: • sediment mobilisation during HDD on sensitive aquatic habitats and species • noise effects on fish from drilling activities • potential for operational cables to generate EMF and the impacts on fish, particularly diadromous species The approach to assessment should be discussed and where possible agreed with relevant consultation bodies. The applicant's attention is drawn to responses from the

ID	Ref	Description	Inspectorate's comments
			Canal and River Trust and Environment Agency relating to HDD (appendix 2 of this opinion).

4.3 Onshore and intertidal ornithology

(Scoping Report Section 7.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
431	Table 7.5.5 and 11.2.4	Impact of pollution due to accidental spills/contaminant release on protected habitats and species – all phases	The scoping report seeks to scope out the effect of pollution due to accidental spills/containment release on protected habitats and species on the basis that a CoCP would be in place to minimise the risk of spillages and to ensure that runoff is controlled in line with the appropriate guidance. For operation and maintenance, risks are to be managed through standard mitigation measures including surface water treatment via sustainable drainage solutions and routine management schedules would be outlined in the drainage strategy; and for decommissioning, impacts are to be mitigated through measures included in the Onshore Decommissioning Plan. The Inspectorate considers that given the stage of the proposed development and as details of the onshore route and likely construction activities are not yet defined, that potential for water quality pollution should be assessed in the ES. Details of the measures to address potential effects should also be explained in the ES and an outline of the CoCP provided (please also refer to ID 4.1.18 of this scoping opinion in relation to HDD). The ES should include an assessment of all phases or demonstrate agreement with consultation bodies that significant effects are unlikely to occur.
432	Table 7.5.5 and 11.2.4	Disturbance and displacement – operation and maintenance phase	The scoping report seeks to scope out the disturbance and displacement of birds on the basis that minimal activities and vehicle movements (no more than ten per day) are anticipated to take place during the operation and maintenance phase and no excavation or construction related activities that could disturb birds would be required. On this basis, the Inspectorate agrees to scope this matter out. The ES should however confirm details of the operational vehicle types and movements with reference to thresholds within the relevant guidance to confirm that no significant effects could occur.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
433	Table 7.5.5 and 11.2.4	Impact of permanent loss of supporting habitats – operation and maintenance and decommissioning phase	The scoping report seeks to scope out the impact of permanent loss of supporting habitats on the basis that any permanent habitat loss would have occurred during the construction phase and no further permanent habitat loss would be required. The Inspectorate agrees that this matter can be scoped out of further assessment for the operational phase in the ES on that basis. However, with regards to the decommissioning phase, as limited details are available of this stage and in the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in agreement to scope this matter out of further assessment.
434	Table 7.5.4, 7.5.5, 11.2.3 and 11.2.4	Impact of temporary loss of supporting habitats and/or resources availability and associated displacement – operation and maintenance phase	The scoping report seeks to scope out temporary loss of supporting habitats and/or resources availability and associated displacement during operation as these impacts would only occur during the construction and/ or decommissioning phases. The Inspectorate agrees to scope this matter out on the basis that any habitat loss would have occurred during the construction phase, and that minimal activities and vehicle movements (no more than ten per day (as per table 7.5.5)) are anticipated to take place during the operation and maintenance phase.

ID	Ref	Description	Inspectorate's comments
435	Table 7.5.3	Study areas	The ES should clearly define and justify the study areas and buffers to be used for each of the survey types listed in table 7.5.3 of the scoping report.
436	Table 7.5.3	Site surveys – onshore converter stations	The scoping report states that bird surveys are being conducted in 2025 for the export cable corridor route and onshore converter stations, although elsewhere in the scoping report, no confirmed routes or locations for the onshore converter stations are available.

ID	Ref	Description	Inspectorate's comments
			The Inspectorate notes that one year of bird survey data is proposed to be collected. The Inspectorate considers that the scale of surveys should be agreed with relevant consultation bodies and directs the applicant to the responses of Lincolnshire County Council, who consider more than one year of surveys should be carried out, and Natural England, who advise a minimum of 24 months of survey effort (appendix 2 of this scoping opinion).
43.7	n/a	East Coast Flyway World Heritage Site	The Inspectorate notes comment from Natural England (appendix 2 of this scoping opinion) in relation to proposals for the East Coast Flyway World Heritage Site which would lie within the scoping boundary. The ES should consider the implications for the assessment of this proposed site.
43.8	n/a	Confidential Annexes	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.

4.4 Historic environment

(Scoping Report Section 7.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
441	Table 7.6.3 and 11.2.4	Direct non-physical impacts. Harm to significance of designated and non-designated heritage assets (NDHAs) due to change within their setting for assets further than 1km from the edge of the Landfall and Onshore Export Cable Corridor – construction phase	The scoping report seeks to scope out direct non-physical impacts to the significance of designated and non-designated heritage assets due to a change within their setting during construction on the basis that construction activities would primarily involve excavation and not require works at height. Therefore, visibility of the works would be limited to the immediate area and any changes within the setting of a heritage asset are considered to be limited beyond 1km. On this basis, the Inspectorate agrees to scope this matter out. However, the assessment of effects on setting should also take account of effects such as vibration, settlement or hydrogeological changes on above-ground heritage assets in close proximity to the cable route such as Grade II and above listed buildings, Scheduled Monuments and conservation areas. The applicant's attention is drawn to the response of Lincolnshire County Council (appendix 2 of this scoping opinion) for guidance on appropriate distances to consider from historic structures.
442	Table 7.6.3 and 11.2.4	Direct non-physical impacts. Harm to significance of designated assets due to change within their setting for assets further than 5km from any Onshore Converter Station –	The scoping report seeks to scope out direct non-physical harm to the significance of designated assets due to a change within their setting during construction on the basis that any such changes, within the setting of a designated heritage asset, would be limited given the distance of more than 5km and having taken into account the height of the converter station. Given the stage of the proposed development, as the locations of the converter stations are not yet confirmed, and as the Zone of Theoretical Visibility (ZTV) has yet to be progressed, the Inspectorate does not agree that this matter can be scoped out of the assessment at this stage. The assessment of effects on setting of heritage assets should therefore be supported by the landscape and visual assessment, particularly in relation to

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		construction, operation and maintenance phases	identifying any designated assets beyond 5km from the proposed converter stations where significant effects are likely to occur.
443	Table 7.6.3 and 11.2.4	Direct physical impacts. Loss of, or harm to, buried archaeological remains and deposits of geoarchaeological and/or paleoenvironmental interests – operation and maintenance phase	The scoping report seeks to scope out this matter on the basis that minimal activities are anticipated to take place during the operation and maintenance phase and would be limited to activities such as repair and maintenance. No excavation that could affect archaeology remains would be required and that any loss or harm to buried resources would have already occurred during the construction phase. On this basis, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.
444	Table 7.6.2, 7.6.3, 11.2.3 and 11.2.4	Direct physical impacts. Loss of, or harm to, buried archaeological remains and deposits of geoarchaeological and/or paleoenvironmental interest – operation and	The scoping report seeks to scope out direct physical impacts to buried archaeological remains and deposits of geoarchaeological and/ or paleoenvironmental interest for the operation and decommissioning phases. The Inspectorate agrees to scope this matter out on the basis that direct physical impacts to buried archaeological remains and deposits of geoarchaeological and/ or paleoenvironmental interest would have already occurred during the construction phase.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		decommissioning phase	
445	Table 7.6.2, 7.6.3, 11.2.3 and 11.2.4	Direct physical impacts. Loss of, or harm to, elements of historic landscape – operation and decommissioning phase	The scoping report seeks to scope out direct physical impacts to historic landscapes for the operation and decommissioning phases. The scoping report does not state whether the assessment of effects will consider permanent and temporary effects on historic landscapes. Given the stage of the proposed development and level of information on the locations of permanent infrastructure, the Inspectorate does not agree that this matter can be scoped out of the assessment at this stage.

ID	Ref	Description	Inspectorate's comments
446	Paragraph 7.6.2.1	Study area	The ES should clearly define and justify the study area for designated and non-designated heritage assets, with reference to the potential ZOI for the proposed development and with reference to the landscape and visual impact assessment for visual effects. Any use of professional judgement should be fully justified in the ES. Effort should also be made to agree the final study area with relevant consultation bodies, such as Historic England and the host local authorities.
447	7.6.4.3	Site specific surveys- Written Scheme of Investigation (WSI)	The Inspectorate notes that a phased approach to field surveys is proposed following discussion with relevant stakeholders and the completion of the initial Desk-based Assessment (DBA). The applicant should seek to agree the scope and timing of the site-specific investigations/ surveys with the relevant consultation bodies, and attention is drawn to the response of Lincolnshire County Council in this regard (appendix 2 of this scoping opinion).

ID	Ref	Description	Inspectorate's comments
448	Table 7.6.5	Impact magnitude criteria	The ES should clarify the definitions used in the choice of magnitude criteria, such as the differences between loss or substantial harm to an asset ('high' magnitude) and the definition of 'clearly harmed' ('medium' magnitude).
449	Paragraph 7.6.8.10	Assessment of effects on setting	No details are provided in the scoping report of the methods that would be used to assess effects on setting. The Inspectorate considers that liaison between the landscape and visual assessment, including use of any ZTV developed for the assessment of landscape and visual effects, should be used to confirm the heritage assets that may experience significant effects from the proposed development. The assessment should be supported by appropriate visualisations such as photomontage 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 Historic England and host local authorities. Cross-reference can be made to the LVIA ES assessment to avoid duplication.
44.10	n/a	Cumulative impacts, interrelated and combined effects on historic landscape character and built heritage	The applicant's attention is drawn to the consultation response from Lincolnshire County Council in appendix 2 of this opinion) in relation to cumulative impacts on above ground heritage assets and historic landscape with other major infrastructure projects in the region such as Viking Link, Viking Carbon Capture and Storage, Outer Dowsing, Grimsby to Walpole, and Eastern Link 3 and 4.
44.11	n/a	Non designated heritage assets Historic landscape characterisation	The scoping report states that the identification and approach to assessment of non-designated historic assets and historic landscape character has yet to be defined which has limited the Inspectorate's ability to comment in detail on this matter. The approach and scale of the historic landscape characterisation should be discussed and where possible agreed with relevant consultation bodies.

4.5 Land use and recreation

(Scoping Report Section 7.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
451	Table 7.7.7 and 11.2.4	Temporary and permanent loss of agricultural land (including BMV land) – operation and maintenance phase	The scoping report seeks to scope out this matter on the basis that minimal activities are anticipated to take place during the operation and maintenance phase and would be limited to repair and maintenance activities. Any land affected during repair or maintenance related activities would be limited in scale and reinstated to its previous condition (or an otherwise agreed upon condition). Permanent impacts are considered during the construction phase. On this basis, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES for the operation and maintenance phase.
452	Table 7.7.7 and 11.2.4	Temporary and permanent disruption of operational farm holdings - operation and maintenance phase	The scoping report seeks to scope out this matter on the basis that minimal activities are anticipated to take place during the operation and maintenance phase and would be limited to repair and maintenance activities. Any land affected during repair or maintenance related activities would be limited in scale and reinstated to its previous condition (or an otherwise agreed upon condition). Permanent impacts due to construction of the infrastructure are considered during the construction phase Details of the repair and maintenance requirements are yet to be defined. The Inspectorate considers that provided these matters are confirmed within the ES and with demonstration of agreement with relevant consultation bodies that significant effects are unlikely to occur that this matter can be scoped out of further assessment in the ES for the operation and maintenance phase. An outline of the relevant controls to repair and maintenance activities should also be presented.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
453	Table 7.7.7 and 11.2.4	Temporary and permanent reduction in access to Public Rights of Way (PRoW) and other routes - operation and maintenance phase	The scoping report seeks to scope out this matter on the basis that minimal activities are anticipated to take place during the operation and maintenance phase and would be limited to repair and maintenance activities. Any land affected during repair or maintenance related activities would be limited in scale and reinstated to its previous condition (or an otherwise agreed upon condition). Permanent impacts are considered during the construction phase. Details of the repair and maintenance requirements are yet to be defined. The Inspectorate considers that provided these matters are confirmed within the ES and with demonstration of agreement with relevant consultation bodies that significant effects are unlikely to occur that this matter can be scoped out of further assessment in the ES for the operation and maintenance phase. An outline of the relevant controls to repair and maintenance activities should also be presented.
454	Table 7.7.7 and 11.2.4	Temporary and permanent reduction in access to registered common land and public open space - operation and maintenance phase	The scoping report seeks to scope out this matter on the basis that minimal activities are anticipated to take place during the operation and maintenance phase and would be limited to repair and maintenance activities. Any land affected during repair or maintenance related activities would be limited in scale and reinstated to its previous condition (or an otherwise agreed upon condition). Permanent impacts are considered during the construction phase. Details of the repair and maintenance requirements are yet to be defined but the Inspectorate notes elsewhere that traffic movements are likely to be less than 10 vehicles a day for maintenance activities. The Inspectorate considers that provided these matters are confirmed within the ES and with demonstration of agreement with relevant consultation bodies that significant effects are unlikely to occur that this matter can be scoped out of further assessment in the ES for the operation and maintenance phase.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			An outline of the relevant controls to repair and maintenance activities should also be presented.
455	Table 7.7.7 and 11.2.4	Temporary and permanent reduction in access to other recreational resources - operation and maintenance phase	The scoping report seeks to scope out this matter on the basis that minimal activities are anticipated to take place during the operation and maintenance phase and would be limited to repair and maintenance activities. Any land affected during repair or maintenance related activities would be limited in scale and reinstated to its previous condition (or an otherwise agreed upon condition). Permanent impacts are considered during the construction phase. Details of the repair and maintenance requirements are yet to be defined but the Inspectorate notes elsewhere that traffic movements are likely to be less than 10 vehicles a day for maintenance activities. The Inspectorate considers that provided these matters are confirmed within the ES and with demonstration of agreement with relevant consultation bodies that significant effects are unlikely to occur that this matter can be scoped out of further assessment in the ES for the operation and maintenance phase. An outline of the relevant controls to repair and maintenance activities should also be presented.

ID	Ref	Description	Inspectorate's comments
456	Table 7.7.2 and Paragraph 7.7.3.8	ALC Mapping	The proposed soil surveys should be sufficiently representative to demonstrate the distribution of ALC grades 3a and 3b. The approach to soil surveys should be discussed and where possible agreed with relevant consultation bodies. The applicant's attention is drawn to the consultation response from Lincolnshire County Council (appendix 2 of this scoping opinion).
457	Table 7.7.6	Impacts to agricultural land	The Applicant's attention is drawn to the Written Ministerial Statement (UIN HCWS466)

ID	Ref	Description	Inspectorate's comments
			issued on 15 May 2024. The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the Proposed Development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided.
458	Table 7.7.6	Impacts to soils	The ES should be clear on where the assessment of effects on soils is to be assessed. This should be considered separately from effects on Best and Most Versatile Land, such that potential effects such as (but not limited to) damage to soils and soil structure from construction activities, changes to drainage and soil handling during the construction and decommissioning phases are appropriately assessed.

4.6 Traffic and transport

(Scoping Report Section 7.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
46.1	Table 7.8.3 and 11.2.4	Impact upon driver (including public transport) and non-motorised user delay, fear and intimidation (non-motorised user amenity), severance and road safety for users of the highway network and other transport receptors due to increases in traffic flows – operation and maintenance phase; and decommissioning phase	The scoping report seeks to scope out these effects during operation and maintenance and decommissioning phases on the basis of limited numbers of vehicles expected to be required during this phase. The Inspectorate agrees that this matter can be scoped out of further assessment, provided the ES includes confirmation of the operational traffic movements. However, the scoping report anticipates (paragraphs 4.8.3.3 to 4.8.3.7) that some decommissioning activities would be the same as those required for construction (but in reverse), or in other cases, the extent of decommissioning activities is not yet confirmed. The Inspectorate notes that it is difficult to predict traffic data for a future decommissioning phase, however, where traffic flows are described as being similar to that of the construction phase which has been scoped in for further assessment, then the Inspectorate considers that traffic and transport during the decommissioning phase should also be scoped in. The ES should clearly set out if and how decommissioning is to be assessed and any proposed development components which may remain following decommissioning, in agreement with the host authorities, secured through the inclusion of the Outline Decommissioning Plan or similar with the application that sets out measures in relation to traffic and access.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.62	Table 7.8.3 and 11.2.4	The impact upon driver (including public transport) and non-motorised user delay, fear and intimidation (non-motorised user amenity), severance and road safety for users of the highway network and other transport receptors resulting from increases in traffic flows as a result of construction, operation and maintenance and decommissioning of the Offshore Transmission Infrastructure.	The scoping report seeks to scope out land-based traffic and transport movement generated by the offshore transmission infrastructure via its base port, as this would be selected post-consent and would be operated in line with existing consents or planning applications. The Inspectorate considers that there is potential for likely significant effects to occur in relation to traffic and transport during all phases from delivery and/ or removal of plant and materials for the offshore component of the Proposed Development. The proposed development is at an early stage and it is not clear what the use of the highway network would be and its relationship with port facilities. As details of the port location(s) are not yet fully developed and the traffic routes for construction, decommissioning, and operation are not defined, this matter should be further explained in the ES. The details should be discussed with relevant consultation bodies and where significant effects are likely to occur as a result of the proposed development, these should be assessed in the ES.

ID	Ref	Description	Inspectorate's comments
4.63	Figure 7.8.1	Strategic network routes	The study area should also consider the A1, A47 and A46 and associated junctions as part of the strategic road network.

ID	Ref	Description	Inspectorate's comments
	Paragraph 7.8.3.3		
464	n/a	Assessment years	With reference to ID 2.1.5 of this scoping opinion, the traffic and transport methodology should set out the base year, peak construction and opening year considered within the assessment.
465	n/a	Routes for Heavy Goods Vehicles (HGVs) and Abnormal Indivisible Loads (AIL)	The scoping report does not set out the routes for HGV or AIL during construction. The ES should detail the routes for HGVs and AILs (where relevant). These routes should be included in the assessment, where significant effects are likely to occur.

4.7 Noise and vibration

(Scoping Report Section 7.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
471	Table 7.9.2 and 11.2.4	Impact on human receptor from vibration generated by additional vehicle movements on local highway network – construction and decommissioning phase	The scoping report seeks to scope out effects from construction traffic vibration on the basis of Design Manual for Roads and Bridges guidance (LA111, 2020e) that operational vibration is unlikely to lead to significant effects as a maintained road surface will be free of irregularities as part of project design and under general maintenance. The Inspectorate agrees that road traffic vibration can be scoped out of the assessment, provided that the ES description of development confirms the vehicle types and numbers for all phases of development (with reference to thresholds within guidance) to justify this position.
472	Table 7.9.2 and 11.2.4	Impact on human receptors (onshore) of noise and vibration generated - construction and decommissioning phase	The scoping report seeks to scope out effects from offshore construction to onshore human receptors on the basis of distance and duration of works. On this basis, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.
473	Table 7.9.2 and 11.2.4	Impact on human receptors from vibration generated during – operation and maintenance phase	The scoping report seeks to scope out effects on human receptors from the operation of the landfall and onshore transmission infrastructure on the basis that these elements are unlikely to generate high levels of vibration. The Inspectorate notes that noise effects from the operation of the onshore converter station are scoped into the assessment in Table 7.9.1 and considers that the assessment should address potential vibration effects from the operation of these facilities as well on human receptors, where significant effects are likely to occur.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
474	Table 7.9.2 and 11.2.4	Impact on human receptors of noise from Onshore Converter Stations switchgear and auxiliary plant - operation and maintenance phase	The scoping report seeks to scope out noise generated by the operation of switchgear and emergency plant on the basis that these would operate very infrequently. No details of the likely duration of the location or operation of the switchgear apparatus are supplied in the scoping report and the details of design measures to address onshore converter substation noise are provided in the scoping report. As such, these should be described within the ES and an assessment of effects provided where significant effects could occur.

ID	Ref	Description	Inspectorate's comments
475	Paragraph 7.9.3.10	Noise and vibration receptors	The ES should also include rivers and river users as potential receptors in the assessment of effects, where significant effects are likely to occur.

4.8 Air quality

(Scoping Report Section 7.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
481	Table 7.10.2 and 11.2.4	Impacts on AQMAS – all phases	The scoping report seeks to scope out consideration of AQMAS on the basis that none occur within the scoping boundary. On that basis, the Inspectorate agrees this matter can be scoped out of further assessment in the ES.
482	Table 7.10.2 and 11.2.4	Impacts within the Intertidal Scoping Boundary – all phases	The scoping report seeks to scope out effects from vehicle and dust emissions in the intertidal zone on the basis that there are no highways that could experience changes in traffic flows within this zone, and as there are no residential or ecological receptors sensitive to dust deposition. The Inspectorate considers that as the location of the landfall is not yet defined but could be in proximity to several sensitive ecological designations (Figure 7.4.2) that this matter cannot be scoped out of the assessment at this stage.
483	Table 7.10.2 and 11.2.4	Impacts on human and ecological receptors from air emissions generated by NRMM – construction and decommissioning phase	The scoping report seeks to scope out effects from on-site plant (NRMM) on the basis of employing on-site management controls and Defra (2022) guidance that exhaust emissions from on-site plant are unlikely to have a significant impact on air quality. The Inspectorate agrees that this matter can be scoped out of the assessment, provided that the ES description of development confirms the on-site plant and site management controls to justify this position.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
484	Table 7.10.2 and 11.2.4	Impact on human and ecological receptors (dust soiling and human health) from fugitive dust emissions - operation and maintenance phase	The scoping report seeks to scope out dust effects during operation on the basis that operation and maintenance activities are unlikely to generate material quantities of dust. The Inspectorate agrees that on that basis, this matter can be scoped out of further assessment in the ES.
485	Table 7.10.2 and 11.2.4	Impact on human and ecological receptors from air emissions generated by vehicle traffic – operation and maintenance phase	The scoping report seeks to scope out effects on human and ecological receptors from operational vehicle emissions on the basis of the low numbers of expected vehicle movements in this phase. The Inspectorate agrees that vehicle traffic emissions can be scoped out of the assessment, provided that the ES description of development confirms the vehicle types and numbers for all phases of development (with reference to thresholds within guidance) to justify this position. The Inspectorate also notes that operational air quality emissions are scoped out of the assessment in the ecology and nature conservation section in the scoping report (section 7.4). Please also see ID 4.2.8 of this scoping opinion, therefore.
486	Table 7.10.2 and 11.2.4	Impact on human and ecological receptors from air emissions generated by plants or stacks (Landfall and Onshore Export Cables) - operation and maintenance phase	The scoping report identifies that as the proposed development does not include construction of any plant or emissions stacks that this matter does not require assessment in the ES. The Inspectorate is content with this approach.

ID	Ref	Description	Inspectorate's comments
48.7	n/a	Guidance	The Applicant's attention is drawn to the Defra advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM2.5 or its precursors.

4.9 Landscape and visual resources

(Scoping Report Section 7.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
491	Table 7.11.2 and 11.2.4	Impact of Offshore Transmission Infrastructure on landscape and seascape character and visual resources – all phases	The scoping report seeks to scope out effects from the offshore transmission infrastructure on landscape, visual and seascape character on the basis that there will be no infrastructure above the water during the operation and maintenance phase, and construction cable laying activities will be negligible in the context of existing vessel movements. The Inspectorate considers that the ES should provide an assessment of potential effects on offshore visual receptors and consideration given to the potential cumulative visual effects of offshore activities on receptors. Cross reference to the shipping and navigation assessment should also be considered.
492	Table 7.11.2 and 11.2.4	Impact of Landfall and Onshore Transmission Infrastructure on	The scoping report seeks to scope out impacts on landscape, visual and seascape character beyond the study area as this is considered sufficient to capture any likely significant effects.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		landscape and seascape character and visual resources located beyond the study area – all phases	The Inspectorate notes that the final ZTV and locations for the onshore converter stations, which could be 26m in height, are not yet defined. On this basis, the Inspectorate does not agree that the impact of landfall and the onshore transmission infrastructure (including the onshore converter station) beyond the study area can be scoped out of the assessment at this stage.
4.93	Table 7.11.2 and 11.2.4	Impact of Landfall and Onshore Export Cables on landscape and visual resources – operation and maintenance phase	The scoping report seeks to scope out impacts on landscape and visual resources during operation and maintenance phase of the onshore export cables as these cables would be buried underground. The Inspectorate agrees that on that basis, this matter can be scoped out of further assessment in the ES.
4.94	Table 7.11.2 and 11.2.4	Impact of Landfall and Onshore Export Cables on landscape character and visual resource – decommissioning phase	The scoping report seeks to scope out effects from future decommissioning activities for the landfall and export cable corridors as only above ground structures are anticipated to require significant decommissioning activity. The Inspectorate notes that this matter is scoped in for the construction phase and that in paragraphs 4.8.3.3 to 4.8.3.7 that some decommissioning activities would be the same as those required for construction (but in reverse), or in other cases, the extent of decommissioning activities is not yet confirmed. As such, given the stage of the proposed development and as decommissioning activities are not yet confirmed, the Inspectorate does not agree that this matter can be scoped out of the assessment at this stage.

ID	Ref	Description	Inspectorate's comments
495	Paragraph 7.11.1	Study area - construction	The scoping report states the study area for the construction of the onshore converter stations would be 1km. The Inspectorate notes in section 4.7.2.13 that construction would involve alterations in land height but that further details of how this would be constructed are not provided. Given the early stage of the project and the limited details on the construction of these elements of the proposed development, the Inspectorate considers that the study area for the onshore converter stations should be larger than 1km. The study area should therefore be discussed and agreed with relevant consultation bodies. Please also refer to ID 4.4.1 and 4.4.2 of this scoping opinion for the Inspectorate's comments in relation to study areas.
496	Paragraph 7.11.3.3	Selection of residential receptors	The scoping report notes that the baseline will include residential receptors where significant adverse effects could be experienced. Details of how these receptors would be selected should be presented in the ES. Where possible, receptors should be discussed and agreed with relevant consultation bodies.
497	Paragraph 7.11.9	Assessment methodology	The scoping report notes that representative viewpoints will be agreed with relevant stakeholders. The Inspectorate considers that the landscape and visual impact methodology should also be discussed and where possible agreed with relevant consultation bodies.
498	n/a	Baseline - receptors	The ES should also consider the Lincolnshire Heritage Coast, rivers and river users as potential receptors in the assessment of effects, where significant effects are likely to occur.

4.10 Health and wellbeing

(Scoping Report Section 7.12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.101	Table 7.12.4 and 11.2.4	Human health related behaviours: impact on physical activities – construction phase; and operation and maintenance phase	The scoping report seeks to scope out an assessment of onshore physical activity health effects on the basis that temporary disruption of access to PRow and open spaces during construction will be considered under the open space, leisure and play health determinant. In addition, workforce health during construction, operation and maintenance will be considered under the health and social care health determinant. The Inspectorate is content with this approach.
4.102	Table 7.12.4 and 11.2.4	Human health related behaviours: impact on risk-taking behaviour - construction phase; and operation and maintenance phase	The scoping report seeks to scope out a health and wellbeing assessment related to risk-taking behaviour during the construction, operation and maintenance phases on the basis that the expected number of construction workers is unlikely to significantly alter community health behaviours. The Inspectorate considers that significant health effects are not likely from risk-taking behaviour and agrees this matter can be scoped out of further assessment.
4.103	Table 7.12.4 and 11.2.4	Human health related behaviours: impact on diet and nutrition - construction phase; and operation and maintenance phase	The scoping report seeks to scope out an assessment of the onshore health effects related to diet and nutrition for the construction, operation and maintenance phases on the basis that construction and operation of the proposed development would not have a significant permanent change to food production or prices. 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.
4.104	Table 7.12.4 and 11.2.4	Social environment: housing – impact on construction phase; and operation and maintenance phase	The scoping report seeks to scope out a health and wellbeing assessment of the onshore health effects related to housing for the construction, operation and maintenance phases on the basis that there is not considered to be a significant change to the availability of housing.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		operation and maintenance phase	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.
4.105	Table 7.12.4 and 11.2.4	Social environment: impact on community identity, culture, resilience and influence - construction phase; and operation and maintenance phase	The scoping report seeks to scope out a health and wellbeing assessment of the onshore effects on community identity, culture, resilience and influence for the construction, operation and maintenance 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 stage of the proposed development and as the locations of the onshore converter stations are not yet confirmed, the Inspectorate does not agree that this matter can be scoped out of the ES.
4.106	Table 7.12.4 and 11.2.4	Social environment: impact on relocation - construction phase; and operation and maintenance phase	The scoping report seeks to scope out a health and wellbeing assessment of the onshore effects related to housing for the construction, operation and maintenance phases on the basis that the proposed development would not involve compulsory land purchases of homes or residential dwellings. 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.
4.107	Table 7.12.4 and 11.2.4	Social environment: impact on community safety - construction phase; and operation and maintenance phase	The scoping report seeks to scope out a health and wellbeing assessment of the onshore effects on community safety, including widespread actual or perceived crime, risk to the public from accidental injury and disruption and the safety of leisure users, for the construction, operation and maintenance 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, provided that outlines of the measures to manage security and safety risks to the public are described within the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.108	Table 7.12.4 and 11.2.4	Social environment: impact on social participation, interaction and support - construction phase; and operation and maintenance phase	The scoping report seeks to scope out a health and wellbeing assessment of the onshore health effects on social participation, interaction and support for the construction and operation and maintenance phases on the basis that potential effects during construction will be assessed in the land use and recreation chapter and operation and maintenance effects are unlikely. The Inspectorate notes that these effects do not appear to have been included in the assessment of effects within scoping report section 7.7 and as such, does not agree that this matter can be scoped out of the assessment at this stage. These effects should be clarified in the ES and an assessment provided, where significant effects are likely to occur.
4.109	Table 7.12.4 and 11.2.4	Economic environment: impact on education and training - construction phase; and operation and maintenance phase	The scoping report seeks to scope out a health and wellbeing assessment of the onshore effects on education and training opportunities for the construction and operation and maintenance phases on the basis that the proposed development is not anticipated to be of a nature or scale that would result in significant effects to 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 further assessment in the ES.
4.10.10	Table 7.12.4 and 11.2.4	Economic environment: impact on employment and income - construction phase; and operation and maintenance phase	The scoping report seeks to scope out a health and wellbeing assessment of the onshore effects on employment and income for the construction and operation and maintenance 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 health 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 confirmation on the likely employment numbers are provided within the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.10.11	Table 7.12.4 and 11.2.4	Bio physical environment: impact associated with climate change and adaption - construction phase; and operation and maintenance phase	The scoping report seeks to scope out a health and wellbeing assessment of the onshore effects on climate change and adaptation for the construction and operation and maintenance phases on the basis that embodied carbon and climate altering pollutant emissions are not of a scale that could have population level effects during construction and potential climate change effects during operation and maintenance will be considered under 'wider societal infrastructure'. 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.
4.10.12	Table 7.12.4 and 11.2.4	Bio physical environment: impact on air quality - construction phase; and operation and maintenance phase	The scoping report seeks to scope out a health and wellbeing assessment of the onshore odour effects on air quality for the construction and operation and maintenance phases, on the basis that odour effects are not anticipated to occur due to the nature of the development. The scoping report also seeks to scope out a health and wellbeing assessment of the onshore air quality effects for the operation and maintenance phase on the basis that any effects are not expected to be on a scale that would affect population health. The Inspectorate agrees that odour emissions are unlikely to occur due to the nature of the proposed development and that this matter can be scoped out of the assessment. The Inspectorate notes that effects on human health receptors during operation of the proposed development are scoped into the air quality assessment, however, in relation to the back-up diesel generators. The Inspectorate considers therefore that this matter cannot be scoped out of the assessment at this stage. However, given this would be assessed in the air quality chapter, the assessment does not need to be duplicated in the ES health and wellbeing assessment provided that appropriate cross referencing is made within the ES to where the assessment of effects is provided.
4.10.13	Table 7.12.4	Bio physical environment: impact on	The scoping report seeks to scope out a health and wellbeing assessment of the onshore effects on water quality and availability for the construction and operation and maintenance phases on the basis that effects are unlikely to significantly affect population

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	and 11.2.4	water quality or availability - construction phase; and operation and maintenance phase	health and pollution control measures will be implemented to break potential pollution linkage pathways to human receptors. The Inspectorate notes that pollution effects on human receptors are considered within the scope of the geology, hydrogeology and ground conditions assessment (scoping report section 7.2) and as such, considers that this matter cannot be scoped out of the assessment at this stage. However, given that this matter would be assessed in the geology, hydrogeology and ground conditions chapter, the Inspectorate agrees that this matter can be scoped out of the health and wellbeing assessment provided appropriate cross referencing is made within the ES to where the assessment of effects is provided.
4.10.14	Table 7.12.4 and 11.2.4	Bio physical environment: impact on land quality - construction phase; and operation and maintenance phase	The scoping report seeks to scope out a health and wellbeing assessment of the onshore effects on land quality for the construction phase on the basis that standard best practice contamination avoidance and response measures will be secured through management plans and air and water pathways are separately considered under the Air Quality (dust) and Water Quality determinants (bathing and potable water). The scoping report seeks to scope out a health and wellbeing assessment of the onshore effects on land quality for the operation and maintenance phase on the basis that no ground disturbance is expected and operational activities would be accompanied by standard spill avoidance and management protocols and response measures and controlled by the Outline Drainage Strategy. The Inspectorate notes that pollution effects on human receptors are considered within the scope of the geology, hydrogeology and ground conditions assessment (scoping report section 7.2) and as such, considers that this matter cannot be scoped out of the assessment at this stage. However, given that this matter would be assessed in the geology, hydrogeology and ground conditions chapter, the Inspectorate agrees that this matter can be scoped out of the health and wellbeing assessment provided appropriate cross referencing is made within the ES to where the assessment of effects is provided.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.10.15	Table 7.12.4 and 11.2.4	Bio physical environment: impact of radiation - construction phase; and operation and maintenance phase	The scoping report seeks to scope out an assessment of the onshore effects on radiation for the construction phase on the basis that the proposed development would not use or make changes to active major electrical infrastructure producing EMF. The scoping report also seeks to scope out an assessment of the onshore effects on radiation for the operation and maintenance phase on the basis that the detailed engineering design would adhere to guidelines ensuring levels of exposure would not pose a risk to public health and the site selection process will have specific regard to the proximity to residential properties and community buildings, such as schools. The scoping report also states that all electrical infrastructure will remain below negligible levels in line with the International Commission Non-Ionising Radiation Protection (ICNIRP) guidelines (2020). The ES should confirm how the final locations selected for the proposed development have taken account of the location of sensitive receptors. Where significant effects are likely to occur, an assessment should then be provided.
4.10.16	Table 7.12.4 and 11.2.4	Institutional and built environment: impact on health and social care services - construction phase; and operation and maintenance phase	The scoping report seeks to scope out an assessment of the onshore effects on health and social care services for the construction phase on the basis that the healthcare needs of the construction workforce would be met by their usual healthcare provider and no large scale in-migration is expected. The scoping report also seeks to scope out an assessment of the onshore effects on health and social care services for the operation and maintenance phase 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.
4.10.17	Table 7.12.4 and 11.2.4	Institutional and built environment: impact on built environment - construction phase; and	The scoping report seeks to scope out an assessment of the onshore effects on the built environment, including hazardous waste or substances for the construction and operation and maintenance phases, on the basis that significant population health implications associated with the proposed development are not anticipated, utilities disruption is

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		operation and maintenance phase	unlikely, no increase in pests is anticipated, and waste would be managed in line with relevant regulatory regimes. 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.
4.10.18	Table 7.12.4 and 11.2.4	Social environment: impact on open space, leisure and play – operation and maintenance phase	The scoping report seeks to scope out an assessment of the onshore effects on open space, leisure and play for the operational phase on the basis that no additional disruption to PRow or open spaces would occur during the operation and maintenance phase. 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.
4.10.19	Table 7.12.4 and 11.2.4	Social environment: impact on transport modes, access and connections – operation and maintenance phase	The scoping report seeks 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 proposed development will generate a limited number of additional vehicle movements on the highway network and it is unlikely that there would be significant population health 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. Vehicle movements during operation should however be clarified in the ES.
4.10.20	Table 7.12.4 and 11.2.4	All health determinants – decommissioning phase	The scoping report seeks to scope out an assessment of the onshore effects on all health determinants during the decommissioning phase on the basis that impacts will be lower than those arising during construction, mitigated though an Onshore Decommissioning Plan and unlikely to give rise to significant effects on population health. Paragraph 4.8.3.4 of the Scoping Report states that the approach to decommissioning is yet to be determined and will be discussed further in the ES. Paragraph 4.8.3.6 states that decommissioning is assumed to be similar to construction in reverse sequence. The Inspectorate considers that given the uncertainty around the decommissioning phase, this matter cannot be scoped out of the assessment at this stage. Where likely

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			significant effects could occur, an assessment should be provided, or a justification should be presented in the ES as to why significant effects are not likely to occur.
4.1021	Table 7.12.4 and 11.2.4	Offshore Transmission Infrastructure: all health determinants – all phases	The scoping report seeks to scope out an assessment of offshore effects on health and wellbeing on the basis that the ES will consider the effects which may link to human health within the commercial fisheries; shipping and navigation and infrastructure and other sea users aspects. The Inspectorate notes that these effects do not appear to have been included in the scope of the commercial fisheries, shipping and navigation or infrastructure and other sea users sections of the scoping report and as such, does not agree that this matter can be scoped out of the assessment at this stage. These effects should be clarified in the ES and an assessment provided, where significant effects are likely to occur.

ID	Ref	Description	Inspectorate's comments
4.1022	n/a	Cumulative effects assessment	Given the number of projects proposed within the scoping boundary, where aspects have identified potential significant effects requiring assessment for health and wellbeing, a CEA and inter-relationships assessment should also be carried out.

4.11 Socio-economics

(Scoping Report Section 8.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.111	Table 8.2.3 and 11.2.6	Demographic changes – all phases	The scoping report seeks to scope out demographic changes during all project phases on the basis that economic impacts are unlikely to be sufficiently large at a UK level and are not expected to be geographically concentrated in local areas. The Inspectorate notes that demographic changes are unlikely to result in significant effects, however this matter cannot be scoped out at this stage given employment numbers arising from the proposed development are unknown.
4.112	Table 8.2.3 and 11.2.6	Changes to housing demand – all phases	The scoping report seeks to scope out changes to housing demand during all project phases on the basis that economic impacts are unlikely to be sufficiently large at a UK level and are not expected to be geographically concentrated in local areas. 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 further assessment in the ES.
4.113	Table 8.2.3 and 11.2.6	Changes to other local public and private services – all phases	The scoping report seeks to scope out changes to other local public and private services during all project phases on the basis that economic impacts are unlikely to be sufficiently large at a UK level and are not expected to be geographically concentrated in local areas. The Inspectorate notes that changes to other local public and private services are unlikely to result in significant effects, however this matter cannot be scoped out at this stage given employment numbers are unknown.
4.114	Table 8.2.3 and 11.2.6	Socio-cultural impacts – all phases	The scoping report seeks to scope out socio-cultural impacts during all project phases on the basis that economic impacts are unlikely to be sufficiently large at a UK level and are not expected to be geographically concentrated in local areas. The Inspectorate agrees

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			that socio-cultural impacts are unlikely to result in significant effects. This matter can therefore be scoped out of further assessment in the ES.
4.115	Table 8.2.3 and 11.2.6	Changes to commercial fisheries – operation and maintenance phase	The scoping report seeks to scope out an assessment of changes to commercial fisheries during operation and maintenance within the socio-economic assessment on the basis that it is unlikely that the presence of underwater Offshore Export Cables will disrupt commercial fisheries. The Inspectorate does not agree to scope this matter out of the socio-economic assessment at this stage, noting that disruption to fishing activities is scoped into the assessment in section 6.7. These effects should be clarified in the ES and an assessment provided, where significant effects are likely to occur.
4.116	Table 8.2.3 and 11.2.6	Changes to shipping and marine recreation – operation and maintenance phase	The scoping report seeks to scope out an assessment of changes to shipping and marine recreation during operation and maintenance within the socio-economic assessment. The Inspectorate notes that all shipping and marine impacts have been scoped into the assessment in section 6.7, therefore does not agree to scope this matter out of the assessment at this stage. These effects should be clarified in the ES and an assessment provided, where significant effects are likely to occur.

ID	Ref	Description	Inspectorate's comments
4.117	n/a	n/a	n/a

4.12 Climate Change

(Scoping Report Section 8.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.12.1	Table 8.3.3 and 11.2.6	Impact of disposal of waste – construction phase	The scoping report seeks to scope out the effects of the disposal of waste on the basis that waste is predominantly inert waste and no significant effects are considered likely to occur. The Inspectorate considers that 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 generated (on and offshore) during construction, operation and decommissioning should be set out in the ES. However, the Inspectorate agrees that where it is demonstrated in the ES that wastes generated by construction are likely to be very limited and inert, that it agrees this matter can be scoped out of assessment in the ES.
4.12.2	Table 8.3.3 and 11.2.6	Impact of Green House Gas (GHG) emissions from consumption of materials and activities – operation and maintenance phase	The scoping report seeks to scope out the effects of GHG emissions from the consumption of materials and activities during the operation and maintenance phase on the basis that there would be minimal such activities generating emissions during these phases. The Inspectorate agrees on that basis that this matter can be scoped out of further assessment in the ES.
4.12.3	Table 8.3.3 and 11.2.6	Impacts of GHG emissions – decommissioning phase	The scoping report seeks to scope out effects from decommissioning on the basis of uncertainty of the fate of future infrastructure into the future. The scoping report proposes that a commitment to an assessment of decommissioning impacts would be included in the DCO.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate considers therefore that this matter should be discussed in the ES, albeit it is acknowledged that an assessment may be high level and it may involve cross-referencing to other assessments within the ES.
4.124	Table 8.3.3 and 11.2.6	Impact of climate change on Ossian Transmission Infrastructure – construction phase; and decommissioning phase	The scoping report seeks to scope out impacts of climate change during construction and decommissioning on the basis that these phases are short term and variations in climate minimal. The Inspectorate notes that flood risk to the onshore transmission assets is included within section 7.3 and notes that Table 8.3.2 that other risks such as from increased temperature and extreme weather events would be assessed, although details of where are not clear. This should be clarified and appropriately signposted in the ES such that it can be demonstrated that significant effects are unlikely to occur. With reference to ID 4.1.1 of this scoping opinion, however, given the uncertainties with future climate change scenarios, this matter should for the decommissioning phase should be described further and an assessment provided.
4.125	Table 8.3.3 and 11.2.6	Impact of GHG emissions from land and seabed use change – operation and maintenance phase; and decommissioning phase	The scoping report seeks to scope out effects from land and seabed change from operation and maintenance phase on the basis that no new land use or seabed changes would occur during these phases. The Inspectorate agrees that this matter can be scoped out of further assessment in the ES. The assessment of effects from decommissioning would be addressed through a commitment to assessment in the DCO at that time. With reference to ID 4.1.1 of this scoping opinion, however, given the future timeline associated with decommissioning, the Inspectorate considers that the approach should be considered in the ES and an assessment of effects provided, where significant effects are likely to occur.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.126	Table 8.3.3 and 11.2.6	In-combination climate change effects	The scoping report seeks to scope out in-combination climate change effects on the basis that these would be addressed in other relevant chapters of the ES. It also states that climate change projections would be provided to each aspect chapter. The Inspectorate is content with this approach provided that the most recent climate change allowances are taken into account. Appropriate signposting and cross referencing should also be provided to ensure consistency across the ES.

ID	Ref	Description	Inspectorate's comments
4.127	n/a	n/a	n/a

4.13 Aspects proposed to be scoped out

(Scoping Report Section 10)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
4.13.1	Section 10.3	Daylight, sunlight and microclimate	The scoping report seeks to scope out effects on daylight sunlight and microclimate on the basis that the above ground structures associated with the proposed development would not be of sufficient height or proximity to existing buildings to give rise to significant daylight or sunlight effects. In addition, it also states that the nature of the proposed development would not result in microclimate changes. The Inspectorate notes that the locations of tallest structures in relation to existing buildings are not yet confirmed in the scoping report and that this should be confirmed in the ES. Where the proximity is confirmed and a lack of potential for these effects to occur can be demonstrated in the ES the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.
4.13.2	Section 10.4.1	Heat	The scoping report seeks to scope out effects from the generation of heat, on the basis that the proposed development will not generate high levels of heat. The applicant's attention is drawn to section 4.0 of this scoping opinion in this regard. While uncertainty remains, an assessment of heat emissions should be considered in the ES. However, the Inspectorate is content that a separate chapter is not required where effects are addressed in other aspect chapters and appropriate signposting is provided.
4.13.3	Section 10.4.2	Radiation – human health effects	The scoping report anticipates that the proposed development will generate radiation in the form of EMF. These matters are scoped into the assessment of effects on ecological receptors in sections 3.2 and 3.3 of the scoping report. The scoping report seeks to scope out effects of EMF on human receptors on the basis that the proposed development would be required to comply with existing regulatory controls and safety measures in relation to electrical safety.

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
			The Inspectorate agrees that a standalone chapter on radiation is not therefore required in the ES, on the basis that the assessment of health and wellbeing effects (table 7.12.3) proposes that the ES should consider the potential for EMF effects on human receptors, where significant effects are likely to occur.
4.134	Section 10.5	Aviation and radar	The scoping report seeks to scope out effects on aviation and radar for the offshore elements of the proposed development on the basis that all structures and works associated with construction, operation and maintenance and decommissioning of the proposed development would be at or below sea level and thus have no potential for significant effects on aviation or radar. The Inspectorate agrees that this matter can be scoped out of the assessment on that basis. The scoping report also identifies that the tallest onshore structures, the onshore converter stations would be 26m with a 33m lightening mast. The scoping report concludes that this is well below the height at which significant effects onshore would be likely to occur. The Inspectorate agrees that on that basis, this matter can be scoped out of the assessment in the ES.
4.135	Section 10.6	Waste	The scoping report proposes that a standalone chapter on waste is not proposed for the ES and notes the intention to adhere to the waste hierarchy approach during each phase of the proposed development. A SWMP is also proposed to contain details of waste management, quantities and reporting. However, it is unclear whether this plan would include both onshore and offshore wastes, and whether it would include the management and any subsequent disposal of wastes such as dredged materials. With reference to ID 2.0.11 of this scoping opinion, the scoping report does not set out the disposal of any debris collected during seabed preparation or whether dredged material could be generated elsewhere such as through landfall construction.

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
			The Inspectorate considers that the ES should therefore include a section on waste to include a description of the nature and quantity of any waste that would be generated during construction, operation and decommissioning, including dredged material. The ES should describe the assumptions made in the assessment with regards to waste. Any likely significant effects from waste collection and disposal, including dredging or dredge disposal, should be assessed.
4.136	Section 10.7 Table 10.7.1	Major accidents and disasters	The scoping report proposes that a standalone chapter for Major Accidents and Disasters is not required for the ES as individual aspect chapters will address the identified risks and the project description in the ES will set out how the design has considered potential major accident and disasters. The Inspectorate agrees that a standalone chapter would not be necessary provided that the information relating to major accidents and disasters is provided elsewhere in the ES. However, table 10.7.1 considers only a limited number of potential effects, and some of the major accident and disaster risks listed in the table are matters that are sought to be scoped out for certain phases of the proposed development elsewhere in the scoping report. Other effects, such as those associated with military training areas (considered in scoping report section 6.10), are not included in this table. The ES should therefore confirm what has been considered within the technical assessments and present an overarching section in the ES which explains how potential impacts have been identified. An assessment of major accidents and disasters should be presented in the ES. The applicant's attention is also drawn to the Maritime and Coastguard Agency comments at appendix 2 of this scoping opinion with respect to collision risk, navigational safety, and other related issues that should be considered in the assessment of likely significant effects. It is also directed to the response of the Health and Safety Executive identifying risks from potential major accident hazard sites and pipelines.

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
			The Inspectorate does not therefore agree that major accidents and disasters can be scoped out from further assessment at this stage.
4.13.7	Section 10.8	Other residues and emissions Material assets	The scoping report notes that impacts of residues and emissions such as dust, pollutants, light noise and vibration, and material assets would be considered within relevant aspect chapters in the ES and not in separate standalone chapters. The Inspectorate is content with this approach.
4.13.8	Paragraph 10.8.1.2	Unexploded ordnance (UXO)	It is noted that consent for UXO removal will be sought in a future Marine Licence application which would be supported by a more detailed assessment. The Inspectorate advises that the ES should still include a high-level assessment 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. If any preliminary works such as UXO surveys would be permitted under the DCO then the effects of these should also be included in the ES.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	Bourne Town Council
	Morton and Hanthorpe Parish Council
	Haconby and Stainfield Parish Council
	Rippingale Parish Council
	Dowsby Parish Council
	Pointon and Sempringham Parish Council
	Billingborough Parish Council
	Horbling Parish Council
	The Moultons Parish Council
	Holbeach Parish Council
	Gedney Parish Council
	Deeping St. Nicholas Parish Council
	Pinchbeck Parish Council
	Crowland Parish Council
	Fleet Parish Council
	Weston Parish Council
	Whaplode Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Quadring Parish Council
	Gosberton Parish Council
	Cowbit Parish Council
	Surfleet Parish Council
	Donington Parish Council
	Kirton Parish Council
	Fishtoft Parish Council
	Freiston Parish Council
	Holland Fen with Brothertoft Parish Council
	Benington Parish Council
	Leverton Parish Council
	Old Leake Parish Council
	Wigtoft Parish Council
	Sutterton Parish Council
	Bicker Parish Council
	Swineshead Parish Council
	Algarkirk Parish Council
	Fosdyke Parish Council
	Frampton Parish Council
	Wyberton Parish Council
	Amber Hill Parish Council
	Butterwick Parish Council
	Wrangle Parish Council
	Swaton Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Little Hale Parish Council
	Great Hale Parish Council
	Heckington Parish Council
	North Kyme Parish Council
	Dogdyke Parish Council
	Helpringham Parish Council
	South Kyme Parish Council
	Friskney Parish Council
	Wainfleet St. Mary Parish Council
	Willoughby with Sloothby Parish Council
	Mablethorpe and Sutton Town Council
	Wildmore Parish Council
	Langrville Parish Council
	Thornton Le Fen Parish Council
	Coningsby Town Council
	Frithville and Westville Parish Council
	Carrington and New Bolingbroke Town Council
	Spilsby Town Council
	Tumby Parish Council
	West Fen Parish Council
	Revesby Parish Council
	East Kirkby Parish Council
	Eastville, Midville & New Leake Group Parish Council
	Stickford Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	West Keal Parish Council
	Toynton St. Peter Parish Council
	Halton Holegate Parish Council
	Tetford Parish Council
	Swaby, Haugh & South Thoresby Parish Council
	Tathwell & Haugham Parish Council
	Legbourne Parish Council
	Wainfleet All Saints Town Council
	Thorpe St. Peter Parish Council
	Croft Parish Council
	Welton Le Marsh Parish Council
	Burgh Le Marsh Town Council
	Skegness Town Council
	Orby Parish Council
	Addlethorpe Parish Council
	Hogsthorpe Parish Council
	Withern with Stain Parish Council
	Anderby Parish Council
	Grimoldby & Manby Parish Council
	Gayton Le Marsh Parish Council
	Great and Little Carlton Parish Council
	Saltfleetby Parish Council
	Theddlethorpe All Saints Parish Council
	Stickney Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Tattershall Thorpe Parish Council
	Kirkby on Bain Parish Council
	Mareham Le Fen Parish Council
	Bolingbroke Parish Council
	East Keal Parish Council
	Toynton All Saints Parish Council
	Firsby Group Parish Council (including Bratoft, Firsby, Great Steeping, Little Steeping and Irby in the Marsh)
	Hameringham Parish Council
	Hagworthingham Parish Council
	Hundleby Parish Council
	Spilsby Town Council
	Partney and Dalby Parish Council
	Belleau Parish Council
	Aby with Greenfield Parish Council
	Little Cawthorpe Parish Council
	Caythorpe & Frieston Parish Council
	Reston Parish Council
	Little Carlton Parish Council
	Claxby St. Andrew Parish Council
	Farlesthorpe Parish Council
	Alford Town Council
	Bilsby Parish Council
	Mumby Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Chapel St. Leonards Parish Council
	Huttoft Parish Council
	Maltby Le Marsh Parish Council
	Theddlethorpe St. Helen Parish Council
	Sausthorpe Parish Council
	Thorney Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
Scottish Natural Heritage (known as NatureScot)	NatureScot
The Forestry Commission	East and East Midlands
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The Historic Buildings and Monuments Commission for England (known as Historic England) (OFFSHORE ONLY)	Historic England
The Joint Nature Conservation Committee	Joint Nature Conservation Committee
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Maritime and Coastguard Agency - Regional Office	Maritime and Coastguard Agency - North East England
The relevant internal drainage board	Black Sluice Internal Drainage Board
	Lindsey Marsh Drainage Board
	Witham First Internal Drainage Board

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Witham Fourth District Internal Drainage Board
	Witham Third Internal Drainage Board
	North Level Internal Drainage Board
	South Holland Internal Drainage Board
	Welland and Deepings Internal Drainage Board
The Canal and River Trust	The Canal and River Trust
Trinity House	Trinity House
The relevant Highways Authority	Lincolnshire County Council Highway Authority
The relevant Highways Authority	National Highways
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
NHS England	NHS England
The Coal Authority	Mining Remediation Authority
The Crown Estate Commissioners	The Crown Estate
	Crown Estate Scotland
The relevant police authority	Lincolnshire Police and Crime Commissioner
	Cambridgeshire Police and Crime Commissioner
The relevant ambulance service	East Midlands Ambulance Service NHS Trust
	East of England Ambulance Service NHS Trust
The relevant fire and rescue authority	Lincolnshire Fire and Rescue
	Cambridgeshire Fire and Rescue Service

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Lincolnshire Integrated Care Board
	NHS Cambridgeshire and Peterborough Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	United Lincolnshire Teaching Hospitals NHS Trust
	East Midlands Ambulance Service NHS Trust
	East of England Ambulance Service NHS Trust
The relevant NHS Foundation Trust	Lincolnshire Partnership NHS Foundation Trust
	Essex Partnership University NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	The Canal and River Trust
Dock and Harbour authority	Fosdyke Yacht Haven
	Port of Boston
Pier	Skegness Pier
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England

STATUTORY UNDERTAKER	ORGANISATION
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Anglian Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Saltfleetby Energy Limited
	Stark Works

STATUTORY UNDERTAKER	ORGANISATION
	National Gas
The relevant electricity generator with CPO Powers	Spalding Energy Expansion Limited
	Lincs Wind Farm Limited
	Triton Knoll Offshore Windfarm Limited
	Hornsea 1 Limited
	Orsted Hornsea Project Four Limited
	Orsted Hornsea Project Three (UK) Limited
	Doggerbank Offshore Windfarm Project 3 Projco Ltd
	Doggerbank Offshore Windfarm Project 1 Projco Ltd
	Doggerbank Offshore Windfarm Project 2 Projco Ltd
	Sofia Offshore Wind Farm Limited
The relevant electricity distributor with CPO Powers	National Grid Electricity Distribution (East Midlands) Limited
	Advanced Electricity Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited
	TC Lincs OFTO Limited
	Triton Knoll OFTO Ltd

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Fenland District Council
West Lindsey District Council
South Holland District Council
Boston Borough Council
North Kesteven District Council
East Lindsey District Council
King's Lynn and West Norfolk Borough Council

LOCAL AUTHORITY
South Kesteven District Council
Peterborough City Council
North East Lincolnshire Council
North Northamptonshire Council
North Lincolnshire Council
Rutland County Council
Cambridgeshire County Council
Norfolk County Council
Nottinghamshire County Council
Leicestershire County Council
Lincolnshire County Council

TABLE A4: THE MARINE MANAGEMENT ORGANISATION

Section 42(1)(a) of the PA2008 requires consultation with the Marine Management Organisation in any case where the proposed development would affect, or would be likely to affect, any of the areas specified in subsection 42(2).

ORGANISATION
The Marine Management Organisation

TABLE A5: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Royal National Lifeboat Institution

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Aby with Greenfield Parish Council
Anglian Water
Billingborough Parish Council
Boston Borough Council
Crowland Parish Council
East Lindsey District Council
Environment Agency
Fenland District Council
Firsby Group Parish Council (including Bratoft, Firsby, Great Steeping, Little Steeping and Irby in the Marsh)
Grimoldby & Manby Parish Council
Halton Hologate Parish Council
Health and Safety Executive
Historic England
Joint Nature Conservation Committee
Lincolnshire County Council
Maritime and Coastguard Agency
Ministry of Defence
National Gas
National Grid
National Highways
Natural England
NatureScot

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Norfolk County Council
North Kesteven District Council
North Lincolnshire Council
Northern Gas Networks Limited
Orsted (Hornsea Project 4 Limited and Lincs Windfarm Limited)
Peterborough City Council
Rutland County Council
Skegness Town Council
South Kesteven District Council
South Holland District Council
South Holland Internal Drainage Board
Swineshead Parish Council
The Coal Authority
The Canal and River Trust
The Forestry Commission
The Marine Management Organisation
Theddlethorpe All Saints and St Helen Parish Council
Thornton Le Fen Parish Council
Trinity House
West Lindsey District Council
Wyberton Parish Council

Aby with Greenfield Parish Council

Need to make it clear that residents of the Parish don't want the project to go ahead.

Likewise after talking to the residence of the village they are of the same opinion and many are sceptical in the extreme of the consultation process.

A concern is that Ossian has clearly collaborated with the other parties behind closed doors over a few years to decide that transmission of power would terminate off Lincolnshire and overhead lines should be the method of transmission.

It is important to note that this decision will form is a keystone for many other projects that are being presented separately, Ossian being for the transmission of the wind farm power and converters, the National grid that will receive the power using massive substations to modify the voltage and further pylons to transmission to parts of the country hundreds of miles away. Then Various companies are now planning to base solar farms, co2 capture facilities and wind farms in the vicinity. The people in Lincolnshire have had no input to these plans to enable this and it is widely believed that due process has not taken place in this process and political expediency for their party has been the main driver. Creating a project that will destroy the very habitat environment that it needs to protect. The reluctance to release the details behind the costings on this public funded project further points to this conclusion. We have merely been presented with a Fait Accompli.

We strongly believe it the projects should reevaluate all options and come up with a solution that will be correct for the future requirements that takes into account point usage and costs in an efficient timeline. Time and thought has to be taken to make this work. There is no rush to get this completed it will make no difference if this takes another five years, the timescales presented to us all are arbitrary and politically driven. A driver that has always given us projects that are rushed and half baked in the past costing millions more overall.

We believe that an offshore method would be show to be the best and cheapest method of transmitting this power.

With a second option of subterranean cabling which has recently so successfully been employed for the Viking link cable and has had very little impact on the area. Clearly the concerns of the locals were correctly taken into account in this case. Possibly of offshore cabling termination at Sizewell where the transmission infrastructure is in place to transmit to relevant parts of the uk should be looked into.

The power that is generated will primarily be required for the south east. Using Lincolnshire as the hub for the whole power grid means that valuable agricultural land and transforming the areas of natural beauty. It not only will have massive impacts on the local inhabitants and wildlife but will destroy the environment that the project is meant to protect. I believe

that the options to create this new energy system have not been explored to have the best and cheapest plan which will fit in with our requirements.

Ossian need to include the following in their planning:

1. How they are going to protect the local community from the noise and traffic disruption both during the build phase and when completed?
2. Will they commit to not building on green-belt or farmland?
3. How will they ensure any onshore structures will be screened so we can't see them?
4. How do they ensure that local wildlife will be protected?
5. How do they ensure the areas of historical interest are protected?
6. How much will they reimburse local residents for their property devaluation?
7. How much compensation for the residents in the area for the stress having to live near the project.
8. Where do they intend to house the workforce involved in the project?
9. How will they ensure that local businesses particularly will not be negatively impacted?
10. Is there a flood plan?`

Our area already suffers from excessive mud and debris from a nearby quarry. This has a dust mitigation plan but is not adhered too by the firm, and the local council is neither monitoring or enforcing it, so added traffic will extenuate this further, particularly heavy traffic that can't come through Aby due to a low viaduct bridge of historical interest and the roads through Aby are too narrow.

Areas around Aby are prone to flooding.

Aby is a popular destination for walkers and holiday makers. There is a beautiful ancient chalk river flowing through Aby and Claythorpe and the footpaths connect to the AONB.

The springs at Belleau which are near unique; the vegetation around the spring waters is alpine according to some experts, year round constant temperature through the chalk.

Swinn Wood and Motherwood are ancient woodlands and prime examples of traditional woodlands with rare and protected flora and fauna.

By Email: Planning Inspectorate
ossiantransmission@planninginspectorate.gov.uk

Our ref: Ossian/ ScopingResponse

27th March 2025

Dear Ms. Deery,

Application by Ossian Offshore Windfarm Limited (the applicant) for an Order granting Development Consent for the Ossian Transmission Infrastructure (the proposed development)

Thank you for the opportunity to comment on the Scoping Report for the above project by Ossian Offshore Wind Farm Ltd (the Applicant). This is one of a multiple number of projects in and around Lincolnshire that qualify as a nationally significant infrastructure project (NSIP) on which Anglian Water has been consulted by the Planning Inspectorate (PINS).

Anglian Water is the appointed water and sewerage undertaker for the project area (shown in Figure 1.3.1). The following response is submitted on behalf of Anglian Water in its statutory capacity regarding water resources, water supply network, water recycling centres (WRC), water recycling assets and the sewer network, as well as the related role of surface drainage.

As a key initial point, Anglian Water would want to draw to your attention to the fact that the Ossian project appears to be proposed on land which is part of the selected site for the Lincolnshire Reservoir. The Scoping Report does not reference the proposed reservoir, whose preferred site overlies part of the Ossian project.

This letter will firstly address the aspects of the Scoping Report which interrelate with the Lincolnshire Reservoir project including associated infrastructure, then consider standard EIA matters which Anglian Water would comment on as the appointed water and sewerage undertaker.

Lincolnshire Reservoir comments

Anglian Water is proposing a new reservoir in Lincolnshire to help meet the growing demands on water supply in the East of England. This is situated 7km southwest of Sleaford, between the settlements of Swaton, Screddington and Helpringham. This illustrative map shows where water is being transferred from sources to the reservoir, and then where the treated water is being sent into supply. Together with the associated water infrastructure we need to transfer water to the reservoir, treat the water and supply it to homes and businesses. The map extracts on page 7 below, indicate the areas where the reservoir and associated infrastructure are proposed in relation to the Ossian project.

The scale of the Lincolnshire Reservoir is such that it automatically qualifies as an NSIP under the Planning Act 2008. Accordingly, the Reservoir project has formally been notified to the Planning Inspectorate following the inception meeting with PINS in October 2022. Our phase two consultation took place between May and August 2024 and a Development Consent Order (DCO) application for the Lincolnshire Reservoir is currently programmed to be submitted in Quarter 4 2028. Further information is available at: [Welcome - Anglian Water - Lincolnshire Reservoir](#) and [Lincolnshire Reservoir - Project information](#)

As set out above, the Lincolnshire Reservoir is a key supply side option and is included in both the Water Resources East Regional plan [Regional Water Resources Plan - Water Resources East](#) which sets out the collective water companies position and Anglian Water's draft Water Resources Management Plan (WRMP) [Water resources management plan \(anglianwater.co.uk\)](#).

At present it is not clear how the Ossian project takes account of the reservoir and its associated infrastructure. Section 5.7 'Cumulative Effects with Other Projects' has not listed other proposed developments such as this reservoir. We would, therefore, encourage the Applicant to further engage with Anglian Water at pre-application stage on this matter, to ensure both projects are given the best chance of success.

Water and sewerage undertake comments on the Scoping Report

Anglian Water works to support the construction and operation of national infrastructure projects that are conducted in accordance with the Water Industry Act 1991. We would expect the EIA to include reference to any existing infrastructure managed by Anglian Water and the provision of replacement infrastructure and the requirements for new infrastructure.

Anglian Water works with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers, wastewater and water supply infrastructure are planned to be undertaken with the minimum of disruption to the project and customers. We would encourage on-going engagement to ensure that Anglian Water and the Applicant have reached agreement on the approach to assets and connections in order that these matters are not drawn out during the Examination stage.

The Scheme - existing and proposed infrastructure

The Ossian project is located within the two Water Resource Zones (WRZ) of Lincolnshire Central and Lincolnshire East and designated as being within a 'seriously water stressed' region. In view of the potential impacts on water resources, the Applicant is advised to consider the published Water Resources East Regional Plan and Anglian Water's WRMP.

As Sections 7.2.3.8 - 7.2.3.9 state, parts of the application area lie close to Source Protection Zones (SPZ). There is a need to ensure that any development proposals do not have an adverse effect on any existing boreholes which are used to supply the public with drinking water.

The project's EIA will need to consider water resources and water efficiency through the preparation of a Water Resources Assessment (WRA). Anglian Water recommends that the WRA is an integral part of Chapter 9 Water Environment. The WRMP should therefore be added to the data sources listed.

Anglian Water welcomes the recognition of risks from the project to water and wastewater infrastructure and, reference is made within the Scoping Report to the potential construction of the impacts on existing

utility infrastructure and services (Section 7). Given the potential location and extent of the proposed development area, there will be existing Anglian Water assets both above and below ground, which serve the surrounding businesses and community. For instance, there are existing Anglian Water assets including several water mains within the project area such as within the highway or its verges which link to the various settlements. Water abstraction locations may also be within the project area.

In addition, Anglian Water has sewerage assets (drainage networks and above ground facilities including pumping stations and water recycling centres/ sewage treatment works), connected to these are pipe connections to the corresponding settlements, including sewers and rising mains which can be in areas beyond the highway verges.

Utilities searches should, therefore, be undertaken to establish the extent of Anglian Water's current and planned assets within the scheme's application boundary. These should be mapped to establish interactions with assets and the scheme designed to avoid impacts upon those assets. Anglian Water would want to ensure the location and nature of our assets serving local communities and strategic water supply infrastructure are identified and protected. To reduce the need for diversions and the associated carbon impacts of those works, ground investigations would enable the Applicant to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to supporting infrastructure.

Maps of underground assets are available to view at the following link: <http://www.digdat.co.uk/>

For land investigation questionnaires relating to above ground assets and formal easements, you should contact our estates team on: awsestates@savills.com

Buffers will be required and will inform the construction and operation of the proposed scheme, and its layout and design, following necessary ground investigations. Suitable easements, separation distances and safe working practices will need to be agreed.

The Scoping Report refers to the use of both trenches and trenchless work (Section 7) methods for installation of cables. Anglian Water requires the following standoff distances are applied for working each side of the medial line of pipes. This information is taken from our Protective Provisions template which will need to be agreed with Anglian Water for the DCO submission.

- (a) 4 metres where the diameter of the pipe is less than 250 millimetres;
- (b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres; and
- (c) A distance to be agreed on a case-by-case basis and before the submission of the plan under sub-paragraph (1) is submitted where the diameter of the of the pipe exceeds 400 millimetres.

Management Plans

The management plans listed under Section 7.10.5 of the Scoping Report, should include steps to remove the risk of damage to Anglian Water's assets from plant and machinery (compaction and vibration during the construction phase) including haul and access roads. With regards to vibration from construction this should take account of potential effects on our assets. Further advice on minimising and then relocating (where feasible) existing assets can be obtained from: connections@anglianwater.co.uk

Scheme assessment, design, mitigation and connections

Water recycling/ sewerage services

Anglian Water notes under Section 7.3.8.10 that a foul water drainage strategy will be prepared. The Report is not clear on how wastewater will be disposed of and how this will be managed such as a connection to an available public sewer. The situation should be confirmed for all stages (construction, operation and de-commissioning) within the Environmental Statement.

Drainage and Surface Water

Anglian Water welcomes the statement in Table 7.3.5 that the Flood Risk Assessment (FRA) will assess all applicable sources of flooding to and identify any mitigation measures required to ensure flood resilience, taking climate change into account, and to prevent any off-site impacts. We consider that this should help to avoid increased risk of ground water infiltration/ surface water ingress to our wastewater networks that may lie in the vicinity of the proposed onshore scheme.

The FRA as part of the EIA, should consider any increased risk of surface water and groundwater flood risks arising from the scheme that could exacerbate sewer flooding risks due to infiltration/ingress to our networks, particularly in terms climate change impacts. The likelihood of more extreme weather events leading to higher-than-average rainfall and cumulative impacts of storm events, as recently experienced during Winter 2023/24, mean that infrastructure becomes increasingly vulnerable to flood risk. The project should aim to minimise any flood risks as far as possible by designing in measures to limit increased flood risks to utilities infrastructure.

Any potential embedded design measures such as Sustainable Drainage Systems (SuDS) to be utilised at permanent above ground installations to manage rainfall run-off and achieve sufficient attenuation to avoid increases in flood risk, and compensation flood storage at temporary site compounds to manage flood risk at these locations. Anglian Water is responsible for management of the risks of flooding from surface water which are directed to foul water or combined water sewer systems.

Our preference would be for surface water run-off from above ground permanent buildings and impermeable surfacing to be managed by SuDS with any outfall to a watercourse, in accordance with the drainage hierarchy. The risk of sewer flooding and any required mitigation within the public sewerage network should form part of an FRA and drainage strategy. Anglian Water would wish to be engaged on the preparation of a drainage strategy and consider that this should be required to demonstrate the appropriate management of run-off from the proposed onshore scheme (see Section 7.3.8.10).

Subject to confirmation that all surface water will be managed following the drainage hierarchy including Sustainable Drainage Systems (SuDS), Anglian Water would want to clarify that the DCO as proposed will have no connection to the public sewer network for construction or for operations. This would then negate the need for the draft DCO Order to provide for any connection and so require consequent Protective Provisions and Requirements to ensure any connections did not compromise the wastewater services of existing customers. Anglian Water will be a consultee set out in Requirements for the approval of drainage strategies and surface water management plans.

Further advice wastewater capacity and options can be obtained by contacting the Pre-Development Team at: planningliaison@anglianwater.co.uk

Water resources

As water may be used in the project construction and operation, this indicates that water resources should be assessed in the EIA. Anglian Water does not consider that sufficient information has been provided to reach a conclusion on the project's potential impacts regarding water supply. Impacts of climate change in terms of water availability for the construction, operation and decommissioning stages are also of relevance. In view of the guidance in the National Policy Statements we would have anticipated that the scoping would have included and then considered the approach to water supply and water resources.

Anglian Water requests that these points are assessed early in the EIA to set out how the project will be supplied with water, the wastewater managed, how water assets serving residents and business will be protected and how design has been altered to reduce the need for new water infrastructure or the diversion of existing assets. Anglian Water also requires that the project seeks to minimise its demand for water and records this in the WRA.

Anglian Water has a statutory duty to supply water for domestic purposes. This means we are legally obliged to supply water to all household properties as well as any domestic requirements (e.g., drinking water, hand-basins, toilets and showers) of non-household properties. In many cases, domestic demand will be the only requirement for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers). Non-domestic demand refers to water use for industrial processes, (e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type of water usage where it might put at risk our ability to supply water for domestic purposes.

Anglian Water has adopted a ['Non-Domestic Water Requests Policy'](#) which states that requests over 20m³/day will be declined. However, for Nationally Significant Infrastructure Projects that are requesting over 20m³/day of non-domestic water (as defined above) for a scheme, a Water Resource Assessment must be completed. This is so we can better understand water demands, water efficiency measures and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth.

We advise that the WRA is used to inform the Preliminary Environmental Impact Report at the Statutory Consultation stage of the Development Consent Order (DCO) process and the Environmental Statement at submission. This will include engagement with environmental regulators. The WRA will also need to be submitted to Anglian Water's pre-planning team also, so that the request for non-domestic water can be considered further. A copy of our WRA template is attached with this letter.

Anglian Water recommends that new water supply connections are not sought during construction and that potable water supply for welfare facilities, for example, are served by tanker to reduce the embedded (capital) carbon from providing new connections. The Applicant should confirm that there will be no temporary concrete batching facilities with consequent water demands and would be offsite and so not require an on-site supply. Water requirements for firefighting measures and construction traffic (dust suppression/ wheel washing areas) should also be explained.

Further advice on water capacity and options can be obtained by submitting a pre-development enquiry to the Pre-Development Team at: planningliaison@anglianwater.co.uk and on the InFlow webpages: [InFlow | Development Services \(anglianwater.co.uk\)](#)

Engagement and next steps

We consider Anglian Water should be included on the list of consultees to be drawn up by the Applicant, as set out in Section 7.3.8.19 of the Scoping Report. Anglian Water notes that a statutory consultation

on the project is concurrently taking place with a closing date of 13th April 2025 which we will responding on.

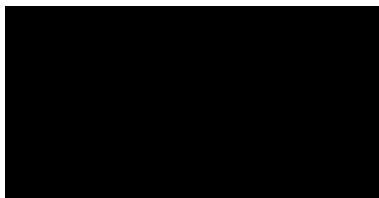
Anglian Water would welcome continued engagement with the Applicant throughout the remaining stages of the project to address and resolve issues prior to the submission of the DCO including Protective Provisions. The preparation of a Statement of Common Ground should document key issues and the status of whether issues have been resolved or remain under discussion, which helps to reduce the Examining Authority questions for statutory undertakers and removes the possible need for changes to the project during Examination.

We would recommend discussion on the following issues:

1. Impact of development on Anglian Water's water and water recycling assets.
2. The design of the project to minimise interaction with Anglian Water assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.
3. Requirement for potable and raw water supplies (if any) and the inclusion of the WRA in the draft EIA.
4. Requirement for water recycling connections (if any).
5. Confirmation of the project's cumulative impacts with Anglian Water projects, including the Lincolnshire Reservoir project.
6. The Draft Development Consent Order (DCO), including draft Protective Provisions and requirements specifically to ensure Anglian Water's services are maintained during construction.

Advice on the form and content of suitable Protective Provisions in the draft Development Consent Order should be sought. Please do not hesitate to contact [REDACTED] [REDACTED] [\[REDACTED\]@anglianwater.co.uk](mailto:[REDACTED]@anglianwater.co.uk) on these aspects or should you require clarification on the above response or during the pre- application to decision stages of the project.

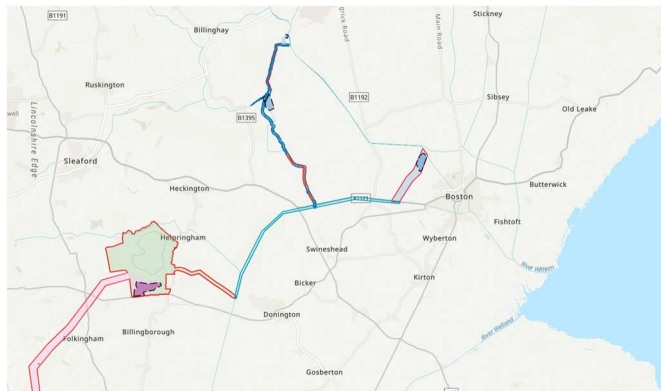
Yours sincerely,



Growth Strategy Manager – Sustainable Growth



Extract showing where water is being transferred from sources to the reservoir, and then where the treated water is being sent into supply - [About the project - Anglian Water - Lincolnshire Reservoir](#)



Extract showing Lincolnshire Reservoir Proposals and Associated Infrastructure - [Anglian Water Lincs Reservoir](#)

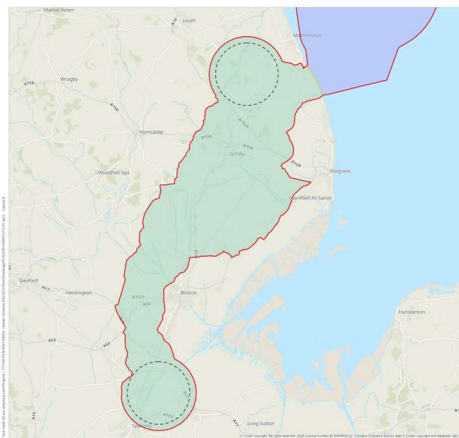


Figure 3.7.1: Onshore Scoping Boundary and Onshore Converter Station Search Areas

Extract from Figure 3.7.1 of the Scoping Report for the Ossian Project.

Water Resource Assessment

The need for a Water Resource Assessment

Anglian Water is committed to supporting sustainable economic growth across the East of England. However, due to the impacts of climate change and to help protect the environment, the amount of water that businesses, including Anglian Water, can abstract is reducing. This situation is reducing our ability to be flexible with new requests to supply non-domestic connections which were not planned for in the Water Resources Management Plan 2025-2050 (WRMP24).

Whilst Anglian Water are taking steps to respond to this challenge with the construction of two new reservoirs and strategic pipeline transfers, these will take time to deliver. As such it is more crucial than ever that we work together with businesses, to ensure we are aware of their water demands for growth, and that demand management and water efficiency solutions are implemented to maximise what water is available.

Whilst Anglian Water has a statutory duty to supply water for domestic purposes (e.g., drinking water, hand-basins, toilets and showers) for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers), there is no legal duty to provide water for non-domestic usage (e.g., agri-food production or car washes) where it might put at risk our ability to supply water for domestic purposes. When a site is designated as an NSIP or SDO, we will do our utmost to provide the water required for your project. However, this is subject to a director level review within Anglian Water and can take some time to approve. In some instances, even NSIPS and SDOs may ultimately be refused their requested non-domestic water request.

Anglian Water has adopted a [‘Non-Domestic Water Requests Policy’](#) which states that requests over 20m³/day will be declined. However, for Nationally Significant Infrastructure Projects that are requesting over 20m³/day of non-domestic water (as defined above) for a scheme, a Water Resource Assessment must be completed. This is so we can better understand water demands, water efficiency measures and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth.

Water Resource Assessment (WRA)

We advise that the WRA is used to inform the Preliminary Environmental Impact Report at the Statutory Consultation stage of the Development Consent Order (DCO) process and the Environmental Statement at submission. This will include engagement with environmental regulators. The WRA will also need to be submitted to Anglian Water’s pre-planning team also, so that the request for non-domestic water can be considered further. To guide this, we have set out below the information we expect to be included.

1. Contact and project details

Applicant name	
Applicant address	
Applicant contact name	

Applicant contact email	
Applicant contact phone number	

Agent name (if applicable)	
Agent address	
Agent contact name	
Agent contact email	
Agent contact phone number	

Retailer name (if applicable)	
Retailer address	
Retailer contact name	
Retailer contact email	
Retailer contact phone number	
Water SPID	
Sewerage SPID	
Trade Effluent DPID	

Site address/location details	
Site contact name	
Site contact role	
Site contact email	
Site contact phone number	

Site type / usage	
Hours of production	
Days of production	
Peak production period	
When will your connection be required	
Number of full-time employees on site	
Number of jobs supported by new/additional supply and discharge request	
Financial investment linked to request	
Project planning route and status - please provide details and timeframe	

2. Existing site supply and discharge (if applicable)

Non-domestic water demand	
Mains (potable) water consumption	
Annual water consumption (m ³ /year)	
Average daily water demand (m ³ /day)	
Peak daily water demand (m ³ /day)	
Peak hourly water demand (m ³ /hour)	
Borehole water consumption	
Annual water consumption (m ³ /year)	
Average daily water demand (m ³ /day)	
Peak daily water demand (m ³ /day)	
Borehole licence reference (please attach)	
Other water consumption (specify source)	
Annual water consumption (m ³ /year)	
Average daily water demand (m ³ /day)	
Peak daily water demand (m ³ /day)	
Anglian Water/site water connection location (Grid ref)	
Meter Serial Number and size	
Site water supply internal and external pipe diameters	
Site water supply pipe length to first point of use	
On-site water storage volume	
Effective water storage volume (m ³)	
Height above ground level of inlet to storage	
Storage inlet control device (ball-valve, motorised valve, etc)	
Percentage of process supplied by on-site water storage	

Trade effluent	
Total trade effluent volume (m ³ /year)	
Average daily trade effluent discharge (m ³ /day)	
Peak daily trade effluent discharge (m ³ /day)	
Trade effluent consent reference (if applicable)	
Trade effluent connection location (Grid ref)	
Trade effluent treatment plant description	
Trade effluent composition	

3. New (or additional needs) site supply and discharge requirements

This should include any temporary non-domestic water uses for construction.

Water demand

Quantity of water requested for domestic purposes (m ³ /day)	
Quantity of water requested for non-domestic (process) purposes (m ³ /day)	
Any water required for the purposes of firefighting	
Quality of water required i.e. potable or non-potable	
Average daily demand (m ³ /day)	
Peak daily demand (i.e. the highest volume we might have to supply in a day in m ³ /day)	
Diurnal and annual profile (m ³)	
Timescales to require the water, including any 'ramping up' to the full volumes e.g. construction needs and timescales	
Trade effluent	
Total trade effluent volume (including existing if appropriate) (m ³ /year)	
Average trade effluent volume (including existing if appropriate) (m ³ /day)	
Peak trade effluent volume (including existing if appropriate) (m ³ /day)	
Project planning route and status – please provide details and timeframe	

4. Water efficiency measures

As set out above, and in Anglian Water's Non-Domestic Water Requests Policy, there is a need to make best use of what water is available across the region, through implementation of water efficiency measures. We expect evidence of high levels of water efficiencies that you are considering implementing as part of your development and processes.

Potential ideas and solutions that we would want evidence on include:

- Maximisation of existing onsite resources (e.g. own borehole)
- Consideration of non-water based or close-loop cooling systems
- Capture and reuse of water from water-based cooling systems e.g. blowdown
- Sharing of resources with neighbouring facilities, considering all water-based resources such as steam, water/effluent reuse, rainwater harvesting
- Specification of highly rated white goods
- Sub-metering on site
- Evidence of water audit systems
- Infrastructure or systems that could manage the timing of water take e.g. onsite storage and control system, production flexibility
- Onsite measures to improve the water environment e.g. wetland

Please set out below what steps you have undertaken or will implement to ensure your processes (including during construction phases), and development are as water efficient as possible:

From: [Parish Clerk](#)
To: [Ossian Transmission Infrastructure](#)
Subject: Response to Statutory Consultation Letter
Date: 12 March 2025 14:32:12

You don't often get email from billingboroughparishclerk@gmail.com. [Learn why this is important](#)

Hello,

Just to confirm that this matter was discussed at a recent meeting of Billingborough Parish Council with Members agreeing that there were no comments to be submitted.

Kind regards

[Redacted Signature]

Clerk/RFO to Billingborough Parish Council

[Redacted Name]



B O S T O N

BOROUGH COUNCIL

Municipal Buildings, West Street, Boston, Lincolnshire, PE21 8QR

Application No: B/25/0087

Case Officer: [REDACTED] **Planning**

Consultant on behalf of the LPA

E-mail: planning@boston.gov.uk

Tel: 01205 314305

25th March 2025

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Sent via email to: ossiantransmission@planninginspectorate.gov.uk

Dear Sir / Madam,

Statutory Pre-Application and Scoping Consultation to Boston Borough Council under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 prior to the submission of an application by Ossian Offshore Windfarm Limited (the applicant) for an Order granting Development Consent for the Ossian Transmission Infrastructure (the proposed development).

Thank you for your recent consultation in relation to the above. Sam Dewar of Dewar Planning Associates has been instructed to act as Planning Consultant on behalf of the three Local Planning Authorities (LPA's) consulted (Boston Borough Council, South Holland District Council and East Lindsey District Council) under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 to carry out statutory scoping consultation on the proposed application.

An individual response will be provided on behalf of each LPA detailing how the development within their authority boundary impacts them.

Introduction

By way of an introduction, I am a chartered member of the RTPI and act as Director and founder of Dewar Planning. I have previously worked as planning officer through to head of planning at local planning authorities and have since formed my own private planning practice submitting applications to over 100 local planning authorities across the UK. These applications have ranged from large wind farms to residential schemes, and various small to major scale commercial



developments. We also continue to provide bespoke consultancy assistance for local planning authorities due to the positive relationships we have developed.

The applicant 'Ossian Offshore Wind Farm Limited (Ossian OWFL)' intends to apply to the Secretary of State for a Development Consent Order (DCO) under Section 37 of the Planning Act 2008 for the construction, operation, maintenance and decommissioning of the offshore and onshore works associated with the Ossian Offshore Wind Farm.

Boston Borough Council (the LPA) are a statutory consultee as part of duty to consult (section 42 of the Planning Act 2008). For an inclusive and robust response, an internal consultation process has also been undertaken seeking internal responses from certain officers, parish councils and Councillors. All consultees have the ability to respond direct to the Applicant as part of this process however we have presented any responses received to date. Responses received after the submission deadline will be collated and sent on to the Applicant directly where it is hoped that will still be taken into account ahead of any formal submission.

List of Consultees

Each LPA are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses were sought internally from department officers and Councillors and externally to Parish Councils and Town Councils. In some cases, consultations were received outside of these bodies and are included for completeness. All consultees have the ability to respond directly to the applicant as part of this process however we have presented any responses received. The list below is the list of consultations sought by the council. Later in this report if any other representations were received, they will also be included however will be shown as being external to demonstrate that these are not necessarily the views of the Council:

1. Environmental Protection
2. Planning Policy
3. Conservation Assistant (Trees)
4. Conservation Officer (Heritage)
5. Senior Ecologist
6. Councillor S Evans
7. Councillor S Welberry
8. Councillor S Woodliffe
9. Councillor R Austin
10. Councillor C Mountain
11. Councillor P Bedford
12. Councillor D Broughton
13. Councillor D Scoot
14. Councillor S Sharpe
15. Councillor H Staples
16. Councillor D Middleton
17. Councillor R Pryke
18. Councillor C Rylott
19. Councillor S Ghosh
20. Councillor A Izard

21. Councillor A Dani
22. Councillor P Marson
23. Councillor D Brown
24. Councillor J Cantwell
25. Councillor J Baxter
26. Councillor C Butler
27. Algarkirk Parish Council
28. Amber Hill Parish Council
29. Bennington Parish Council
30. Bicker Parish Council
31. Holland Fen with Brothertoft Parish Council
32. Butterwick Parish Council
33. Fishtoft Parish Council
34. Fosdyke Parish Council
35. Frampton Parish Council
36. Kirton Parish Council
37. Leverton Parish Council
38. Old Leake Parish Council
39. Sutterton Parish Council
40. Swineshead Parish Council
41. Wigtoft Parish Council
42. Wrangle Parish Council
43. Wyberton Parish

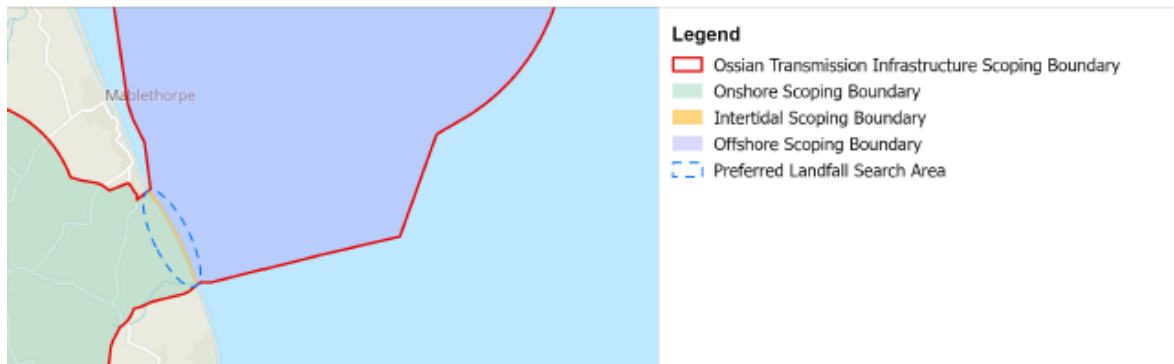
The Proposal

Within the Boston boundary it is expected that it will be largely the cable route under consideration. For context, our understanding of the proposed development which the LPAs are required to comment on includes the onshore elements only as listed below.

It is understood that the array of offshore wind turbines over 80kilometres off the coast of Scotland is being considered for consent by the Scottish Government with an application submitted in 2024 and this application will seek consent for the electrical transmission infrastructure required to bring the power generated to the National Grid for onward supply. The key considerations of the transmission infrastructure are as follows:

Landfall

The Applicant has stated a Landfall in the area between Sandilands and Anderby Creek avoids sensitive designations (including the dunes) at Theddlethorpe. The proposed landscape is consistent with the advice the Applicant has received by provided by Natural England and appears, from initial studies to be technically feasible and would allow opportunities for collaboration with other projects. Work is currently focusing on refining the landfall position within the 'search area' as shown below (blue dotted line in the extract of Figure 3.6.3).



Extract from Figure 3.6.3 showing preferred landfall search area

Onshore Converter Stations

Two Onshore Converter Station Search Areas have been identified, as shown on Figure 3.7.1 (black dotted lines). The locations of these areas have been informed by National Grids preferred siting zones for the new Lincolnshire Connection Substation (LCS) and Weston Marsh Substations that will provide the points of connection for Ossian.

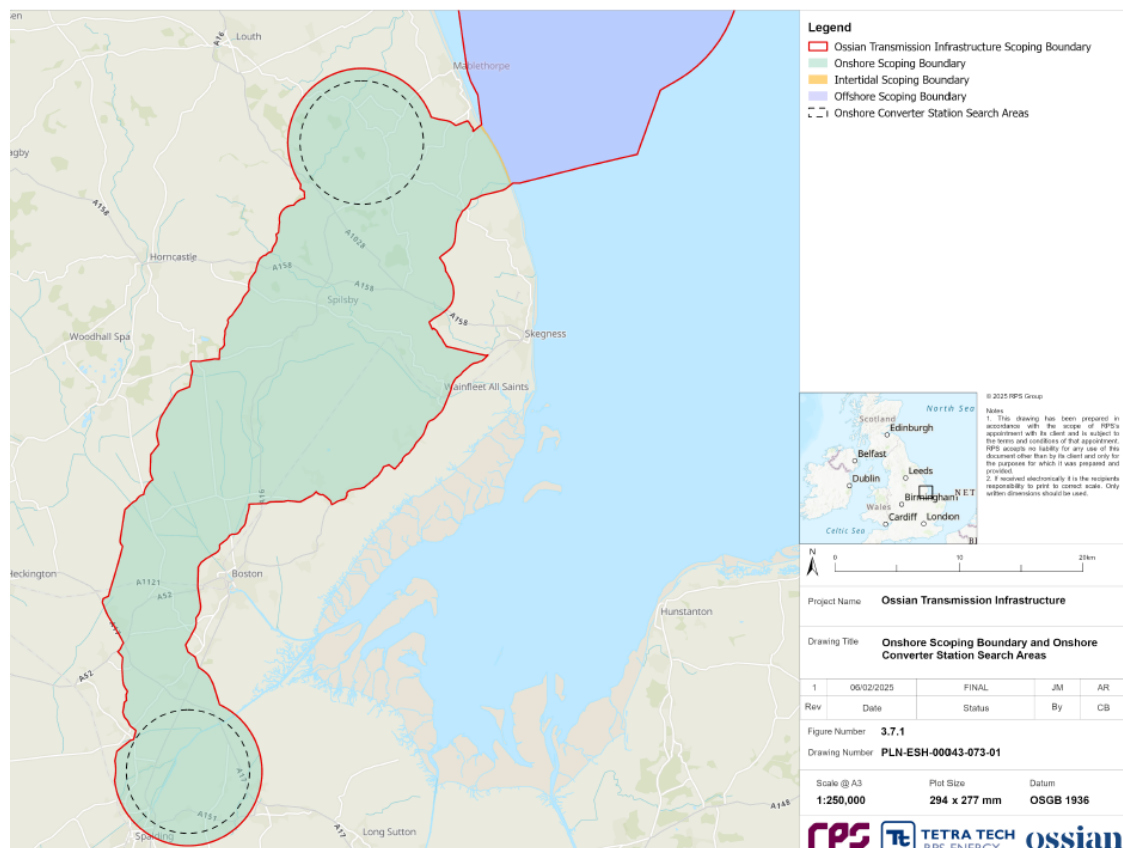


Figure 3.7.1 Extract showing search areas for converter stations

Up to three Onshore Converter Stations will be required as part of the Ossian Transmission Infrastructure (and will be located within the Onshore Converter Station Search Areas). One will be

located in proximity to the Lincolnshire Connection Substation (LCS) and up to two will be required in proximity to the Weston Marsh Substation.

In later studies and in defining the Onshore Scoping Boundary, the Applicant has focused on a search area around Lincolnshire Connection Substation A in East Lindsey District as the Applicant expects that to be the LCS location.

Table 4.7.1: Onshore Converter Station Parameters

Parameter	Project Design Envelope
Transmission type	HVDC to HVAC
LCS A Onshore Converter Station	
Number of Onshore Converter Stations	1
Maximum distance from National Grid Lincolnshire Connection Substation (km)	5
Indicative permanent footprint (including landscape planting, drainage) (hectares)	7.5
Maximum building height (m)	26
Maximum height of lightning protection (m)	33
Temporary construction working area (in addition to permanent footprint) (hectares)	2.5
Weston Marsh Onshore Converter Stations	
Number of Onshore Converter Stations	2
Maximum distance from National Grid Weston Marsh Substation (km)	5
Indicative permanent footprint (including landscape planting, drainage) (hectares)	15 (2 x 7.5)
Maximum building height (m)	26
Maximum height of lightning protection (m)	33
Temporary construction working area (in addition to permanent footprint) (hectares)	5 (2 x 2.5)

Extract from Table 4.7.1 showing sizes of stations

The Onshore Converter Station Search Areas identified on **Figure 3.7.1** comprise a 5 km radius around these two locations (LCS A and Weston Marsh). This radius is primarily driven by the likely feasibility with regard to length of connection between the Onshore Converter Stations proposed as part of the Ossian Transmission Infrastructure and the point of connection (the proposed National Grid substation). There are technical, efficiency and environmental benefits to siting the Onshore Converter Stations in proximity to the proposed NGET substations, such as:

- reduced cable length between the Onshore Converter Station and the point of connection, resulting in reduced disruption to communities and the environment; and
- improved technical efficiency.

Onshore Export Cable Corridor

The starting point for consideration of potential Onshore Export Cable Corridors was identified by the need for a connection between:

- the Landfall and the Onshore Converter Stations; and

- the Onshore Converter Stations and the point of connection at the proposed NGET substations.

The Applicant has stated in the Scoping Report submissions that work has been undertaken to identify environmentally sensitive areas and other projects in the area, including the existing routes of the Viking Link Interconnector and the Triton Knoll Electrical System and the proposed routes for the Grimsby to Walpole, Outer Dowsing and Eastern Green Link 3 and 4 projects.

The established approach to routing linear transmission infrastructure, known as the Horlock Rules, is to choose the most direct route but to avoid, if practicable, areas of high amenity and environmental value. These principles have determined the Onshore Scoping Boundary within which siting work will continue for potential cable routes.

Work is currently being undertaken to identify potential Onshore Export Cable Corridors, which will avoid potential impacts that could lead to significant environmental effects where practicable, together with consideration of local communities and engineering feasibility. This includes taking into account the potential harm to the Lincolnshire Wolds National Landscape

Planning Policy

Whilst the applicant will seek permission for the proposals directly from the SOC for a DCO under section 37 of the Planning Act 2008, there are still a number of local and national planning policies which are considered relevant and should be taken account of as part of the development process. These plans and local knowledge have been formed over several years and have come from a significant evidence base.

The South East Lincolnshire Local Plan 2011-2036 (SELLP) was jointly adopted by Boston Borough and South Holland District Council on the 8 March 2019. The relevant policies within the South East Lincolnshire Local Plan 2011-2036 are:

- Policy 2 'Development Management' – requires proposals to demonstrate sustainable development considerations have been met through a number of criteria.
- Policy 3 'Design of New Development' – requires development to create distinctive places through the use of high quality and inclusive design, demonstrating compliance with a number of considerations.
- Policy 4 'Approach to Flood Risk' – developments must satisfy the sequential test and be supported by a site-specific flood risk assessment covering risk from all sources of flooding including the impacts of climate change. It must be demonstrated that surface water from the development can be managed and will not increase the risk of flooding to third parties.
- Policy 28 'The Natural Environment' – Requires the protection, enhancement and management of natural assets, by ensuring all development proposals provide an overall net gain in biodiversity.
- Policy 29 'The Historic Environment' - Distinctive elements of the South East Lincolnshire historic environment will be conserved and, where appropriate, enhanced.

- Policy 30 'Pollution' Development proposals will not be permitted where, taking account of any proposed mitigation measures they would lead to unacceptable adverse impacts upon:
 - health and safety of the public;
 - the amenities of the area; or
 - the natural, historic and built environment;
 - by way of:
 - air quality, including fumes and odour;
 - noise including vibration;
 - light levels;
 - land quality and condition; or
 - surface and groundwater quality.
 - Planning applications, except for development within the curtilage of a dwellinghouse as specified within Schedule 2, Part 1 of The Town and Country Planning (General Permitted Development) (England) Order 2015, or successor statutory instrument, must include an assessment of:
 - impact on the proposed development from poor air quality from identified sources;
 - impact on air quality from the proposed development; and
 - impact on amenity from existing uses.

- Policy 31 'Climate Change and Renewable and Low Carbon Energy' - All development proposals will be required to demonstrate that the consequences of current climate change has been addressed, minimised and mitigated.

- Policy 32 'Community, Health and Wellbeing' - Development shall contribute to the creation of socially-cohesive and inclusive communities; reducing health inequalities; and improving the community's health and well-being.

- Policy 33 'Delivering a More Sustainable Transport Network' – reinforces the national approach to promoting sustainable alternatives to the car through new development, making the best use of, and seek improvements to, existing transport infrastructure and services. Solutions that are based on better promotion and management of the existing network and the provision of sustainable forms of travel are supported. To achieve this, a Transport Assessment and associated Travel Plan will be submitted with proposals.

The NPPF was originally implemented in 2012, with the most recent revision being December 2024. The NPPF sets out the UK Government's planning policies for England and how these are expected to be applied.

The NPPF does not contain specific policies for NSIPs (for which particular considerations apply, determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant NPSs) but may be considered as a relevant consideration as below:

- Paragraph 124 - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land (49). Footnote 49 of the

NPPF states: Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity.

- Paragraph 125 - Planning policies and decisions should:
 - a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
 - b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
 - c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
 - d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)⁴⁸; and
 - e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.
- Paragraph 161 - The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- Paragraph 170 - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- Paragraph 187 - Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Representations Received

The LPA does not have in house specialists or advisers for all topic areas relevant to this response, therefore the below list of representations sets out the comments and advice received from internal consultees as well as external consultants employed by the Council. Where no comments have been received and no external consultant employed, this response will seek to comment generally on the topic areas where appropriate, however it is acknowledged that comments may be sent directly by the County Council and these will be endorsed by the Council.

As the Council do not have a Landscape Officer, an external company was sought to respond on behalf of the Council. Terra Loci are Landscape Architects and specialise in Landscape Planning.

The comments received from consultees are summarised as follows, and as stated they are divided into internal and external. If any external responses are received that officers believe are relevant to certain chapters of the scoping report, then these will be elaborated upon within the review section of the response:

Landscape (summarised and expanded upon later in this response)

- Landfall, cable routes and locations of onshore transmission equipment and converter substations are currently not fixed. The LVIA must be undertaken based on final, fixed locations and routes for these elements, defining which sections of the cable route will be laid using open trench methods.
- Paragraph 7.11.2.1 outlines the proposed study area for the Landscape and Visual assessment. A 1km radius study area is proposed around all construction activities, this is

likely to be sufficient for low and ground level construction activities requiring small plant. A wider study radius will be required for the assessment of construction activities relating to the three Onshore Converter Stations.

- The study area for impact arising from construction activities relating to the three Onshore Converter Stations should be 5km from the land to be occupied by the proposed buildings to match the proposed study area for permanent impacts.
- Supporting Zone of Theoretical Visibility analysis based on the Maximum Design Scenario should also be provided to ensure that the proposed study area is sufficient.
- Broad receptor groups as outlined in paragraph 7.11.3.3 appear to be appropriate
- No reference to Residential Visual Amenity Assessment (RVAA) is made within the scoping report, where significant effects on residential receptors are likely to arise RVAA should be undertaken.
- Table 7.11.1 outlines the Potential Impacts Proposed to be Scoped in for Landscape and Visual Resources. Rows one and two set out the proposed scope of temporary construction impacts. For the avoidance of any doubt potential impacts arising from the construction of the Onshore Converter Stations should be included within these parts of the assessment.
- Table 7.11.2 outlines Impacts Proposed to be Scoped Out of the Assessment for Landscape and Visual Resources, based on the justification included within this table, the impacts scoped out of the assessment appear appropriate.
- The full LVIA methodology, including factors and / or matrices used for determining sensitivity of landscape and visual receptors and magnitude and significance of effects should be submitted and approved prior to the assessment being undertaken.
- All visual representation with should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019).
- The EIA process should detail the measures to be taken to ensure the building design of the Onshore Converter Stations will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.
- Cumulative impact assessment should include other proposals currently at Scoping stage and onwards.

Environmental Protection

- No comments received during the consultation period.

Forward Planning Officer

- Part 1 of 5 - The cable route will cause disturbance during construction but, as we have experienced with other schemes, once completed has little impact. They do need to evidence their choice of route and address the impacts it has. The lasting impact of the proposal are the Substations (Lincolnshire Connection Node and Western Marsh), but these are NGET projects as part of the Grimsby to Walpole project. The bit that Ossian are dealing with is relatively benign. The elements of concern will be considered during the National Grid proposals.
- Part 2 of 5 - This focuses on offshore and is outside our jurisdiction. No comments
- Part 3 of 5 - This focuses on onshore. The chapter headings cover the usual subjects found in NSIP projects. The technical specialists are more capable of critiquing their subject areas.
- Part 4 of 5 - This completes what was considered in part 3 and the technical specialists can critique their subject areas.
- Part 5 of 5 - This relates to trans boundary impacts and considers impacts on other countries. The report screens out all impact except for marine mammals, off shore ornithology, commercial fisheries, shipping and navigation. These are matters outside the councils' jurisdiction. The onshore Transboundary Impacts consider the usual subject areas covered by SA for NSIPs and screens out impacts except for Onshore and intertidal ornithology. This seems reasonable and is consistent with the offshore ornithology conclusion. Under the combined impacts it screens in climate change. Owing to national commitments to tackle climate change the impact does need to be quantified. Therefore, ruling it in is appropriate.

Conservation Assistant (Trees)

- No comments received during the consultation period.

Heritage Lincolnshire

- As stated within paragraph 7.6.3.7, part 3 of the Scoping report; "There are a considerable number of listed buildings within the Onshore Scoping Boundary and Intertidal Scoping Boundary. Many of these are clustered within historic settlements which are often designated as Conservation Areas: Alford; Raithby; Hundleby; Spilsby; Old Bolingbroke; Wainfleet; Revesby; Kirton Holme; Swineshead; Wigtoft, Pinchbeck and Moulton. Grade I and Grade II* listed buildings within the Onshore Scoping Boundary and Intertidal Scoping Boundary include numerous churches along with external fonts and church crosses, also country houses, chapels, schools and windmills."
- For any above-ground developments proposed within the setting of listed buildings, conservation areas, scheduled monuments, or non-designated heritage assets, a

comprehensive and impartial heritage impact assessment must accompany any future application. This assessment should identify built heritage assets, designed landscapes, and/or archaeological features along the proposed development's course. Once identified, the significance of these assets must be described and evaluated, followed by an assessment of the proposal's impact on significance, in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990, the respective Local Plan, and the National Planning Policy Framework.

- The visual impact on the setting of designated heritage assets will be a primary concern. Therefore, a Visual Impact Assessment will likely be required to accompany the Heritage Impact Assessment to provide a clear understanding of the development's impact on the setting of these assets.

Senior Ecologist

- I support the proposed methods and approach used to assess the onshore ecology and nature conservation impacts as described in the scoping report documents available from the Planning Inspectorate's National Infrastructure Project page (<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0210006/documents>), and I believe the research proposals to be suitably rigorous and appropriate.
- I further support the recommendations raised by representatives from Natural England, the Environment Agency, and others during the first ETG meeting (20 March 2025), including the development of specific methods to assess potential impacts to raptor populations (Barn Owl, Marsh Harrier, Redkite, and Hobby), and night-roosting Lapwing and Curlew.
- As mentioned during the ETG, I also believe that it would be useful for the EIA to specifically report on the habitat composition and agricultural land grade of land falling within the potential transmission line boundaries (e.g., reported separately by local district). This baseline information can provide a broader context for interpreting all further species reporting, as well as provide a useful gauge to compare to the specific habitats impacted when the transmission line location is finalized.

Councillor Responses

As part of the consultation process Councillors have the right to respond directly. At the time of this response no replies from Councillors have been received however they will be sent directly to the Applicant when they come forward.

Parish Council Responses

- *Sutterton Parish Council- Comments* - The application was discussed at our PC meeting on the 5th March. Whilst we recognise this is an EIA, Sutterton Parish Council would like to make the following comments regardless. We would like to

suggest the formation of a Community Liaison Group to keep our residents informed and with respect to the underground cables we would like to seek assurances that the land taken out will be replaced as it was so as not to affect the growing potential of the land from the cable.

- *Old Leake Parish Council- Comments as follows:*

- *This is harmful to marine life and birds*
- *Cabling AGAIN? why are routes not shared with Tritton Knoll & Viking Link*
- *Considered to be absurd routing if this layout is agreed*
- *It is essential that people/planning/contractors get the depth correct and use Viking Link established good quality workmanship as the bench mark for standards.*

As part of the consultation process Parish Councils have the right to respond directly. At the time of this response no other replies from Parishes have been received however they will be sent directly to the Applicant when they come forward.

Review of the EIA Scoping Report

At this stage the following comments are offered in connection with the topic areas as listed. As stated in the aforementioned section, where no opinion has been received from in-house advisors at the Council nor has there been an external consultant employed to provide comment then general observations have been put forward. Some chapters proposed in the scoping report are best covered by the County Council or other statutory stakeholders and so in this case as officers at the LPA we have remained silent.

Geology, Hydrogeology and Ground Conditions

Boston Council do not have an in-house geologist and the Coal Authority may have chosen to comment directly on the content of EIA Scoping Report, however having reviewed the information put forward, the approach taken appears reasonable in the methodology and we have the following specific comments to offer:

In relation to this topic the following has been raised:

- Soil management practices may need further evidence and investigation with relation to marine silts
- Methodologies to prevent silt slurries should be presented as these pose a dangerous environmental risk.

Hydrology and Flood Risk

Lincolnshire County Council act as Lead Local Flood Authority and may comment directly on the proposed development, as may the Drainage Board and the Environment Agency. Having reviewed the information put forward within the EIA Scoping Report, the approach taken appears reasonable in the methodology however we would want to ensure that in the laying of cables the integrity of the drains is maintained.

Onshore Ecology and Nature Conservation

Boston Council do not have an in-house ecologist and other consultees such as the Wildlife Trust, and Lincolnshire County Council may have chosen to comment directly on the content of the consultation, however having reviewed the information put forward within the EIA Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer other than the following:

- The Council would like to reiterate the importance of achieving a biodiversity net gain for this proposed nationally significant development, in line with The Environment Act 2021.
- Additionally ornithological sites within the region alongside RSPB locations need careful assessment, with it remaining unknown how they will be impacted by the proposed development.
- Lastly, temporary construction works can have a significant effect and we would therefore welcome a full scheme of remediation and reinstatement after these works have been undertaken

Onshore and Intertidal Ornithology

This section considers the potential impacts arising from the construction, operation and maintenance and decommissioning of the Landfall and Onshore Transmission Infrastructure and identifies the proposed scope of, and methodology for, the EIA process for onshore and intertidal ornithology.

The Natural England, the Wildlife Trust, Lincolnshire County Council and others may have chosen to comment directly on the content of the consultation, however having reviewed the information put forward within the EIA Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer

To reiterate the comments relevant from the Councils Senior Ecologist are as follows:

- The development of specific methods to assess potential impacts to raptor populations (Barn Owl, Marsh Harrier, Redkite, and Hobby), and night-roosting Lapwing and Curlew.

- It would be useful for the EIA to specifically report on the habitat composition and agricultural land grade of land falling within the potential transmission line boundaries (e.g., reported separately by local district). This baseline information can provide a broader context for interpreting all further species reporting, as well as provide a useful gauge to compare to the specific habitats impacted when the transmission line location is finalized.

Historic Environment

Having reviewed the information put forward within the EIA Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer other than:

- The Council would expect a landscape visual assessment for any above ground features and for each to be looked at separately;
- We would expect a scheme of trail trenching to be included as part of the main planning submission.

Please also note the comments received from Heritage Lincolnshire who act as a consultee to the LPA for such matters.

Land Use Recreation

Having reviewed the information put forward, the approach taken appears reasonable in the methodology however we have the following comments to make:

- All the relevant issues appear to have been scoped in, albeit some of them at a very strategic level; and
- We are concerned that additional water scarcity for agricultural holdings resulting in loss of productivity could undermine viability of agricultural businesses – particularly considering the effects of climate change.

Traffic and Transport

Lincolnshire County Council act as highways authority for the LPA and may comment directly on the proposed development. Having reviewed the information put forward, the approach taken appears reasonable in the methodology and we have no specific comments to offer other than the following points:

- The suitability of the rural roads, many of which are in poor condition (e.g. subsidence), to cope with the loading by heavy construction vehicles. What mechanism is in place for any urgent reinstatement. Is a survey of the roads (and any strengthening needed) to be carried out at the commencement of works?
- What restrictions will be placed on working hours/days?
- What is the procedure in place to deal with complaints from residents regarding access, noise, dust etc.?
- Construction compounds and field accesses in the countryside can have a significant effect and we would therefore welcome a full scheme of remediation and reinstatement after the cable/works have been undertaken.

Noise and Vibration

Having reviewed the information put forward within the EIA Scoping Report, the approach taken appears reasonable in the methodology and we have the below comments to offer:

- The Council should be provided with contact details in the event of complaints to assist in the management of complaints and concerns.
- The Council and all relevant noise sensitive receptors in the immediate area to any proposed works are to be informed ahead of these works should they occur outside of normal working hours.
- The Council and all relevant vibration sensitive receptors in the immediate area to any proposed works are to be informed ahead of these works. Additionally appropriate monitoring equipment is to be used in the vicinity of works in order to assess the level of vibration propagating from the works site.

Air Quality

Having reviewed the information put forward, the approach taken appears reasonable in the methodology and we have the below comments to offer.

The Council would expect the following to be complied with during the project installation phase:

- Burning of waste should be avoided. Any burning of waste deemed strictly necessary should be undertaken in accordance with the relevant waste management exemption issued the Environment Agency, and consideration should be given to the timing of such burning, and the prevailing weather conditions to impact emissions to air and nuisance to offsite receptor's; and
- Soil stockpiles should be sealed to reduce fugitive dust emissions.

Landscape and Visual Resources

At this stage we do not have details of the final locations, appearances or extents, of onshore elements however the information as provided for the EIA Scoping Report has been reviewed by external consultants Terra Loci, with the following comments on behalf of the Local Planning Authority which are summarised as follows:

Landfall, cable routes and locations of onshore transmission equipment and converter substations are currently not fixed. The LVIA must be undertaken based on final, fixed locations and routes for these elements, defining which sections of the cable route will be laid using open trench methods. Alternatively, should the final cable route and equipment locations not be available at the time of assessment, appropriate assessment scenarios should be agreed for assessment to take place on all reasonably foreseeable options.

Paragraph 7.11.2.1 outlines the proposed study area for the Landscape and Visual assessment. A 1km radius study area is proposed around all construction activities, this is likely to be sufficient for low and ground level construction activities requiring small plant. A wider study radius will be

required for the assessment of construction activities relating to the three Onshore Converter Stations. The study area for impact arising from construction activities relating to the three Onshore Converter Stations should be 5km from the land to be occupied by the proposed buildings to match the proposed study area for permanent impacts.

Supporting Zone of Theoretical Visibility analysis based on the Maximum Design Scenario should also be provided to ensure that the proposed study area is sufficient.

Broad receptor groups as outlined in paragraph 7.11.3.3 appear to be appropriate. Specific landscape and visual receptors and representative viewpoints must be submitted and approved prior to the assessment being undertaken. Reference is made to “Occupiers of residential properties, where there is the potential for receptors to experience significant adverse effects” However, no approach is proposed to show how residential receptors which may experience significant adverse effects would be selected for inclusion within the assessment. An approach for the scoping in and out potential residential receptors should be proposed.

No reference to Residential Visual Amenity Assessment (RVAA) is made within the scoping report, where significant effects on residential receptors are likely to arise RVAA should be undertaken.

Table 7.11.1 outlines the Potential Impacts Proposed to be Scoped in for Landscape and Visual Resources. Rows one and two set out the proposed scope of temporary construction impacts. For the avoidance of any doubt potential impacts arising from the construction of the Onshore Converter Stations should be included within these parts of the assessment.

Table 7.11.2 outlines Impacts Proposed to be Scoped Out of the Assessment for Landscape and Visual Resources, based on the justification included within this table, the impacts scoped out of the assessment appear appropriate.

The full LVIA methodology, including factors and / or matrices used for determining sensitivity of landscape and visual receptors and magnitude and significance of effects should be submitted and approved prior to the assessment being undertaken.

All visual representation with should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made. Locations for proposed ‘photomontage’ visualisations, including visualisation types, following TGN 06/19 should be submitted and approved prior to being undertaken.

The EIA process should detail the measures to be taken to ensure the building design of the Onshore Converter Stations will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

Cumulative impact assessment should include other proposals currently at Scoping stage and onwards. Due to the overlapping timescale of their progress through the planning system,

cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

Health and Wellbeing

Section 7.12 of the EIA Scoping Report identifies the proposed scope of the assessment for health and wellbeing relevant to the Ossian Transmission Infrastructure. The health and wellbeing assessment uses the residual effect conclusions of other relevant EIA topic assessments as an input and explains their public health implications. The terms health and wellbeing are used interchangeably, and parity is given to considering both physical and mental health outcomes.

Having reviewed the information put forward, the approach taken appears reasonable in the methodology and we have no comments to offer.

Concluding Remarks

Whilst we appreciate many stakeholders will comment directly to the Applicant on the project, we wanted to provide a response based on the submitted Scoping Report with assessment of the proposed onshore cable route and associated switching and convertor stations and substations.

We note your community engagement to date however we would welcome future discussions over any proposed community benefits as well as any proposed employment and skills schemes that could be provided to the local workforce as well as any other potential grid infrastructure improvements that may be facilitated by the development.

This advice is based upon the information available at this time. Please note that the advice is given without prejudice to any future comments made by the Local Planning Authority upon the receipt of further information, whether during or before the submission of a full EIA planning application.

We kindly ask that the comments received from stakeholders listed are taken into consideration as you can see there is in part strong feelings about the proposal.

If you have any queries, please do not hesitate to contact me on the details provided and I would appreciate it if all future correspondence could be made directly to myself as I have been instructed by the Local planning Authority to act on their behalf until the end of the application process. This will avoid any delays in our response as we have struggled to allow internal consultees sufficient time to get back to us.

Yours sincerely,


Consultant Planning Officer
@dpaplanning.co.uk


Secretary of State
The Planning Inspectorate
Environmental Services
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your Ref EN0210006

Our Ref IPP-262

Wednesday 12 March 2025

BY EMAIL ONLY: ossiantransmission@planninginspectorate.gov.uk

EN0210006 - Ossian Transmission Infrastructure ("the Project") - EIA Scoping Report Notification and Consultation

Thank you for your consultation on the Environmental Impact Assessment Scoping for the above project.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.

Having reviewed the location of the Onshore Cable Corridor Search Area (October 2024), we wish to make the following comments:

The Trust is Navigation Authority for the River Witham and is the freehold owner of the riverbed between Lincoln and the Grand Sluice, Boston. The River Witham falls within the Onshore Cable Corridor Search Area.

Cable Route Corridor

The Onshore Cable Corridor Search Area includes a stretch of the River Witham southeast of Chapel Hill and the Grand Sluice, Boston which is a stretch of approximately 13km in length. We note that assessment work is ongoing, and the final route of the corridor has not yet been narrowed or finalised.

We strongly recommend that the Trust is included in discussions over the location of the cable crossing so we can advise on any potential issues likely to affect navigational safety or our interests as an affected landowner. The Scoping Report indicates that the cable crossing of the river will be underground, and we consider that this will assist in minimising visual impacts on the river and potential impacts on use of the Navigation.

Any crossing of the river is likely to require the prior consent of the Trust. Please be advised that the Trust is a statutory undertaker and has specific duties to protect its waterways. We would therefore resist any proposed use of compulsory purchase powers which may affect our land or undertakings. We reserve the right to seek protections under s127 of the Planning Act 2008 should any proposals affect land which has been acquired for the purposes of our undertaking. Accordingly, we advise that the acquisition of any Trust land or rights over Trust land should be secured by agreement and we strongly recommend early contact with the Trust's Utilities Team to commence discussions over the terms of such an agreement ahead of submission of the Development Consent

Canal & River Trust Planning Team

Canal & River Trust, National Waterways Museum, Ellesmere Port South Pier Road Ellesmere Port Cheshire CH65 4FW
T: 0151 355 5017 E: nationalwaterwaysmuseum@canalrivertrust.org.uk W: canalrivertrust.org.uk

Order (DCO) application. Please contact [REDACTED], Senior Utilities Surveyor, at [REDACTED] [\[REDACTED\]@canalrivertrust.org.uk](mailto:[REDACTED]@canalrivertrust.org.uk) or on [REDACTED] for further advice.

As the proposal will involve survey and works affecting the Trust's waterways, in our capacity as landowner, we will also require the applicant/developer to comply with the Trust's current Code of Practice for Works Affecting the Canal & River Trust and recommend early discussion with the Trust's Infrastructure Services Team over all works likely to affect Trust property. Please contact [REDACTED], Works Engineer, via Enquiries.TPWNorth@canalrivertrust.org.uk or on [REDACTED] for further advice.

Noise, Vibration and Navigational Safety

Works to install a cable crossing beneath the River Witham have significant potential to generate noise and vibration impacts and these effects on the river and users of the river should be assessed and considered within the Environmental Statement. In particular, works in proximity to the river need to be carefully managed to minimise the risk of significant vibration or loading that could adversely affect the stability of the riverbank or riverbed. In carrying out ground investigations it should be noted that while the Witham is a river, it has been significantly engineered in pre-industrial times, so ground conditions may be highly variable in the vicinity of the river. Detailed survey work will therefore be necessary to inform methodologies around the design of the cable crossing of the River Witham.

In recent made DCOs for similar cables beneath the River Trent (Cottam Solar Project, Gate Burton Energy Park and West Burton Solar Project) we have secured the following principle in the certified design principles document: that *Horizontal Directional Drill depth will be a maximum of 25m below the bottom of the riverbed and a minimum of 5m below the lowest surveyed point of the riverbed in order to prevent risk of any scour exposing cable.* We would be seeking similar parameters within this project to protect the River Witham riverbed.

Ecology and Biodiversity

The Environmental Statement should consider the potential for sediment mobilisation from the riverbed through the use of directional drilling methods (HDD) to install cable connections beneath waterways such as the River Witham. There will be a small risk of vibrations leading to sediment mobilisation, or the emission of pollutants, so this impact should be **scoped in**, with consideration given to the provision of field studies into invertebrates and fish species found in the water to assess the sensitivity of these species to potential sediment movement.

The proposed area falls within a priority species target area for Lapwing, which require farmland and managed wet grassland habitats with wide open landscapes during the breeding season. All vegetation works should be outside of bird nesting season including preparations for HDD launch and exit pits.

Water vole surveys on all banks should be included in the assessments, because the River Witham is not far from Norfolk where they have recently eradicated mink and water vole numbers are recovering. Surveys over multiple seasons will be needed as numbers are hoped to grow exponentially by 2030.

Invasive species known to be present on the River Witham:

- Azolla Water Fern is present around Antons Gowt, and Floating Pennywort has been present in the past too. Both species cause issues with navigation. Strict biosecurity controls to ensure boots and equipment do not spread these to other watercourses should be always observed.
- To prevent the spread of Crayfish plague disinfection is required. The disinfectant must be one that is suitable for use near waterbodies.

Temporary construction lighting along the cable corridor route in the vicinity of the River Witham will have the potential to disturb wildlife. As a result, we believe the impact should be **scoped in** to assessments, with consideration given to the provision of mitigation measures to minimise impacts on ecology and biodiversity, as well as landscape and visual impact.

Canal & River Trust Planning Team

Canal & River Trust, National Waterways Museum, Ellesmere Port South Pier Road Ellesmere Port Cheshire CH65 4FW
T: 0151 355 5017 E: nationalwaterwaysmuseum@canalrivertrust.org.uk W: canalrivertrust.org.uk

Landscape and Visual Impact

The Environmental Statement should consider the potential visual impact of construction operations along the cable route corridor, which extends to, and includes part of, the River Witham. In particular, the siting of construction compounds should be considered within the landscape and visual impact assessment, and river users should be considered as potential receptors. It is important that visual impacts are assessed within the context of the river being a navigable waterway and that visual impacts on the river do not result in any harm to navigational safety.

Heritage

The Environmental Statement should consider the proposals' potential impact on heritage assets, such as Anton's Gowt Lock. This is a Grade II listed structure, and proposals (including surveying) should ensure they do not adversely harm the lock or its setting.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

[Redacted Signature]

Area Planner – Midlands

[Redacted Email] [@canalrivertrust.org.uk](mailto:[Redacted Email]@canalrivertrust.org.uk)

[Redacted Phone]

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

Canal & River Trust Planning Team

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T: 0151 355 5017 **E:** nationalwaterwaysmuseum@canalrivertrust.org.uk **W:** canalrivertrust.org.uk

From: [Enquiries](#)
To: [Ossian Transmission Infrastructure](#)
Subject: RE: EN0210006 - Ossian Transmission Infrastructure project - Notification of Environmental Impact Assessment scoping report consultation
Date: 11 March 2025 09:18:59
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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Good morning, Nadia,

Please find comments from our councillors, below:-

'Although the Council understands the drive for more renewable electricity it opposes and objects to the further industrialisation of the District. The numerous planning applications for a variety of installations connected to renewable power are changing the face of the fenland countryside for the worse and all with no discernible community benefit of a substantial nature.'

Thank you and kind regards



Deputy Clerk for Crowland Parish Council



Please consider the environment and whether you need to print this e-mail

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www.e-lindsey.gov.uk

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Sent via email to:
ossiantransmission@planninginspectorate.gov.uk

Our Reference: S/086/00283/25

Contact: [REDACTED]

Ext: [REDACTED]

Email: Dev.Control@e-lindsey.gov.uk

Date: 26 March 2025

Dear Sir / Madam,

APPLICANT:	Ossian Offshore Wind Farm Limited (Ossian OWFL)
PROPOSAL:	Statutory Pre-Application and Scoping Consultation to East Lindsey District Council under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 prior to the submission of an application by Ossian Offshore Windfarm Limited (the applicant) for an Order granting Development Consent for the Ossian Transmission Infrastructure (the proposed development)
LOCATION:	Ossian Offshore Wind Farm

Thank you for your recent consultation in relation to the above. Sam Dewar of Dewar Planning Associates has been instructed to act as Planning Consultant on behalf of the three Local Planning Authorities (LPA's) consulted (Boston Borough Council, South Holland District Council and East Lindsey District Council) under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 to carry out statutory scoping consultation on the proposed application.

An individual response will be provided on behalf of each LPA detailing how the development within their authority boundary impacts them.

Introduction

By way of an introduction, I have previously worked as planning officer through to manager for 14 local planning authorities and have submitted applications, while working in the private sector, in over 100 local planning authorities across the UK. These applications have ranged from large wind farms to large scale residential applications and various small to major scale commercial developments. I have also represented a number of planning authorities acting as planning consultant officer for large scale applications subject to a Planning Performance

Agreement (PPA) and I am bound by the RTPI code of professional conduct (as amended in February 2023).

The applicant 'Ossian Offshore Wind Farm Limited (Ossian OWFL)' intends to apply to the Secretary of State for a Development Consent Order (DCO) under Section 37 of the Planning Act 2008 for the construction, operation, maintenance and decommissioning of the offshore and onshore works associated with the Ossian Offshore Wind Farm.

Each Local Planning Authority are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses have been sought internally from department officers, parish councils and Councillors. All consultees have the ability to respond direct to the applicant as part of this process however we have presented any responses received.

List of Consultees

Each LPA are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses were sought internally from department officers and Councillors and externally to Parish Councils and Town Councils. In some cases, consultations were received outside of these bodies and are included for completeness. All consultees have the ability to respond directly to the applicant as part of this process however we have presented any responses received. The list below is the list of consultations sought by the council. Later in this report if any other representations were received, they will also be included however will be shown as being external to demonstrate that these are not necessarily the views of the Council:

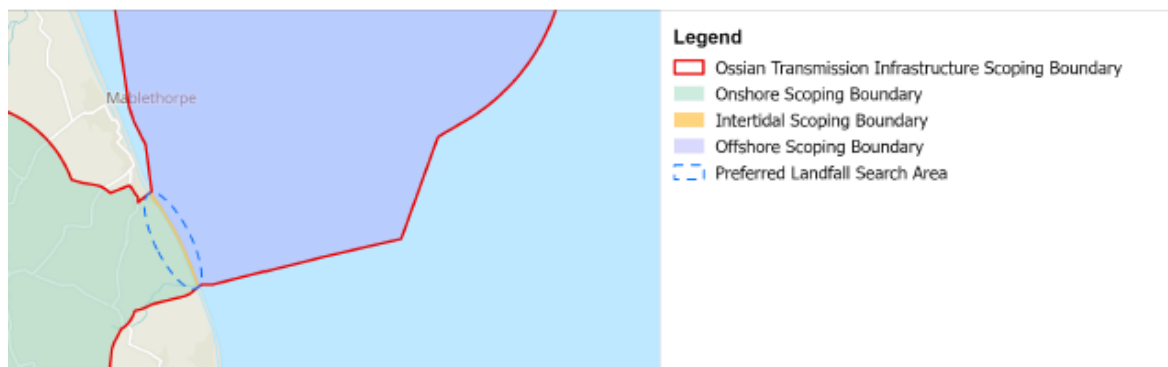
- Environmental Health
- Tree Officer
- Planning Policy
- Heritage Lincolnshire
- Ecology Officer
- Every Parish Council in East Lindsey
- Every Councillor in East Lindsey

The Proposal

Est Lindsey District Council is where the proposed landfall from the offshore array will occur. There will also be a planned converter station as well as a cable route which is yet to be finalised. For context our understanding of the proposed development which the LPAs are required to comment on includes the onshore elements only as listed below. It is understood that the array of offshore wind turbines over 80kilometres off the coast of Scotland is being considered for consent by the Scottish Government with an application submitted in 2024 and this application will seek consent for the electrical transmission infrastructure required to bring the power generated to the National Grid for onward supply. The key considerations of the transmission infrastructure are as follows:

Landfall

The Applicant has stated a Landfall in the area between Sandilands and Anderby Creek avoids sensitive designations (including the dunes) at Theddlethorpe. The proposed landscape is consistent with the advice the Applicant has received by provided by Natural England and appears, from initial studies to be technically feasible and would allow opportunities for collaboration with other projects. Work is currently focusing on refining the landfall position within the 'search area' as shown below (blue dotted line in the extract of Figure 3.6.3).



Extract from Figure 3.6.3 showing preferred landfall search area

Onshore Converter Stations

Two Onshore Converter Station Search Areas have been identified, as shown on Figure 3.7.1 (black dotted lines). The locations of these areas have been informed by National Grids preferred siting zones for the new Lincolnshire Connection Substation (LCS) and Weston Marsh Substations that will provide the points of connection for Ossian.

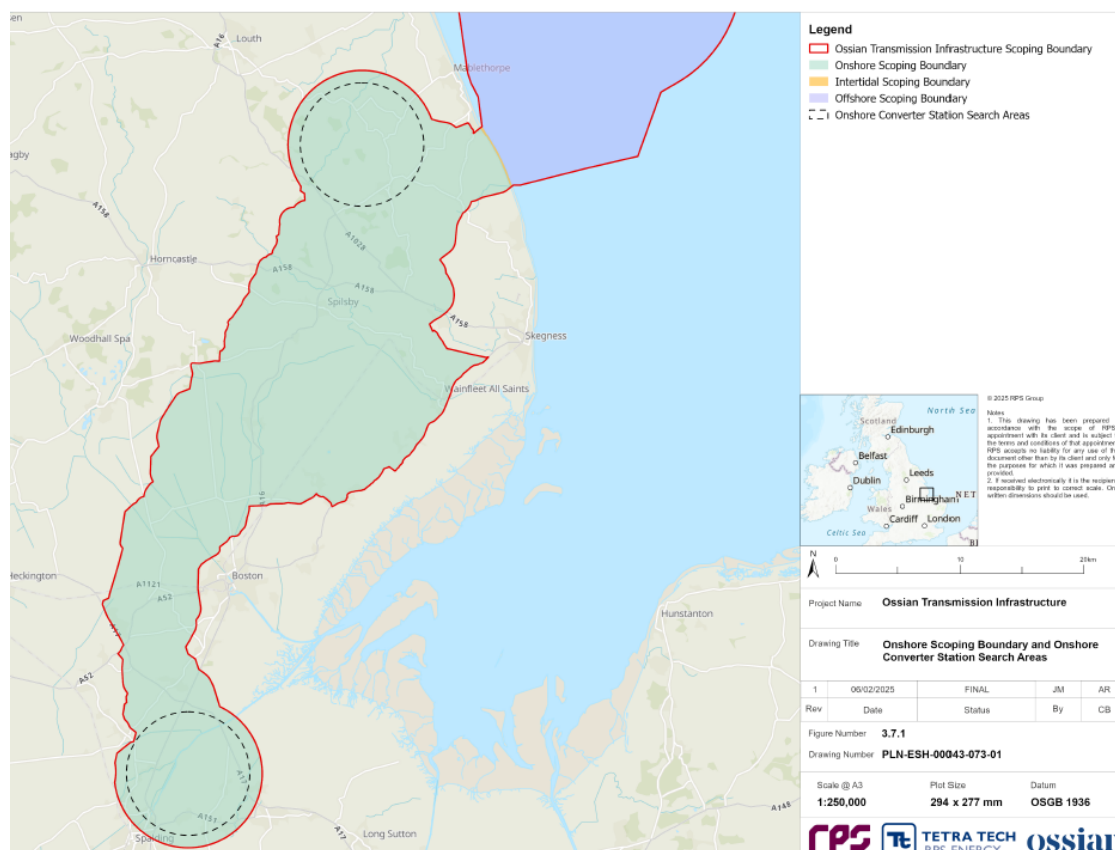


Figure 3.7.1 Extract showing search areas for converter stations

Up to three Onshore Converter Stations will be required as part of the Ossian Transmission Infrastructure (and will be located within the Onshore Converter Station Search Areas). One will be located in proximity to the Lincolnshire Connection Substation (LCS) and up to two will be required in proximity to the Weston Marsh Substation.

In later studies and in defining the Onshore Scoping Boundary, the Applicant has focused on a search area around Lincolnshire Connection Substation A in East Lindsey District as the Applicant expects that to be the LCS location.

Table 4.7.1: Onshore Converter Station Parameters

Parameter	Project Design Envelope
Transmission type	HVDC to HVAC
LCS A Onshore Converter Station	
Number of Onshore Converter Stations	1
Maximum distance from National Grid Lincolnshire Connection Substation (km)	5
Indicative permanent footprint (including landscape planting, drainage) (hectares)	7.5
Maximum building height (m)	26
Maximum height of lightning protection (m)	33
Temporary construction working area (in addition to permanent footprint (hectares)	2.5
Weston Marsh Onshore Converter Stations	
Number of Onshore Converter Stations	2
Maximum distance from National Grid Weston Marsh Substation (km)	5
Indicative permanent footprint (including landscape planting, drainage) (hectares)	15 (2 x 7.5)
Maximum building height (m)	26
Maximum height of lightning protection (m)	33
Temporary construction working area (in addition to permanent footprint (hectares)	5 (2 x 2.5)

Extract from Table 4.7.1 showing sizes of stations

The Onshore Converter Station Search Areas identified on **Figure 3.7.1** comprise a 5 km radius around these two locations (LCS A and Weston Marsh). This radius is primarily driven by the likely feasibility with regard to length of connection between the Onshore Converter Stations proposed as part of the Ossian Transmission Infrastructure and the point of connection (the proposed National Grid substation). There are technical, efficiency and environmental benefits to siting the Onshore Converter Stations in proximity to the proposed NGET substations, such as:

- reduced cable length between the Onshore Converter Station and the point of connection, resulting in reduced disruption to communities and the environment; and
- improved technical efficiency.

Onshore Export Cable Corridor

The starting point for consideration of potential Onshore Export Cable Corridors was identified by the need for a connection between:

- the Landfall and the Onshore Converter Stations; and
- the Onshore Converter Stations and the point of connection at the proposed NGET substations.

The Applicant has stated in the Scoping Report submissions that work has been undertaken to identify environmentally sensitive areas and other projects in the area, including the existing routes of the Viking Link Interconnector and the Triton Knoll Electrical System and the proposed routes for the Grimsby to Walpole, Outer Dowsing and Eastern Green Link 3 and 4 projects.

The established approach to routing linear transmission infrastructure, known as the Horlock Rules, is to choose the most direct route but to avoid, if practicable, areas of high amenity and environmental value. These principles have determined the Onshore Scoping Boundary within which siting work will continue for potential cable routes.

Work is currently being undertaken to identify potential Onshore Export Cable Corridors, which will avoid potential impacts that could lead to significant environmental effects where practicable, together with consideration of local communities and engineering feasibility. This includes taking into account the potential harm to the Lincolnshire Wolds National Landscape

Planning Policy

Whilst the applicant will seek permission for the proposals directly from the Secretary of State for a DCO under section 37 of the Planning Act 2008, there are still a number of local and national planning policies which are considered relevant and should be taken account of as part of the development process. These plans and local knowledge have been formed over several years and have come from a significant evidence base.

The Local Plan for East Lindsey comprises the Core Strategy 2018 and the Settlement Proposals Document 2018. The relevant objectives and policies within the East Lindsey Local Plan are:

Vision and Objective 1 - Seeks a network of thriving, safer and healthy sustainable communities, where people can enjoy a high quality of life and an increased sense of well-being and where new development simultaneously addresses the needs of the economy, communities and the environment.

Vision and Objective 3 - Seeks a growing and diversified economy that not only builds on and extends the important agriculture and tourism base but supports the creation of all types of employment.

Vision and Objective 6 - Seeks a commitment to tackling the causes and effects of global climate change through local action.

Vision and Objectives Para 1.11 - Seeks to achieve the vision of a commitment to tackling the causes and effects of global climate change through local action, Support is provided for new development to ensure it does not cause flood risk to existing properties and encourage new development to reduce flood risk to existing properties.

Vision and Objectives Para 1.11 - Supports the use of renewable energy but balanced against the protection of the District's distinct landscapes.

Strategic policy 10 (SP10) – Design - Development around water sources will only be supported if it contains adequate protection preventing pollution from entering into the water source.

Strategic policy 11 (SP11) – Historic Environment - The Council will support proposals that secure the continued protection and enhancement of heritage assets in East Lindsey, contribute to the wider vitality and regeneration of the areas in which they are located and reinforce a strong sense of place.

Strategic policy 13 (SP13) – Inland Employment - The Council will support growth and diversification of the local economy by: Strengthening the rural economy by supporting in the large, medium and small villages: Development where it can provide local employment.

Strategic policy 16 (SP16) – Inland Flood Risk - The Council will support development that demonstrates an integrated approach to sustainable drainage that has positive gains to the natural environment. The Council will support development for business, leisure and commercial uses in areas of inland flood risk where it can be demonstrated that accommodating the development on a sequentially safer site would undermine the overall commercial integrity of the existing area. Such developments must incorporate flood mitigation measures in their design.

Strategic policy 17 (SP17) – Coastal East Lindsey - All relevant development will need to provide adequate flood mitigation. The council will support improvements to flood defences, infrastructure associated with emergency planning and the development and replacement community buildings. Development must also demonstrate that it satisfies the Sequential and Exception Test and will need to provide adequate flood mitigation.

Strategic policy 21 (SP21) – Coastal Employment - The Council will support the rural coastal economy by supporting development in the large, medium and small villages where it: Provides local employment and help support local services.

Strategic policy 23 (SP23) – Landscape - The District's landscapes will be protected, enhanced, used and managed to provide an attractive and healthy working and living environment. Development will be guided by the District's Landscape Character Assessment and landscapes defined as highly sensitive will be afforded the greatest protection.

Strategic Policy 24 (SP24) - Biodiversity and Geodiversity - Development proposals should seek to protect and enhance the biodiversity and geodiversity value of land and buildings and minimise fragmentation and maximise opportunities for connection between natural habitats.

Strategic Policy 25 (SP25) – Green Infrastructure - In the case of sites not identified on the Inset Maps, development will only be permitted on open spaces provided unacceptable harm will not be caused to their appearance, character or role.

Strategic Policy 27 (SP27) – Renewable and Low Carbon Energy Large-scale renewable and low carbon energy development, development for the transmission and interconnection of electricity, and infrastructure required to support such development, will be supported where their individual or cumulative impact is, when weighed against the benefits, considered to be acceptable in relation to:

- residential amenity;
- surrounding landscape, townscape and historic landscape character, and visual qualities;
- the significance (including the setting) of a historic garden, park, battlefield, building, conservation area, archaeological site or other heritage asset;

- sites or features of biodiversity or geodiversity importance, or protected species;
- the local economy;
- highway safety; and
- water environment and water quality

Strategic Policy 28 (SP28) – Infrastructure and S106 Obligations - Infrastructure schemes will be supported provided they are essential in the national interest; contribute to sustainable development, and respect the distinctive character of the district.

The NPPF was originally implemented in 2012, with the most recent revision being December 2024. The NPPF sets out the UK Government's planning policies for England and how these are expected to be applied.

The NPPF does not contain specific policies for NSIPs (for which particular considerations apply, determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant NPSs) but may be considered as a relevant consideration as below.

Paragraph 124 - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land⁴⁹.

Footnote 49 of the NPPF states:

Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity.

Paragraph 125 - Planning policies and decisions should:

- encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
- recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
- give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

- promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and
- support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.

Paragraph 161 - The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

Paragraph 170 - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Paragraph 187 - Planning policies and decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and;
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Representations Received

Each LPA are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses were sought internally from department officers, Parish Councils, Town Councils and Councillors. All consultees have the ability to respond directly to the applicant as part of this process however we have presented any responses received.

East Lindsey District Council does not have in house specialists or advisers for all topic areas relevant to this response, therefore the below list of representations sets out the comments and advice received from internal consultees as well as external consultants employed by the Council. Where no comments have been received and no external consultant employed, this response will seek to comment generally on the topic areas where appropriate, however it is acknowledged that comments may be sent directly by the County Council and these will be endorsed by the Council, as a two-tier planning authority.

As the Council do not have a Landscape Officer, an external company was sought to respond on behalf of the Council, Terra Loci, who are Landscape Architects and specialise in Landscape Planning.

The comments received from consultees are summarised as follows. Please note that for transparency the wording of each response is as it has been received as it is important that these are taken into account by the Applicant in their entirety.

The comments received from consultees are summarised as follows:

Terra Loci Landscape Architects - acting on behalf of the Council – summarised and elaborated upon within main body of this statement

- Landfall, cable routes and locations of onshore transmission equipment and converter substations are currently not fixed. The LVIA must be undertaken based on final, fixed locations and routes for these elements, defining which sections of the cable route will be laid using open trench methods.
- Paragraph 7.11.2.1 outlines the proposed study area for the Landscape and Visual assessment. A 1km radius study area is proposed around all construction activities, this is likely to be sufficient for low and ground level construction activities requiring small plant. A wider study radius will be

required for the assessment of construction activities relating to the three Onshore Converter Stations.

- Supporting Zone of Theoretical Visibility analysis based on the Maximum Design Scenario should also be provided to ensure that the proposed study area is sufficient.
- No reference to Residential Visual Amenity Assessment (RVAA) is made within the scoping report, where significant effects on residential receptors are likely to arise RVAA should be undertaken.
- Table 7.11.1 outlines the Potential Impacts Proposed to be Scoped in for Landscape and Visual Resources. Rows one and two set out the proposed scope of temporary construction impacts.
- Table 7.11.2 outlines Impacts Proposed to be Scoped Out of the Assessment for Landscape and Visual Resources, based on the justification included within this table, the impacts scoped out of the assessment appear appropriate.
- The full LVIA methodology, including factors and / or matrices used for determining sensitivity of landscape and visual receptors and magnitude and significance of effects should be submitted and approved prior to the assessment being undertaken.
- All visual representation with should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019).
- The EIA process should detail the measures to be taken to ensure the building design of the Onshore Converter Stations will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.
- Cumulative impact assessment should include other proposals currently at Scoping stage and onwards.

Environmental Protection

- No comments received during the consultation period.

Forward Planning Officer

- Part 1 of 5.

I will let others comment on the landfall between Sandilands and Anderby Creek but I agree with the reasoning for not continuing with the other potential landfall locations.

The cable route will cause disturbance during construction but, as we have experienced with other schemes, once completed has little impact. They do need to evidence their choice of route and address the impacts it has.

The lasting impact of the proposal are the Substations (Lincolnshire Connection Node and Western Marsh), but these are NGET projects as part of the Grimsby to Walpole project. So to my mind the bit that Ossian are dealing with is relatively benign. The elements of concern will be considered during the National Grid proposals.

- Part 2 of 5

This focuses on offshore and is outside our jurisdiction. No comments

- Part 3 of 5

This focuses on onshore. The chapter headings cover the usual subjects found in NSIP projects. The technical specialists are more capable of critiquing their subject areas.

- Part 4 of 5

This completes what was considered in part 3 and the technical specialists can critique their subject areas.

- Part 5 of 5

This relates to trans boundary impacts and considers impacts on other countries. The report screens out all impact except for marine mammals, off shore ornithology, commercial fisheries, shipping and navigation. These are matters outside the councils' jurisdiction.

The onshore Transboundary Impacts consider the usual subject areas covered by SA for NSIPs and screens out impacts except for Onshore and intertidal ornithology. This seems reasonable and is consistent with the offshore ornithology conclusion.

Under the combined impacts it screens in climate change. Owing to national commitments to tackle climate change the impact does need to be quantified. Therefore ruling it in is appropriate.

Conservation Assistant (Trees)

- No comments received during the consultation period.

Heritage Lincolnshire

- As stated within paragraph 7.6.3.7, part 3 of the Scoping report - "There are a considerable number of listed buildings within the Onshore Scoping Boundary and Intertidal Scoping Boundary. Many of these are clustered within historic settlements which are often designated as Conservation Areas: Alford; Raithby; Hundleby; Spilsby; Old Bolingbroke; Wainfleet; Revesby; Kirton Holme; Swineshead; Wigtoft, Pinchbeck and Moulton. Grade I and Grade II* listed buildings within the Onshore Scoping Boundary and Intertidal Scoping Boundary include numerous churches along with external fonts and church crosses, also country houses, chapels, schools and windmills."

- For any above-ground developments proposed within the setting of listed buildings, conservation areas, scheduled monuments, or non-designated heritage assets, a comprehensive and impartial heritage impact assessment must accompany any future application. This assessment should identify built heritage assets, designed landscapes, and/or archaeological features along the proposed development's course. Once identified, the significance of these assets must be described and evaluated, followed by an assessment of the proposal's impact on significance, in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990, the respective Local Plan, and the National Planning Policy Framework.
- The visual impact on the setting of designated heritage assets will be a primary concern. Therefore, a Visual Impact Assessment will likely be required to accompany the Heritage Impact Assessment to provide a clear understanding of the development's impact on the setting of these assets.

Senior Ecologist

- I support the proposed methods and approach used to assess the onshore ecology and nature conservation impacts as described in the scoping report documents available from the Planning Inspectorate's National Infrastructure Project [page \(https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0210006/documents\)](https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0210006/documents), and I believe the research proposals to be suitably rigorous and appropriate.
- I further support the recommendations raised by representatives from Natural England, the Environment Agency, and others during the first ETG meeting (20 March 2025), including the development of specific methods to assess potential impacts to raptor populations (Barn Owl, Marsh Harrier, Redkite, and Hobby), and night-roosting Lapwing and Curlew.
- As mentioned during the ETG, I also believe that it would be useful for the EIA to specifically report on the habitat composition and agricultural land grade of land falling within the potential transmission line boundaries (e.g., reported separately by local district). This baseline information can provide a broader context for interpreting all further species reporting, as well as provide a useful gauge to compare to the specific habitats impacted when the transmission line location is finalized.

Councillor Responses

- As part of the consultation process Councillors have the right to respond directly.
- At the time of this response no replies from Councillors have been received however they will be sent directly to the Applicant when they come forward.

Parish Council Responses

- Halton Hologate with Halton Fenside Parish Council – Objection

The Parish Council resolved unanimously to welcome the scoping report consultation however, request that specific attention is paid to the flood risk during the construction phase as the cables will pass watercourses and vital infrastructure networks.

This letter also sets out the **formal objection** of the Parish Council to the Ossian underground cable proposals due to overexposure in the county - this would mean there would be 5 or 6 major corridors of power cables in our area of the county, the damage to agricultural land and distribution to the farming industry.

- Tattershall with Thorpe Parish Council – no comments

As part of the consultation process Parish Councils have the right to respond directly. At the time of this response no other replies from Parishes have been received however they will be sent directly to the Applicant when they come forward.

- Louth Town Council

Louth Town Council consider that this specific development, although not directly in the Louth area, highlights a concern that it feels needs to be addressed and stated.

The proposal of the pylons through Lincolnshire, additional windfarms, the associated substations, coupled with the storage facilities for Carbon Capture and Nuclear Waste are demonstrating a piecemeal approach to the degradation of the countryside of Lincolnshire. Many local residents fear this will affect the county, both in terms of tourism and food production.

There is great fear that the pylons may increase potential large output solar farms taking arable land, and the coast has many sites of scientific interest and is now part of a larger nature reserve.

Some honesty, and a holistic view of what Lincolnshire is expected to carry in terms of national infrastructure would be appreciated, as more people accept there needs to be some compromise here and there, but the 'chipping' away by small applications, is slowly removing any red line the local people of the county may have

Review of the EIA Scoping Report

At this stage the following comments are offered in connection with the topic areas as listed. As stated in the aforementioned section, where no opinion has been received from in-house advisors at the Council nor has there been an external consultant employed to provide comment then general observations have been put forward. Some chapters proposed in the scoping report are best covered by the County Council or other statutory stakeholders and so in this case as officers at the LPA we have remained silent.

Geology, Hydrogeology and Ground Conditions

East Lindsey Council do not have an in-house geologist and the Coal Authority may have chosen to comment directly on the content of the consultation at phase 2, however having reviewed the information put forward within the PEIR, the approach taken appears reasonable in the methodology and we have no specific comments to offer

Hydrology and Flood Risk

Lincolnshire County Council act as Lead Local Flood Authority and may comment directly on the proposed development, as may the Drainage Board and the Environment Agency. Having reviewed the information put forward within the PEIR, the approach taken appears reasonable in the methodology however we would want to ensure that in the laying of cables the integrity of the drains is maintained.

Onshore Ecology and Nature Conservation

East Lindsey Council do not have an in-house ecologist and the Wildlife Trust may have chosen to comment directly on the content of the EIA Scoping Report. We have no specific comments to offer other than the following points in general:

- The Council would like to reiterate the importance of achieving a biodiversity net gain for this proposed nationally significant development, in line with The Environment Act 2021.
- Additionally ornithological sites within the region alongside RSPB locations need careful assessment, with it remaining unknown how they will be impacted by the proposed development.
- Lastly, temporary construction works can have a significant effect and we would therefore welcome a full scheme of remediation and reinstatement after these works have been undertaken

Onshore and Intertidal Ornithology

This section considers the potential impacts arising from the construction, operation and maintenance and decommissioning of the Landfall and Onshore Transmission Infrastructure and identifies the proposed scope of, and methodology for, the EIA process for onshore and intertidal ornithology.

The Natural England, the Wildlife Trust, Lincolnshire County Council and others may have chosen to comment directly on the content of the consultation, however having reviewed the information put forward within the EIA Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer

To reiterate the comments relevant from the Councils Senior Ecologist are as follows:

- The development of specific methods to assess potential impacts to raptor populations (Barn Owl, Marsh Harrier, Redkite, and Hobby), and night-roosting Lapwing and Curlew.

- It would be useful for the EIA to specifically report on the habitat composition and agricultural land grade of land falling within the potential transmission line boundaries (e.g., reported separately by local district). This baseline information can provide a broader context for interpreting all further species reporting, as well as provide a useful gauge to compare to the specific habitats impacted when the transmission line location is finalized.

Historic Environment

Having reviewed the information put forward the approach taken appears reasonable in the methodology and we have no specific comments to offer other than:

- The Council would expect a landscape visual assessment for any above ground features and for each to be looked at separately;
- We would expect a scheme of trail trenching to be included as part of the main planning submission.

Land Use Recreation

Having reviewed the information put forward, the approach taken appears reasonable in the methodology however we have the following comments to make:

- All the relevant issues appear to have been scoped in, albeit some of them at a very strategic level; and
- We are concerned that additional water scarcity for agricultural holdings resulting in loss of productivity could undermine viability of agricultural businesses – particularly considering the effects of climate change.

Traffic and Transport

Lincolnshire County Council act as highways authority and may comment directly on the proposed development. Having reviewed the information put forward, the approach taken appears reasonable in the methodology and we have no specific comments to offer other than the following points:

- The suitability of the rural roads, many of which are in poor condition (e.g. subsidence), to cope with the loading by heavy construction vehicles. What mechanism is in place for any urgent reinstatement. Is a survey of the roads (and any strengthening needed) to be carried out at the commencement of works?
- What restrictions will be placed on working hours/days?
- What is the procedure in place to deal with complaints from residents regarding access, noise, dust etc.?
- Construction compounds and field accesses in the countryside can have a significant effect and we would therefore welcome a full scheme of remediation and reinstatement after the cable/works have been undertaken.

Noise and Vibration

Having reviewed the information put forward within the EIA Scoping Report, the approach taken appears reasonable in the methodology and we have the below comments to offer:

- The Council should be provided with contact details in the event of complaints to assist in the management of complaints and concerns.
- The Council and all relevant noise sensitive receptors in the immediate area to any proposed works are to be informed ahead of these works should they occur outside of normal working hours.
- The Council and all relevant vibration sensitive receptors in the immediate area to any proposed works are to be informed ahead of these works. Additionally appropriate monitoring equipment is to be used in the vicinity of works in order to assess the level of vibration propagating from the works site.

Air Quality

Having reviewed the information put forward, the approach taken appears reasonable in the methodology and we have the below comments to offer.

The Council would expect the following to be complied with during the project installation phase:

- Burning of waste should be avoided. Any burning of waste deemed strictly necessary should be undertaken in accordance with the relevant waste management exemption issued the Environment Agency, and consideration should be given to the timing of such burning, and the prevailing weather conditions to impact emissions to air and nuisance to offsite receptor's; and
- Soil stockpiles should be sealed to reduce fugitive dust emissions.

Landscape and Visual Resources

At this stage we do not have details of the final locations, appearances or extents, of onshore elements however the information as provided for the EIA Scoping Report has been reviewed by external consultants Terra Loci, with the following comments on behalf of the Local Planning Authority which are summarised as follows:

Landfall, cable routes and locations of onshore transmission equipment and converter substations are currently not fixed. The LVIA must be undertaken based on final, fixed locations and routes for these elements, defining which sections of the cable route will be laid using open trench methods. Alternatively, should the final cable route and equipment locations not be available at the time of assessment, appropriate assessment scenarios should be agreed for assessment to take place on all reasonably foreseeable options.

Paragraph 7.11.2.1 outlines the proposed study area for the Landscape and Visual assessment. A 1km radius study area is proposed around all construction activities, this is likely to be sufficient for low and ground level construction activities requiring small plant. A

wider study radius will be required for the assessment of construction activities relating to the three Onshore Converter Stations. The study area for impact arising from construction activities relating to the three Onshore Converter Stations should be 5km from the land to be occupied by the proposed buildings to match the proposed study area for permanent impacts.

Supporting Zone of Theoretical Visibility analysis based on the Maximum Design Scenario should also be provided to ensure that the proposed study area is sufficient.

Broad receptor groups as outlined in paragraph 7.11.3.3 appear to be appropriate. Specific landscape and visual receptors and representative viewpoints must be submitted and approved prior to the assessment being undertaken. Reference is made to “Occupiers of residential properties, where there is the potential for receptors to experience significant adverse effects” However, no approach is proposed to show how residential receptors which may experience significant adverse effects would be selected for inclusion within the assessment. An approach for the scoping in and out potential residential receptors should be proposed.

No reference to Residential Visual Amenity Assessment (RVAA) is made within the scoping report, where significant effects on residential receptors are likely to arise RVAA should be undertaken.

Table 7.11.1 outlines the Potential Impacts Proposed to be Scoped in for Landscape and Visual Resources. Rows one and two set out the proposed scope of temporary construction impacts. For the avoidance of any doubt potential impacts rising from the construction of the Onshore Converter Stations should be included within these parts of the assessment.

Table 7.11.2 outlines Impacts Proposed to be Scoped Out of the Assessment for Landscape and Visual Resources, based on the justification included within this table, the impacts scoped out of the assessment appear appropriate.

The full LVIA methodology, including factors and / or matrices used for determining sensitivity of landscape and visual receptors and magnitude and significance of effects should be submitted and approved prior to the assessment being undertaken.

All visual representation with should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made. Locations for proposed ‘photomontage’ visualisations, including visualisation types, following TGN 06/19 should be submitted and approved prior to being undertaken.

The EIA process should detail the measures to be taken to ensure the building design of the Onshore Converter Stations will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

Cumulative impact assessment should include other proposals currently at Scoping stage and onwards. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping

stage would be likely to be a material consideration at the time of determination of the planning application

Health and Wellbeing

Section 7.12 of the EIA Scoping Report identifies the proposed scope of the assessment for health and wellbeing relevant to the Ossian Transmission Infrastructure. The health and wellbeing assessment uses the residual effect conclusions of other relevant EIA topic assessments as an input and explains their public health implications. The terms health and wellbeing are used interchangeably, and parity is given to considering both physical and mental health outcomes.

Having reviewed the information put forward, the approach taken appears reasonable in the methodology and we have no comments to offer.

Concluding Remarks

Whilst we appreciate many stakeholders will comment directly to the Applicant on the project, we wanted to provide a response based on the submitted application with assessment of the proposed development.

We note your community engagement to date however we would welcome future discussions over any proposed community benefits as well as any proposed employment and skills schemes that could be provided to the local workforce as well as any other potential grid infrastructure improvements that may be facilitated by the development.

This advice is based upon the information available at this time. Please note that the advice is given without prejudice to any future comments made by the LPA upon the receipt of further information, whether during or before the submission of a full EIA planning application.

If you have any queries, please do not hesitate to contact me on the details provided. We look forward to being involved again in the next stage of the process.

Yours sincerely,

[Redacted Signature]

Consultant Planning Officer

[Redacted Email Address]@dpaplanning.co.uk

[Redacted Contact Information]



██████████
Planning Inspectorate
National Infrastructure Planning
Temple Quay
Bristol
BS1 6PN

Our ref: XA/2025/100283/01-L01
Your ref: EN0210006
Date: 27 March 2025

Dear Ms Deery

ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT

OSSIAN TRANSMISSION INFRASTRUCTURE

Thank you for consulting the Environment Agency (EA), on the 25 February 2025, to review the Environmental Impact Assessment (EIA) Scoping Report for Ossian Transmission Infrastructure.

We have listed our headline comments below in **Table 1.1**, with detailed comments and advice to the Applicant provided in Appendices A-G, Documents Reviewed in Annex I and additional informative in Annex II. We recommend the use of a commitments register to aid further scoping out of topics.

Based on the information submitted, there is a significant risk the development will impact on the aspects and issues below. We therefore request they be scoped in for assessment to ensure they are adequately assessed and mitigated.

Table 1.1 Headline Comments

Aspect	Issue	Developer position	EA position
Fisheries	Electromagnetic Fields	Scoped Out.	Scope In.
	European Eels	Not included as a receptor.	Scope In.
	Noise Impacts to Fish	Not included as an impact.	Scope In.
Flood Risk and Coastal Management	Decommissioning	Scoped Out.	Scope In.
Geomorphology	Decommissioning	Scoped Out.	Scope In.
Groundwater	Heat Pollution	Scoped Out.	Scope In.

and Contaminated Land	Unforeseen Contamination	Scoped Out.	Scope In.
	Cable Decommissioning	Scoped Out.	Scope In.
	Groundwater Receptor (Chalk Aquifers and Abstraction Boreholes)	Not included.	Scope In.
Water Resource	Water resources	Scoped out.	Scope In.

Our advice has been provided under our chargeable service agreement with the Applicant: **ENVPAC/1/NIT/00075**.

Any requests to disapply any permits or consents should be sent to us in writing as soon as possible, to allow us sufficient time for their consideration (minimum 6 months). Sufficient time is required to ensure we can appropriately respond to discharge of requirements and protective provision consultations. Please ensure in your Development Consent Order (DCO) a minimum of 21 days is stipulated as a response time for the discharge of requirements, and a minimum of 61 days for protective provisions.

Please note, this response does not represent our final view in relation to any environmental permit applications made to us. Our final views will be based on all relevant information, including applications and guidance available at the time of submission.

We look forward to continuing to work with you as the detailed proposals continue to develop, and to review and provide advice on relevant supporting documents as these are generated.

Yours sincerely



Planning Advisor

Direct e-mail NIteam@environment-agency.gov.uk

LIST OF APPENDICES

APPENDIX A – BIODIVERSITY

APPENDIX B – FISHERIES

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ANNEX I – DOCUMENTS REVIEWED

ANNEX II – INFORMATIVE

APPENDIX A – BIODIVERSITY

We agree with what has been ‘Scoped In’ and ‘Scoped out’ of the EIA regarding biodiversity.

The applicant hasn’t provided detail on legislation at this stage. At future statutory submissions we expect to see reference to key nature conservation legislation (e.g. Wildlife and Countryside Act 1981), in addition to newer legislation (e.g. Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024).

Below we have provided detailed advice on the impacts identified and the proposed methodology of assessment. Please also refer to the Annex II – Informative, for advice to the applicant regarding watercourse crossings and baseline data sources.

Open-Cut Trench Mitigation

Document Reference: EIA Scoping Report: Part 1

Chapter Reference: 4.7 Onshore Components – Section 4.7.3.2

Issue

Entrapment of mammals when using open-cut trench methods for cable laying.

Impact

Risks to protected species.

Solution

The risk of mammal entrapment should be considered under the impact ‘*Killing, injury or disturbance of protected species*’. Appropriate mitigation should be proposed, including:

- Trench covers
- Ramps to allow wildlife to escape
- Securely fenced compounds

Pre-construction Surveys

Document Reference: EIA Scoping Report: Part 1

Chapter Reference: 4.7 Onshore Components – Section 4.8.1.6

Issue

Onshore construction is anticipated to take approximately four years, and the site-specific survey proposal (Chapter 7.4, Table 7.4.4) does not mention whether pre-construction surveys are planned for otters and water voles in addition to baseline surveys.

Impact

Changes in the baseline of species presence and distribution. Damage or destruction of holts/burrows or disturbance during construction.

Solution

Riparian mammal pre-construction checks/surveys should be conducted prior to construction of each route section to determine any changes in presence or distribution of otters and water voles. The Chartered Institute of Ecology and Environmental Management's Advice Note 'On the lifespan of ecological reports & surveys' states that species survey data may be out of date around 12-18 months following a survey.

Additional Information

We would like to acknowledge information provided in the meeting between the Environment Agency and the Applicant on 20 March 2025. Discussions clarified that pre-construction surveys will be conducted. Whilst the Applicant has verbally agreed this in our discussions, we require this to be confirmed within documentation going forward.

Construction Riparian Buffer Zones

Document Reference: EIA Scoping Report: Part 3

Chapter Reference: 7.3 Hydrology and Flood Risk

Issue

There is no reference within the EIA Scoping report to the establishment and maintenance of a riparian buffer during construction.

Impact

Disturbance of and habitat loss for riparian mammals.

Solution

The Applicant should maintain a riparian buffer around all watercourses, free from development. As a minimum, this should be 10m from the bank top. During the construction phase, temporary construction compounds within 15m of watercourses could be screened with fencing on sides adjacent to the watercourse, and working lighting could be positioned to avoid light-spill onto sections of the watercourse. Both measures would lower the risk of disturbance to riparian mammals occupying the watercourse.

Additional Information

We would like to acknowledge the information provided in the meeting between the EA and the Applicant on 20 March 2025. Whilst the Applicant has verbally agreed this in our discussions, we require this to be confirmed within documentation going forward.

Biodiversity Net Gain (BNG)

Document Reference: EIA Scoping Report: Part 3

Chapter Reference: 7.4 Onshore Ecology and Nature Conservation – Table 7.4.5.4

Issue

No BNG commitment has been made, nor has a target been set.

Impact

By not committing to BNG early and planning suitable assessments, the project runs the risk of not considering BNG appropriately.

Solution

We acknowledge the applicant's intention to agree BNG within the proposed Onshore Ecology and Nature Conservation ETG and that it will be outlined in the Environmental Statement (ES). Although BNG is not yet a legal requirement for NSIPs, the emerging guidance will likely require developers to achieve a minimum of 10% BNG. Delivery of BNG is now also best practice, and many NSIPs have committed to deliver BNG prior to the release of government guidelines.

Additional Information

We appreciate at this stage there is little specific design information, however we have the following points for the applicant to consider moving forward.

- Propose to deliver at least 10% BNG through the scheme.
- Encourage the completion of a River Condition Assessment and the use of the Watercourse Metric to calculate the watercourse baseline, which will inform the delivery of enhancement and mitigation to watercourse habitats.
- For potential biodiversity net gain opportunities, we recommend the applicant refers to both the mitigation measures within the Water Framework Directive and opportunities identified within the Local Nature Recovery Strategy.

APPENDIX B – FISHERIES

We agree with the issues ‘Scoped In’ to the EIA regarding fisheries. We have outlined below a short summary of Issues, developer position and EA position. Followed by detailed comments of our concerns.

Our remit extends 12 nautical miles from the shoreline, our comments are in relation to both offshore and onshore elements of the project proposal.

To provide clarity we have formulated the below in **Table 1.2** to summarise our position.

(Table 1.2 Fisheries Position Summary)

Issue	Developer position	EA Position
Electromagnetic Fields	Scoped Out.	Scope In.
European Eels	Not Included as a receptor.	Scope In.
Noise Impacts to Fish	Not Included as an impact.	Scope in

Please refer to the Annex II – Informative, for advice to the applicant regarding watercourse crossings and baseline data sources.

Detail Comments

Electromagnetic Fields (EMFs)

Document Reference: EIA Scoping Report: Part 3

Chapters: 7.4 - Table 7.4.5

Issue

The impacts on fish from Electro-Magnetic Fields (EMF) associated with high voltage buried cables under main watercourses has not been scoped in.

Impact

By not considering this impact-pathway, fish behaviour and egg development maybe effected.

Solution

Scope impacts on fish from EMF in. Particular attention should be given to diadromous fish species. The assessment should include details on the strength of EMF emitted from cables and how deep they will be buried. Ideally, cables should be buried to a depth where EMF levels will not impact on fish.

European Eels (Coastline)

Document Reference: EIA Scoping Report: Part 2

Chapters: 6.4 Table - 6.4.6

Issue

The impact on European eel (*Anguilla*) has not been included as a receptor.

Impact

Certain methods of excavation/dredging can harm European eels.

Solution

Scope in the impact on European eel from excavations of the seabed near the coast. These activities will require an exemption from the Eels (England and Wales) Regulations 2009 and mitigation maybe required to avoid harming or disturbing eels.

Noise Impacts on Fish

Document Reference: EIA Scoping Report: Part 3

Chapters: 7.4 - Table 7.4.5

Issue

Noise impacts on fish associated with drilling under watercourses has not been scoped into the EIA.

Impact

Drilling is considered as continuous noise and may have a behavioural impact on fish which could impact on key life stage migrations and spawning. Significant behavioural effects on fish may not be considered leading to an impact on fish populations.

Solution

Scope this impact-pathway into the EIA. Assess and implement the appropriate mitigation measure to ensure that fish are not impacted. Additionally, ensuring that works are completed outside of the migration and spawning windows will reduce the risks to fish.

APPENDIX C – FLOOD RISK AND COASTAL MANAGEMENT

We agree with the issues ‘Scoped In’ to the EIA regarding flood risk and coastal management. We have outlined below a short summary of Issues, developer position and EA position, followed by detailed comments of our current concerns.

We do not agree with the proposal to ‘Scope Out’ flood risk impacts for the decommissioning phase. The report states that decommissioning impacts are likely to be no worse than construction impacts for flood risk and coastal management. However, construction impacts have been scoped in for further assessment, while decommissioning impacts have been scoped out. If decommissioning impacts are expected to be similar to construction impacts, then they should also be scoped in.

Any elements left in situ must not impact on our future maintenance or improvement works, so we are likely to require the removal of redundant cables from ducts under Environment Agency assets. The reinstatement works to remove above ground infrastructure may take place within areas at risk of flooding. The flood risk of this activity will need to be assessed, and mitigation measures put in place.

To provide clarity we have formulated the below in **Table 1.3** to summarise our position.

(Table 1.3 Flood Risk and Coastal Management Position Summary)

Issue	Developer position	EA Position
Decommissioning	Scoped out.	Scope in.

Below our detailed comments we have provided advice to the applicant on the impacts identified and their proposed methodology of assessment. Please refer to the Annex II – Informative, for advice to the applicant regarding:

- Watercourse crossings
- Beach replenishment scheme legal agreement
- Sequential test
- Flood Risk Assessment (FRA)
- Climate change flood risk assessment

Detailed Comments

Decommissioning

Document Reference: EIA Scoping Report: Part 3

Chapters: 7.3 - Table 7.3.6

Issue

The impacts of increased flood risk arising from watercourse crossings, diversions, or impacts on flood defences during decommissioning of onshore infrastructure has been scoped out.

Impact

There are potential impacts to Main Rivers, flood defences and beach assets during removal of underground cables.

Solution

We would expect all cables to be removed from beneath watercourses and assets, followed by permanent filling and sealing of ducts to prevent any ingress of floodwater. This element should be scoped into the EIA to fully assess the potential risks and impacts during decommission.

Advice to applicant

We note the scoping report does not consider fluvial and tidal flood risk adequately. We acknowledge that a Flood Risk Assessment (FRA) will address this, whilst further assessing the impacts of climate change to all sources of flood risk to its maximum extent. The FRA should then propose the appropriate mitigation measures, to ensure the development is resilient to the impacts of flood risk, safe for its lifetime and does not increase to others.

It should be noted if the operational lifetime is extended, the project may increase flood risk to third parties or be susceptible to flooding. This should be anticipated in the FRA and an assessment made to understand the risk presented by climate change for its full potential lifetime.

APPENDIX D – GEOMORPHOLOGY

We agree with what has been ‘Scoped In’ to the EIA regarding geomorphology. We have outlined below a short summary of Issues, developer position and EA position. Followed by detailed comments of our current concerns.

We do not agree with the report to ‘Scope Out’ geomorphology impacts during the decommissioning phase. The decommissioning plan is to leave cabling infrastructure in-situ. Due to the impacts of climate change and erosion these cables can be exposed due to the changes in coastal process and should be removed.

To provide clarity we have formulated the below in **Table 1.4** to summarise our position.

(Table 1.4 Geomorphology Position Summary)

Issue	Developer position	EA Position
Decommissioning	Scoped out	Scope In

Please refer to the Annex II – Informative, for advice to the applicant regarding geomorphology Informative, general considerations, water sensitivity and watercourse crossings.

Detailed Comments

Landfall Infrastructure Decommissioning

Document Reference: EIA Scoping Report: Part 1

Chapters: 4.8.3.7

Issue

Transmission cable infrastructure will be left in-situ to avoid environmental disturbance.

Impact

Due to coastal erosion, climate change and processes these cabling can become exposed after decommissioning.

Solution

Remove the cabling infrastructure during the decommissioning phase. Include a commitment to remove the cabling infrastructure if it becomes exposed prior to decommissioning.

APPENDIX E – GROUNDWATER AND CONTAMINATED LAND

We agree with what has been ‘Scoped In’ to the EIA regarding groundwater and contaminated land. We have outlined below a short summary of Issues, developer position and EA position. Followed by detailed comments of our current concerns.

We do not agree with the position to ‘Scope Out’ the impacts of heat, cable decommissioning and unforeseen contamination. We also have concerns relating to the sensitivity assigned to groundwater receptors, as explained below.

To provide clarity we have formulated the below in **Table 1.5** to summarise our position.

(Table 1.5 Groundwater and Contaminated Land Position Summary)

Issue	Developer position	EA Position
Heat Pollution	Scoped Out.	Scope In.
Unforeseen Contamination	Scoped Out.	Scope In.
Cable Decommissioning	Scoped Out.	Scope In.
Groundwater Receptor (Chalk Aquifers and Abstraction Boreholes)	Not included.	Scope In.

Below our detailed comments we have provided advice to the applicant on the impacts identified and their proposed methodology of assessment. We have provided further groundwater and contaminated land informative in Annex II.

Detailed Comments

Heat Pollution

Document Reference: EIA Scoping Report: Part 3

Chapters: 7.2 - Table 7.2.11

Issue

Heat as a groundwater pollutant has been scoped out of the EIA.

Impact

Heat pollution of groundwater could be caused by the high voltage cables.

Solution

To Scope Out this impact, the applicant should demonstrate that significant sources of heat would not be generated from underground cables during the operation phase. The applicant should also demonstrate that underground cables would not interact with groundwater bodies.

At this stage we require the potential thermal implications of buried cables, in relation to risks to groundwater to be scoped in. Until further consideration via desk-based assessment when the ground conditions and the thermal characteristics of the cables to be installed are better understood.

Additional Information

The Scoping Report states, *“the levels of heat loss and dissipation of heat through the soil can only be determined once further details of the cable voltage, soil structure (including its thermal properties) and the final engineering design are known.”* As these parameters are not known it is not possible to scope out this impact yet.

Cable Decommissioning

Document Reference: EIA Scoping Report: Part 1 & 3

Chapters: 4.8 - 4.8.3.7 & 7.2 - table 7.2.10

Issue

Decommissioning of infrastructure cabling being left in-situ

Impact

These cables could act as a source of contamination or a contaminant migration pathway following the decommissioning phase. There is potential for retained infrastructure to cause contaminative impact to controlled waters following decommissioning phase if risks are not properly assessed.

Solution

Recommend the applicant consider the risks posed by retention of below ground infrastructure following decommissioning.

Additional Information

At decommissioning stage, it is proposed that cables may be left in the ground with the cable ends cut, sealed and securely buried as a precautionary measure. In table 7.2.10 it mentions risks arising from decommissioning will be managed through the onshore decommissioning plan. It is assumed this is just the activities rather than assessing risks from what remains in situ.

Unforeseen Contamination

Document Reference: EIA Scoping Report: Part 3

Chapters: 7.2 - Table 7.2.11

Issue

Unforeseen contamination has been scoped out of further assessment.

Impact

Lack of clarity on the processes that will be followed if contamination is discovered, this could exacerbate the issue.

Solution

We request the inclusion of an unexpected contamination requirement.

Additional Information

We can agree for unforeseen contamination to be scoped out, if the appropriate controls and procedures are secured in the event of discovering unexpected contamination.

Groundwater Abstractions

Document Reference: EIA Scoping Report: Part 3

Chapters: 7.2 - Table 7.2.4 & Figure 7.2.2.

Issue

Licensed groundwater abstractions within the search area have been omitted from Table 7.2.4 and Figure 7.2.2 does not appear to include deregulated abstractions.

Impact

If all receptors are not identified it may be that risks will not be determined and mitigation measures that may be required are not included.

Solution

Confirm that all groundwater abstraction receptors are included in future baseline assessment. Include these groundwater abstractions detailed below,

- TF4011681794 - Elsham Linc Limited - AN/029/0014/003 PROSPERITY FARM BOREHOLE
- TF42408030 Aby Farms - 4/29/14/*G/0109 STOVIN BOREHOLE WITHERN

Advice to applicant**Diesel Generator and Associated Fuel Storage**

Document Reference: EIA Scoping Report: Part 1

Chapters: 4 - 4.7.2.8

Issue

The Northern onshore converter station search area contains Source Protection Zone 1,2 and 3 (SPZ). The converter station has back-up diesel generator and presumed associated fuel storage. This presents a risk of contamination to groundwater.

Impact

Siting of a diesel fuel tank within an SPZ1 could present an unacceptable risk of contamination to the groundwater.

Solution

Ensure that the convertor station is not located within an SPZ1. Please refer to [The Environment Agency's approach to groundwater protection](#). At this point the exact location of the convertor stations is not defined. The northern convertor station search area does contain an SPZ 1, 2 & 3.

Sensitivity Criteria

Document Reference: EIA Scoping Report: Part 3

Chapters: 7.2 - 7.2.12 & 7.2.8.4

Issue

SPZ3 has been assigned the medium sensitivity category. Private water supplies have not been assigned into a sensitivity category.

Impact

SPZ3 is the total catchment that an abstraction draws water from, therefore any water within it should be afforded adequate protection from pollution. Insufficient protection of the groundwater within SPZ3 and the private water supplies, could result in pollution of these supplies.

Solution

Raise the sensitivity rating from medium to high for SPZ3 and private water supplies.

Additional Information

The Scoping Report references Design Manual for Roads and Bridges (DMRB) LA109: Geology and Soils (Highways England et. al., 2019) and DMRB LA113: Road drainage and the water environment (Highways England et. al., 2020b)

We have some concerns about the methodology presented in the DMRB documents.

In relation to estimating the sensitivity of the water environment (Table 3.70 in LA 113 – as referred to in Table 3.11 of LA 109), we have concerns about the environmental value applied to Source Protection Zones (SPZs). SPZ 3s are only attributed a medium importance, as has been transposed into Table 7.2.12. We would argue this act as the total catchment of a water supply, they should be attributed a high sensitivity rating.

Horizontal Directional Drilling

Document Reference: EIA Scoping Report: Part 1

Chapters: 4 - 4.6.2.2

Issue

Horizontal direction drilling may be used in sensitive groundwater areas (Chalk Aquifer) and presents a risk of pollution. This is particularly sensitive in parts of the site due to the presence of the chalk aquifer.

Impact

HDD may involve the use of drilling muds which risks pollution to groundwater sources/chalk aquifer.

Solution

We expected a hydrogeological risk assessment to be completed for the HDD works. The applicant may wish to know that groundwater in the Chalk aquifer can be artesian or sub-artesian depending on the time of the year. For this reason, future excavation of the overlying deposits or HDD crossing needs to be carefully considered.

Foundation Works Risk Assessment

Document Reference: EIA Scoping Report: Part 3

Chapters: 7.2 - Table 7.2.10

Issue

Insufficient information is available about the types and depths of foundations that will be used in the development.

Impact

Certain foundation installation methods have the potential to create pathways for contamination transmission into the underlying aquifers.

Solution

Foundation Works Risk Assessments should be included in the CEMP. In table 7.2.10 it states a foundation works risk assessment will be completed. Due to the sensitivity of the relating to the underlying aquifers we request a commitment be made and this be secured in the CEMP.

Chalk Stream Habitat

Document Reference: EIA Scoping Report: Part

Chapters:

Issue

There are chalk streams, which are now priority habitat, and could be impacted by the development.

Impact

Critical receptors have not been identified, putting them at risk from damage by the development.

Solution

Include chalk streams as receptors in future baseline assessments and risk assessments for the development. The 'high certainty' chalk streams that overlap with the scoping area include Burlands Beck (TF4821971884) and Willoughby High Drain (TF4834671596). There is also a 'low certainty' chalk stream south of the A158 at TF4601066533.

APPENDIX F – MARINE

We agree the with the projects identified impacts, pathways, receptors and project stages that have been 'Scoped In' for the EIA regarding the marine environment.

We also agree with the components that have been 'Scoped Out' for further assessment and the proposed method for determining significance of this chapter. All relevant legislation has been included in the scoping report.

Below we have provided advice to the applicant that can improve the report where information is incorrect, incomplete or unclear. Please refer to the Annex II – Informative, for advice to the applicant regarding baseline data sources.

Advice to applicant

Habitat Descriptions

Document Reference: EIA Scoping report: Part 2

Chapters: 6 - Table 6.3.2

Issue

Mismatch between the intertidal environment and descriptions of subtidal habitats and associated communities.

Impact

Misunderstanding of which habitats are present, leading to incorrect assessment of potential impacts from the project.

Solution

Describe intertidal habitats using specific intertidal habitats from EUNIS rather than those for subtidal habitats.

Additional Information

The table 6.3.2 on broad scale habitat types and associated typical intertidal communities contains descriptions of subtidal habitats. Whilst some of the generic descriptions of infralittoral habitat can be used to classify some intertidal habitat, there are a whole set of EUNIS descriptions for intertidal habitats that would be more suitable.

EMF

Document Reference: EIA Scoping report: Part 2

Chapters: 6 - Table 6.3.5

Issue

Incorrect description for mode of transmission of electricity.

Impact

Misrepresentation of potential changes to EMF may lead to misunderstanding of potential impacts.

Solution

Ensure that description of transmitted current is correct and modify description of potential changes to EMF where necessary.

Additional Information

“Subsea electrical cables (e.g. high voltage alternating current Offshore Export Cable(s)) emit EMFs along their lengths, which has the potential to alter background EMFs.” Offshore cables will conduct DC electricity. AC and DC electricity have different effects on EMF.

Species Clarification

Document Reference: EIA Scoping report: Part 2

Chapters: 6 - 6.4.3.4

Issue

We consider that Allis shad (*Alosa alosa*) is unlikely to be included in the top 4 pelagic species caught.

Impact

Potential for incorrect assessment of risks from the project.

Solution

Revise the text to include landings information for the correct species.

Additional Information

The statement “The top four pelagic species caught in 2022 within these rectangles by weight in tonnes were herring, mackerel, horse mackerel *Trachurus trachurus* and allis shad *Alosa alosa*. These species were also the top four pelagic species caught in 2022 by catch value (£s).” *A. alosa* is a scarce and protected species, fishing for which is prohibited in the UK. A more likely candidate is blue whiting (*Micromesistius poutassou*).

Sea Trout

Document Reference: EIA Scoping report: Part 2

Chapters: 6 - 6.4.3.6

Issue

Sea trout not included as a diadromous species.

Impact

Potential for incorrect assessment of risks from the project.

Solution

Sea trout (*Salmo trutta*) are also a diadromous species present in the area of the project. The absence of this species from Eastern Green Link 3 & 4 data is an error. Include sea trout in the list of diadromous species and any subsequent assessments of potential impact.

Migratory Species

Document Reference: EIA Scoping report: Part 2

Chapters: 6 - 6.4.3.6 & 6.4.3.7

Issue

Incorrect use of adjectives for migratory fish.

Impact

Misunderstanding of directions of migration may lead to incorrect assessment of risks from the project.

Solution

Revise the text to use correct adjectives.

Additional Information

There are 8 diadromous species, of which one is catadromous (*A. anguilla*) and the remainder are anadromous. Diadromous migrate between fresh and marine waters (or vice versa) during their lifecycle location of breeding not specified. Anadromous migrate up rivers from the sea to spawn. Catadromous migrate down rivers to the sea to spawn. Catadromous fish and anadromous fish are each a subset of diadromous fish.

Taxonomic Descriptions

Document Reference: EIA Scoping report: Part 2

Chapters: 6 - 6.4.3.13

Issue

Incorrect taxonomy.

Impact

Potential for incorrect assessment of risks from the project.

Solution

Use correct taxonomic descriptions. The family Ommastrephidae constitute species of squid, not octopuses.

Invasive and Non-native Species (INNS)

Document Reference: EIA Scoping report: Part 5

Chapters: Appendix 9.2, Table 1.2

Issue

Incomplete consideration of processes related to INNS.

Impact

Potential for incorrect assessment of risks from the project, leading to failure in compliance with WFD.

Solution

Ensure that risks of introduction of INNS and facilitation of spread of INNS are included within the assessment.

Additional Information

Reference is made only to spread of INNS (e.g. by creation of stepping stone effects using novel hard substrata on soft seabeds). There are also risks of introduction of INNS (e.g. via ballast waters from vessels used in construction).

Water Framework Directive Waterbodies

Document Reference: EIA Scoping report: Part 5

Chapters: Appendix 9.3, Table 1.5.1

Issue

Incomplete list of waterbodies.

Impact

Potential for incorrect assessment of risks from the project, leading to failure in compliance with WFD.

Solution

Include additional waterbodies in the assessment, specifically those downstream of directly affected waterbodies. The transitional waterbodies of Witham (GB530503000100) and The Wash Inner (GB530503311300) are immediately downstream of waterbodies with direct overlap and should also be included.

APPENDIX G – WATER RESOURCES

We agree with what has been ‘Scoped In’ of the EIA regarding Water Resources. We have outlined below a short summary of Issues, developer position and EA position. Followed by detailed comments of our current concerns.

We disagree with the reports assessment to ‘Scope Out’ Impacts to existing water supplies. There are indirect impacts for increasing demand from public water supply to consider. Water Supply for consumptive activities has not been considered in sufficient detail by the scoping exercise for the construction phase.

To provide clarity we have formulated the below in **Table 1.6** to summarise our position.

(Table 1.6 Water Resources Position Summary)

Issue	Developer position	EA Position
Water resources	Scoped out.	Scope In.

Below our detailed comments we have provided advice to the applicant on the impacts identified and their proposed methodology of assessment. Please refer to the Annex II – Informative, for advice to the applicant dewatering/abstraction licenses.

Detailed Comments

Water Resources

Document Reference: EIA Scoping report: Part 3

Chapters: 7 - Table 7.3.6

Issue

Water resources has been scoped out of further assessment for all phases.

Impact

Impact local water supply.

Solution

Early engagement with Anglian Water to understand if water supply demands can be met. Complete a water resource assessment for the construction phase of the development. The production of a basic water supply strategy that evaluates the construction phase water demands.

Additional Information

We agree for the operational phase that any water demand may be negligible. However, demands during construction should not be underestimated.

Advice to applicant

Water Resources

Anglian Water Service (AWS) has adopted a “Non-Domestic Water Requests Policy” for which it asks of applicants who require non-domestic water supply to complete Water Resource Assessment to understand water demands, water efficiency measures and to effectively forecast water supply requirements. AWS may not be able to supply all new non-domestic demands until new strategic supplies are developed. Therefore, we advise that you engage in conversation with AWS to ensure that supply can be achieved for the development’s needs.

We recommend a basic water supply strategy be produced to evaluate the water demands during the construction phase. In addition to potable and domestic water needs, demands may include (but are not limited to) dust suppression; bentonite clay mixing for HDD; concrete production; wheel/concrete washing which, when added together may not be considered negligible.

This strategy could be compiled using the Water Resources Assessment approach set out by Anglian water. If water cannot be provided from AWS, the applicant will need to plan for other sources of supply. We would expect the assessment to be undertaken alongside the Environmental Statement or to comprise part of a CEMP or CoCP.

ANNEX I – DOCUMENTS REVIEWED

- Ossian Offshore Windfarm: Transmission Infrastructure EIA Scoping Report: Part 1 (of 5). February 2025.
- Ossian Offshore Windfarm: Transmission Infrastructure EIA Scoping Report: Part 2 (of 5). February 2025.
- Ossian Offshore Windfarm: Transmission Infrastructure EIA Scoping Report: Part 3 (of 5). February 2025.
- Ossian Offshore Windfarm: Transmission Infrastructure EIA Scoping Report: Part 4 (of 5). February 2025.
- Ossian Offshore Windfarm: Transmission Infrastructure EIA Scoping Report: Part 5 (of 5). February 2025.

ANNEX II – INFORMATIVE

Flood Risk and Coastal Management Beach Replenishment Scheme

We have significant concerns the offshore and landfall location between Sandilands and Anderby Creek, as shown on Figure 3.6.3, has the potential to impact on the delivery and costs of our flood risk management works.

The defences today along the Lincolnshire Coast are a combination of wide-open beaches with either natural or man-made sand dunes and concrete walls. The hard defences were originally designed to withstand the full force of the tides and waves of the North Sea, with a low-level beach at the base of the defences. During the 1980s and 1990s, many of these defences were improved rather than replaced, followed by the addition of a higher-level beach. Work has continued to be carried out each year to make sure the beach height is maintained. Replenishing the sand means the beach takes the brunt of the wave's force and energy instead of hard defences like sea wall. These works reduce both the amount of damage/erosion to the hard defences and the risk of water overtopping.

Every year, we invest in artificially nourishing the beaches from Saltfleet to Gibraltar Point. This not only helps to reduce the risk of flooding for Lincolnshire's coastal communities but also retains the appearance of the sandy beach. With sand naturally disappearing every year, it is predicted without nourishment the beaches would be gone in 5-7 years. This work reduces the risk of flooding to 20,000 homes and businesses, 24,500 static caravans and 35,000 hectares of land along the Lincolnshire Coast.

We must ensure additional measures are in place for the continued protection of our assets. We will require the Applicant to enter into a legal agreement with us. This legal agreement will ensure installation of any cables and construction of the project do not adversely affect the annual beach nourishment works. Not protecting these scheduled works would result in delays, additional cost to us and increase the risk of tidal flooding along the Lincolnshire Coast.

Geomorphology Informative

Below are some general guidelines for watercourse crossings and coastal landfall.

When considering depth of crossings in the coastal environment at landfall, historic and future rates of coastal change should be considered as possible worst-case scenarios should current beach maintenance scheme cease.

Geophysical and geotechnical studies should be used to identify if/where there might be the possibility of subsidence/sinkhole formation along the cable route. Trenchless methods used at landfall should be designed with future maintenance/upgrade of

existing sea defences in mind. Cable routing should also be at sufficient depth as to not interfere with natural processes and future shoreline change.

General Geomorphology Considerations

Below are general guiding principles to consider when designing watercourse crossings/coastal landfall to avoid negatively affecting geomorphology and natural processes:

- Avoid unnecessary interference with natural processes. For instance, encourage the use of trenchless techniques such as Horizontal Directional Drilling (HDD) to minimise the likelihood of cables entering the water environment.
- Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.
- Ensure coastal landfall infrastructure is located outside of areas expected to be impacted by coastal change over the duration of the project.
- Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by future coastal erosion or river movement, becoming an impediment to natural processes.
- Consider opportunities to deliver WFD mitigation measures/BNG uplift as part of the design.
- Avoid preventing the delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration or flood defence works (including construction of bypass channels).

Notes:

- i. WFD applies to all surface waterbodies, not just those designated for monitoring purposes.
 - ii. BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric.
- Any potential construction, operational, and decommissioning phase impacts the proposed scheme may have on the river must be subject to a WFD Assessment to the satisfaction of the EA.
 - Any infrastructural developments on river/floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.
 - Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook (Flood Estimation Handbook (FEH) | UK Centre for Ecology & Hydrology (ceh.ac.uk)). Therefore, any infrastructure developments should also take some account of the

likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. 'a flood-rich epoch') over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/behaviour).

- If river crossings (bridges, culverts, and buried cables) are required as part of the development, we would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.

Further guidance in regard to river crossings can be found in the following document:

SEPA, 2010. Engineering in the water environment: good practice guide River crossings Second edition. SEPA

Watercourse Sensitivity

- Care should be taken by applicants when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.
- WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated.
- Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

Groundwater and Contaminated Land Informative

We also recommend early engagement with regard to potential permits that may be needed for treatment or re-use of any waste deposits.

The scoping report has identified all the local historic landfill sites. Any potential development on historic landfills or other brownfield sites should begin with a Preliminary Risk Assessment to assess risk from contamination.

Dewatering Informative

We agree the impacts of Dewatering should remain scoped in to further assessment.

If dewatering is required, it will require an abstraction licence if it doesn't 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*](#).

Consumptive abstraction from Groundwater is not available from primary aquifers in this region. If the abstraction is shallow enough to be in continuity with the surface water, other restrictions may also apply. More details can be found in the Abstraction Licensing Strategy for the catchment.

In addition to potential volumes, locations and depth, we recommend consideration for if the 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 license being granted.

Watercourse Crossing/Crossing Schedule

Full details of all proposed watercourse crossings should be provided, including locations, methodologies, and assessments of flood defence assets potentially affected. It would be beneficial to this points summarized in a Crossing Register.

Watercourse Crossing

Access tracks and crossing types over watercourses have not been specified for the construction phase. It is assumed that access tracks over watercourses (such as culverts) will be required for vehicles during the construction phase, yet there is no reference within the EIA Scoping report to the proposed vehicle-crossing methodology.

Culverts have the potential to fragment habitats and reduces connectivity, making dispersal and commuting for some species difficult. Culverts also put an added pressure on otters during periods of high water-levels, as culverts offer little room for conveyance and put otters at risk of being killed when crossing roads.

Should any access tracks cross watercourses or ditches, we would expect to see open-span bridge design. There may be potential for existing watercourse crossing points to be improved for ecology. For example, removal of a culvert and replacing with an open span bridge. For access, temporary or permanent, open span crossings are preferred over culverts. We encourage the use of existing crossings for access over the construction of new crossings.

Open-Cut Crossings

Where open-cut excavations are proposed, this can be damaging to fish and their habitat. Details of the proposed crossings and methodology should be provided. Trenchless techniques are favoured and less damaging to fish. Where trenchless techniques are not feasible, an assessment of the habitat suitability for fish and potential fish surveys are required at locations of crossings.

It should be further noted that open-cut excavations crossings can be damaging to hydromorphology of the watercourse. Proposed watercourse crossing methodologies and potential risks to the morphology should be identified. This would also provide data for BNG and may indicate areas for WFD uplift.

HDD Crossings

Where the project proposes to cross Main Rivers, we require these crossings to be made via HDD. Detail of HDD crossings that interact with flood defences have not been identified. We recommend providing a crossing schedule that should be inclusive of HDD methodologies and locations. We would also require the below information to be submitted:

- Flood defences condition assessment.
- Impacts on the flood defences.
- Mitigation measures.
- Monitoring requirement, with proposed reinstatement wording to the flood defence asset if impacted by the project.

Baseline Data Source (EA Ecology and Fish data explorer)

The baseline data sources for Fisheries, Marine and Biodiversity do not include data from the EA Ecology and Fish Population Database. We recommend the use EA fish population data and monitoring report from the EA Lincolnshire beach renourishment scheme, to support the quality of the baseline data.

This data service platform holds data collected during routine samples by the EA, including protected, priority/notable and INNS species. Not using this extensive data base could lead to an Incomplete understanding of species present, leading to unanticipated impacts from the project.

According to our records European smelt, European eel and river lamprey, brook lamprey, spined loach, bullhead and brown/sea trout are present in watercourses proposed to be crossed by the scheme, as well as a notable population of coarse fish species.

Sequential Test

Design principles set out for the site selection for onshore converter stations includes avoiding areas that fall within areas of high flood risk. We support this principle,

however the Sequential Test should be applied to the development site, and to the layout of development within the site boundary.

In accordance with National Planning Policy Framework and the sequential test (paragraph 168), development 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 impact of climate change, to avoid (where possible) flood risk to people and property. The project should take a sequential approach where it can, if there are any opportunities for development to be located outside of flood zones 2 and 3 and into flood zone 1, this should be prioritised.

Flood Risk Assessment

As the project lifetime has the potential to be extended past its predicted lifetime, the project should anticipate this and assess the risk posed by climate change for its full potential lifetime. Climate change impacts on flood risk to the proposed development should be assessed for the entirety of the development lifetime.

The developer will need to consider the future flood extent of the design flood plus climate change, which should be informed by the design life of the development. The developer will also need to consider the Credible Maximum Scenario in the context of climate change. Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk)

Climate Change Flood Risk Assessment

Climate change is expected to alter the baseline hydrology and flood risk including river flows, rainfall intensity, and sea levels. The impacts of climate change must be fully assessed within the FRA, and appropriate mitigation included in the development design, where required. The development is classed as essential infrastructure.

For fluvial flood risk, the higher central climate change allowance should be used (70th percentile). A sensitivity test for the credible maximum scenario, which in this case would be the upper climate change allowance for fluvial flows (95th percentile) and the H++ scenario for tidal flood risk, should also be completed.

Waste Informative

Movement of waste off-site – Duty of care & Carriers, Brokers and Dealers Regulations

The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes.

The code of practice applies to you if you produce, carry, keep, dispose of, treat, import or have control of waste in England or Wales.

The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly and only given to businesses authorised to take it. The code of practice can be found

here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/506917/waste-duty-care-code-practice-2016.pdf :
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/506917/waste-duty-care-code-practice-2016.pdf

If you need to register as a carrier of waste, please follow the instructions here:

<https://www.gov.uk/register-as-a-waste-carrier-broker-or-dealer-wales>

Movement of waste off-site – Duty of care & Carriers, Brokers and Dealers Regulations Characterization and classification of waste

In order to meet the applicant's objectives for the waste hierarchy and obligations under the duty of care, it is important that waste is properly classified. Some waste (e.g. wood and wood based products) may be either a hazardous or non-hazardous waste dependent upon whether or not they have had preservative treatments.

Proper classification of the waste both ensures compliance and enables the correct onward handling and treatment to be applied. In the case of treated wood, it may require high temperature incineration in a directive compliant facility. More information on this can be found here: <https://www.gov.uk/how-to-classify-different-types-of-waste>

Use of waste on-site – authorisation or permit required

If materials that are potentially waste are to be used on-site, the applicant will need to ensure they can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc...' in order for the material not to be considered as waste. Meeting these criteria will mean waste permitting requirements do not apply.

Where the applicant cannot meet the criteria, they will be required to obtain the appropriate waste permit or exemption from us.

A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as:

- any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a

particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.

- We have produced guidance on the recovery test which can be viewed at <https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery-permits#how-to-apply-for-an-environmental-permit-to-permanently-deposit-waste-on-land-as-a-recovery-activity>.

You can find more information on the Waste Framework Directive here:

<https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-framework-directive>

More information on the definition of waste can be found here:

<https://www.gov.uk/government/publications/legal-definition-of-waste-guidance>

More information on the use of waste in exempt activities can be found here:

<https://www.gov.uk/government/collections/waste-exemptions-using-waste>

Non-waste activities are not regulated by us (i.e. activities carried out under the CL:ARE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the Waste Framework Directive). The 'Is it waste' tool, allows you to make an assessment and can be found here:

<https://www.gov.uk/government/publications/isitwaste-tool-for-advice-on-the-by-products-and-end-of-waste-tests>

The waste hierarchy & resource management in relation to construction waste

The developer must apply the waste hierarchy as a priority order of prevention, re-use, recycling before considering other recovery or disposal options. Government guidance on the waste hierarchy in England can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf

Site Waste Management Plans (SWMP) are no longer a legal requirement, however, in terms of meeting the objectives of the waste hierarchy and your duty of care, they are a useful tool and considered to be best practice.

Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Contact: [REDACTED]
Development Services
Direct Dial Tel: [REDACTED]
E-mail: [REDACTED]@fenland.gov.uk

Our ref: F/YR25/4011/LACON
Your ref: EN0210006

19 March 2025

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) - Regulations 10 and 11 Application by Ossian Offshore Windfarm Limited (the applicant) for an Order granting Development Consent for the Ossian Transmission Infrastructure (the proposed development)

Thank you for providing the opportunity to comment on the non-statutory consultation for the proposed Ossian Transmission Infrastructure.

The Council has considered the documents and plans and would like to offer the following comments;

Onshore works

It is noted that the proposed onshore converter stations, Lincolnshire Connection and Weston Marsh Substations, are to be developed by National Grid Electricity Transmission (NGET) as part of the Grimsby to Walpole project and would be required close to the National Grid substations to transform the electricity supplied by the Ossian Array from HVDC to HVAC for connection to the National Grid electricity transmission system.

Visual impact

It is understood that there may be impacts to the landscape character by virtue of the proposed onshore converter stations and associated works, however it is not possible to comment on these impacts until such time that as a minimum, a Landscape Visual Impact Assessment (LVIA), including any consideration of statutory designated sites, is produced for consideration.

Construction

Given the scale of the project, initial concerns are raised regarding the potential impacts of the highway network, particularly given the condition and classification of the some of the

19 March 2025

Planning Inspectorate

Our ref: F/YR25/4011/LACON

highways that would be necessary to use to undertake the works. Such concerns include, construction traffic impacts, damage to highways, diversions necessary and potential congestion. When the proposal enters a statutory stage of consultation, the Council would expect that a transport assessment, phasing plan and construction transport management plan is produced for consideration.

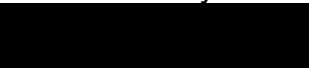
Heritage

Notwithstanding the above comments regarding LVIA, it is understood that the development as proposed will impact on a number of undesignated heritage assets in Fenland. The corridor passes through an area of fen crossed by a number of roddons, areas of raised ground which were historically exploited. In Tydd St. Giles this is particularly notable with medieval salt workings utilising the fen, shown from find spots of medieval artefacts found along the fen edge and major roddons crossing the area (e.g., Cambridgeshire Historic Environment Record reference. MCB24468, 03825, 10921 and 03826). The application in its current form does not contain information regarding the archaeological potential of the corridor route through Fenland and therefore it is not possible to understand the impact on designated and undesignated heritage assets at this time. An assessment of these impacts would be expected to be provided for consideration under any future statutory consultation.

Conclusion

The above comments are based on initial proposals set out within the consultation documents, which at this time do not offer any detailed technical analysis or conclusions of localised impacts to the Fenland District or wider areas. Therefore, whilst the comments above should be noted, the Council reserves the right to provide further comments at a later stage.

Yours faithfully



Senior Development Officer

General Data Protection regulations 2018

To provide you with our services we need to record personal information, such as your name and address. This information will be kept securely and only accessed by approved staff.

From: [REDACTED]@btinternet.com
To: [Ossian Transmission Infrastructure](#)
Subject: EN0210006 Ossian Offshore Windfarm
Date: 19 March 2025 12:54:27

You don't often get email from [REDACTED]@btinternet.com. [Learn why this is important](#)

Please see the responses from the Firsby Group parish Council below:

We object to this planning application on the basis of points 1) and 2):

1) If pylons and overhead cables are to be used to transmit any/part of/all of the electricity generated by Ossian coming onshore and transmitted through East Lindsey as pylons and overhead cables are ugly and an aesthetic abomination on the landscape, very early/mid 20th century, very regressive, grossly scarring and negatively affecting the environment long term. This will lead to a devastating effect on the health and well being of the local population, especially, and any visitors or tourists to the area which will result in a negative effect on the growth of the local tourist economy compounded by significantly reducing the value of surrounding land and residential property in the area.

And

2) If converting stations utilised are close to residential properties and/or not totally screened which will result in a devastating effect on the health and well being of, especially, the local population and any visitors or tourists to the area hence also producing a negative effect on the growth of the local tourist economy compounded by significantly reducing the value of surrounding land and residential property. Total screening will prevent a deterioration in the environment and location well away from residential properties will ensure residents do not suffer from noise pollution and great negative equity in the value of their properties.

We do not object to the planning application:

If all of the electricity generated by Ossian coming onshore and being transmitted through Lincolnshire is transmitted via underground cables with any converting stations complying with Point 2.

This application assumes and is dependent on the Grimsby to Walpole pylons and the associated infrastructure being approved.

Kind Regards

[REDACTED]

[REDACTED]

Clerk to Firsby Group Parish Council

From: [REDACTED]
To: [Ossian Transmission Infrastructure](#)
Subject: Ossian Transmission Infrastructure EIA Scoping Consultation - EN0210006
Date: 24 March 2025 17:04:48
Attachments: [image001.jpg](#)

You don't often get email from [REDACTED]@forestrycommission.gov.uk. [Learn why this is important](#)

Thank you for consulting the Forestry Commission on this proposal.

As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.

Although it is hard to assess the potential specific effects of the proposal due to the lack of clarity and detail provided by the supplied maps.

We note there are several areas of Ancient Woodland within the onshore scoping boundary.

Ancient Woodland:

Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

Section 5.4.32 of EN-1 – The Overarching National Policy Statement for Energy states:

“Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both the construction and operational phases”

Section 5.4.53 goes on to state:

“The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists”

We would particularly refer you to further technical information set out in Natural England and Forestry Commission’s [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide](#) and [“Keepers of Time” – Ancient and Native Woodland and Trees Policy in England](#).

The Standing Advice states that proposals should have a buffer zone of at least 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you’re likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction. For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. This will create a minimum root protection area.

Where possible, buffer zones should contribute to wider ecological networks and be part of the green infrastructure of the area. They should consist of semi-natural habitats such as including woodland, scrub, heathland and wetland.

There is a need to consider both the direct and indirect impacts resulting from construction. Direct impacts can include, but are not limited to, damaging or compacting soil, damaging functional habitat connections and changing the woodland ecosystem by removing the woodland edge or thinning trees. Indirect impacts can also include reducing the amount of semi-natural habitats next to ancient woodland, increasing the amount of dust, light, air or soil

pollution or changing the landscape character of the area.

We would expect to see a detailed assessment of any impacts to the ancient woodland, including details of measures to be taken to reduce and mitigate any effect.

It is essential that fuels, chemicals or water materials such as topsoil, minerals or hardcore are not stored on Ancient woodland soils or under the woodland canopy.

Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage.

Priority Habitat:

We note there are numerous areas of mixed deciduous woodland within the scoping area. Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 “Duty to conserve and enhance biodiversity” and Sect 41 – “List of habitats and species of principle importance in England”.

Section 5.11.27 of EN-1 of the Overarching National Policy Statement for Energy states:

“Existing trees and woodlands should be retained wherever possible.....The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long term management and maintenance of newly planted trees should be secured”

Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through loss of connectivity, damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy.

Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone as well as dust prevention measures to reduce any potential impact of dust pollution.

Grant Funded Woodland:

It should be noted that some of the small woodlands within scoping area were established or managed with the support of public money in the form of the Farm Woodland Premium Scheme (FWPS)

These grants are still in ‘obligation’. The obligation period can last for up to thirty years from the date the first instalment of grant was paid. The landowner is expected to meet all of the Terms and Conditions of the agreement contract. Failure to do so is likely to require the Forestry Commission to seek to recover all of the relevant grant that has been paid to avoid public money being wasted.

Net Deforestation and Tree Planting:

It is expected that there will be a thorough assessment of any loss of all trees within the project

boundary and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.

Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development. Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between the existing woodland blocks on site, to link them and ensure maximum gains to increase habitat connectivity, to make woodlands more resilient and to benefit biodiversity across the whole area, not solely in specific isolated areas. Ideally we would like to see woodland creation to be carried out in 5ha blocks or that connecting planting with existing woodlands, should create blocks of at least 5ha.

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050, The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes: The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases, particularly in areas where there are ancient woodlands.

Plans should also be in place to ensure the long term management and maintenance of new and existing woodland, perhaps by creation of a UK Forestry Standard compliant management plan, with access also needing to be considered for future management.

We hope these comments have been useful to you. If you require any further information, please do not hesitate to contact me.

Best wishes

[Redacted]

[Redacted]

Local Partnership Advisor
East & East Midlands

[Redacted]

[Redacted] [@forestrycommission.gov.uk](mailto:[Redacted]@forestrycommission.gov.uk)

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From: [Grimoldby and Manby Parish Council](#)
To: [Ossian Transmission Infrastructure](#)
Subject: EN0210006 re. Ossian Windfarm
Date: 19 March 2025 21:47:55

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Grimoldby and Manby Parish Council endorse and support the comments of Mablethorpe and Sutton Town Council and Theddlethorpe Parish Council since they are more directly involved than we are. Their comments are:

Mablethorpe and Sutton Town Council: With reference to conditions within Schedule 4 of EIA Recommendations, Members considered that factors specified in regulation 4(2) likely to be significantly affected by the development were specifically, although not limited to, population, human health, biodiversity and loss of agricultural land.

Theddlethorpe Parish Council: The council resolved to ask that the following be included in the EIA: Survey of expected impact/effect on wildlife (this project will intrude on the dunes and the King's Coronation Coast). Survey of expected impact/effect on the water table. Survey of expected impact/effect on climate change. Survey of expected impact/effect on flooding risks. Survey of expected health impacts on residents. Expected net carbon footprint of the project.

Electromagnetic compatibility, particularly Radiated emissions (with particular emphasis near primary schools). Archaeological study of the planned route.

Economic viability of the project on its own merit; particularly as the proposal assumes the Grimsby to Walpole pylons will be approved, what is the status of the EGL3 and EGL4 if the pylons do not go ahead as proposed?

CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

Email: ossiantransmission@planninginspectorate.gov.uk

Dear Mr Bhatia

Date: 18 March 2025

**PROPOSED OSSIAN TRANSMISSION INFRASTRUCTURE (the project)
PROPOSAL BY OSSIAN OFFSHORE WINDFARM LIMITED (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of 25 February 2025 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

Yes - According to the HSE's records, the proposed DCO boundary for this Nationally Significant Infrastructure Project is within the consultation zones for nine Major Hazard Sites (MAH) and eleven Major Accident Hazard Pipelines (MAHP) as listed below. This is based on the GIS files (OSN_ScopingBoundary_BNG.zip) received on 03/03/2025 from Ossian Wind farm Project and the red line onshore scoping boundary and onshore converter station search areas indicated on Figure 3.7.1 on drawing number PLN-ESH-00043-073-01, dated 06/02/2025 on page 23 of the Scoping Report Part 1, dated 21/02/2025 ([EN0210006-000003-Ossian Transmission Infrastructure Scoping Report Part 1.pdf](#))

At this stage in the project the scoping boundary is large to allow for changes in the landfall and routing options. As the project progresses and decisions are made over routing, the width of the boundary corridor should decrease significantly. The Scoping report indicates that a site selection process is ongoing with a number of sites being looked at for landfall of the offshore cabling and locations for up to three Onshore Converter stations. Figure 4.7.1 of the Scoping Report Part 1 indicates that a development corridor of up to 60m in width will be required during laying of the cable route infrastructure, but at this stage there is no clear indication of the landfall, route or siting of converter stations.

The Major Accident Hazard sites identified within the scoping boundary are listed below:

1. H0950 – PP & H (Spalding) Ltd, Wardentree Lane Pinchbeck Spalding Lincs, PE11 3UG
2. H3482 – Fold Hill Foods Ltd, Dovecote Farm Lade Road Old Leake Boston Lincs PE22 9RJ
3. H3711 – PKA Flogas UK Ltd, The Depot Huttoft Road Mumby Skegness LN13 9JS
4. H3763 – John Parsons Marketing Ltd, Port of Fosdyke Fosdyke Bridge Boston Lincs PE20 2DB
5. H4421 – F & H Panton Bros, The Willows Willow Wood Farm Main Road East Kirkby Spilsby, PE23 4BY
6. H4483 – F & H Panton Bros, Lancaster Farm & Stickford Farm Fen Road Stickford Boston PE22 8HD
7. H4653 – Calor Gas, Lincolnshire Gases Compound Ltd, Glebe Farm, Raithby, Lincolnshire. PE23 4DL
8. H4812 – Moulton Bulb Company, Long Lane Moulton Lincolnshire PE12 6PP
9. H4953 – Calor Gas, Lancaster Business Park Main Road East Kirkby Spilsby PE23 4BU.

These should be included in further risk assessments as the project develops.

The MAHPs encountered along the project route are listed below:

1. 1032003 Spalding Energy Company Ltd, 14" Fuel gas supply pipeline at Spalding
2. 11622 InterGen (UK) Limited, NTS to Spalding Energy PS Pipeline
3. 12450_2717 Cadent Gas Ltd, Belnie Tee - Belnie
4. 4483080 Spalding Energy Expansion Ltd, AGI West Marsh Road - Welland Power Station
5. 6905_1180 National Gas, 7 Feeder Gosberton/North Level Main Drain
6. 6910_1185 National Gas, 7 Feeder Hatton / Gosberton
7. 6927_1201 Cadent Gas Ltd, Pinchbeck / Midville
8. 6928_1202 Cadent Gas Ltd, Gosberton / Gosberton Tee
9. 6929_1203 Cadent Gas Ltd, Midville / Candlesby
10. 7036_1307 National Gas, 8 Feeder Theddlethorpe/Hatton
11. 7038_1309 National Gas, 17 Feeder Theddlethorpe / Hatton

The Applicant should contact the above MAHP operators to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this:

- i) The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
- ii) The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.
- iii) To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice is dependent on the location of areas where people may be present in relation to HSE's consultation zones [[HSE: Land use planning - HSE's land use planning methodology](#)]. Based on the information supplied in the Scoping Report, Parts 1-5, dated 21/02/2025 it is unlikely that HSE would advise against the development. The potential for introduction of populations associated with the project is limited. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information as provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

Would Hazardous Substance Consent be needed?

Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of [The Planning \(Hazardous Substances\) Regulations 2015](#) as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an "addition rule" in Part 4 of Schedule 1 for below-threshold substances.

Based on the [EN0210006-000003-Ossian Transmission Infrastructure Scoping Report Part 1.pdf](#), and subsequent parts 2-5, inclusive, it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no in-scope hazardous substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application.

Consideration of Risk Assessments

[Regulation 5\(4\)](#) of the [Infrastructure Planning \(Environmental Impact Assessment\) Regulations 2017](#) requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in the Planning Inspectorate's Advice Note 11 'working with public bodies in the infrastructure planning process' Annex G [Nationally Significant Infrastructure Projects - Advice Note Eleven, Annex G: The Health and Safety Executive -](#)

[GOV.UK \(www.gov.uk\)](http://GOV.UK). This document includes the requirement to consider risk assessments under the heading “Risk assessments”.

Section 10.7 of the Scoping Report Part 4 covers Major Accidents and Disasters ([EN0210006-000006-Ossian Transmission Infrastructure Scoping Report Part 4.pdf](#)). It states that where the Ossian Transmission Infrastructure encounters consultation zones associated with MAH and MAHP the applicant will seek to consult with the HSE, other relevant bodies and the pipeline operators. It also states that the risk of major accidents and disasters will be considered within each topic chapter of the PEIR and ES. The applicant intends to scope out a standalone chapter on major accidents and disasters.

The DCO boundary currently encompasses a number of major accident hazard sites and major accident hazard pipelines. At this stage and given the limited information provided on final routing and transmission infrastructure we would advise that major accidents and disasters remains in scope and are considered further to better determine the development’s vulnerability to major accidents and how the development would impact surrounding sites and infrastructure.

It would be beneficial for the applicant to undertake this risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation at each stage in the consultation and development process.

Explosives sites

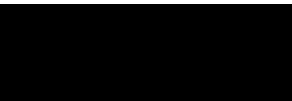
Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE’s designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk . We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely




CEMHD4 NSIP Consultation Team

██████████
Senior EIA Advisor
Planning Inspectorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

26th March 2025

Dear Ms Luhr,

Ossian Transmission Infrastructure – EIA Scoping Report Consultation

Thank you for your email notification, dated 27th February 2025, requesting our comments on the following document, as referenced:

Ossian Offshore Wind Farm: Transmission Infrastructure EIA Scoping Report (February 2025)

In summary, we agree with the scoping in of impacts to the historic environment as relevant to any area within English jurisdiction set out in Chapter 6.9 (marine archaeology) and Chapter 7.6 (historic environment), as relevant to defined aspects of construction, operation and maintenance and decommissioning phases of this proposed development.

The role of Historic England

As you may be aware, Historic England is the Government's advisor on all aspects of the historic environment in England. Historic England's general powers under section 33 of the National Heritage Act 1983 were extended (via the National Heritage Act 2002) to modify our functions to include securing the preservation of monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. We provide our advice in reference to National Policy Statements and in recognition of the English marine plan areas (inshore and offshore), as defined by the Marine and Coastal Access Act 2009 and the objectives and policies of published Marine Plans.

Introduction

We understand from the EIA Scoping Report produced for this proposed development that electricity export cables could be routed from the Ossian Floating Offshore Wind Farm (the “Ossian Array”), which might be located in the North Sea off the east coast of Scotland.

The spatial extent of this proposed development relevant to England planning and consenting jurisdiction is therefore the transmission infrastructure of up to six offshore export cables to landfall, High Voltage Direct Current (HVDC) onshore export cables and up to three Onshore Converter Stations (OCSs) for HVDC to High Voltage Alternating Current (HVAC) conversion (collectively referred to as the “Ossian Transmission Infrastructure”). Connection of the Ossian Transmission Infrastructure to the National Grid electricity transmission network could occur at new substations at Lincolnshire Connection Node (LCN) and Weston Marsh to be developed by National Grid Electricity Transmission (NGET).

The consenting mechanism within England will be as a Nationally Significant Infrastructure Project, as confirmed by Secretary of State under section 35 of the Planning Act 2008. However, we note that Ossian Offshore Wind Farm Ltd intend to produce a single Environmental Statement (ES) that sets out the environmental effects for all onshore and offshore aspects, including the Scottish Offshore Transmission Infrastructure. We therefore ask that in your response to the Applicant you request that all information presented (including all policy and legislative requirements) in the ES is geographically specific to either England or Scotland.

Chapter 3 Site selection and consideration of alternatives (EIA Scoping Report Part 1)

Section 3.5. (Offshore Transmission Infrastructure (Stage 3)) – We concur that the desktop review of constraints for the offshore export cable corridor includes marine archaeology. We also note that the preferred cable landfall search area is between Sandilands and Anderby Creek (Lincolnshire) and that desk-based data gathering includes the historic environment for all elements of proposed onshore transmission infrastructure with consideration also given to other existing electricity cable circuits.

Chapter 4 Project Description (EIA Scoping Report Part 1)

Section 4.5 (Offshore Components), Table 4.5.2 (Indicative design parameters as relevant to England) state a seabed burial depth target of between 1m and 3m in “high risk areas”, which will require preparation comprising pre-lay grapnel run, boulder clearance and sandwave clearance with pre-construction geophysical surveys. Therefore, there is risk that archaeological materials might be encountered presently buried within the contemporary seabed.

Section 4.7 (Onshore components) describes the OCSs required as:

- One OCS in the vicinity of one of the two new Lincolnshire Connection Substations (LCS) proposed as part of the Grimsby to Walpole project; and
- Up to two OCSs in the vicinity of the new Weston Marsh Substation proposed as part of the Grimsby to Walpole project which may be co-located or separately located.

Regarding the anticipated specifications of the Onshore Converter Stations, Table 4.7.1 offers a maximum building height of 26m with an indicative footprint of 7.5ha for both LCS and Weston Marsh. These are design factors that are relevant to the assessment of impact.

Chapter 5 Approach to Environmental Impact Assessment (EIA Scoping Report Part 1)

Paragraph 5.5.2.20, the language is a little loose in respect of major/moderate impacts and what may be “material” in the decision-making process. We understand the intention to highlight impact levels that could be key to the determination of the scheme – and clear focus in this respect is wise. However, “material” in planning terms has a different and broader sense and the wording here may cause confusion.

Section 5.10 (Approach to consultation and engagement), Figure 5.10.1 (Evidence plan process structure), we acknowledge that we are part of the Evidence Plan Process Steering Group, and we take this opportunity to clarify that “Historic Environment”, while included in the “Onshore” box, should be managed to thematically cover either onshore or offshore matters, as we recommended at an EPP Steering Group meeting held on 21st January 2025.

Chapter 6.9 Marine Archaeology (EIA Scoping Report Part 2)

We are aware that the intertidal area will be included within the onshore historic environment chapter and that for this scoping report information has been drawn from the UK Hydrographic Office. It is therefore important that the Applicant has acknowledged the importance of commissioning geophysical and geotechnical survey data as well as obtaining other desk-based sources of information, as summarised in Annex A (Gazetteer of known wrecks and obstructions). It is also important that this Scoping Report acknowledges the risk that presently unknown elements of the historic environment might be encountered within the proposed development corridor, as stated in paragraph 6.9.3.8.

Section 6.9.4 (Proposed Data Sources), Table 6.9.1 includes Historic England data resources which it will be important to access for information within the English Inshore Marine Planning Area. We note that geophysical survey of the Offshore Scoping Boundary, as relevant to the English marine planning, was undertaken between February to November 2024 (paragraph

6.9.4.5) and that a geotechnical survey will also be undertaken to inform project design. However, regarding the marine geophysical survey conducted to date, it is important that reporting (i.e. archaeological analysis and interpretation) is included in any PEIR and is not delayed until the ES. This is a very important matter so that data analysis and planning of any subsequent geotechnical survey campaign is fully informed by an assessment of archaeological potential and risk.

6.9.5 (Mitigation measures) references The Crown Estate guidance published in 2014. It is therefore important that the Applicant, should they go on to produce an Environmental Statement (ES), appreciate that these are the publications to use:

- *Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects*, published July 2021; and
- *Protocol for Archaeological Discoveries: Offshore Renewables Projects*, published July 2014

It is important in any ES subsequently produced that the Applicant is clear about respective roles for a professional, accredited and experienced retained archaeological advice service to support the Applicant in project delivery, any specialist sub-contractors (e.g. as described in paragraph 6.9.8.7) and the specific role and responsibilities of national curatorial bodies (e.g. Historic England) in either England or Scotland.

Section 6.9.6 (Proposed scope of the assessment), in reference to Table 6.9.2, we agree with the impacts to be scoped into the assessment as relevant to the identified project phases of “construction”, “operations and maintenance” and “decommissioning”. We are also minded to agree with impacts to be scoped out of the assessment, as relevant to English marine planning areas, set out in Table 6.9.3 and the scoping out of transboundary impacts, as described in paragraph 6.9.8.9.

Section 6.9.8 (Proposed assessment methodology) we recommend that in the preparation of the marine archaeology ES chapter that any guidance documents used (as relevant to England) are checked to ensure they are still relevant e.g. publications produced before the Marine and Coastal Access Act 2009.

Chapter 7.6 Historic Environment (EIA Scoping Report Part 3)

Historic England welcomes the positive approach set out in respect of onshore heritage. We are also aware that this project is being brought forwards alongside other NSIP projects by National Grid and others, which are both technically and spatially associated. In particular, ongoing work on Outer Dowsing Offshore Wind Farm, Grimsby to Walpole (transmission assets and substations) and the emerging National Grid Eastern Green Link projects.

We welcome the references to published advice and existing studies, such as our documents covering Deposit Modelling, Setting of Heritage Assets, Preserving Archaeological Remains, and the work we funded by Caitlin R. Green *Land on the Edge – the landscape evolution of the Lincolnshire coastline* (2023) which is of particular relevance. Alongside the cited sources we also draw your attention to our recently published advice on Lithic Scatters <https://historicengland.org.uk/images-books/publications/managing-lithic-sites/> and to historic studies such as *The book of duck decoys, their construction, management, and history* by Sir Ralph Payne-Gallwey (1886) <https://archive.org/details/bookofduckdecoysx00payn>, alongside the 1st Edition 1" Ordnance survey which provide insight into the landscape of wildfowl exploitation, wind pumps and drainage engines.

We also take this opportunity to refer you to the Ministry of Defence statutory remit under the Protection of Military Remains Act 1986 and the information that we have online in respect of military air crash sites <https://historicengland.org.uk/research/current/discover-and-understand/military/aircraft-crash-sites/>

At this early stage, without prejudice to the issues which may emerge through the EIA process, we highlight the following locations: Toot Hill motte and bailey castle (Scheduled Monument); Alford Mill (Listed Building Grade I); and Gunby Hall (Grade I) in the consideration of effects. Insofar as it is possible to avoid the Lincolnshire Wolds National Landscape this will also assist in avoiding the rich upland archaeology on the chalk.

Whilst the EIA Scoping necessarily focuses on the identification of “significant environmental effects” it should be born in mind that further to the relevant National Policy Statement and National Planning Policy Framework, all harm to designated heritage assets including setting effects requires clear and convincing justification. Therefore, such impacts whilst not always reportable in EIA terms will need to be set before the decision maker, attention on this point can avoid time later spent in Issue Specific Hearings as part of DCO examination.

Paragraph 7.6.2 – There should be some reference to the use of professional judgement and advice from consultees in respect of assets which outside the radii may yet need to be considered in terms of setting (for instance where there are long designed/borrowed views or vista). This is picked up later in the report but is worth signposting here also.

Paragraph 7.6.3.9 – With regards to undesignated heritage assets, demonstrable and potential equivalence in significance to a scheduled monument should also be considered, bearing in mind significance may be revealed through the assessment process and not identified early on.

Tables 7.6.2 and 7.6.3 – consideration should be given to the potential for ongoing post-construction impacts upon the significance of buried organic remains/peat were new water pathways or drainage effects have been introduced by the cable trench and cable bedding acting as a drain/pathway.

Paragraph 7.6.4 – Professional judgement should be applied at the upper end of non-designated asset interest and again where Grade II assets meet upper tier designations, in some instance particular sites will be more appropriately treated in the band above for assessment purposes considering their particular significance and sensitivity.

Conclusion

In terms of further work, we look forwards to providing further advice to the Applicant, should this project proceed to Preliminary Environmental Information Report, and any subsequent ES produced to support a DCO application. We also take this opportunity to refer the Applicant to the expertise of the English local government archaeological advisors and historic building specialists. Pre-determination assessment work should of necessity focus upon information required to assist the DCO examination process. In particular, determination of the case and the planning balance alongside the refinement of route options, addressing impacts by design and ensuring sufficient time and resource supports appropriate mitigation.

Multiple assessment techniques and data sources should be used to build a picture of the resource and impacts thereon, which should also complement each other and support refinement and targeting. For example, integration of cartographic, LiDAR, aerial photographs, locally held Historic Environment Records, Portable Antiquities Scheme data and deposit modelling with geophysical survey and trial trench investigations. The margins where historically wet areas met dry ground should be given particular attention as they can be both rich areas of past human activity and easily overlooked if modelling is too crude.

Some locations in a scheme are likely to involve particularly complex and challenging engineering or archaeological matters; for instance, at waterway crossings, these should as far as possible be assessed as early as possible to ensure the project timings and resources can be efficiently deployed. As with all large scale project, there will be ancillary access, lay-down, compound and other works should be brought into the scope of the Environmental Statement.

Yours sincerely,



Head of Marine Planning

Halton Holegate with Halton Fenside Parish Council

Office Address:
Clerk's Office
Franklin Hall
Halton Road
Spilsby
PE23 5LA

Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

27th March 2025

Dear Sirs,

Please see below the responses from Parish Councillors for your notification relating to Ossian Offshore Windfarm Transmission Infrastructure Development (Your Ref: EN0210006).

Firstly, we must record our general support for the current and previous Governments drive towards sustainable and secure electricity generation and transmission across the whole of the UK, however, we have serious concerns about the uncoordinated approach being pursued by the Government and the many commercial developers of these projects.

This Transmission Infrastructure Proposal is the fourth such project that is proposing a Corridor of Interest that passes through our Parish. The other projects include National Grid Great Upgrade (Pylons), Eastern Green Link 3 (EGL3) (U/G Cables) and Eastern Green Link 4 (EGL4) (U/G Cables).

We are concerned that if all these separate projects receive consent and proceed to fruition in their separate wide corridors that this will result in great swathes of our Parish and District being sterilised for future building, will result in significant potential health risks being manifested and will reduce the productivity of some of the most highly productive farmland in the UK. This we feel is unacceptable and unfair burden being placed on our district.

In previous responses to the various applications the Parish Council has expressed a preference for the cables to be taken offshore to a landfall site close to the Grid Connection Point in Southeastern Lincolnshire and we strongly reassert our continued support for that approach.

At a recent Ossian Consultation Event in Franklin Hall Spilsby, members of the Parish Council who attended were informed that this project, which is located some 80km offshore in Eastern Scotland above Aberdeen was to be connected to the National Grid in Scotland but this proposal was vetoed by National Grid and a connection point in South Eastern Lincolnshire was notified some 450km south of the windfarm site.

This situation was further exacerbated by Natural England also vetoing under sea cables through The Wash. This has resulted in a 400km Offshore cable and 70km of onshore transmission route through our district.

We are assuming this is a similar scenario presented to the previous three developers which has left the Parishioners of Halton Hologate facing massive over exposure to disturbance and on-going adverse impacts of these four separate projects.

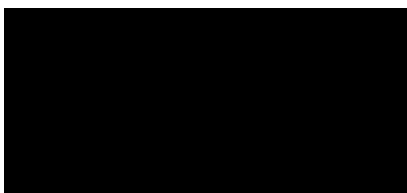
If we accept that these projects are all required and need to pass through our district (which we in Halton Hologate do not, as we continue to support the off-shore approach through The Wash!) then we hereby call on the *Department of Energy and Net Zero* and the *Planning Inspectorate* to take control of the planning of, and lead these developments in a coordinated manner such that the various developers cooperate and build a single transmission line capable of serving all needs now and well into the future. We also strongly suspect that the coordinated approach would also bring forward significant cost savings overall that would also reduce energy costs to all consumers and businesses in the UK.

In conclusion, our village has suffered serious flooding of property and lands in the last 20 years, the most recent occurrence following the passage of Storm Babet in October 2023. Much of this flooding has been caused by the lack of improvements and maintenance to Environment Agency Main Rivers due in part to low levels of funding by successive Governments and the extra burden being placed on other watercourse that serve our community by climate change induced heavier and more frequent rainfall events. Any ground works that would be carried out by these various Energy Transmission Proposals could potentially make matters worse if not properly controlled and management of flood risk instigated as damage to the drainage systems from construction works is inevitable.

If you require any further information, please do not hesitate to contact me.

On behalf of Halton Hologate Parish Council.

Kind regards,



Parish Clerk
Halton Hologate Parish Council

From: [REDACTED]
To: [Ossian Transmission Infrastructure](#)
Subject: EN0210006 - Ossian Transmission Infrastructure project – Response to EIA Scoping Report Consultation
Date: 27 March 2025 16:35:12
Attachments: [image001.png](#)

You don't often get email from [REDACTED]@orsted.com. [Learn why this is important](#)

Dear Sir/Madam

Thank you for notification of the consultation on the EIA Scoping Report for the Ossian Transmission Infrastructure project (the “Project”) submitted by Ossian Offshore Wind Farm Limited (“Ossian”). This response is submitted on behalf of Orsted Hornsea Project Four Limited and Lincs Wind Farm Limited (together, referred to as “Orsted”).

The offshore export cables and reactive compensation substations for the consented Hornsea Four Offshore Wind Farm (“Hornsea Four”) are within the Scoping Boundary and any cables comprised within the Project will require to cross the Hornsea Four offshore export cables. Orsted would therefore welcome early engagement from Ossian in relation to any potential interactions the Project may have with Hornsea Four infrastructure or operations and any potential impacts on Hornsea Four should be considered within the EIA.

The array for Lincs Offshore Wind Farm is adjacent to the Scoping boundary and so depending on the location of the Project’s infrastructure within the Scoping boundary and the vessel movements associated with the Project, there is potential for the Project to impact the operations of Lincs Offshore Wind Farm which should be considered within the EIA.

Orsted would like to be consulted in respect of the Project going forward and would welcome early engagement from Ossian on any potential interactions with Orsted assets and operations.

Kind regards

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From: [JNCC Offshore Industries Advice](#)
To: [Ossian Transmission Infrastructure](#)
Cc: [JNCC Offshore Industries Advice](#)
Subject: RE: EN0210006 - Ossian Transmission Infrastructure project - Notification of Environmental Impact Assessment scoping report consultation
Date: 25 February 2025 13:11:50
Attachments: [image002.png](#)
[image004.png](#)
[image005.png](#)

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Good Afternoon,

Thank you for contacting and JNCC regarding the Ossian Transmission Infrastructure project.

JNCC's role in relation to offshore renewables in English waters has been delegated to Natural England.

Natural England is now authorised to exercise the JNCC's functions as a statutory consultee for offshore renewable energy installations in inshore and offshore waters (0-200nm) adjacent to England.

As operations are within English waters therefore, Natural England should provide a response. Natural England will contact JNCC directly if they require additional input.

As such JNCC will not be providing further comment at this time.

Please contact me with any questions regarding the above comments.

Kind regards,



Offshore Industries Advice Officer

Marine Management Team

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E-Mail: nsips@lincolnshire.gov.uk

Ref: EN0210006

Date: 27 March 2025

Dear Ms Deery

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Ossian Offshore Windfarm Limited (the applicant) for an Order granting Development Consent for the Ossian Transmission Infrastructure (the proposed development)

Thank you for your letter dated 25 February 2025 consulting Lincolnshire County Council (the Council) on the Environmental Impact Assessment (EIA) Scoping Report prepared by RPS Group for and on behalf of Ossian Offshore Wind Farm Limited.

The Council has reviewed the information provided and has the following comments to make in respect of the EIA Scoping. Please note the comments are limited to the onshore portion of the proposed project and are listed in chapter order.

Chapter 3: Site Selection and Consideration of Alternatives

3.4 Identification of the Points of Connection to the Onshore Grid

Paragraph 3.4.1.3 and 3.4.1.4 states that the NGENSO 'Beyond 2030' documents confirm that the Ossian Array will connect to the Lincolnshire Connection (LCS) and Weston Marsh substations. It would be helpful if a reference could be provided for this document and the location of this information.

It is noted in 3.7.2 that the (upto 3) Onshore Converter stations will be located in proximity (ideally 2.5km) to the Lincolnshire Connection and Weston Marsh substations. However it is also noted that at LCS, NGET has identified that two sites will be required for system resilience, LCS A and LCS B. However paragraph 3.7.2.4 states that *'In later studies and in defining the Onshore Scoping Boundary, the Applicant has focused on a search area around LCS A in East Lindsey District as the Applicant **expects** that to be the LCS location.'* Consideration however needs to be made should the connection be directed to LCS B.

In paragraph 4.8.1.1 it is also noted that the construction timeline and stages will be detailed within the ES and influenced by grid connection dates (4.8.1.6). The Council appreciates that Ossian has a grid connection offer and that the Ossian timetable for delivery will be dependent on the delivery of the Lincolnshire Connection Node and Weston Marsh substations, both of which form a part of the Grimsby to Walpole grid upgrade scheme. Consideration however needs to be made should these substations fail to come to fruition as a worst case scenario. Currently no alternative grid connection options are proposed.

Chapter 4: Project Description

Paragraph 4.7.2.1, please note that the 'Beyond 2030' report (NGESO, 2024)' does not appear to specifically reference Ossian as claimed, it purely states in the table entitled 'New Infrastructure' under Codes SW E1c 1 and SW E1c 2 *'offshore network cable from a coordinated series of windfarms connecting to Weston Marsh' and 'Lincolnshire Connection Node'*.

Chapter 5: Approach to Environmental Impact Assessment

5.7. Cumulative Effects with Other Projects

Section 5.7.1.2 of the Scoping Report identifies the production of a cumulative effects assessment with the approach detailed in the following paragraphs with a long list based on the zone of influence for each topic identified within the ES. The long list will then be reduced based on conceptual, physical and temporal overlaps, with the short listing process due to be documented within the ES.

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017¹ Schedule 4 Part 4, states that the EIA should contain: *"A description of the aspects of the environment likely to be significantly affected by the Development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors"* and in relation to cumulative effects, Schedule 4 Part 5: *"A description of the likely significant effects of the development on the environment resulting from, inter alia: ... (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental*

¹ The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Schedule 4: [The Infrastructure Planning \(Environmental Impact Assessment\) Regulations 2017](#)

importance likely to be affected or the use of natural resources...' The Overarching National Policy Statement for Energy (EN-1)² also states in paragraph 4.2.5 that: "*when considering cumulative effects, the ES should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been sought or granted, as well as those already in existence)*"

Currently it is unclear how cumulative impacts will be presented in the ES. The Council would expect a separate chapter to be provided on cumulative effects in order to provide a comprehensive assessment of both the interaction of effects generated by the proposed development having a combined effects on the same receptors, and in combination effects and impacts with other projects.

The study area for the assessment of inter project effects should be sufficient in extent to capture all relevant projects within the Lincolnshire geographical boundary. It is appreciated that the Zones of Influence will be germane to each topic of the ES. The Council wishes to ensure that the relevant Zones of Influence are sufficiently wide to ensure factors across the wider Lincolnshire county geography such as Best and Most Versatile Land, haulage routes, construction/employment traffic and port deliveries which may overlap with other projects both geographically and/or temporally are recognised and addressed. The Council would also recommend these extents are discussed and further reviewed with regard to Landscape and Visual Assessment as the full extent of potential visibility of the development is not yet fully known.

The Scoping Report does not contain a list of projects which the applicant considers would contribute to cumulative impacts. The Council would welcome contact with the applicant to identify those projects considered as Reasonably Foreseeable Future Projects (RFFPs). The current list of Nationally Significant Infrastructure Projects (NSIP) in Lincolnshire is as follows with those project in the east and other linear schemes where there are likely to be interactions are shown in italics

- Mallard Pass Solar Farm
- *Viking CCS Immingham to Theddlethorpe*
- Cottam Solar Farm
- West Burton Solar Farm
- *Heckington Fen*
- *NWS GDF Theddlethorpe*
- *Boston Alternative Energy Facility*
- Gate Burton Solar Farm
- *Temple Oaks (Folkingham Airfield)*
- *Outer Dowsing Offshore Wind Project*
- *South Lincolnshire Reservoir*
- Tilbridge Solar
- A46 Newark Bypass

² Overarching National Policy Statement for Energy (EN-1) [EN-1 Overarching National Policy Statement for Energy](#)

- *Springwell Solar Farm*
- *Beacon Fen Energy Park*
- *Fosse Green Energy*
- *One Earth Solar*
- *Meridian Solar*
- *Grimsby to Walpole transmission*
- *Eastern Green Links 3 and 4 transmission*
- *Leoda Solar*
- *Theddlethorpe Flexible Generation*

Please note this does not include projects which fall under the Town and Country Planning Act approval route.

The list of developments should also be kept under review as new projects may emerge into the public domain via a DCO, TCPA or Local Plan route in advance of the Ossian Scheme ES cut off date.

5.10 Approach to Consultation and Engagement

Although this is not a topic for this scoping report, it is welcomed that Ossian has set up both Steering Groups and Expert Topic Groups to inform the development of the project. However, although Section 5.10.6 has regard to Section 47 of the Planning Act 2008, and discusses the statutory consultation, no reference is made to the requirement of Section 47 for applicants to consult relevant local authorities on the content of their Statement of Community Consultation.

Chapter 7: Assessment of Effects – Onshore Environment

7.2 Geology, Hydrogeology and Ground Conditions

The Council appreciates that ‘Sterilization of mineral reserves’ is scoped into the ES (Table 7.2.10 and paragraph 7.2.9.2) with a mineral resource assessment to be undertaken and mitigation agreed in consultation with the Mineral Planning Authority should avoidance not be practicable. This is also summarised in Table 11.2.3, proposing to scope in ‘sterilisation of safeguarded mineral reserves’ which is appropriate given that the Ossian scoping boundary includes both Sand and Gravel Safeguarding Areas and Areas of Search.

Table 7.2.7 and Figure 7.2.10 shows the location of historic landfills and two live landfills. It is noted that the project advocates avoidance of impact through design by selecting options that avoid where practicable as a starting point, sensitive features or constraints (e.g. geological designated sites, groundwater abstraction points, historical landfills). It is noted in Table 7.2.10 that ‘The potential for contamination will be identified through preparation of a desk study, development of a preliminary risk assessment, and ground investigation where practicable and necessary. This will inform any remediation and/or mitigation requirements where avoidance is not practicable.’ There appears to be no consideration of the impacts other than groundwater contamination should the transmission route breach an historic landfill by accident or design. It is therefore proposed that consideration of the wider impacts need to be scoped in and included in the Remediation Strategy.

In Table 7.2.11: Impacts Proposed to be Scoped out of the Assessment for Geology, Hydrogeology and Ground Conditions: Heat generated by the Onshore Export Cables on groundwater quality, during the operation and maintenance phase has been scoped out. It is noted that the levels of heat loss and dissipation of heat through the soil can only be determined once further details of the cable voltage, soil structure (including its thermal properties) and the final engineering design are known. Therefore, this should be scoped in and assessed using the worst case scenario. The effect of this Cable generated heat on soil and BMV should be scoped in, as the scoping boundary includes significant areas of Grade 1 and Grade 2 land. As such Table 7.2.12 Sensitivity Criteria and Table 7.2.13: Magnitude of Impact Criteria, should include soils/agricultural land classification as medium and adverse respectively.

7.3. Hydrology and Flood Risk

The Report states that a hydrology and flood risk assessment, drainage strategy, Code of Construction Practice (CoCP) (including guidance in relation to pollution control measures, surface water control measures and flood control measures) will be prepared and that in the preparation of these documents there will be further consultation with the Council. As such the Council has no further comment at this stage.

7.4 Onshore Ecology and Nature Conservation; and

7.5 Onshore and Intertidal Ornithology

General comments

The Applicant's Scoping Report covers both offshore and onshore biodiversity and ecology. The Council has focused its response on the onshore ecological elements of the scheme and would expect Natural England and/or the Marine Management Organisation to lead on offshore elements.

Chapter 7.4 of the Scoping Report covers onshore ecology and Chapter 7.5 covers onshore and intertidal ornithology. Having reviewed these and other sections of the report relevant to onshore ecology and biodiversity, subject to the comments below, the Council supports the approach to the assessment of ecological impacts.

Proposed Study Area for the Assessment

The Council agrees that the study area as set out at 7.4.2 is appropriate and agrees that associated Zones of Influence as described as 7.5.2.1 are also appropriate to ensure that potential impacts on mobile species are also assessed.

Current Baseline

With the exception of wintering bird surveys, limited field surveys have been conducted at this stage of the project and information presented in the report results solely from initial desk-based studies.

A suite of important ecological sites ranging from internationally designated sites to locally important sites have been identified. The Applicant will need to identify potential impact

pathways for these sites and their interest features and present an analysis of potential impacts, along with associated avoidance and mitigation measures at Preliminary Environmental Information Report (PEIR) stage.

Desk based studies have also indicated the presence of a range of habitats and species within the study area. Surveys to establish the precise locations of these habitats and presence/absence of species will be required to identify any impacts and to inform mitigation and enhancement opportunities.

Paragraph 7.4.3.11 identifies a range of protected species that may potentially be present within the study area. This includes Natterjack toad. This species was previously confined to coastal sand dune habitats but is now thought to be expanding to more inland areas. The Council recommends further information on the species' current distribution is obtained from local Natural England and Lincolnshire Wildlife Trust officers who manage the Saltfleetby Theddlethorpe Dunes National Nature Reserve.

Proposed ecological surveys

Tables 7.4.4 and 7.5.3 set out the suite of ecological surveys that will be undertaken in support of the application. The Council considers that the list of surveys is broadly appropriate. The Council notes that the extent and methodologies will be discussed with an Ecology Expert Topic Group (ETG).

Specific comments in relation to the planned surveys are as follows:

- Given the presence of a suite of ecologically important sites designated for their importance for migratory bird populations in the vicinity of the proposal, the Applicant will need to ensure they have access to sufficient data to determine potential impacts on these populations. Consideration should be given to appropriate timing of surveys during the year to detect areas outside the designated site boundaries used by birds i.e. Functionally Linked Land. Ornithological surveys should also cover more than a single year to help ensure that results are not skewed by any particularly harsh weather patterns.
- Breeding bird surveys should be designed to ensure that species whose breeding activity may not necessarily be encompassed within the scope of a standard breeding bird survey (e.g. due to the timing of their breeding activity) are accurately recorded. Relevant species will include but may not be limited to barn owl and quail.
- The Council will expect to see a plan identifying where any TPO, veteran and ancient trees/woodlands are located within the site and showing that consideration has been given to suitable working distances within proximity to trees. The Council advises that ancient woodland data for the county has recently been updated by the Greater Lincolnshire Nature Partnership. The Applicant may already have access to this data but should ensure that the most up to date information is being used to assess impacts including from field surveys commissioned in support of the application.

In addition to this, the Ancient Woodland Inventory generally omits woodlands smaller than 2ha. Therefore, the Applicant should ensure that all woodlands in the zone of influence have been suitably assessed during field surveys to clarify the presence / absence of potential ancient woodland.

- Botanical surveys should be appropriately timed and targeted to detect the presence of populations of scarce arable flora within the survey area.

Scope of the assessment

The Council agrees with the list of potential impacts to be scoped into the assessment presented in Tables 7.4.5 and 7.5.4.

Tables 7.4.6 and 7.5.5 sets out impacts which the Applicant proposes to scope out of further assessment. The impact of pollution caused by accidental spills is currently proposed to be scoped out based on assertions that significant effects are not predicted due to a commitment to the development of a CoCP. Whilst general details of design and control measures are presented in the report, the Council considers it is premature to scope impacts out at this stage until more detail of these measures is presented in proposed Outline CoCP.

The impact of permanent loss of supporting habitats during decommissioning is also proposed to be scoped out. The Council considers that this is also premature at this stage given the limited information provided in relation to decommissioning at this stage.

Assessment of Cumulative Impacts and Effects

The requirement for assessment of cumulative effects is identified at 5.7 of the report. There are a number of development proposals of varying scales in the vicinity of this proposal. These range from small scale housing developments to other NSIP scale energy developments. The combined implications for habitat loss, disturbance, land-use change and associated impacts on species will need careful consideration in the final DCO application.

Other Biodiversity Assessments

Given the potential for impacts on statutorily designated sites and certain protected species, the Applicant will need to provide the information reasonably required for a Habitats Regulations Assessment. The Applicant recognises this at 9.2 in the Scoping Report. The Planning Inspectorate will need to undertake a Habitats Regulations Assessment and satisfy itself that sufficient information has been submitted by the Applicant to enable this to be completed.

Biodiversity Net Gain

The Council notes that the Applicant has not yet determined its approach to Biodiversity Net Gain (BNG) and is awaiting the publication of further guidance on the requirement for NSIPs to deliver BNG from Government. Section 4.6 of Overarching National Policy Statement for Energy (EN-1) (17 January 2024) states: *“Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible.”* Given the

scale of the proposed development the Council will expect the project to deliver a significant level of BNG.

The Applicant will need to ensure that habitat surveys are carried out to appropriate standards to allow the population of the Statutory Biodiversity Metric and calculation of the level of gains achieved. The current best practice method for this is set out in the Statutory Biodiversity Metric User Guide. A MoRPH assessment will be required to calculate baseline river units where watercourses (with the exception of ditches) are present in or adjacent to the proposed DCO boundary.

The Council encourages the Applicant to work with other developers and stakeholders in the area to identify opportunities to deliver BNG strategically including by keeping up to date with emerging local strategies such as the Greater Lincolnshire Local Nature Recovery Strategy.

Commitments to deliver BNG will need to be secured in the DCO and the Applicant will need to demonstrate that the commitments made to delivering BNG are achievable.

Future engagement and consultation

The Council welcomes the establishment of an Ecology ETG and confirms that their Infrastructure Ecologist will be happy to engage in this process.

7.6 Historic Environment

Built Heritage

The decision to scope out the onshore converter station beyond 5km (Table 7.6.3, Part 3 of the Scoping Report) is premature. Part 1 of the Scoping Report confirms that the location is still under discussion, meaning that the assumption of negligible impact beyond 5km cannot be justified at this stage. Until a final site and design are agreed upon, the study area must remain open to revision. This is particularly relevant where assets of the highest significance may be affected, as indicated in the assessment methodology.

Non-designated heritage assets

The scoping report excludes consideration of non-designated heritage assets (NDHA), despite their importance in defining the historic character of the area. Volume 3, Section 7.6.3.9 of the Scoping Report states that baseline data for non-designated heritage assets has not yet been acquired and that an assessment will only be undertaken once the infrastructure locations are refined. Given that these assets contribute to local distinctiveness and historic landscape character, the Environmental Statement (ES) must clearly set out how they will be identified and considered. The Historic Landscape Characterisation (HLC) approach should be referenced to ensure historic landscape features and NDHAs are properly assessed, particularly where the cable corridor may affect features or setting within the historic environment, such as farmsteads, workers' cottages, ridge and furrow or boundary walls.

Impacts on the historic environment

For the onshore cable corridor, the decision to scope out non-physical impacts (above ground) beyond 1km is reasonable, given the underground nature of the project. However, where the cable passes close to above-ground heritage assets, there should be appropriate mitigation in place to address potential environmental effects such as vibration, settlement or hydrogeological changes. In particular, changes to settings should be assessed for the most sensitive receptors, such as Grade II and above-listed buildings, Scheduled Monuments and Conservation Areas.

While vibration effects from underground works are typically localised, there should be monitoring and mitigation where works take place within 100m of historic structures. Potential groundwater flow disruption or drawdown effects should be considered within 250m, particularly where heritage assets rely on stable subsoil conditions. The scoping report does not commit to assessing these risks, which should be clarified. Temporary setting impacts from construction compounds or access roads should also be assessed on a case-by-case basis where these are in proximity to heritage assets.

The scoping report provides a limited discussion of historic landscape characterisation beyond designated heritage assets. While the document acknowledges the need for further assessment, there is no clear commitment to how impacts on the broader historic landscape will be considered. Given that temporary disturbance to field boundaries, hedgerows, or historic enclosures is possible during construction, the reinstatement strategy should align with the area's historic character and be clearly set out in later stages of the ES.

Cumulative, interrelated and combined effects

The Council looks forward to further detail concerning cumulative impacts on above-ground heritage assets and historic landscape. Other major infrastructure schemes in the region, such as Viking Link, Viking CCCS, Outer Dowsing, Grimsby to Walpole and Eastern Green Link 3 & 4, may contribute to cumulative changes in historic landscape character and setting effects for the historic environment, particularly built heritage. The scoping report does not demonstrate how these overlapping developments will be accounted for within the ES.

Given the scale of energy infrastructure being developed, the applicant should provide further clarification on how cumulative impacts will be identified and assessed, along with any interrelated or combined effects on certain heritage assets (such as construction noise, setting changes, and temporary land disturbance), which may collectively impact a single heritage asset.

Summary of initial comments

While the underground nature of the project limits permanent direct effects on built heritage, the assessment methodology should still address the Council's following concerns:

- The Ossian Scoping report's proposal to scope out of setting impacts before the final location of the converter station is confirmed.

- A clear approach to how non-designated heritage assets will be assessed and incorporated into the study.
- The need for a commitment to monitoring and mitigation for heritage assets in close proximity to the cable route during construction.
- The consideration of cumulative impacts, interrelated and combined effects on historic landscape character and built heritage.

The work undertaken in the scoping report is a helpful foundation for assessing the historic environment. Further details on construction methodologies, setting impacts, and the approach to non-designated assets should be included as the project progresses. Until then, the heritage and historic landscape study areas should remain open to further revision.

Archaeology

The Council is pleased to see that archaeology will be scoped in.

Regarding the requirements for archaeological work which will need to be completed before the DCO submission, the Council would expect the desk-based assessment to be complete and the field evaluation to be well underway by the time the PEIR is produced.

The full standard suite of archaeological evaluation is required. It is vital that a competent full desk-based assessment (DBA) be completed at the earliest opportunity as desk-based work provides the basis for initial understanding of the historic environment within the project area. This is informed by and built upon by a full air photo/LiDAR assessment and geophysical survey which in turn assists in the development of the trial trenching programme.

Sufficient field evaluation is an essential aspect of effective project management, particularly as unevaluated areas of unknown archaeological potential leave a high degree of risk to the development given the potential for archaeology to have significant impacts on work programmes and budgets. Failure to adequately evaluate the Site at the application stage could lead to unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided. There is no public benefit in the destruction of unknown unrecorded heritage assets.

Sufficient baseline information on the archaeology to be impacted across the site is required by NPPF, EIA Regulations and National Policy Statement EN-1, the latter which states at 5.8.10 that *"The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents"*

Specific aspects of the Scoping Report:

Within Sections 4.4.1.2 and 5.4.5, it states that it is likely that some flexibility in terms of design will still be required at the time of submission. Whilst it is accepted that use of the Rochdale Envelope is necessary for some of the design elements of the scheme, this should not be viewed as justification for delaying any archaeological field evaluation to a later

stage. Appropriate field evaluation should be built into the design process to allow better understanding and decision-making in terms of final design parameters.

Where the developer proposes the Rochdale Envelope in dealing with their application, it is essential that an understanding of the archaeological resource is achieved to allow for informed and appropriate mitigation. This can only be achieved through adequate trenching evaluation of the full impact zone and the timely provision of the results to inform the baseline evidence and subsequent informed fit for purpose mitigation strategy. Ideally this should be in advance of the determination and certainly the results are needed in advance of the work programme commencing in any of the areas not currently adequately evaluated.

This is in accordance with NSIPs Advice Note Nine paragraph 5.2³ which states that *“Implementation of the Rochdale Envelope assessment approach should only be used where it is necessary and should not be treated as a blanket opportunity to allow for insufficient detail in the assessment. Applicants should make every effort to finalise details applicable to the Proposed Development prior to submission of their DCO application. Indeed, as explained earlier in this Advice Note, it will be in all parties’ interests for the Applicant to provide as much information as possible to inform the Pre-application consultation process.”*

Section 4.7.3.4 states that cable installation would require working compounds along the HVDC and HVAC Onshore Export Cable Corridors and that temporary accesses for construction traffic are likely to be required. These compounds and access routes will cause harm to buried archaeological remains if present and will require appropriate evaluation. Where multiple locations are under consideration, the Council would advise that an understanding of potential archaeological impacts through early archaeological field evaluation should inform design selection rather than the archaeological potential to be evaluated once design has been finalised.

For both the HVDC Onshore Export Cables (Section 4.7.3.8) and the Onshore HVAC Cables (Section 4.7.3.12), the site selection process will identify the alignment for each cable corridor, taking into account environmental, community, engineering and landowner constraints. The environmental constraint assessment should include archaeology and appropriate evaluation will need to be completed to inform design.

The current preferred Landfall Search Area includes the part of the coastline between the southern edge of Sandilands and Anderby Creek, south of Mablethorpe (Section 4.6.1.2). Whilst trenchless techniques are proposed, these will require Transition Joint Bays whose construction would necessitate temporary construction compounds (Section 4.6.2.3). Whilst these temporary works compounds would be fully reinstated once construction is complete, any impact on archaeology would be permanent.

³ Nationally Significant Infrastructure Projects – Advice Note Nine: Rochdale Envelope [Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope - GOV.UK](#)

The permanent infrastructure associated with the Onshore Converter Stations would include built elements, as well as operational drainage features (such as attenuation ponds and/or swales) and landscape/biodiversity planting (Section 4.7.2.9). It is essential that all areas of ground disturbance, including landscaping and biodiversity planting, and the permanent access from the highway and car parking area (Section 4.7.2.10) are included in the archaeological evaluation.

All temporary construction compounds and temporary construction access that are required at each Onshore Converter Station site require prior archaeological evaluation (Section 4.7.2.14) as although these are temporary structures, their impact on archaeological remains will be permanent.

The Council welcomes the Applicants statement that all commitments will be set out within a Commitments Register (Section 4.8.1.10) and anticipate constructive dialogue regarding the extent that the historic environment will feature on this Register.

It would be beneficial for the Applicant to set out if the Historic Environment will be included within the Environmental Management Plan or if it will have its own bespoke Management Plan (Section 4.8.1.11).

Consideration of impacts to archaeology should be included within the other topic-specific management plans (Section 4.8.1.12). The Council has seen in other NSIP submissions a lack of interoperability in the assessment and understanding of the impacts, for example the heritage or archaeology chapter does not include reference to the impacts of proposed ecological mitigation measures or drainage strategies which would have extensive ground impacts to the archaeological horizon. The Council would therefore strongly encourage an integrated approach to undertaking assessments informed by an understanding of the range of impacts which would result from the Ossian scheme, and that documents such as the topic-specific management plans inform the assessment chapters including cultural heritage.

The Council would expect archaeology to feature within any Operation and Maintenance Management Plans (Section 4.8.2.8). Impacts to archaeological remains can occur from any groundworks undertaken for repair purposes where ground disturbance has not already occurred.

The Onshore Decommissioning Plan has yet to be developed and will be formulated in accordance with the latest available guidance, legislation and any new technologies at the time of decommissioning, approximately 35 years from the operational commencement of the Ossian project unless its lifespan is extended (Section 4.8.3.4). Given the unknown nature of the Decommissioning Plan and changes to technology at that point, it is anticipated that archaeology cannot be scoped out and should be assessed until such time as the likelihood of any impacts can be determined effectively.

The Council is pleased that the Scoping Report sets out that the EIA process will be an iterative one (Section 5.4.3) and that it will be an evidence-based approach (Section 5.4.4)

but has some concerns over any over-reliance on data from the Outer Dowsing and EGL3 and EGL 4 NSIP schemes in relation to the Historic Environment (Section 5.4.4.1) unless it is for a shared cable corridor or converter substation.

However, the Council welcomes the evidence-based approach, given that the evidence generated from the archaeological evaluation including trenching results would allow us to understand where areas of archaeological sensitivity survive across the Site. This should be undertaken early enough for the results to inform the iterative process and at least be underway by the submission of the PEIR. This would allow for archaeological mitigation through informed design and is essential for effective risk management, providing an understanding of the extent of archaeological mitigation fieldwork required which can then be accommodated within the work programme. Pre-determination evaluation of the connection corridor area can be very useful for informing a decision on the most cost effective and viable route and can allow for archaeological mitigation by iterative design.

When determining the likely significant effects, it is crucial to have an accurate understanding of the significance of any archaeological assets (Section 5.5.2). Where remains have been identified from purely desk-based or non-intrusive surveys, the EIA should acknowledge that the level of significance has not yet been accurately determined and that the remains could be of high significance.

In terms of duration of impact (Section 5.5.2.12), any impact on archaeology is likely to be permanent, and the topic chapter within the ES should reflect this permanency. Archaeological remains represent a finite and irreplaceable asset. Harm to this resource should be considered in this context of irreversibility. EN-1 (Section 5.9.9 – 5.9.15)⁴ outlines requirements for understanding the significance of heritage assets that will be affected, including 5.9.12: *'The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.'* and EIA Regulations 5 (2d)⁵ states that *'The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors...(d)material assets, cultural heritage and the landscape.'*

The assessment of impact should not be based on an assumed or anticipated level of significance where field evaluation should have been undertaken, as per EN-3 footnote 94⁶ which stipulates that *'The results of pre-determination archaeological evaluation inform the design of the scheme and related archaeological planning conditions.'* It is accepted that this is with reference to the Solar Photovoltaic Generation chapter but this can be taken as an example of good practice. Paragraph 2.8.68 of EN-3 with regard to Offshore states *'The applicant should assess the effects of the offshore transmission and any associated*

⁴ Overarching National Policy Statement for Energy (EN-1) [EN-1 Overarching National Policy Statement for Energy](#)

⁵ The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 [The Infrastructure Planning \(Environmental Impact Assessment\) Regulations 2017](#)

⁶ National Policy Statement for Renewable Energy Infrastructure (EN-3) [National Policy Statement for renewable energy infrastructure \(EN-3\)](#)

infrastructure on the marine, coastal and onshore environment. Paragraph 4.3.6 of EN-1 states that ‘Where the NPSs use the term ‘environment’ they are referring to both the natural and historic environments’. As such the spirit of footnote 94 is also relevant to an appropriate level of field evaluation with regard to wind farms and their transmission infrastructure.

In determining an effective fit for purpose mitigation strategy, both embedded and secondary (Section 4.6.3), there needs to be adequate and effective evaluation of the site, comprising desk-based and field evaluation, at an early stage. The Council is pleased to see these will be included within the Commitments Register (Section 5.6.3.5) but concerns remain whether these will be simply a list of mitigation measures rather than a targeted site-specific mitigation derived from an effective programme of field evaluation. All archaeological field evaluation should be complete by the time of DCO submission. Where mitigation comprises preservation *in situ* areas, the full extent of the archaeological areas must be determined and each area fenced off and subject to a programme of monitoring throughout the construction, operation and the decommissioning phases, with no ground disturbance whatsoever which may disturb or affect the archaeological remains including plant movement or storage. The fencing will need to remain in place and be maintained throughout the lifetime of the scheme including decommissioning and refits. These measures should be included in the appropriate management strategy for the preservation *in situ* areas to ensure the protection measures stay in place for the duration of the project construction, operation and decommissioning.

The formation of an Expert Topic Group (Section 5.10.4) is appreciated and the Council look forward to working constructively with the Applicant’s experts in ensuring an adequate and fit for purpose approach to archaeology is established for the Ossian project. The Council would anticipate that cross-disciplinary effects are also considered alongside hydrology, ecology, traffic and transport, landscape and air quality/noise/health given the potential for impacts to arise from works, for example drainage swales or soil inversion from wildflower planting.

Within Tables 7.3.5 and 7.3.6, potential mitigation in the form of water course diversions and restoration of field drainage may cause unanticipated harm to the historic environment. Where these actions are proposed, it is recommended that any archaeological impacts are considered beforehand and appropriate assessment and mitigation deployed.

Within Table 7.4.5, it is also necessary to point out that where avoidance is not practicable, any suitable measures proposed to mitigate (or compensate) significant effects identified as part of the assessment for onshore ecology and nature conservation may have consequential impacts for archaeological remains. Therefore, it is essential that a full desk-based and field evaluation is undertaken for the redline boundary including any areas of ecological enhancement so that a full understanding of the possible impacts to archaeology can be understood and mitigated appropriately.

It is expected that the Ecology Management Plan, which will include measures to mitigate long term impacts on habitats and species at the Onshore Converter Stations and

manage/enhance any newly created or enhanced habitats, will fully consider the potential consequential impacts on archaeological remains which may occur as a result of the ecological mitigation and BNG (Section 7.5.5). Landscaping and a range of habitat creation and ecological mitigation measures such as scrapes, pond and lake creation and soil inversion can detrimentally impact currently surviving archaeology. The depths of disturbance and the depth of surviving archaeology across the site needs to be understood to know where these works would destroy archaeology.

Tree planting is also very destructive to underlying archaeological remains, the root structures of mature trees can be deep and cover areas several times the size of the tree canopy. The root structures can destroy surviving archaeological features, change soil chemistry and hydrology, there can be uprooting from storm damage and when a tree dies the roots wither and leave voids which collapse. Sufficient detail will need to be provided to allow for an understanding of the potential impacts, for example soil inversion for wildflower planting and the depth and extent of ecological mitigation measures such as scrapes, ponds and wetland creation. This is necessary so that the impacts upon any surviving archaeology may be understood and so that proportionate mitigation of the impacts can be agreed with respect to areas of archaeological sensitivity.

The Council seeks clarity on Section 7.6.4.3 and the statement *'The field surveys will be informed by environmental conditions and consultation will be undertaken to agree the scope of field survey and its suitability'* and what environmental conditions may inform field surveys? The standard assessment techniques is required, comprising the standard suite of archaeological evaluation consisting of desk-based work, geophysical survey and a robust trenching programme, in order to inform reasonable mitigation of the developmental impact. Geophysical survey is essential as a prospecting technique for informing the trial trenching programme. For those areas where geophysical survey is not undertaken a greater density of evaluation trenching will be needed to determine the archaeological potential. This is essential for ensuring the EIA and the mitigation strategy are adequately informed across the redline boundary.

Geophysical survey and other remote survey techniques require evaluation trenching in order to determine the depth, extent, state of preservation and significance of archaeology and also to provide ground-truthing for so-called 'blank' areas where previous evaluation techniques have not identified archaeology. This is because there are types of archaeology that do not come up in desk-based assessments or geophysical survey such as burials, types of geology which may affect geophysical survey results, and later human activity such as medieval ridge and furrow ploughing can mask earlier archaeological features. Significant areas of unexpected archaeology have been identified during the trenching phase of every other NSIP across Lincolnshire and this will undoubtedly be the case here as well. Historic England Advice Note 17: Planning and Archaeology⁷ states in Section 131 that *'Appropriate evaluation can support the smooth and speedy progression of the development and help to manage the developer's risk early in the planning process'*. It also states in Section 132 that *'Data gathered can also help to inform a costed mitigation strategy, the*

⁷ Historic England Advice Note 17: Planning and Archaeology [HEAN 17 Planning and Archaeology](#)

benefits of which include a reduction in the chances of unexpected risks and associated costs, and potentially the scope to allocate the cost of archaeology appropriately into financial forecasts’.

The Chartered Institute for Archaeologists Standard and guidance for archaeological advice by historic environment services⁸ stipulates that ‘*Advisors should only make a recommendation in response to a development proposal where the significance of assets affected by the development proposal and the scale of any loss of significance is adequately understood. Where there is insufficient evidence, advisors should recommend that further information be gathered prior to determination of the proposal. Requirements for the gathering of further information should always be focused on informing decision making.*’. Limited survey data can impact the appropriate formulation of an effective mitigation strategy, project timescales and lead to unnecessary and avoidable costs.

The Council is pleased to observe the Lincolnshire Archaeology Handbook referenced in the relevant guidance (Section 7.6.8.4) of the Ossian Scoping Report. The Lincolnshire Archaeology Handbook (2024)⁹ lays out the requirements for undertaking archaeological work in the County. The Council wishes to highlight section 5.16: Guidance for large schemes including NSIPs and EIAs, General Scoping Opinion for the Historic Environment.

Please be advised that most of Lincolnshire is not suitable for trenching over the wet winter months so it is pragmatic to ensure there is sufficient time during those seasons where evaluation work, particularly trenching, can be effectively undertaken.

It would also be expected for a scheme of this size to include a reasonable degree of enhancement of the historic environment, community engagement and public outreach. Consideration of enhancement of the historic environment is invaluable in balancing the impacts of any development proposal, and interest in archaeology, particularly in any remains which have been found locally, if done well, can have the potential to foster high amounts of positive publicity. It can increase both physical and mental well-being and offset elements of a development which may be poorly perceived or have a visibly negative impact on surrounding communities. The recently published report ‘The Value of Heritage and the Historic Environment in Lincolnshire’ (February 2025)¹⁰ demonstrates these benefits.

In summary, the EIA will require the full suite of comprehensive desk-based research, non-intrusive surveys, and intrusive field evaluation by trenching for the full extent of proposed impact. The results should be used to minimise the impact on the historic environment through informing the project design and to provide the basis for a fit for purpose site-specific mitigation strategy to adequately deal with the impacts of this development upon currently surviving archaeology.

⁸ Chartered Institute for Archaeologists Standard and guidance for archaeological advice by historic environment services [ClfA-SandG-Archaeological-Advice-by-HER-2020.pdf](#)

⁹ Lincolnshire Archaeology Handbook (2024) [Archaeological handbook – Lincolnshire County Council](#)

¹⁰ The Value of Heritage and the Historic Environment in Lincolnshire’ (February 2025). [valuesofheritagereport2025.pdf](#)

Overall, the Council is broadly positive regarding the approach being proposed and are keen to work with the Applicant going forwards in establishing an effective approach to understanding, managing and mitigating the archaeological risk that will occur, alongside maximising the public benefit that will be gained from the archaeological work.

7.7. Land Use and Recreation

Soils

The main soil and agriculture elements of this project are set out in Part 3, Chapter 7.7. The foundation of chapter 7.7 is set out in Part 1, paragraph 1.4.3.18 which states:

'The potential impacts of the Onshore Transmission Infrastructure and Landfall on land use and recreation receptors include the following.

- *Temporary and permanent loss of agricultural land, including Best and Most Versatile (BMV) land.*
- *Temporary and permanent impacts on peaty soils.*
- *Temporary and permanent disruption to the operation of farm holdings.*
- *Temporary and permanent reduction in access to Public Rights of Way (PRoW) and other promoted routes.*
- *Temporary and permanent reduction in access to registered common land and public open space.*
- *Temporary and permanent reduction in access to other recreational resources (e.g. golf courses, sport facilities etc).'*

Paragraph 3.7.2.9 details the work undertaken to date with regard to data collection with paragraph 3.7.3.8 stating *'A GIS analytics mapping tool is being used to analyse environmental and engineering constraints data with the aim of avoiding a number of environmental constraints and designations at an early stage. Current work includes landscape appraisal and a review of constraints and input from technical environmental specialists including in relation to.....*

- *onshore ecology (including ornithology);*
- *landscape and visual;*
- *historic environment;*
- *hydrology and flood risk;*
- *soils;*
- *land use (including agricultural land classification);*
- *geology and ground conditions;*
- *traffic and transport;*
- *air quality;*
- *noise; and*
- *socio-economics.*

It is noted however, that to date no ALC survey has been undertaken with regard to the transmission route, converter stations, although schedules of condition are proposed pre-entry.

Paragraph 7.7.2.1 proposes the study area for the assessment of land use and recreation and is defined as *'the land to be temporarily or permanently required for the Landfall and Onshore Transmission Infrastructure (which will be defined as the Order Limits by the time of the application), landward of MLWS'* and includes the following aspects (with regard to soils) that be considered within the study area:

- *soil types and patterns of soils, including and relevant topographic and climatic data;*
- *the quality of agricultural land, in accordance with the Ministry of Agriculture, Fisheries and Food (MAFF) Agricultural Land Classification (ALC) guidelines (MAFF, 1988), including 'Best and Most Versatile' (BMV) ALC Grades 1, 2 and 3a agricultural land;*
- *peat, including areas of peat within the study area;*
- *farm holdings and/or enterprises;*

This definition in 7.7.2.1 appears to pre-empt any surveys, as it reads that the study area is the land required for, rather than the land to be 'identified as required' for the landfall and transmission infrastructure. As such it appears that the proposed route has been determined prior to any surveys having taken place. Paragraph 7.7.3.8 states that *'representative soil surveys will be undertaken to determine the quality of agricultural land within the Onshore Scoping Boundary and Intertidal Scoping Boundary and inform the assessment of land use and recreation to be reported in the ES'*. Clarification of what consists of a representative soil sample is required, given that three areas within the Onshore Scoping Boundary and Intertidal Scoping Boundary have been subject to detailed surveys – is this classed as a representative sample?

Similarly in Table 7.7.5 'Site Specific Surveys to be used for the assessment of land use and recreation' soil and ALC surveys are proposed. However the column 2 'Summary' states that *'surveys of soils and ALC grades will be undertaken in accordance with Natural England Guidance Note TIN 049 using a Dutch hand auger to examine soil profiles up to a depth of 1.2 m at approximately 100 m intervals within the areas of survey'* and that *'The location of soil surveys will include the areas of permanent infrastructure and any potential areas of peaty soils and may be supplemented by examination of any available data, such as soil pits.'* From the text in Paragraph 7.7.2.1 and Table 7.7.5, no reference appears to be made to the use of more detailed soil surveys across the whole of the scoping boundary to inform the identification of the transmission route, which should form part of the iterative ES design process. As currently written other than for the substations, the order limits will be defined before a detailed ALC survey is undertaken.

The proposed development is likely to have a permanent impact where fixed structures are constructed and a mainly temporary impact whilst installing buried cabling, that will result in the loss of agricultural production in the development area generally, and/or the possible permanent loss of production from mostly medium to excellent quality agricultural land.

Provisional ALC mapping

Paragraph 7.7.3.5 introduces the provisional ALC mapping within the Onshore Scoping Boundary and Intertidal Scoping Boundary as shown in Table 7.7.2 and Figure 7.7.2, which shows that the majority of land within the scoping boundary as Grades 1, 2 and 3.

It is noted in paragraph 7.7.3.8 that representative soil surveys will be undertaken to determine the quality of agricultural land within the Onshore Scoping Boundary and Intertidal Scoping Boundary which will inform the assessment of land use and recreation to be reported in the ES. The Council would seek clarity of what is meant by 'representative' but agrees with the proposed soil survey methodology identified in Paragraph 7.7.8.5 with surveys to be in accordance with:

- Agricultural Land Classification (ALC) guidelines (MAFF, 1988); and
- Agricultural Land Classification: protecting the best and most versatile agricultural land - Natural England Technical Information Note TIN049 (2012).

Soil types

According to available published data, local knowledge and the national soil map indicates that the area predominantly comprises loamy, silty and clayey soils of coastal flats with naturally high groundwater. Other soil types include localised areas of slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils and large areas of fen silt, or organic fen peatland soils.

These soils are significantly different but rely on drainage, either at field level or pumped drainage for their agricultural productivity and performance. The survey work so far undertaken has not been at ALC level but there is a commitment to soil investigation to identify soil-based challenges and for a specialist be employed.

Soil Disturbance

The area is mainly farmland with areas of pumped drainage fen and therefore the established land drainage is crucial to maintaining soil productivity. In consequence these soils are heavily dependent on local field drainage and the wider Internal Drainage Board drainage systems. Any significant disruption in drainage will affect the short term productivity of soils, but may also have longer term consequences. During construction the route will involve a lot of trafficking across the soil and inevitably during the construction phase, there will be compaction and possibly some drains will be severed and dislodged.

The mitigation measures will include the requirement for a Soil Management Plan in line with published guidance as outlined in paragraph 7.7.8.6. It is also noted that in the Onshore Ecology and Nature Conservation chapter, paragraph 7.4.5.1, also includes the production of a soil management plan as a mitigation measure, to protect and maintain the quality of soils (including peaty soils) during construction and includes guidelines for handling, storage and reinstatement of soils to ensure that temporarily affected land can be restored to its former use. It is noted that these measures may evolve/be refined as the design and EIA process progresses

Installing power cables, including by Horizontal Directional Drilling (HDD)/trenchless techniques, can involve disturbance of soils across long distances of the countryside affecting farms, natural areas and ecosystems. Soils can be disturbed and damaged during soil handling, storage and reinstatement, adversely affecting natural ecosystems or

agricultural production. Field drains can be severed requiring repair, replacement or complete reinstatement. Drainage problems may not be apparent immediately post reinstatement.

These impacts can be minimised by careful evaluation of soil and ground conditions prior to installation, the development of a soil management plan and supervision of on-site operations together with schedules of condition and post completion assessment.

Table 7.4.5 scopes in 'Changes in hydrology affecting important ecological features'. It is requested that the potential cumulative impact of soil disturbance attributed to (but not limited to) field drains and compaction is also included in this consideration. Table 7.7.6 Potential Impacts proposed to be scoped in also needs to consider the impact of drainage issues on soils during construction and decommissioning needs to be scoped into the ES.

Soil structure can be significantly damaged during the construction phase of the process, particularly on heavy clay soils of the Salop series. There is inevitably a lot of trafficking of vehicles on the land during construction and if this work is undertaken when soils are wet, there can be significant damage. Much of this damage can be remedied post construction, but not all and it is possible that long term drainage issues occur on the site due to the construction.

During the construction and decommissioning phases, soil and water natural capital could be affected and cause short or long term issues. The production of a Soil Management Plan is noted and this should be established as part of the Construction Phase to minimise the impact on soil resources.

Land Drainage

A careful and measured approach should be taken to Land Drainage. Landowners should be fully consulted and existing drainage schemes examined before construction begins. Insofar as reasonably possible, existing drainage schemes should be avoided by the construction, but if they cannot be avoided, they will need to be re-instated to a standard that existed prior to their disturbance to help minimise the impact on continuing farming operations post-construction.

It is noted that a hydrogeological, hydrological and flood risk assessments are proposed to be undertaken as part of the EIA process along the route. A soil management plan has also been proposed and should relate to both the construction and restoration plan and include farm drainage.

Farming Circumstance and Impact on Land Holdings

There is mention of the impact on farm holdings or land structures (paragraph 7.7.1.1) affected by the proposal. From local knowledge there are numerous landowners, or occupiers. Consideration needs to be made of the impact on occupiers and the nature of the tenure of their holdings.

In considering the impact on the overall farming enterprises both locally and across the District or County, it may be necessary to seek additional information on the impact on the individual farms themselves. Table 7.7.6 proposes to scope in the temporary and permanent loss of agricultural land and the temporary and permanent disruption of farm holdings. It is noted that Paragraph 7.7.2.2 states that *'impacts to an entire land holding will be considered, even where that extends beyond the boundary of the land required. As such, the study area for the purposes of the assessment of farm holdings and/or enterprises will encompass the land to be temporarily or permanently required for the Landfall or Onshore Transmission Infrastructure and the full extent of affected land holdings.'* which will help to address the nature, scale and duration of socio-economic changes.

Irrespective of the land quality issues, there will be matters of concern to farmers and landowners including:-

- Land drainage
- Weed burden
- Biosecurity for plant diseases
- Timeliness of soil stripping, storage and handling
- Compaction of subsoil
- Re-instatement to previous quality/standard

Paragraph 7.7.9.1 bullet point 3 *'soil and ALC surveys to determine the quality of the agricultural land (see Table 7.7.5)'* – please see the Council's comments on Table 7.7.5 above, seeking clarification on the boundary, location and quantity of ALC surveys.

Cumulative ALC Impacts

There are a number of NSIPs within Lincolnshire, with others planned or proposed with the majority of sites on farmland. The situation is fluid as new proposals come forwards. Lincolnshire in particular has substantial areas of agricultural land, including a significant amount of land within the Best and Most Versatile category. As such under 7.7.8.20, it is requested that the cumulative impact of known NSIPs on BMV across Lincolnshire are considered within the ES.

Public Rights of Way

It is noted and welcomed that public rights of way are scoped in, and that a more detailed and comprehensive baseline assessment with regard to Public Rights of Way will be undertaken once the siting for the Onshore Transmission Infrastructure (converter stations and transmission routes) have been refined.

The Council welcomes the opportunity to engage with the developer on the Outline PRow Management Plan, including requirements for managed crossings and temporary or permanent diversions (where appropriate). Opportunities for mitigation including improvement to the network and other areas of open space including appropriate access to PRow, National Trails and new coastal access routes.

It is appreciated that in 7.7.8.11 ongoing engagement will be undertaken with stakeholders to ensure they are aware of emerging survey results and the likely mitigation requirements and that the approach to mitigation will be discussed and agreed with the Expert Topic Groups and recorded in a Commitments Register, where practicable.

7.8 Traffic and Transport

The Council as Highway Authority will be seeking to ensure the traffic impact is acceptable with regards to highway capacity and safety and promotion of sustainable modes in line with National Planning Policy. The Report states that a Transport Assessment will be prepared and that in the preparation of these documents there will be further consultation with the Council. The Council is pleased to see the proposed scope follows standard guidance and as has no further comment at this stage.

The Council would like to highlight that the other NSIP schemes within the locality, will need to be included in any transport cumulative assessment.

7.9. Noise and Vibration

The Council will defer to East Lindsey/Boston Borough and South Holland Councils and their Environmental Health teams on the scope and methodology for this element of the ES.

7.11 Landscape and Visual Resources

This review has been carried out by AAH Consultants on behalf of the Council and relates to landscape and visual issues and elements of the onshore proposals only. It is based upon a review of the relevant onshore sections of '*Ossian Offshore Wind Farm: Transmission Infrastructure; EIA Scoping Report Parts 1 to 5; February 2025.*', Prepared by RPS Group Limited for Ossian Offshore Wind Farm Limited.

As part of the submission, the Council expect the production of a Landscape and Visual chapter of any ES, which would be in the form of a Landscape and Visual Impact Assessment (LVIA), which along with any supporting information (such as plans or figures) reflect current best practice and guidance from, as a minimum, the following sources:

- 'Guidelines for Landscape and Visual Impact Assessment', (GLVIA3), April 2013 by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA);
- 'An Approach to Landscape Character Assessment', Natural England (2014);
- 'Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals', 17th September 2019 by the Landscape Institute (LI);
- 'Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)', 10th January 2020 by the Landscape Institute (LI);
- 'Technical Guidance Note (TGN) 04/20 Infrastructure', April 2020 by the Landscape Institute (LI);
- 'Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations', May 2021 by the Landscape Institute (LI); and

- 'Technical Guidance Note (LITGN) 2024-01 Notes and Clarifications on Guidelines for the Landscape and Visual Impact Assessment Third Addition (GLVIA3)', August 2024 by the Landscape Institute (LI);

Overall, the Council would expect that the assessment of potential Landscape and Visual matters and evolving proposals relating to Ossian Offshore Wind Farm, as an NSIP follow an iterative process of engagement and consultation to ensure the following are not fixed at this stage and are discussed, developed and agreed at subsequent technical meetings with the applicant.

- LVIA Methodology;
- Development, and subsequent Zone of Theoretical Visibility (ZTV), parameters;
- Study Area extents (distance);
- Viewpoint quantity and locations;
- Photomontage/Accurate Visual Representations (AVRs):
 - Quantity and location;
 - Phase depiction;
 - AVR Type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout;
- Cumulative effects, including surrounding developments to be considered; and
- The extent as to which a Residential Visual Amenity Assessment (RVAA) should be considered (based on the Landscape Institute TGN 2/19) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

While the focus of this review is on Landscape and Visual matters, other information provided within the EIA Scoping Report, and associated Appendices and Figures, has also been considered, providing background and context to the site. At this initial stage of the NSIP/DCO process, the content and level of information provided by the applicant within *Section 7 Assessment of Effects – Onshore Environment*, and specifically *Section 7.11 Landscape and Visual Resources*, are generally considered satisfactory, however, as stated previously, the Council would expect to discuss this content and approach as part of the iterative process. Due to the scale and extent of the Site and proposed development, it is expected there would be adverse landscape and visual effects.

It is not clear from Table 7.11.1 whether construction stage effects from the construction of the Onshore Converter Stations are intended to be scoped into the LVIA. The Council would expect the LVIA to assess the construction phase effects of all elements of the scheme, and this should also consider wider effects from construction traffic and any highways works required to accommodate this traffic and abnormal loads, which may require carriageway or junction improvements of vegetation removal to accommodate.

The following should be considered in the evolving assessment and layout:

Viewpoints

The final locations of viewpoints are to be reviewed and agreed with the Council and other relevant stakeholders. The final viewpoint selection should also consider views of taller and more conspicuous elements, such as Onshore Converter Stations and associated infrastructure once the layout is more developed, as well as consider potential key, or sensitive, viewpoints. The Council would welcome an initial discussion and subsequent workshop (on site if appropriate) with the applicant team in regards to proposed viewpoints.

Photomontages

To gain an understanding of the visibility of the development and how the Onshore Converter Station, associated infrastructure and Onshore Export Cables would appear in the surrounding landscape, Photomontages/Accurate Visual Representations (AVRs) should be produced. The number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with the Council and other relevant stakeholders and produced in accordance with TGN 06/19 Visual Representation of Development Proposals. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years). The Photomontage/AVR Level and Type is to be discussed and agreed.

Methodology

As stated previously, the LVIA should be carried out in accordance with the GLVIA3 and undertaken by suitably qualified personnel. The methodology provided at Proposed Assessment Methodology 7.11.8 provides an overview but does not provide enough detail at this stage to provide detailed comment and refers to the overall ES methodology in section 5.5, which is not specific to LVIA. The Council would request that the methodology be specific to a LVIA, follow the guidance in GLVIA3 (stated above), and be included in the methodology section of the report. The most up to date technical guidance should be used, and the methodology is further interrogated at the next phases of the project.

The Methodology within section 7.11.8 identifies at 7.11.8.14 that *“any effects with a significance level of major or above will be considered to be significant. Where the magnitude of impact is ‘no change’, no effect would arise”* and at 7.11.8.15 *“In all cases, the evaluation of receptor sensitivity, impact magnitude and likely significance of effect will be informed by professional judgement and underpinned by narrative to explain the conclusions reached.”*

The Council would expect that effects that are Minor or Negligible will not be deemed “Significant”. Effects that are Moderate **would likely be** “Significant” but reasoned justification provided where judged as not deemed “Significant”. Effects that are Substantial or Major will be deemed “Significant”. The approach to assessment should be discussed further and agreed once a detailed methodology has been provided.

The LVIA methodology should also clearly lay out the process of assessing temporary and permanent elements of the scheme, and the LVIA should clearly identify those elements

that would not be decommissioned at the end of the life of the development and assessed accordingly.

Scope of the Study Area:

It is acknowledged in Section 7.11.2.1 that, an initial Study Area covering 5km from the Onshore Converter Station Sites and 1km from the Onshore Export Cable Corridor, has been allowed for the proposed Development. At this early stage, it is recommended these extents are discussed and further reviewed as the full extent of potential visibility of the development is not yet fully known.

A ZTV map should be produced once the location of the development within the Onshore Converter Station Search Area and Infrastructure Scoping Boundary (Figure 3.7.1) has been confirmed and proposals have been developed; the Study Area should not be fixed until the full extents of visibility are known from both desktop and site work. It is suggested that a separate and combined ZTV for the 2 locations of the Onshore Converter Stations be produced and potentially one for the Onshore Export Cable Corridor.

In Section 3.7.2.2 it states that *“Up to three Onshore Converter Stations will be required as part of the Ossian Transmission Infrastructure (and will be located within the Onshore Converter Station Search Areas). One will be located in proximity to the LCS and up to two will be required in proximity to the Weston Marsh Substation.”* Dependent on the location of the two Onshore Converter Stations within the Western Marsh Onshore Converter Station Search Area, the Infrastructure Scoping Boundary and the Onshore Converter Station Search Area may need to be expanded to incorporate their location.

Once the study area has been defined, the LVIA should also provide a justification for the full extent/distance, which would be further refined as part of the iterative process.

Landscape

Published landscape character assessments have been not identified however to align with GLVIA3 the LVIA should include an assessment of landscape effects at a range of scales and likely need to include a finer grain landscape assessment that includes the Site and immediate area that also considers individual landscape elements or features that make up the character area.

The Scoping Report identifies that the Onshore Scoping Boundary, the Onshore Converter Station Search Area and associated buffer has a prevalence of sensitive landscape receptors found within and in close proximity of the boundary. They include the following:

- Ecology and Nature Conservation: Internationally Designated Sites include: The Wash (Ramsar) and The Wash and Norfolk Coast (SAC). Statutory Designated Sites include: The Wash (SSSI), Bratoft Meadows (SSSI) and Vernatts Drain (LNR);
- Historic Environment: Designated heritage assets include: Battle of Winceby (Registered Battlefield), Hagnaby Abbey (Scheduled Monument) and Spilsby (Conservation Area);

- Land Use and Recreation: King Charles III England Coat Path (National Trail) and Harrington Hall (Registered Parks and Gardens)
- Landscape Resources: Several statutory designated landscapes are located within the Onshore Scoping Boundary and are illustrated in Figure 7.11.1. The Lincolnshire Wolds National Landscape covers a wide tract of upland landscape and overlaps the Onshore Scoping Boundary. Registered Parks and Gardens at Gunby Hall (a National Trust property), Well Hall and Harrington Hall also lie within the Onshore Scoping Boundary.

There is a need to further clarify the range of potential landscape receptors to be considered, however at this early stage of the project, the Council would request these be reviewed and consulted upon further once proposals have been developed as the Council is not currently in a position to confirm their inclusion or omission.

The figures below identify a range of potential landscape receptors to be scoped in and out of the LVIA and include:

- 7.4. Onshore Ecology and Nature Conservation - 7.4.5 and 7.4.6
- 7.6. Historic Environment - 7.6.2 and 7.6.3
- 7.7. Land Use and Recreation - 7.7.6 and 7.7.7; and
- 7.11. Landscape and Visual Resources – 7.11.1 and 7.11.2

Visual

The Council requests that the visual assessment should identify and focus on visual receptors, with recent LI guidance (LITGN 2024-01) clarifying that the “*focus of the visual assessment should be the visual receptors*”, and that viewpoints are for the “*illustration of the visual effects*”.

The Council would expect that the visual assessment would include for identification of visual receptors and should clearly cross reference viewpoints to associated receptors. At this early stage of the project, the Council requests any visual receptors be reviewed and consulted upon further once proposals have been developed. Based on current information, the Council is not in a position to confirm their inclusion or omission.

The visual assessment should take account of the 'worst case scenario' in terms of winter views, and effects associated with landscape mitigation at the Operational Phase (year 1), Residual Phase with planting having established (10 to 15 years), and at the Decommissioning Phase.

The LVIA should ensure all elements associated with the development are considered and assessed, such as *Onshore Converter Station and infrastructure e.g. Control building and storage building* which may be more visible than other elements due to height, mass and extent.

Cumulative impacts

Cumulative Landscape and Visual effects should be assessed in regards to other major developments, and in particular Onshore Converter Stations and associated infrastructure as appropriate in regards to proximity and scale.

Mitigation and Layout

As this is an iterative process, at this stage it is not relevant to comment on any potential mitigation or layout of the development. However, best practice guidance, relevant published landscape character assessment's and Local and County Council Policy and Guidance shall be referred to and implemented as appropriate.

The Council would also expect the landscape and planting scheme is coordinated with other relevant disciplines, such as ecology, heritage or civils (e.g. SuDS features), to improve the value of the landscape and reflect appropriate local and regional aims and objectives. Any Landscape Scheme and associated Outline Landscape and Ecological Management Plan should accompany the ES which should, as a minimum, cover the establishment period (which is assumed would be up to 15 years to cover the period up to the residual assessment), but this may likely be for the lifetime of the project for any planting associated with the development. The management plan should provide for both new planting and existing retained vegetation and how it will be managed and protected through all phases of the development.

7.12 Health and Wellbeing

In the Scoping Report, the Council is pleased to see a chapter on Human Health will be included in the PEIR. The detailed examination of the health profiles for all three sites within the development area, as well as their comparison to larger geographic regions is appreciated.

Noise, vibration, air pollutants, and travel disruption associated with the onshore transmission infrastructure are all considered and scoped appropriately.

To alleviate potential concerns from the local community, the Council requests that the applicant consider addressing the feedback provided below on the wider determinants, which in Table 7.12.4 are proposed to be scoped out of the current assessment for human health due to a low likelihood of occurrence:

- **Community identity, culture, resilience and influence:** Landscape alteration and its impacts on community identity, while considered for the operation of the Onshore Converter Stations, is omitted for the construction and operation of the Onshore Export Cables, owing to their location underground and the temporary and transient nature of works. The influence of night lighting on community identity is scoped in (with respect to near distance views from residential properties close to the Onshore Converter Stations), and it is recommended that its impacts on mental health be carefully considered and signposted within the proposed Health and Wellbeing chapter.

- **Community Safety:** It is understood that surface excavations will be undertaken with best practices in mind and managed to reduce access and risk to the public. The applicant notes that they will assess public safety and the risk of accidental injury on the beach near the site's landfall under the Land Use and Recreation chapter. It is recommended that clear references to community safety within this chapter are made in order to identify implications.
- **Climate Change and adaptation:** The Council requests that the applicant make clear references to human health in the Wider Societal Infrastructure section (as referenced in Table 7.12.3) regarding the positive health impacts of climate change mitigation associated with the renewable nature of the energy provided by the transmission infrastructure, considering this is to be scoped out of the health and wellbeing assessment.
- **Water Quality:** The potential impact of contaminants reaching human receptors and associated management strategies are detailed throughout the EIA. It is requested that there be clear references to human health within the relevant Water Quality sections, considering this will be scoped out of the health and wellbeing assessment.
- **Radiation:** Potential risks associated with radiation exposure are proposed by the applicant to be excluded from the health and wellbeing chapter based on compliance with exposure limits established by the International Commission on Non-Ionizing Radiation Protection and, therefore, would not pose a risk to public health. It is noted that buried cables will have no exposed electrical field and it is therefore considered this provides reasonable grounds for exclusion.

Chapter 8: Assessment Of Effects – Offshore and Onshore Environment

Chapter 8.2 Socio- Economics

Data sources and guidance documents.

It is recommended that local websites such as Visit Lincolnshire are included in the list in Table 8.2.1 to identify visitor attractions. It would also be beneficial to broaden the list at Table 8.2.1 to also include sources related to onshore elements of the application proposal – this could allow for a fuller assessment of the scheme benefits in Lincolnshire and how these benefits can be maximised.

Receptors and impacts.

The following should be scoped-in to the assessment:

- *Demographic changes:* The scoping report in table 8.2.3 '*Impacts Proposed to be Scoped Out of the Assessment for Socio-economics*' is generally a superficial assessment of whether these factors will be significant. As an example, until job numbers are known, the impacts of a likely temporary workforce and the potential to cause social issues, is not known. Examples of impacts arising from other NSIPs needs to be assessed to ensure the potential impacts are understood and mitigation measures put in place.
- *Changes to housing demand, changes to other local public and private services, and socio-cultural impacts:* Table 8.2.3 is superficial in assessing the scale of impact

which again is dependent on number of workers and nature of jobs, as per bullet point 1 above.

- *Road closures and construction traffic:* There is limited mention of this impact, which will have social and economic negative impacts ranging from the delay of emergency vehicles, to issues of access to nearby towns as centres for community and employment. It is welcome to see mention of access to tourist assets which could be enhanced including:
 - Construction phases should avoid peak visitor attraction time, especially when the visitor economy provides employment and income for local communities.
 - 'Bad press' about congestion, additional HGVs and construction traffic (for example) can have a big impact on the number of visitors who visit the area, and this must be taken into account when planning the scheme.
- *Supply chain: e.g. through use of British made materials:* should be fully understood and scoped-in.
- *Recreational assets:* Changes to behaviour and outcomes of recreational users as a result of the offshore and onshore elements of the Project.
- *Demographic and Service Demand Impacts, including short term accommodation demand:* The potential influx of new people into the area to support the development and construction of the Project may have impacts on the demand for community services and structure of the population.
- *Physical presence of infrastructure:* The physical presence of infrastructure could interfere with socio-economic factors, including recreation activities and other socio-economic and tourism activities.
- *Accessibility of employment sites to rural communities:* Should a local construction workforce/ supply chain be encouraged, the EIA should consider how employment will be made accessible (in terms of travel) for local people to be able to access employment. Mitigating factors could include:
 - Funded travel to work scheme
 - Engagement and partnership with local transport providers
 - Support for local people to access private transport at reduced cost, where the above solutions are not possible (last resort).
- *Workforce development:* The EIA should consider an approach that prepares the local labour market for the forthcoming opportunities. This could include:
 - Local training and skills provider engagement at an early opportunity.
 - Sector development support, to allow the local supply chain to prepare the existing workforce and encourage opportunities to grow the workforce.
 - Bespoke activity that encourages evidenced 'hard to reach' and opportunity potential workforce (over 50's, retired military etc) to access new skills and jobs.
 - Raising aspirations within the local communities: Evidence shows that low aspirations in communities is a key blocker to accessing employment. A high profile project such as Ossian can help raise aspirations in local communities

by supporting local incentives and schemes. This will also support the Ossian project by unblocking barriers to local people accessing employment. This will need to be funded activity by the developer.

- *Cumulative impacts:* There are also a number of other NSIPs in the area, and cumulative impacts will need to be considered.

Scope of, and approach to, the assessment.

As indicated above, cumulative impacts of this and other NSIPs need to be assessed through this EIA process and in the consideration of the DCO.

Chapter 10:

10.6 Waste

The inclusion of the waste hierarchy and measures at 10.6.1.4 including waste identification and segregation, compliance and training, environmental protection, monitoring and reporting and health and safety are included in the site waste management plan. It is also noted that *'The measures to be included in the Site Waste Management Plan will ensure that waste generated during construction of the Ossian Transmission Infrastructure is kept to a minimum and does not result in unnecessary pressure on local waste management infrastructure, either alone or cumulatively with other nearby developments.'* (10.6.1.5). However, until a Site Waste Management Plan is produced, the amount of waste produced at each stage and whether this will impact on existing waste management facilities (alone or cumulatively) is unknown. The Council need to understand how much waste the project anticipates generating at each stage and how this will be addressed. It is proposed that a standalone chapter in the ES addressing waste is not required (10.6.1.9) however the consideration of waste in the ES needs to be robust, as given the size of the project, the potential cumulative impact of waste streams from other large infrastructure projects within Lincolnshire, and the worst case scenario for the as yet unknown decommissioning strategy, waste arisings and their management has the potential to have a significant impact.

The Council will continue to engage with this proposal as required. Should there be any further queries, please do not hesitate to get in contact.

Yours sincerely,

[Redacted Signature]

[Redacted Name]

Head of Planning



Maritime &
Coastguard
Agency

Maritime and Coastguard Agency
UK Technical Services - Navigation
Spring Place
105 Commercial Road
Southampton
SO15 1EG

Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

www.gov.uk/mca

Your Ref: EN0210006

Date: 14 March 2025

Via email: ossiantransmission@planninginspectorate.gov.uk

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Ossian Offshore Windfarm Limited (the applicant) for an Order granting Development Consent for the Ossian Transmission Infrastructure (the proposed development)

Scoping consultation

The MCA has reviewed the scoping report provided by Ossian Offshore Wind Farm Limited for the Ossian Offshore Transmission Infrastructure as detailed in your correspondence of 25 February 2025. We acknowledge that this consultation relates to the offshore elements of the proposed works in English waters and not the onshore elements of the proposed works or the offshore elements of the proposed works in English waters. We would like to comment as follows:

The development area carries a moderate amount of traffic with several important commercial shipping routes to/from UK ports and the North Sea. Attention needs to be paid to routing, particularly in heavy weather so that vessels can continue to make safe passage without large-scale deviations. The likely cumulative and in combination effects on shipping routes should be considered for this project. It should consider the proximity to other windfarm developments, other infrastructure, and the impact on safe navigable sea room.

We note the commitment to complete a Navigation Risk Assessment (NRA), including a baseline study which will summarise the available background navigation data and focus on any key shipping routes and/or anchorage/disposal areas and fishing activity in the vicinity of the cable corridor route. With supporting marine traffic surveys, the NRA will 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).

A range of potential impacts on shipping and navigation and other marine users have been identified which could occur during the construction, operation, and decommissioning phases of the project and will be scoped in to the assessment. We note the assessment will follow the International Maritime Organization (IMO) Formal Safety Assessment (FSA) methodology, which we welcome. This is the internationally recognised approach for assessing the impact to shipping and navigation users. The MCA would expect the NRA and EIA report to detail 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.

Paragraph 6.8.3.2 states that seasonal traffic data has been collected which includes two 14-day periods of Automatic Identification System (AIS) data on marine vessel traffic in winter and summer. AIS only data is acceptable for the export cable corridor as no fixed structures are planned. However the applicant is reminded that the data must be as up to date as possible and must not be older than 12 months at the time of consent application. It is noted in Table 6.8.1 that VMS and RYA Coastal Atlas will be used. Since radar surveys are not required it is recommended that that additional AIS data is collected to the 28 days identified in the scoping report such as a 12-month period. In this instance the survey period may be extended to 24 months before consent application. The MCA is happy to discuss this requirement with the applicant.

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. If 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. The development of a Cable Burial Risk Assessment as outlined in 6.8.5.1 is welcomed. It is noted in paragraph 4.6.2.2 that Horizontal Directional Drilling (HDD) may be used at landfall. An under keel clearance (UKC) assessment should be conducted for the maximum draughts of vessels anticipated in area in accordance with MGN654 Annex 3.

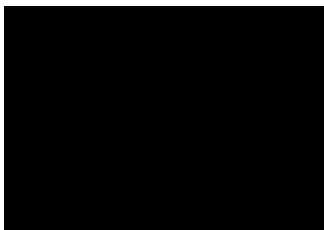
It is noted in paragraph 4.5.2.3 that HVDC transmission infrastructure will be installed. We would like to remind the applicant that consideration must be given to the effect of electromagnetic deviation on ships' compasses. The MCA would be willing to accept a three-degree deviation for 95% of the cable route. For the remaining 5% of the cable route no more than five degrees will be attained. If a HVDC cable is being used, we would expect the applicant to do a desk based compass deviation study based on the specifications of the cable lay proposed and assess the effect of EMF on ship's compasses. MCA may request for a deviation survey post the cable being laid; this will confirm conformity with the consent condition. The applicant should then provide this data to UKHO via a hydrographic note (H102), as they may want a precautionary notation on the appropriate Admiralty Charts (actions at a later stage depending upon the desk-based study and post installation deviation survey).

As stated in 3.5.1.3 although Ossian offshore wind farm does include construction of Offshore Substation Platforms (OSPs) they are outside scope of this report and will be assessed within the Ossian Offshore Wind Farm array EIA to be submitted to Scottish Government. Therefore, as no fixed structures are planned for this part of the project a Search and Rescue checklist and full Emergency Response Co-operation Plan (ERCoP) are not required. A Marine Emergency Action Card (MEAC) is considered appropriate for this part of the project when considered in isolation.

MGN 654 Annex 4 requires that hydrographic surveys of the installed cable(s) should fulfil the requirements of the International Hydrographic Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager. Failure to report the survey or conduct it to Order 1a might invalidate the Navigational Risk Assessment if it was deemed not fit for purpose.

On the understanding that the Shipping and Navigation aspects are undertaken as per the above and in accordance with MGN 654 and its annexes, along with a completed MGN checklist, MCA is likely to be content with the approach for assessment.

Yours faithfully,



Offshore Renewables Lead
UK Technical Services Navigation



Ossian Offshore Wind Farm – Export Cable Corridor
Planning Inspectorate
ossiantransmission@planninginspectorate.gov.uk
(By Email only)

Our reference: DCO/2024/00015
Your reference: EN0210006

26 March 2025

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11.

MMO scoping consultation response on the application by Ossian Offshore Wind Farm Ltd (the Applicant) for an Order granting Development Consent (DCO) for the Export Cable Corridor Project (the Proposed Development).

Thank you for your scoping consultation dated 27 February 2025 and for providing the Marine Management Organisation (MMO) with the opportunity to share our comments with you on the Ossian Offshore Wind Farm – Export Cable Corridor Project Scoping Report.

The MMO's role in Nationally Significant Infrastructure Projects (NSIPs)

The MMO was established by the Marine and Coastal Access Act 2009 (MCAA 2009) to make a contribution to sustainable development in the marine area and to promote clean, healthy, safe, productive and biologically diverse oceans and seas.

The responsibilities of the MMO include the licensing of construction works, deposits and removals in English inshore and offshore waters and for Northern Ireland offshore waters by way of a marine licence. Inshore waters include any area which is submerged at mean high water spring (MHWS) tide. They also include the waters of every estuary, river or channel where the tide flows at MHWS tide. Waters in areas which are closed permanently or intermittently by a lock or other artificial means against the regular action of the tide are included, where seawater flows into or out from the area.

In the case of NSIPs, the Planning Act 2008 (the 2008 Act) enables DCOs for projects which affect the marine environment to include provisions which deem marine licences.



As a prescribed consultee under the 2008 Act, the MMO advises developers during pre-application on those aspects of a project that may have an impact on the marine area or those who use it. In addition to considering the impacts of any construction, deposit or removal within the marine area, this also includes assessing any risks to human health, other legitimate uses of the sea and any potential impacts on the marine environment from terrestrial works.

Where a marine licence is deemed within a DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement and revocation of provisions relating to the marine environment. As such, the MMO has a keen interest in ensuring that provisions drafted in a deemed marine licence (DML) enable the MMO to fulfil these obligations.

Further information on licensable activities can be found on the MMO's website at <https://www.gov.uk/government/collections/planning-and-development-marine-licences>

Further information on the interaction between the Planning Inspectorate and the MMO can be found in our joint advice note at <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2013/04/Advice-note-11-Annex-B-MMO.pdf>

General Comments

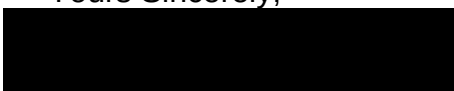
The MMO notes that there was not enough time from fully consult with our scientific advisors Centre of Environment, Fisheries and Aquaculture Science (CEFAS). The MMO will request further data sources to support assessments following consultation with our scientific advisors and will provide a follow up response at the end of April. It is noted the Applicant has engaged with the MMO and our scientific advisors will be included in our Preliminary Environmental Information Report (PEIR) review. The MMO also encourages the Applicant to engage with key stakeholders during the pre-application process.

Please find attached the scoping opinion of the MMO.

The MMO reserves the right to make further comments on the project throughout the preapplication process and may modify its present advice or opinion in view of any additional information that may come to our attention. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.

If you require any further information, please do not hesitate to contact me using the details provided below.

Yours Sincerely,

A black rectangular box redacting the signature of the sender.

[REDACTED]
Marine Licencing Case Officer

D [REDACTED]
E [REDACTED]@[marinemangement.org.uk](mailto:[REDACTED]@marinemangement.org.uk)

Scoping Opinion

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11.

Title: Ossian Offshore Wind Farm – Export Cable Corridor

Applicant: Ossian Offshore Wind Farm Ltd

MMO Reference: DCO/2024/00015

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1 Proposal

Ossian Offshore Wind Farm – Export Cable Corridor

1.1 Project Background

The project intends to develop transmission infrastructure to connect the Ossian Offshore Wind Farm Array (located 80 kilometres (km) off the East coast of Scotland and subject to application for consent under section 36 of the Electricity Act 1989) to National Grid at substations in Lincolnshire. The Proposed Development comprises the installation of approximately 400km of high voltage direct current (HVDC) offshore export cables (to the extent that these are located in English waters), landfall structures, HVDC onshore export cables and onshore converter stations, and all other development integral to the construction, operation and maintenance of the Proposed Development, including access.

2 Location

The Ossian Offshore Wind Farm export cable corridor (ECC) is located off the East Coast of England, which is displayed in Figure 1 below.

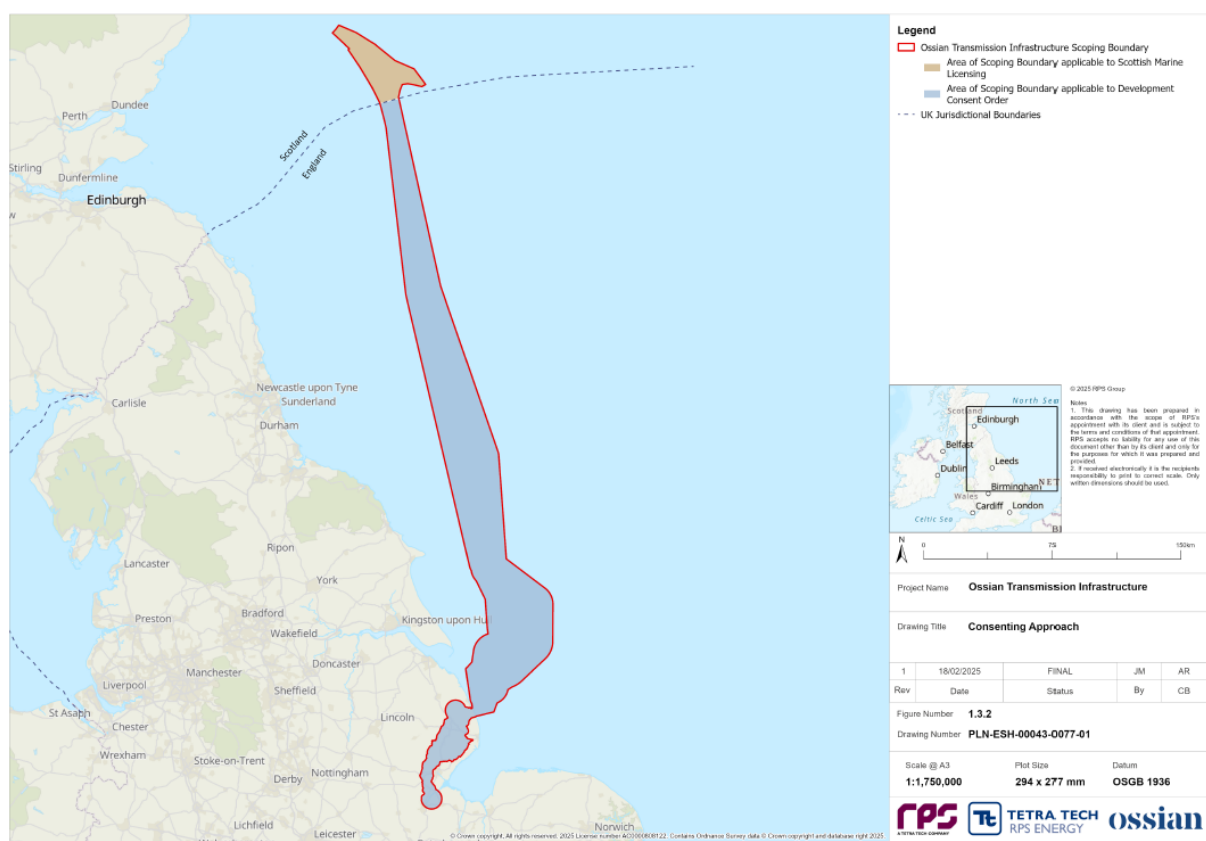


Figure 1: Location plan and scoping boundary

3 Scoping Opinion

Ossian Offshore Wind Farm Ltd has asked the Planning Inspectorate on behalf of the Secretary of State for its opinion (a Scoping Opinion) as to the information to be provided in an Environmental Statement (ES) relating to the Proposed Development. The Planning Inspectorate has consulted the MMO on the Scoping Report and asked that the MMO identifies the information that should be provided in the ES. The MMO has reviewed the Scoping Report and broadly agrees with the topics outlined, however has the following comments that should be considered before the Planning Inspectorate issues its Scoping Opinion.

Due to resource demands the MMO was not able to seek advice from our scientific advisors (CEFAS) and therefore this report is a high level overview of what is expected in the ES. The MMO does plan to submit a further report will more advice to both PINS and the Applicant in the near future. Noting this may be after the PINS scoping opinion.

4 Definitions to include within the Environmental Statement

- 4.1 The MMO asks the Applicant to amend the definition of Mean High Water Springs to ensure that it matches the MMO definition, which can be found at <https://www.gov.uk/guidance/marine-licensing-definitions#mean-high-watersprings>: The height of Mean High Water Springs (MHWS) is the average throughout the year, of two successive high waters, during a 24-hour period in each month when the range of the tide is at its greatest (Spring tides).
- 4.2 The MMO asks the Applicant to include the year e.g. Marine and Coastal Access Act 2009 in the definition .
- 4.3 The MMO asks the Applicant to include a definition of Marine Plans within the ES.
- 4.4 The MMO requests that the Applicant include a definition of offshore. The MMO defines offshore as relating to waters extending past 12 nautical miles (nm) measured seaward from the territorial sea baseline.
- 4.5 The MMO asks the Applicant to include a definition of the Rochdale Envelope within the glossary.

5 Consents

- 5.1 Within section 1.3 consenting approach the MMO requests that the Applicant specifies which activities the deemed marine licence will be applied for within the upcoming PEIR submission and the final Environmental Statement (ES). The MMO recommends this is covered within a 'consents' chapter.
- 5.2 The MMO also recommends the 'consents' chapter clearly outlines the other consents the Applicant is applying for including marine and terrestrial components.

6 Legislation and Policies

- 6.1 The Applicant must ensure any dredged material that will be deposited in the marine environment is suitable for disposal at sea. Under the Marine and Coastal Access Act 2009, dredging is defined as 'using any device to move any material (whether or not suspended in water) from one part of the sea or seabed to another part'. The MMO licences disposing of dredged materials at sea and uses guidelines produced by OSPAR to regulate this activity. Details of how to correctly sample and analyse sediment in support of a marine licence application can be found here: [Marine licensing: Sediment Analysis - GOV.UK](#)
- 6.2 The MMO welcome the chapter heading considering marine policies and plans. The MMO request a compliance assessment table is provided within the ES to demonstrate how the applicant has considered all the North East Inshore and North East Offshore Marine policies.

7 Environmental Statement Structure

- 7.1 The MMO requests that the following marine chapters are included within any future ES documents:
 - Marine Physical Processes
 - Marine Sediment and Water Quality
 - Underwater Noise and Vibration
 - Benthic and Intertidal Ecology
 - Fish and Shellfish Ecology
 - Marine Mammals
 - Marine Ornithology
 - Commercial Fisheries
 - Shipping and Navigation
 - Aviation and Radar
 - Infrastructure and Other Users
 - Marine Archaeology and Cultural Heritage
 - Marine Seascape, Landscape and Visual Impacts
- 7.2 The MMO notes that underwater noise is only covered within Chapter 6.5 Marine Mammals. Noise impacts will also need to be considered within Chapter 6.4 Fish and Shellfish Ecology.

8 Marine Protected Areas

- 8.1 The MMO notes that designated sites have been mentioned within the following chapters and the MMO largely defers to Natural England in relation to Marine Protected Areas:
- 6.2 Physical processes
 - 6.3 Benthic
 - 6.4 Fish and Shellfisheries
 - 6.5 Marine Mammals
 - 6.6 Offshore Ornithology
- 8.2 The MMO would like to see the inclusion of the Southern North Sea SAC to chapter 6.4 of the ES as part of the conservation objectives for the area state that the condition of supporting habitats and processes, and the availability of prey is maintained.
- 8.3 The MMO recommends the Applicant engages with the statutory nature conservation body - Natural England and or the Joint Nature Conservation Body, alongside Nature Scot (due to overlaps within their jurisdiction, to discuss the impacts of their proposal on the marine protected areas in the vicinity of the works.

9 Habitats and Species of Principal Importance

- 9.1 The MMO has identified grey seals (*Halichoerus grypus*), harbour seals (*Phoca vitulina*), harbour porpoises (*Phocoena phocoena*), Minke Whale (*Balaenoptera acutorostrata*), and White Beaked Dolphin (*Lagenorhynchus albirostris*) in the vicinity of the proposed works
- 9.2 From 0 to 12 nm seals are protected under the Conservation of Seals Act 1970 and regulation 45 of The Conservation of Habitats and Species Regulations 2017 (CHSR). If the Applicant considers the works could result in an offence, the applicant will need to obtain a wildlife licence. The MMO Marine Conservation Team can be contacted at:
- MarineConservationTeam@marinemanagement.org.uk to discuss this further. Please see MMO's webpage guidance with details of offences for seals: <https://www.gov.uk/government/publications/protected-marine-species/seal>
- 9.3 The MMO notes that Red Throated Divers are present in the works area and recommends the applicant follows the Red Throated Diver Protocol as agreed with Natural England – this could be similar to the below:.

Red Throated Divers: Licensable activities must adhere to the Red Throated Diver best code of Practice to minimise disturbance:

- *Selecting routes that avoid known aggregations of birds;*
- *Restricting vessel movements to existing navigation routes (where the divers are typically relatively low).*
- *Maintaining direct transit routes (to minimise transit distances through areas used by divers);*
- *Avoidance of over-revving of engines (to minimise noise disturbance); and*

- *Briefing of vessel crew on the purpose and implications of these vessel management practices.*

10 Physical Processes

10.1 The MMO has no comments to make on this chapter at this time.

11 Benthic Subtidal and Intertidal Ecology

11.1 The MMO has no comments to make on this chapter at this time.

12 Fish and Shellfish Ecology

12.1 The MMO requests that underwater noise (UWN) impacts are included within this chapter and does not agree that UWN has been scoped out.

12.2 The MMO notes that long term habitat loss has been scoped out, the MMO does not agree with this being screened out as not all fish and shellfish have fully pelagic lifecycles. The MMO advises that habitat loss is screened in for fish and shellfish during the construction phase of the project.

13 Marine Mammals

13.1 The MMO agrees with the impacts that the Applicant has scoped in and has no comments to make on this chapter.

14 Offshore Ornithology

14.1 The MMO defers to NE on the ornithological matters within this chapter.

15 Commercial Fisheries

15.1 The MMO agrees with the impacts that have been scoped in within this chapter.

16 Shipping and Navigation

16.1 The MMO agrees with the impacts that have been scoped in and has no comments to make on this chapter.

16.2 The MMO defers to Trinity house (TH) and the Maritime and Coastguard Agency (MCA) and other relevant interested parties.

17 Marine Archaeology

17.1 The MMO defers to Historic England (HE) on the marine archaeological matters within this chapter.

18 Infrastructure and other Sea Users

18.1 The MMO agrees with the impacts that have been scoped in and has no comments to make on this chapter.

19 Water Quality

19.1 The MMO has no comments on this chapter and defers to Environment Agency (EA).

20 Geology, Hydrogeology and Ground conditions

20.1 The MMO has no comments on this chapter at this time.

21 Hydrology and Flood Risk

The MMO has no comments on this chapter and will defer to the EA.

22 Onshore Ecology and Nature Conservation

22.1 The MMO has no comments on this chapter and defers to NE.

23 Onshore and Intertidal Ornithology

23.1 The MMO has no comments on this chapter and defers to NE.

24 Historic Environment

24.1 The MMO has no comments on the chapter and defers to Historic England (HE).

25 Land Use and Recreation

25.1 The MMO has no comments on this chapter and defers to the Local Planning Authorities.

26 Traffic and Transport

26.1 The MMO has no comments on this chapter and defers to the Local Planning Authorities and Highways agency.

27 Noise and Vibration

27.1 The MMO has no comments on this chapter and defers to the Local Planning Authorities.

28 Air Quality

28.1 The MMO has no comments on this chapter and defers to the Local Planning Authorities and the UK Health Security Agency (UKHSA).

29 Landscape and Visual Resources

29.1 The MMO has no comments on this chapter and defers to the Local Planning Authorities and Natural England.

30 Health and Wellbeing

30.1 The MMO has no comments on this chapter and defers to the Local Planning Authorities and the UK Health Security Agency (UKHSA).

31 Socio-economics

31.1 The MMO has no comments on this chapter and defers to the Local Planning Authorities.

32 Climate Change

32.1 The MMO has no comments on this chapter.

33 Waste

33.1 The MMO has no comments on this chapter and defer to EA.

34 Decommissioning

34.1 The MMO also welcomes that decommissioning has been considered. The MMO notes that the decommissioning environmental plan will be developed and agreed with the Environment Agency. The MMO requests that we are consulted if any decommissioning is undertaken below mean high water springs and this should be presented within the Application as an Outline Decommissioning Plan. The MMO also recommends the Applicant engages with Natural England regarding the decommissioning.

35 Conclusion

The topics highlighted in this scoping opinion should be assessed during the EIA process and the outcome of these assessments should be documented in the ES in support of the Development Consent Order and Deemed Marine Licence application and any associated planning application(s). This statement, however, should not necessarily be seen as a definitive list of all EIA requirements. Given

the scale and programme of these planned works other work may prove necessary.

Yours Sincerely,

[Redacted Signature]

[Redacted Name]
Marine Licencing Case Officer

D [Redacted]
E [Redacted] [@marinemanagement.org.uk](mailto:[Redacted]@marinemanagement.org.uk)



Defence
Infrastructure
Organisation

Ministry of Defence
Safeguarding Department
St George's House
DIO Headquarters
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

Your Reference: EN0210006

Tel: [REDACTED]

Our Reference: DIO10066510

Email: [REDACTED]@mod.gov.uk

[REDACTED]
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

27 March 2025

By email only

Dear Claire,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11.

Application by Ossian Offshore Windfarm Limited (the applicant) for an Order granting Development Consent for the Ossian Transmission Infrastructure (the proposed development).

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested – updated correspondence.

Thank you for consulting the Ministry of Defence (MOD) on the request for a scoping opinion with respect to the above proposed development.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, technical sites or maritime defence assets and interests.

This consultation concerns the Ossian Transmission Infrastructure, proposed transmission infrastructure that would serve to connect the Ossian Array, a proposed floating wind farm located approximately 80km off the east coast of Scotland, through Scottish and English waters to landfall in Lincolnshire before it is connected to the National Grid.

This consultation response relates only to transmission infrastructure within English territorial waters and onshore in England, Infrastructure within Scottish waters is dealt with separately under applications for section 36 consent and Marine Licences which have been submitted to the Scottish Government.

This representation has been prepared with regard to the 'Ossian Offshore Wind Farm: Transmission Infrastructure, EIA Scoping Report: Parts 1 – 5', dated February 2025. The Offshore Scoping Boundary

represents the current stage of site selection and will be refined further to identify an Offshore Export Cable Corridor ahead of the applications for development consent and for a Marine License.

The Ossian Transmission Infrastructure contains a number of components which include:

- Offshore Export Cables from the OSPs (which form part of the Array Application) to Landfall. The Offshore Export Cables will be routed through both Scottish and English waters.
- Landfall - The Offshore Export Cables are to be brought ashore on the coast of Lincolnshire. At landfall the Offshore Export Cables are to be jointed to the Onshore Export Cables via the Transition Joint Bays. The Landfall area is defined by the area between Mean Low Water Springs (MLWS) up to and including the Transition Joint Bays.
- Onshore Transmission Infrastructure, which includes the following:
 - HVDC Onshore Export Cables - Onshore High Voltage Direct Current (HVDC) cables from the Landfall to the Onshore Converter Stations.
 - Onshore Converter Stations - required to convert HVDC to High Voltage Alternating Current (HVAC) such that the power can be supplied to the National Grid. The Onshore Converter Stations required include:
 - one converter station at the Lincolnshire Connection Node; and
 - up to two converter stations at Weston Marsh.
 - HVAC Onshore Export Cables - Onshore HVAC cables between the Onshore Converter Stations and the points of connection to the National Grid.

The applicant has prepared an Environmental Impact Assessment Scoping Report '*Ossian Offshore Wind Farm Transmission Infrastructure: EIA Scoping Report*' (dated 21 February 2025) for the proposed development. This recognises some of the principal defence issues that will be of relevance to the progression of the proposed development. I write to confirm the safeguarding position of the MOD in response to the information contained within the submitted Environmental Statement.

Offshore Development

The project will entail the installation of subsea cables and associated infrastructure to link the Ossian Wind Farm with onshore electricity grid infrastructure.

The applicant's EIA Scoping Report summarises issues relating to 'Infrastructure and Other Sea Users'. At sections 6.10.3.25, 6.10.3.26, and the table with reference 6.10.2 identify Military Practice and Exercise Areas (PEXAs) which overlap with scoping boundary. These areas, their respective limits, and the activities listed for each area are set out in the table below:

Area	Lower limit	Upper limit	Activity
D307 Donna Nook	0 feet - Surface	23000 feet	Ordnance, Munitions and Explosives. High Energy Manoeuvres. Unmanned Aircraft System (VLOS/BVLOS). Electronic/Optical Hazards.
D323A	Flight level 50	Flight level 660	High Energy Manoeuvres. Ordnance, Munitions and Explosives (OME). Electrical/Optical Hazards. Unmanned Aircraft System (BVLOS).
D323B	Flight level 50	Flight level 660	High Energy Manoeuvres. Ordnance, Munitions and Explosives (OME). Electrical/Optical Hazards. Unmanned Aircraft System (BVLOS).
D323C	Flight level 50	Flight level 660	High Energy Manoeuvres. Ordnance, Munitions and Explosives (OME). Electrical/Optical Hazards. Unmanned Aircraft System (BVLOS).

D323D	Flight level 50	Flight level 660	High Energy Manoeuvres. Ordnance, Munitions and Explosives (OME). Electrical/Optical Hazards. Unmanned Aircraft System (BVLOS).
D412 Staxton	0 feet - Surface	10000 feet	Ordnance, Munitions and Explosives.
D513B Druridge Bay	0 feet - Surface	23000 feet	High Energy Manoeuvres. Ordnance, Munitions and Explosives (OME). Electrical/Optical Hazards.
D513C Druridge Bay	0 feet - Surface	10000 feet	High Energy Manoeuvres. Ordnance, Munitions and Explosives (OME). Electrical/Optical Hazards.

In addition, it should be noted that part of PEXA D613C also sits above English waters and is within the scoping boundary. D613C has a lower limit of Flight level 100 and an upper limit of Flight level 660 and is an area where activity includes High Energy Manoeuvres and use of Ordnance, Munitions and Explosives.

The potential effect of the development on these areas should be scoped into any Environmental Impact Assessment Report taken account of and scoped in as the project moves forward to ensure no adverse effects are caused to military training conducted there. The potential need for sub-sea cable installations routed through this Danger Area to be fitted with protection from projectiles or other objects that may be dropped into the sea as a consequence of military training should be taken into account.

Another concern with regard to the proposal is the potential for the development to form a physical obstruction to low flying aircraft. Should the construction or decommissioning phases of the proposed development entail the permanent or temporary deployment of tall or narrow profile structures, this may have implications for military low flying training activities that may be conducted. Proposals entailing the deployment of structures (whether temporary or permanent) that will have a total height of 50 metres or greater above the surface, on or offshore, should be evaluated to confirm the need for aviation warning lighting or notifications to airspace users.

Please note, there are other defence interests in the locality relating to maritime navigational interests and 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.

The potential for unexploded ordnance (UXO) to be present within the development area is indirectly acknowledged throughout the report as it describes the potential for noise in the benthic and sea mammal sections. It would be appropriate to give particular consideration to the potential presence of UXO in the area covered by Danger Areas D513, D412 and D307.

Onshore Development

The applicant has identified landfall search area 3, land between Sandilands and Anderby Creek, as their preferred location. The offshore approach to this area has the potential to bring it close to Donna Nook range and this should be considered. In the event that other search areas are revisited, consideration should be given to the effect on military danger areas along that coast which include ranges at Donna Nook, Wainfleet and Holbeach.

The scoping submission describes a high voltage direct current connection from transition joint bays where the offshore development makes landfall, to onshore converter stations and high voltage alternating current cables between the onshore converter stations and the points of connection to the National Grid. At paragraph 4.7.3.2 the applicant states that all onshore export cables will be installed below ground and that no overhead lines are proposed.

The onshore extent of the scoping boundary area identified in the submission falls within the statutory safeguarding zones drawn to assure the operation and capability of a military aerodrome, RAF Coningsby, as well as the technical assets sited/deployed there which facilitate air traffic management, navigation, and communications. In addition, the onshore scoping boundary passes through a statutory safeguarding zone drawn to assure the operation and capability of an asset known as the East 1 WAM Network an asset that also facilitates air traffic management.

Once a final route is proposed, it must be assessed against operational and technical statutory safeguarding matters relevant to RAF Coningsby and the East 1 WAM Network. There is potential for construction work to expose soil which may be an attractant for large flocking birds which could cause a hazard to military aircraft and should be scoped in for future consideration.

The southern onshore Converter station falls within the statutory safeguarding area for the Wainfleet and Holbeach range and any development within this area will need to be assessed as the project moves forward.

As with the offshore element, the potential for the development to form a physical obstruction to low flying aircraft is a concern for the MOD. It is acknowledged that a maximum height for onshore development of 33m above ground level has been identified. Should the construction or decommissioning phases of the proposed development entail the permanent or temporary deployment of tall or narrow profile structures, this may have implications for military low flying training activities that may be conducted.

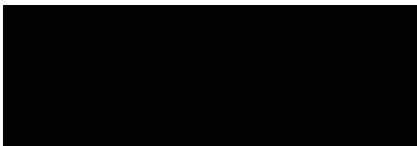
The introduction of any permanent or temporary structures 50 metres or greater in height will need to be reviewed by the MOD to identify if they will have any implications to low flying training activities and identify any mitigation measures that may be necessary.

It is acknowledged that, at this stage, detailed designs for the various proposed structures and their locations may not have been finalised, as such these representations are limited to the principle of the development only.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's documents published on the project website as of the date of this letter. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. If any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely,

A large black rectangular box redacting the signature of the Safeguarding Manager.

Safeguarding Manager

Submitted via email to: ossiantransmission@planninginspectorate.gov.uk

Date: 24th March 2025

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Ossian Offshore Wind Farm Ltd (the Applicant) for an Order granting Development Consent for the Ossian Transmission Infrastructure (the Proposed Development)

I refer to your email dated 25/02/2025 regarding the above proposed DCO. This is a response on behalf of National Gas PLC (NGT). Having reviewed the scoping consultation documents, NGT wishes to make the following comments regarding gas infrastructure which may be affected by proposals.

NGT has 4 feeder mains located within or in proximity to the Order limits. Details of this infrastructure is as follows:

- Feeder Main – FM17 – Theddlethorpe to Hatton
- Feeder Main – FM08 – Theddlethorpe to Hatton
- Feeder Main – FM07 – Hatton to Gosberton
- Feeder Main – FM07 – Gosberton to Tydd St Giles
- NGT Leasehold – LL254022
- Cathodic Protection Groundbeds/TR
- Ancillary apparatus

Please note that NGT has existing easements for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.

You should also be aware of NGT's guidance for working in proximity to its assets, further guidance and links are available as follows.

CATHODIC PROTECTION SYSTEM

To ensure a high level of safety and reliability in operation, National Gas Transmission's assets are protected by a cathodic protection system. It is essential that buried steel pipework associated with the transmission and distribution of natural gas is designed, installed, commissioned and maintained to withstand the potentially harmful effects of corrosion and that the corrosion control systems employed are monitored to ensure continued effectiveness. Installations in the vicinity of National Gas Transmission's assets which may potentially interfere

with the cathodic protection system must be assessed and approved by National Gas Transmission, and appropriate control measures must be put in place where required.

Installations which have the potential to interfere with National Gas Transmission's Cathodic protection system include (but are not limited to):

1. High voltage cable crossings and parallelism
2. High voltage ac pylon parallelism
3. Battery Energy Storage Systems
4. Third party pipelines with cathodic protection systems
5. PV Solar arrays

Further information on D.C interference can be found in UKOPA/GPG/031 Edition C Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx

Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx (hold ctrl and click to access) Further information on A.C. interference can be found in UKOPA/GPG/027 UKOPA Good Practice Guide UKOPA Good Practice Guide (hold ctrl and click to access)

The safe limits for transfer voltage and impressed current that a high-pressure gas pipeline can be exposed to are outlined in T/PL/ECP/1, T/PL/ECP/2 and BS EN 50122-1. These are the safe limits for non-electrically trained personnel.

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.

Key Considerations:

- NGT has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.
- Please be aware that written permission is required before any works commence within the NGT easement strip. Furthermore a Deed of Consent will be required prior to commencement of works within NGT's easement strip subject to approval by NGT's plant protection team.
- Any large installations which may result in a large population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning methodology, and the HSE response should be submitted to National Gas Transmission for review
- The below guidance is not exhaustive and all works in the vicinity of NGT's asset shall be subject to review and approval from NGT's plant protection team in advance of commencement of works on site.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and NGT's Dial Before You Dig Specification

for Safe Working in the Vicinity of NGT Assets. There will be additional requirements dictated by NGT's plant protection team.

- NGT will also need to ensure that its pipelines remain accessible during and after completion of the works.
- Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of a NGT representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of NGT High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.
- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with NGT's Plant Protection team is essential:
 - Demolition
 - Blasting
 - Piling and boring
 - Deep mining
 - Surface mineral extraction
 - Landfilling
 - Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.)
 - Wind turbine installation - minimum separation distance of 1.5x the mast/hub height is required, and any auxiliary installations such as cable or track crossings will require a deed of consent.
 - Solar farm installation
 - Tree planting schemes

Traffic Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.
- Permanent road crossings will require a surface load calculation, and will require a deed of consent.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.

- The type of raft shall be agreed with NGT prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the NGT pipeline without the prior permission of NGT
- NGT will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to NGT.
- An NGT representative shall monitor any works within close proximity to the pipeline to comply with NGT specification T/SP/SSW22

New Asset Crossings:

- New assets (cables/pipelines etc) may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- The separation distance for a cable >33kV is 1000mm and pre and post energisation surveys may be required at National Gas Transmission's discretion. A risk assessment/method statement will need to be provided to, and accepted by National Gas Transmission prior to the deed of consent being agreed. Where a new asset is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.
- A new service should not be laid parallel within an easement strip
- Clearance must be at least 600mm above or below the pipeline
- An NGT representative shall approve and supervise any cable crossing of a pipeline.
- A Deed of Consent is required for any cable crossing the easement

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGT apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO. NGT 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.

Adequate access to NGT pipelines must be maintained at all times during construction and post construction to ensure the safe operation of our network.

Yours Faithfully

Asset Protection Team

Further Safety Guidance

To download a copy of the HSE Guidance HS(G)47, please use the following link:

<https://www.hse.gov.uk/pubns/books/hsg47.htm>

Working Near National Gas Assets

<https://www.nationalgas.com/land-and-assets/working-near-our-assets>

Specification for Safe Working in the Vicinity of National Gas High Pressure Pipelines and Associated Installations

<https://www.nationalgas.com/document/82951/download>

Tree Planting Guidance

<https://www.nationalgas.com/document/82976/download>

Excavating Safely

<https://www.nationalgas.com/document/82971/download>

Dial Before You Dig Guidance

<https://www.nationalgas.com/document/128751/download>

Essential Guidance:

<https://www.nationalgas.com/gas-transmission/document/82931/download>

Solar Farm Guidance

<https://www.nationalgas.com/document/82936/download>

Development Liaison Officer
Land, Planning and External Affairs

[\[REDACTED\]@nationalgrid.com](mailto: [REDACTED]@nationalgrid.com)

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
ossiantransmission@planninginspectorate.gov.uk

25 March 2025

Dear Sir/Madam

APPLICATION BY OSSIAN OFFSHORE WINDFARM LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE OSSIAN TRANSMISSION INFRASTRUCTURE (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

I refer to your letter dated 25th February 2025 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure within or in close proximity to the current red line boundary.

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.

Existing Infrastructure

Substation

- BICKER FEN 400 kV Substation
- SPALDING NORTH 400 kV Substation

Associated overhead and underground apparatus including cables

Overhead Lines

• 2WS ROUTE 400 kV OHL	BICKER FEN - SPALDING NORTH - WEST BURTON SPALDING NORTH-WALPOLE
• 4ZM ROUTE 400 kV OHL	SPALDING NORTH - WALPOLE BICKER FEN - WALPOLE - WEST BURTON BICKER FEN - SPALDING NORTH - WEST BURTON

I enclose a plan showing the location of NGET's apparatus within the scoping area

New infrastructure

Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network. <https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd>

Proposed New Onshore Infrastructure

- **[Grimsby to Walpole \(G2W\)](#)**

The Grimsby to Walpole upgrade is a proposal to build a new high voltage overhead line in Lincolnshire, including building new pylons and up to five new substations including Weston Marsh Substation which forms part of the G2W Project.

- **[Eastern Green Link \(EGL\) 3 and 4](#)**

The EGL 3 project will be a new offshore High Voltage Direct Current (HVDC) electrical link from Peterhead to the Norfolk area. EGL4 will be a new offshore HVDC electrical link from east Scotland, also to the Norfolk area.

It should be noted that there may be further interactions with additional new strategic infrastructure where the projects are in their early development.

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 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.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects>. 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.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

Specific Comments – Electricity Infrastructure:

- 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
- 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 5 (2019)”.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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.

To download a copy of the HSE Guidance HS(G)47, please use the following link:
<http://www.hse.gov.uk/pubns/books/hsg47.htm>

Further Advice

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.

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. Further information relating to this can be obtained by contacting the email address below.

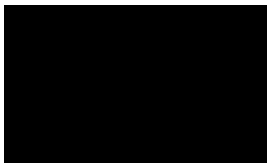
Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

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

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully



**Development Liaison Officer
Commercial and Customer Connections
Land, Planning and External Affairs**



Legend

Buried Cable

Buried Cable
Commissioned

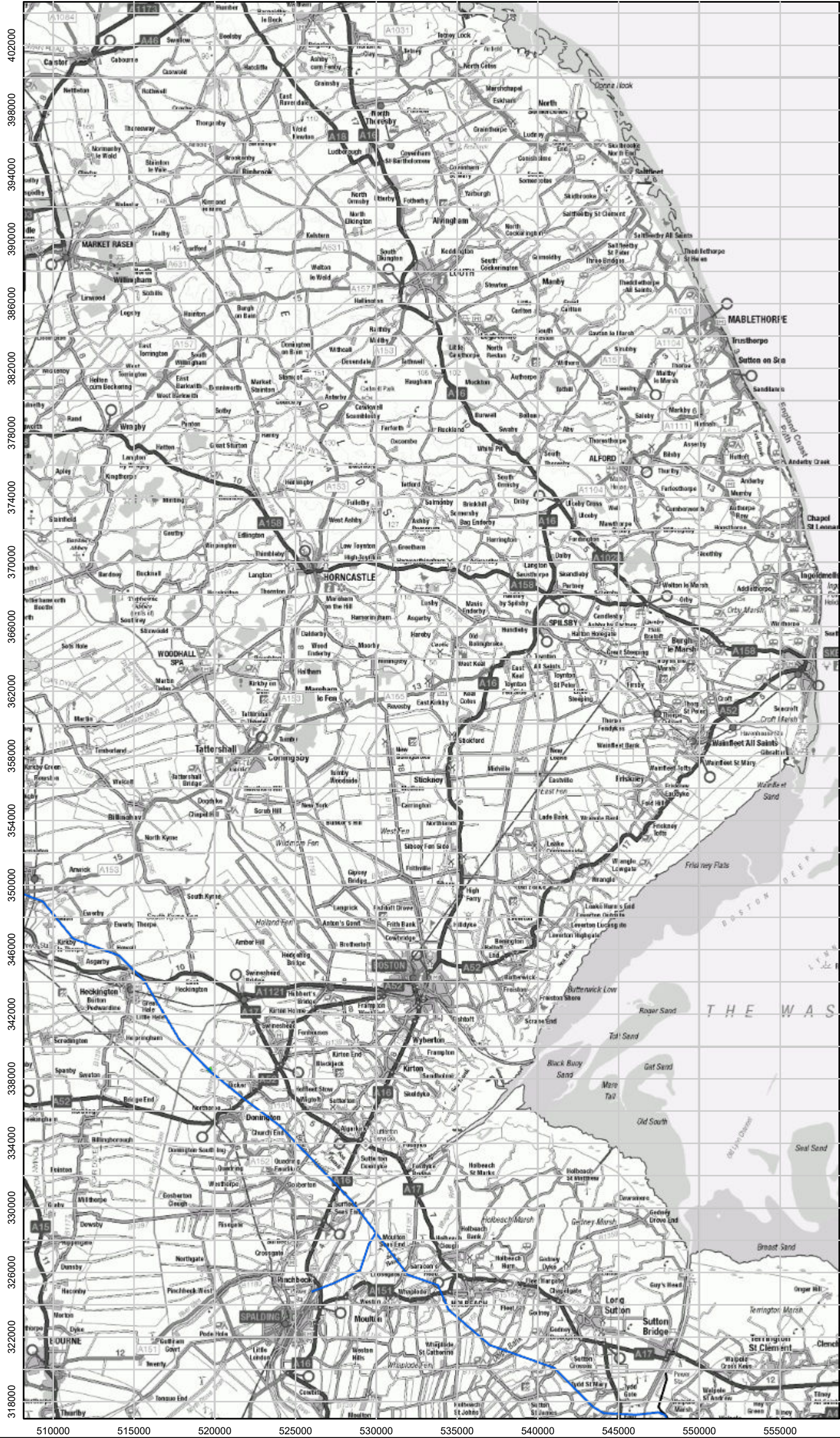
OHL 132Kv &
Below

OHL 132Kv &
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Commissioned

OHL 400Kv

OHL 400Kv
Commissioned

Notes



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OS Disclaimer: Background Mapping information has been reproduced from the Ordnance Survey map by permission of Ordnance Survey on behalf of The controller of His Majesty's Stationery Office.

©Crown Copyright Ordnance Survey National Grid Electricity Transmission (100024241) & National Gas Transmission (100024886)



NG Disclaimer: National Grid UK Transmission. The asset position information represented on this map is the intellectual property of National Grid PLC (Warwick Technology Park, Warwick, CV346DA) and should not be used without prior authority of National Grid.

Note: Any sketches on the map are approximate and not captured to any particular level of precision.



Legend

Buried Cable

Buried Cable

Commissioned

OHL 132Kv & Below

OHL 132Kv & Below

Commissioned

OHL 400Kv

OHL 400Kv

Commissioned

Substations

Substations

Commissioned

Notes



Technical Guidance Note 287

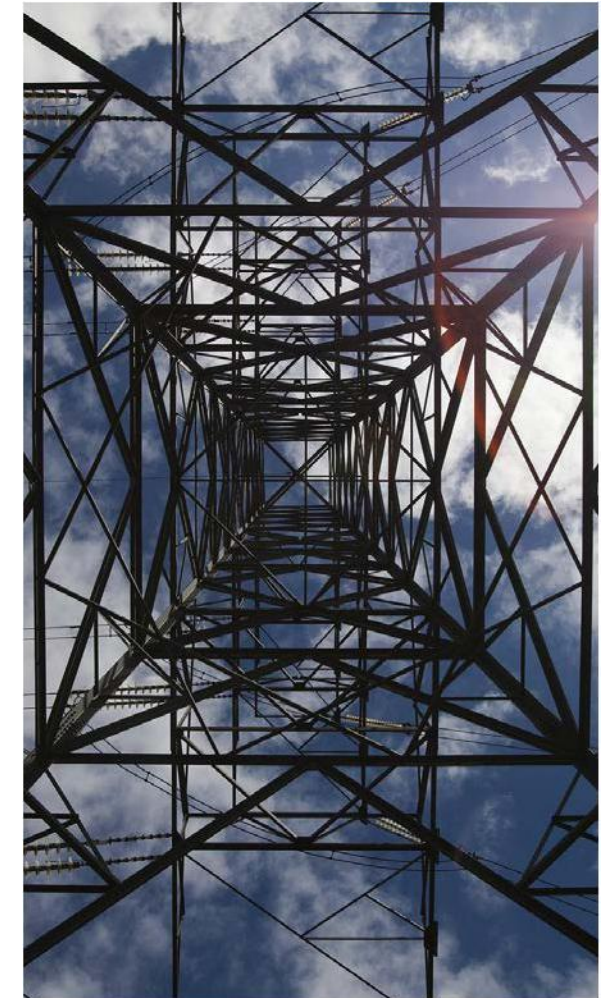
Third-party guidance for working near National Grid Electricity Transmission equipment

nationalgrid





Purpose and scope	3	Risk of impact identification	6
Contact National Grid	3	Risks or hazards to be aware of	7
How to identify specific National Grid sites.....	3	Land and access	7
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Disclaimer

National Grid Gas Transmission and National Grid Electricity Transmission or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law, nor does it supersede the express terms of any related agreements.



Purpose and scope

The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

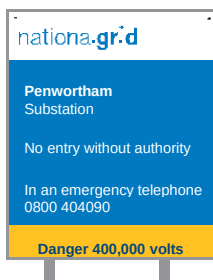
The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

How to identify specific National Grid sites

Substations

The name of the Substation and emergency contact number will be on the site sign.



Overhead Lines

The reference number of the tower and the emergency contact number will be on this type of sign.



Contact National Grid

Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

www.lsbud.co.uk

Email: assetprotection@nationalgrid.com

Phone: 0800 001 4282

Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

Consider safety

Consider the hazards identified in this document when working near electrical equipment



Part 1

Electricity transmission infrastructure

National Grid owns and maintains the high-voltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

Part 2

Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is *The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002*. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the *British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV*. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a life-threatening

electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.



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Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires. If any person, object or material gets too close to the wires, electricity could 'flashover' and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, 'avoiding danger from overhead power lines', and any legislation which is relevant to the work you are completing.

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What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals

Part 3

What National Grid will do for you and your development

Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

400kV

The maximum nominal voltage of the underground cables in National Grid's network

Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.





Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

For further information, contact Asset Protection:

Email: assetprotection@nationalgrid.com
Phone: 0800 001 4282

Electrical clearance from overhead lines

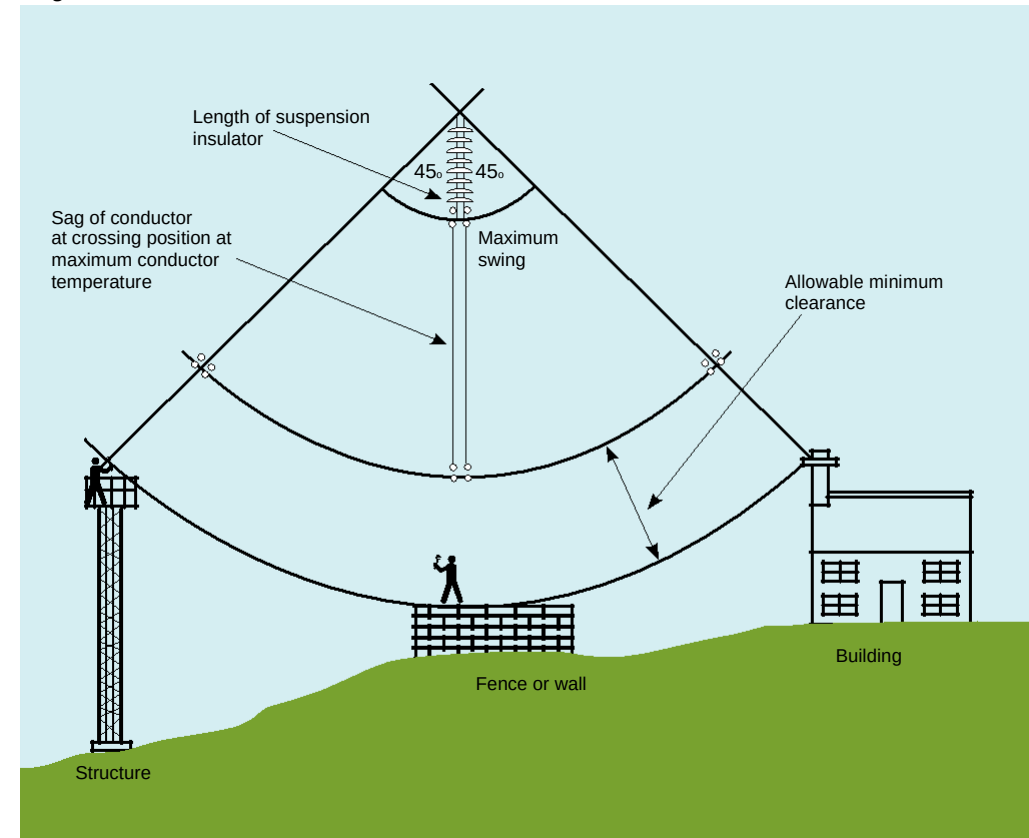
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

As we explained earlier, *Electrical Networks Association TS 43-8* details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

Diagram not to scale



There should be at least 5.3m between the conductors and any structure someone could stand on

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

7.3m

The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground

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The undergrounding of electricity cables at Ross-on-Wye

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Underground cables Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as *HSG 47 (Avoiding Danger from Underground Services)*.

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, on-site supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be laid in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum separation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the

equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

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Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

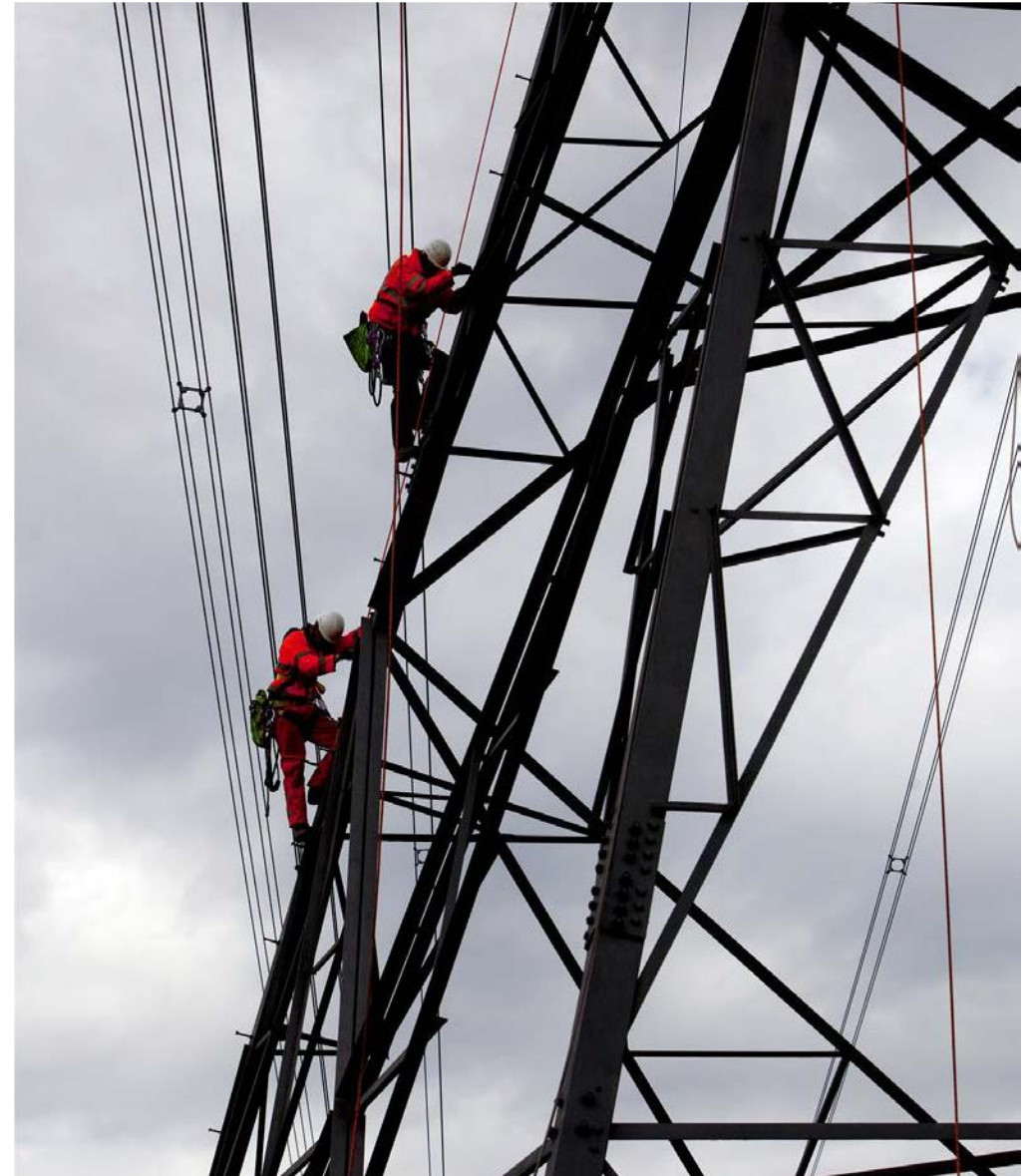
Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed. In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

30m

If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information

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Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire (*as outlined in ENA TS 43-8*).

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

BS ISO 4866:2010 states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in *BS 5228-2:2009*.

Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metal-clad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit www.emfs.info.



200m

*The minimum distance that
should be maintained from
National Grid assets when
quarry blasting*

Specific development guidance

Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice*. The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

- (i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line
- (ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

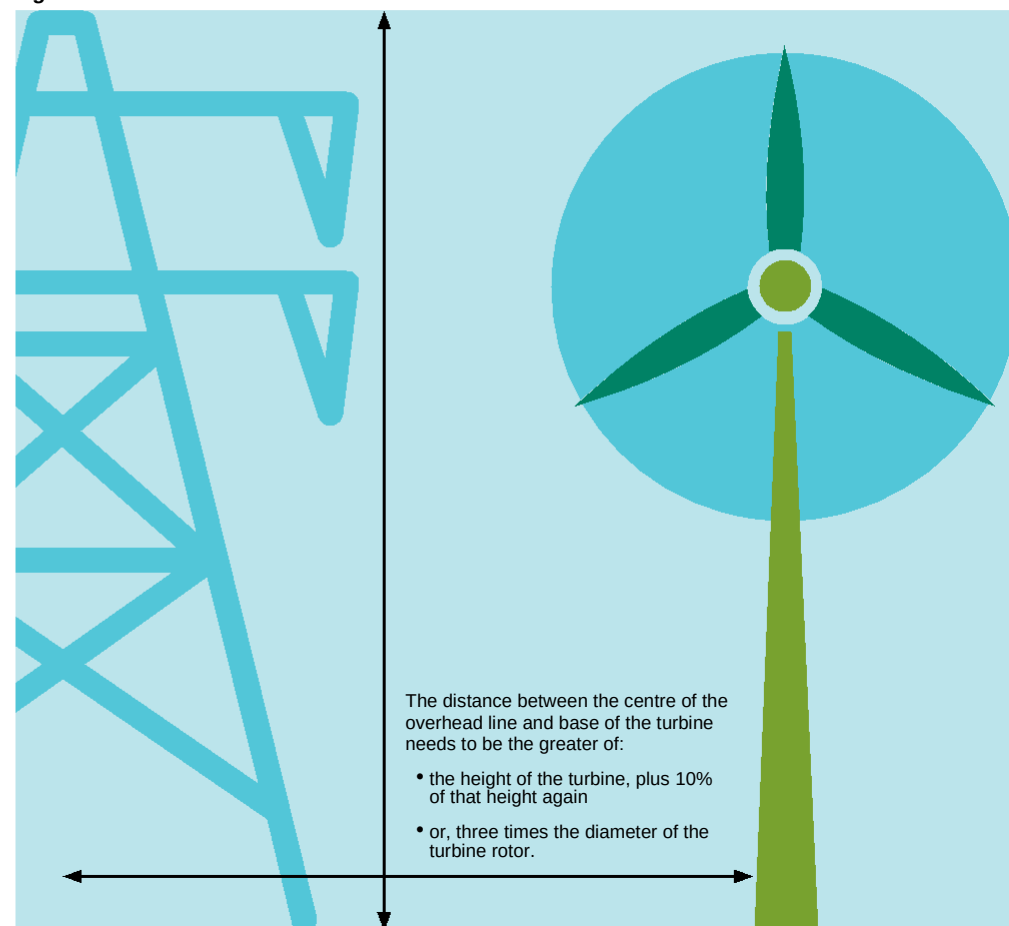
Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

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Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line



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The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

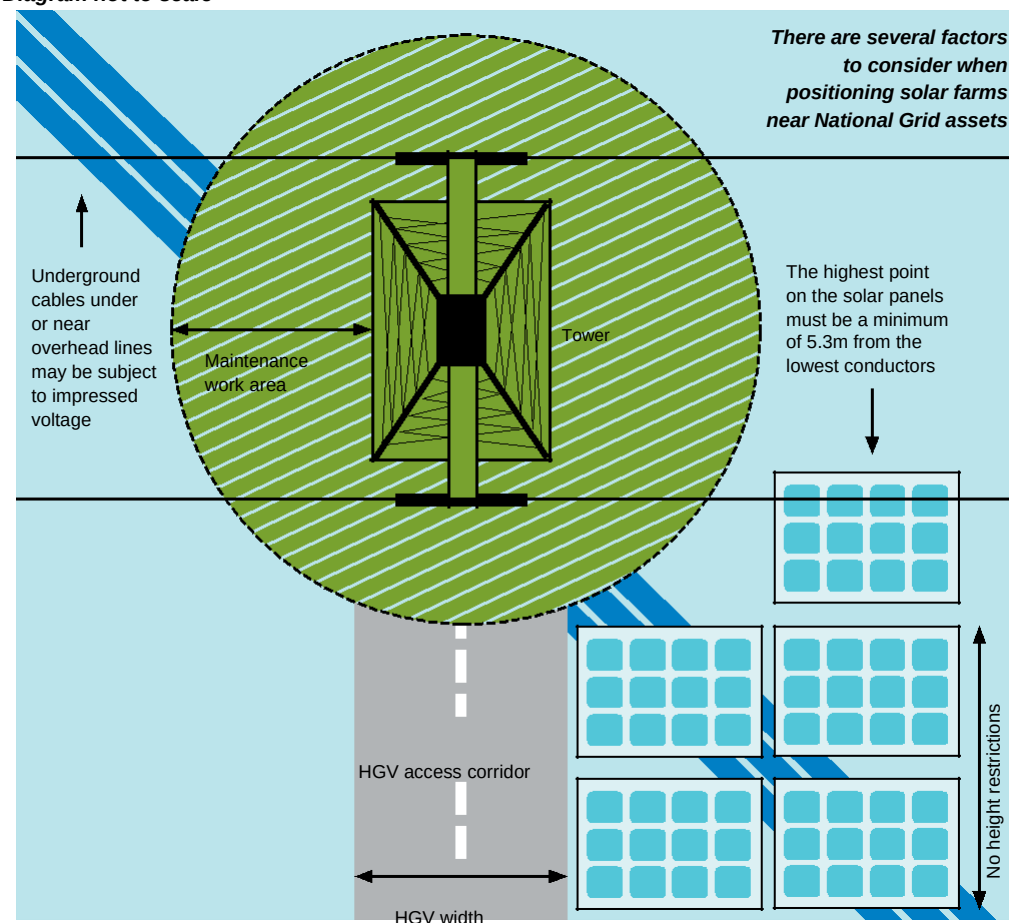
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles,

Diagram not to scale



Including access through any compound gates. During maintenance – and especially re-conductoring – National Grid would need enough space near our towers for winches and cable drums. If enough space is not available, we would require solar panels to be temporarily removed.



Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

Contact details

Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)¹
- Give your name and contact phone number
- Explain the nature of the issue or hazard
- Give as much information as possible so we can identify the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer

¹ It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

Routine enquiries

Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
0800 0014282

Opening hours:
Monday to Friday 08:00-16:00

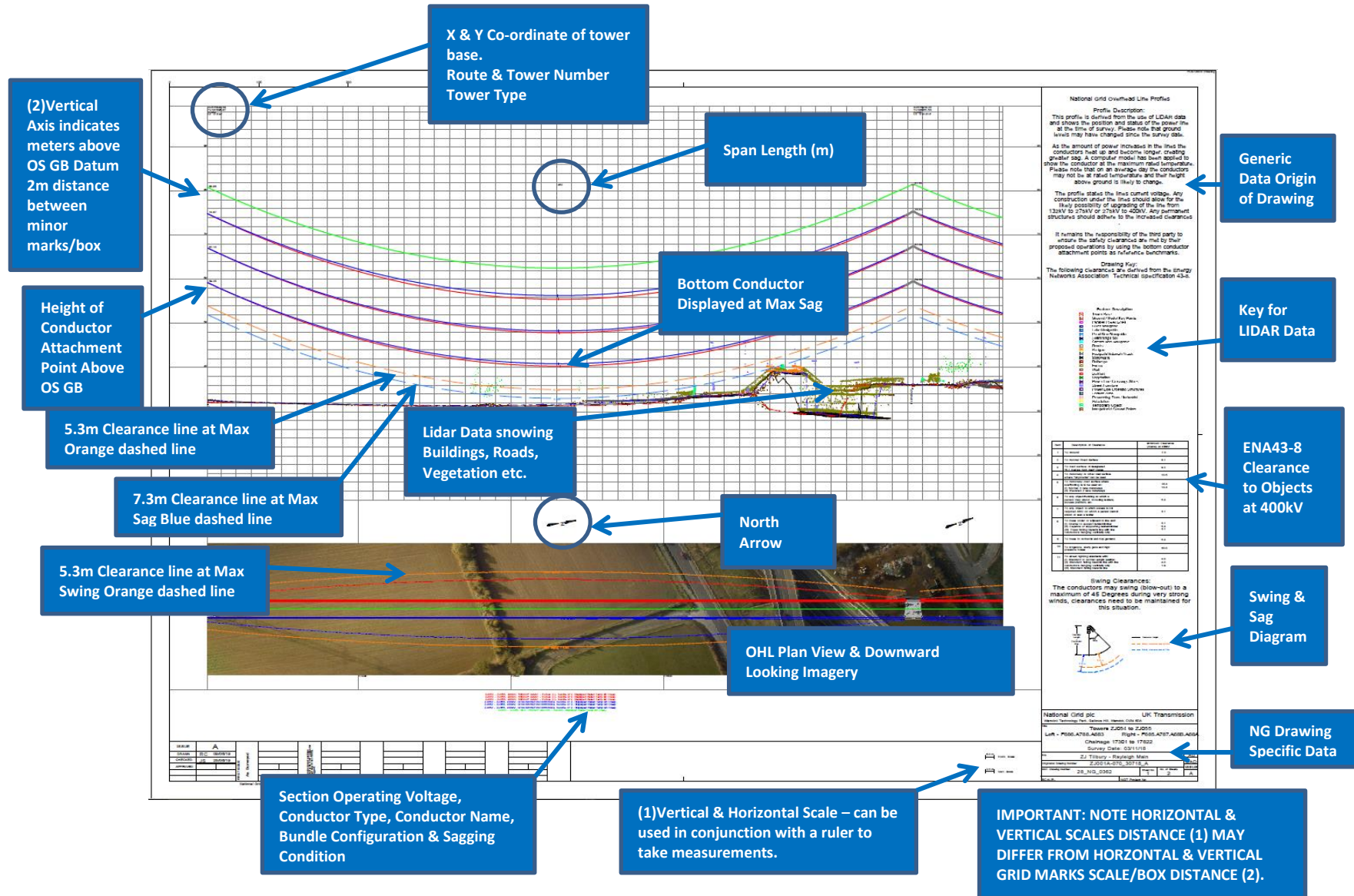
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14 APPENDIX A



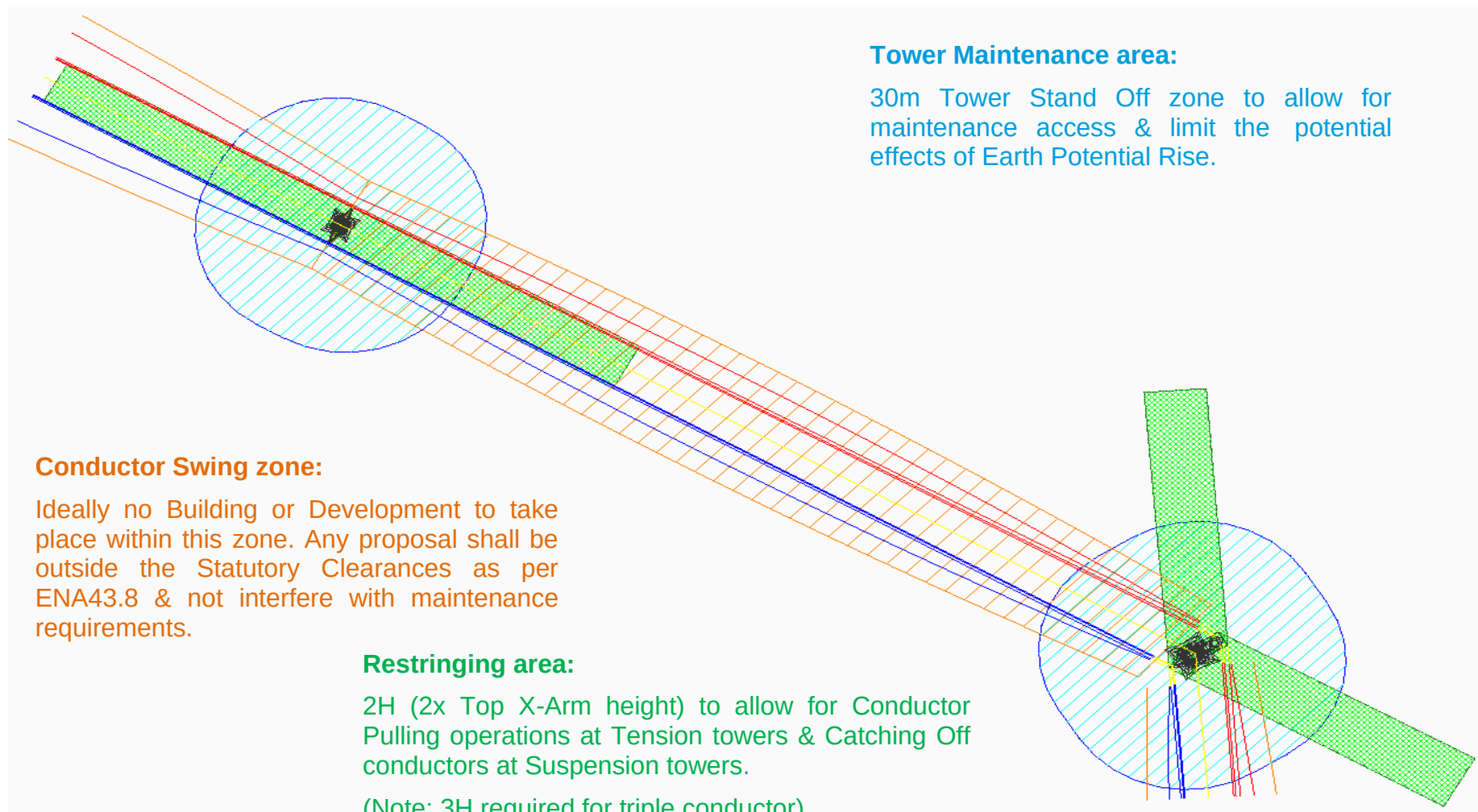
OHL Profile Drawing Guide



15 APPENDIX B



OHL Tower Stand Off & Reconductoring Area



Our ref: NH/25/10187

Your ref:

Ossian Transmission Infrastructure project


Assistant Spatial Planner
The Cube
199 Wharfside Street
Birmingham
B1 1RN

Tel: 0300 470 8319

Tuesday 25 March 2025

Via email: ossiantransmission@planninginspectorate.gov.uk

Dear Claire Deery

Ossian Offshore Wind Farm – EIA Scoping Report for the development of transmission infrastructure to connect the Ossian Offshore Wind Farm Array (located in Scottish waters and subject to application for consent under section 36 of the Electricity Act 1989) to National Grid at substations in Lincolnshire.

Thank you for inviting National Highways to provide comments on the Environmental Impact Assessment (EIA) Scoping Report regarding the forthcoming planning application for the above proposal.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

As part of this application, our interest is the A1, A47, A52 and A46, which form part of the SRN. The nearest points of impact from the development on the SRN will be the A47/A16 junction and A46/A15 junction approximately 20km south and 38km west, respectively of the Onshore Scoping Boundary and Onshore Converter Station Search Areas.

National Highways has outlined below both the general and specific matters that we would wish to see considered as part of the Environmental Impact Assessment (EIA).

General aspects to be considered in all cases include

- We acknowledge that you will prepare a Transport Assessment (TA), a Construction Traffic Management Plan (CTMP), and a Construction Noise and Vibration Management Plan (CNVMP) in support of the forthcoming planning application and look forward to receiving these for review.
- An assessment of transport-related impacts of the proposal should be carried out and reported as described in the Department for Transport's 'Guidance on Transport Assessment (GTA)' and DfT Circular 01/2022. Although the GTA guidance has been archived, it still provides a good practice guide in preparing a TA. In addition, the Department for Levelling Up, Housing, Communities and Local Government also provides guidance on preparing TAs.
- Environmental impact arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported.
- Adverse changes to noise and air quality should be considered, in relation to compliance with the Air Quality Standard Regulations, EU Exit regulations, and/or in local authority designated Air Quality Management Areas (AQMAs).

Site-Specific considerations

Following a review of the EIA Scoping Report, we have set out our comments below.

- We acknowledge that baseline traffic flows for the baseline assessment will be calculated from ATCs and MCC surveys in the vicinity of the Scheme. We welcome that the developer will engage with National Highways to determine the extent of traffic data to be collected and on the scope of surveys to be undertaken. We recommend that the traffic data collected from the surveys is collected in a neutral period. We look forward to receiving the traffic flows for review.
- It is mentioned that collision data for the study area will be obtained and analysed within the ES. We look forward to receiving the collision data for review. As a minimum, we would require the study area to include key junctions on the SRN. We recommend that collision data for the most recent 5-year period is assessed, excluding 2020, which was subject to Covid-19 lockdowns.
- We appreciate that the highway assessment methodology is to be determined. We request that a Base Year, Peak Construction Year and Opening Year are proposed and confirmed in the TA.

- It is noted that there are no parts of the Strategic Road Network located within the Onshore Scoping Boundary and/or referenced as likely routes for construction traffic, including HGVs and Abnormal Indivisible Loads (AIL) in the EIA Scoping Report. We would recommend that the A1, A47, A52 and A46 are considered as likely distributor roads. In addition, we would welcome further information on the number, frequency and routing of the movement of construction traffic as part of the CTMP.

Other matters

- We welcome the preparation and submission of the Construction Traffic Management Plan (CTMP) and Construction Noise and Vibration Management Plan (CNVMP) in support of the forthcoming planning submission.
- We also acknowledge that Air Quality and Noise Assessments will be included as part of the Environmental Impact Assessment process. We look forward to reviewing these assessments in due course.

EIA Scoping Report: Part 3 (Of 5)

We have reviewed Chapter 7.8. Traffic and Transport in the EIA Scoping Report and have the following comments and observations.

Study Area

We welcome the proposal to discuss and agree the study area for highway impact assessment with National Highways given the routing of HGV and AIL (Abnormal Indivisible Load) is likely to route to the site via the A1, A47, A52 and A46.

Legislation, Planning Policy Context and Guidance

National Highways' approach to planning is stated in DfT's Circular 01/2022, "Strategic Road Network and the Delivery of Sustainable Development" (the Circular). The approach taken to progressing this development should align with and reference the Circular.

We note that the IEMA Guidelines for the Environmental Assessment of Traffic and Movement (2023) will be used to examine the environmental impacts of the development in terms of traffic and movement.

Consultation

We welcome early consultation with regard to traffic and movement for agreement on scope, study area, and methodological approach.

Baseline Conditions

Scenario Testing

We would welcome further information on the approach of scenario testing including the scenarios assessed and would recommend including the following scenarios:

- Baseline
- Peak Construction Year without Scheme; and
- Year of Opening

We look forward to receiving confirmation of the peak construction year and opening year when available.

Planned Surveys

It is noted that the traffic survey methodology, including the nature and type of traffic survey, is to be refined. We would welcome further details on the mentioned, and on the location and timings of traffic surveys.

Potential Effects and Mitigation

We welcome further information on the impact of construction traffic on the SRN in the TA and the proposed development of a Framework Construction Traffic Management Plan (CTMP).

Operation

The scheduled operations and maintenance works would likely occur approximately one week per year with the maximum number of vehicles expected to be up to ten vehicles per day. We welcome confirmation of these numbers in the TA.

Decommissioning

The EIA Scoping Report predicts the number of vehicle movements for decommissioning will be similar or less than during construction. We welcome confirmation of this number in the TA.

Mitigation

Subject to the extent of the impact of construction traffic on the SRN, mitigation may be required. National Highways will be able to advise on this once the results of scenario testing have been submitted to National Highways for review.

Assessment Methodology

We welcome the production and submission of a TA for review, and we note the proposed contents of the TA outlined in the EIA. We would recommend confirmation of the TA's contents and the assessment methodology with National Highways before it is produced to avoid abortive work.

Conclusion

- National Highways welcomes early engagement in support of this development.
- We would expect to see a Transport Assessment (TA), Construction Traffic Management Plan (CTMP), and Construction Noise and Vibration Management Plan (CNVMP) that assesses transport-related impacts on the SRN, including environmental impacts from construction.
- The CTMP should include traffic volume, composition, and routing choices on the SRN.

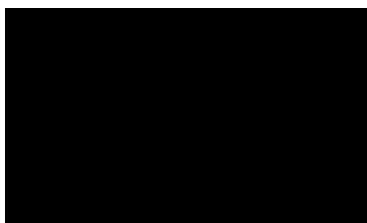
Standing advice

Please note that these comments imply no pre-determined view of the acceptability of the proposed development in terms of traffic, environmental, or highway considerations.

These comments relate specifically to matters arising from National Highways' responsibilities to manage and maintain the Strategic Road Network (SRN) in England, in line with DfT's Circular 01/2022 to support sustainable delivery of growth. For comments related to the local road network, please consult the appropriate local highway authority. The Local Planning Authority will determine the final scope of the Environmental Statement.

Please do not hesitate to contact me if you require any further information or clarification.

Yours sincerely,



Midlands Operations Directorate

Email: @nationalhighways.co.uk

Date: 27 March 2025
Case ref: 33132
Consultation: 504044
Your ref: EN0210006



Environmental Services
Operations Group 3
Temple Quay House
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BY EMAIL ONLY

Dear Claire Deery,

Planning Act 2008 (as amended) and Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Application by Ossian Offshore Wind Farm Limited (the Applicant) for an Order granting Development Consent for the Ossian Transmission infrastructure (the Proposed Development).

Proposal: Ossian Transmission Infrastructure

Location: Connection from the Ossian Array floating offshore wind farm to the transmission network in Lincolnshire, routed through Scottish and English waters and making landfall on the Lincolnshire coast

Thank you for your letter dated 27th February 2025 consulting Natural England on the Environmental Impact Assessment (EIA) Scoping report. This letter constitutes Natural England's formal statutory response; however, this is without prejudice to any comments we may wish to make in light of further submissions on the presentation of additional information.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles). As the application is located partially outside English territorial waters, it should be noted that pursuant to an authorisation made on the 9th of December 2013 by the JNCC under paragraph 17(c) of Schedule 4 to the Natural Environment and Rural Communities Act 2006, **Natural England is authorised to exercise the JNCC's function as a statutory consultee in respect of applications for offshore renewable energy installations in offshore waters (0-200 nm) adjacent to England.** This application was included in that authorisation and therefore Natural England will be providing statutory advice in respect of that delegated authority.

Case law¹ and guidance² has stressed the need for a full set of environmental information to be available for consideration prior to an application for a Development Consent Order (DCO).

We also direct the Applicant to our guidance on *Nature conservation considerations and environmental best practice for subsea cables for English Inshore and UK offshore waters* (September 2022). This is available on our Sharepoint page here: [Environmental considerations for offshore wind and cable projects - Home](#). Please note that you will need to request access to that page (via a pop-up) which should be granted within three days.

Please see the following Annexes to this letter for Natural England's advice:

Annex A – summary of key issues – provides a summary of Natural England's key comments for offshore, intertidal and terrestrial elements of the proposals.

Annex B – EIA Scoping – provides Natural England's advice on the offshore, intertidal and terrestrial scope of the Environmental Impact Assessment (EIA) for this development.

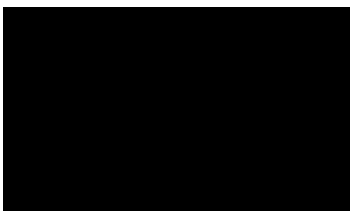
Annex C – detailed offshore comments – provides Natural England's detailed advice for the offshore project-specific aspects of the scoping report.

In accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again if the proposal is amended in any way which significantly affects its impact on the natural environment.

Please note that Natural England must be consulted on Environmental Statement/ Application documents. We advise that sufficient time should be given to thoroughly assess the survey data, have Expert Topic Group consultation on, and implement actions, where necessary prior to submission.

For any queries or further advice on this consultation please contact the case officers [REDACTED] [\[REDACTED\]@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk) (offshore lead) and [REDACTED] [\[REDACTED\]@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk) (onshore lead), and please copy to consultations@naturalengland.org.uk.

Yours sincerely,



Higher Officer - Norfolk and Suffolk, Marine Major Casework

¹ *Harrison, J in R. v. Cornwall County Council ex parte Hardy (2001)*

² *Note on Environmental Impact Assessment Directive for Local Planning Authorities Office of the Deputy Prime Minister (April 2004) available from* <http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>

Annex A – EN0210006 Ossian Transmission Infrastructure – Natural England’s Advice on EIA Scoping – summary of main issues

This **Annex A** provides Natural England's main issues in relation to offshore, intertidal and terrestrial elements of the scoping report, as set out below.

Please see **Annex B** for advice on the offshore, intertidal and terrestrial scope of the Environmental Impact Assessment (EIA) for this development.

Please also see **Annex C** for detailed comments on the offshore project-specific aspects of the scoping report.

OFFSHORE

1. Approach to scoping

It is noted that due to the timing of the scoping report the information contained within it is extremely high level and based on a large area of search. The rationale for the inclusion of these large boundaries is due to substantial components of the projects remaining undetermined at the point of scoping, but also other aspects including incomplete data collection.

This makes it difficult to provide targeted advice on the scope of the assessments at this stage. Given the EIA scoping opinion from PINS is binding regarding the scope of the Environmental Statement (ES), this creates consenting risks further down the line with identifying and resolving environmental impacts/concerns.

Additionally, we highlight that because we are unable to confirm with a high level of confidence that the data collection proposed will be sufficient to inform the assessments, we are also unable to advise on the potential scale and level of risk this project may pose to nature conservation receptors. Without having this understanding, it is unclear to Natural England how this project will now progress towards submission and ensure that there is sufficient time in the pre-application phase to identify and address all the potential environmental concerns.

There is a risk with premature scoping, and submission of the Preliminary Environmental Information Report (PEIR) prior to the completion of the data collection and analysis, that consenting issues are identified late in the day and are not resolved in advance through pre-application discussions or data collection, and that Examinations are then unable to resolve these issues. This runs counter to the increased emphasis on ‘front-loading’ issues in the NSIP process, and the ambition of the British Energy Security Strategy as regards speeding up the consenting process.

In addition, Natural England highlight the risk that any additional data analysis has the potential to change the conclusions of the ES from those set out in the PEIR, which could cause potential delays to the project both during consenting and/or in the pre-construction phase. More generally, Natural England advises that 24 months of survey effort is the minimum expected evidence standard for bird and marine mammal data, to have any certainty to draw conclusions from and inform requirements for mitigation measures.

2. Focus of the Scoping Report

When scoping a project, developers, or their consultants, should satisfy themselves that they have addressed all the potential impacts and the concerns of all organisations and individuals with an interest in the project. Due to the capacious scoping envelope it is challenging to scope impacts out at this stage and therefore difficult for Natural England to comment meaningfully. Further consideration is likely needed in relation to the cable corridor and need for further scoping or ongoing discussions. However, due to the timing of 'the scoping' we have focused our advice on the known issues of greatest importance/risk considering the likelihood of significant effects on the environment.

In these scenarios we also advise the focus of the EIA consultation to be on the characterisation survey methodology and approach to the assessment as there is insufficient evidence presented to enable us to agree impacts being scoped out.

3. Transmission assets

Natural England notes that the Applicant acknowledges that the scoping report only considers the transmission infrastructure required for the Project's grid connection, and not any interconnectivity that may be required as a result of the recommended coordinated approach for the East Coast Region outlined in the National Grid Electricity System Operator (ESO)'s Holistic Network Design (HND). However, if circumstances should change and a more coordinated/joined up approach for energy transmission for multiple NSIP projects is taken forward; we advise that thorough consideration will need to be given to consenting implications from infrastructure and interdependency and assessing in-combination/ cumulative impacts. All of which may have implications for project timelines.

4. Impacts to marine designated sites

The development of the Project's preferred landfall location is likely to result in a cable route through the following marine designated sites:

- Holderness Offshore MCZ
- Swallow Sand MCZ
- Southern North Sea SAC
- Greater Wash SPA

If impacts are found to cause lasting change, then without prejudice compensation or Measures of Equivalent Environmental Benefit is likely to be required. This will also apply if the project design changes and the Humber Estuary SPA, or Inner Dowsing Race Bank and North Ridge SAC can't be avoided. Please see Annex C for more information.

5. Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards

Natural England has been leading the 'Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards' project, funded by Defra's Offshore Wind Enabling Actions Programme (OWEAP).

The project is providing up-front best practice advice on the way data and evidence is used to support offshore wind farm development and consenting in English waters, focussing on the key ecological receptors which pose a consenting risk for projects, namely seabirds, marine mammals, seafloor habitats and species and fish.

The project aims to facilitate the sustainable development of low impact offshore wind by increasing clarity for industry, regulators and other stakeholders over data and evidence requirements at each stage of offshore wind development, from pre-application through to post-consent. However, we advise that this best practice guidance is also applicable to other marine major casework

The advice documents are currently stored on a SharePoint Online site, access to the site needs to be requested from neoffshorewindstrategicsolutions@naturalengland.org.uk. Please allow up to three working days for requests to access the site to be granted. Natural England is currently reviewing ways of making the advice more accessible and open access.

The application should be fully informed by the recommendations in the Best Practice Advice, and we will increasingly be appraising applications with respect to the extent to which the guidance has been followed.

In addition we refer the Applicant to our [Cabling Lessons Learnt guidance](#).

Further guidance is also set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Please see **Annex C** for detailed comments on the offshore project-specific aspects of the scoping report.

INTERTIDAL (LANDFALL)

We note the preferred landfall site at Anderby Creek and welcome the Applicant's efforts to minimise impacts on designated sites as a result of landfall location.

We can provide the following comments regarding technical aspects of landfall as discussed at the recent Expert Topic Group meeting with the Applicant on 20th March 2025:

- ***Geotechnical Information***

Experience from other cable installations along the Lincolnshire Coast, has identified issues with the technical viability of Horizontal Directional Drilling (HDD) with failures and several sink holes and bentonite frac-outs occurring. Therefore, we advise at the time of consent geotechnical investigations in the form of boreholes, will be required to support the Application and demonstrate that HDD at landfall is feasible. As a minimum Natural England advises that geotechnical data from the intertidal area of the project and the entry and exit pit locations are most relevant, particularly so at the entry pit as the first 30m are most likely to have unconsolidated geology.

Given that several projects are proposing cable landfall in the near vicinity, Natural England would be supportive of shared geotechnical investigations with data from neighbouring project, noting this maybe be outside this project's consent boundary.

- ***HDD Method Statement and Contingency plan***

In relation to HDD and potential bentonite frac-out/break out we draw the Applicant's attention to the North Falls OWF 7.15 Outline Horizontal Directional Drill Method Statement and Contingency Plan [\[REP1-037\]](#). Whilst we are still working with the Applicant to reach agreement on all aspects of the document, we believe this to be a

good example of what is required and would welcome Ossian providing a similar document. Therefore, we encourage you to follow progress on this through the North Falls Examination.

- ***Exit pit locations***

Natural England advises consideration of length of HDD and punch out/exit pit locations given the presence of a sunken forest along this stretch of coast which would need to be avoided.

In addition, when considering exit locations we advise there is likely to be a requirement for cable protection due to the dynamic nature of the coastline and erosion. With this in mind the need for cable protection will need to be fully justified with consideration given to MCA issues, due to reducing water depth by no more than 5%, changes in seabed elevation over the lifetime of the project and avoiding disruption of sediment transportation. We advise considering other projects in the area and the lessons learned from their development works.

Further information relating to landfall is provided in Annex B, Section 16.

TERRESTRIAL

Overall, we would expect the ES to set out how the proposals have followed the 'avoid, mitigate, compensate' hierarchy as set out in the National Planning Policy Framework (NPPF) and the government's Overarching National Policy Statement for Energy (EN-1)³. Focus should be given to avoiding sensitive sites, with alternatives robustly considered.

Considering this, Natural England can highlight the following key areas of concern in relation to the onshore cabling route (this is not exhaustive):

- ***Trenchless cabling techniques such as Horizontal Directional Drilling (HDD) - impacts on designated sites***

We note that trenchless techniques such as HDD are to be considered where the onshore cable route would need to cross environmentally sensitive features. Natural England acknowledges the potential benefits over the open trenched approach for avoiding potential impacts to environmentally sensitive features. However, trenchless techniques carry their own risks (such as frac out and sink holes). Therefore, if, once all alternative options have been exhausted, avoidance is found not to be possible, we advise that only trenchless options which have been rigorously demonstrated to be technically feasible should be progressed.

Furthermore, where any crossings, trenchless or open cut, are proposed in the vicinity of a geological designated site, careful consideration of the specific site conditions and features is required to ensure potential risks are appropriately assessed, together with any required mitigation.

- ***Onshore cabling route – impact on protected landscape, habitat severance and functionally linked land***

The underground cable route preferred corridor includes a substantial part of the Lincolnshire Wolds National Landscape. A Landscape and Visual Impact Assessment

³ [National Policy Statements for energy infrastructure - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policy-statements/national-policy-statements-for-energy-infrastructure)

(LVIA) for the scheme should include assessment of potential construction and operational effects on the defined special qualities of the national landscape, as set out in the Management Plan: [Management Plan - Lincolnshire Wolds Countryside Service \(lincswolds.org.uk\)](https://www.lincswolds.org.uk/our-work/management-plan)⁴.

Among the potential impacts scoped in Scoping Report Part 3, Table 7.11.1 is the permanent impact of the Onshore Converter Stations on landscape elements and character and visual amenity. However, the description and proposed assessment relates only to operational activities such as lighting, and not the presence of the converter stations themselves. We note from Table 4.7.1 (Part 1) that the maximum building height for the onshore converter stations is 26m (33m including lightning protection). **We advise that potential impacts of the Onshore Converter stations themselves on the protected landscape and its setting should be scoped in.**

The ES should include robust assessment of alternative route options along with proposed construction methods and their feasibility, such as use of HDD, and their efficacy in terms of mitigation. Robust justification will be needed where the proposed cable corridor route cannot avoid the national landscape or its setting.

Regarding the proposed bird survey methods and frequency, we advise that additional surveys may be required if the proposed cable route, once defined, is close enough to potentially impact designated sites supporting notable bird populations. This includes Keal Carr and Willoughby Wood SSSIs and SPA/ Ramsar functionally linked land.

The ES should also include assessment of impact of severance on biodiversity and the functionality of habitats at a landscape scale, as well as impact on the national landscape setting. This should include how impacts to these features will be avoided.

- ***Cumulative impacts***

Natural England is aware there are multiple separate proposed energy schemes seeking landfall along this section of the Lincolnshire coast which will need to be assessed in combination. We would strongly encourage an overall coordinated and holistic approach is adopted for the projects to minimise environmental impacts particularly during construction, and would welcome strategic discussions with the Applicant on this.

As the scoping boundary is refined, more detailed advice will be provided by Natural England at Expert Topic Group (ETG) meetings with the Applicant during the pre-application process.

Please see **Annex C** for Natural England's further detailed comments regarding the terrestrial elements of the scoping report.

⁴ <https://www.lincswolds.org.uk/our-work/management-plan>

Annex B – EN0210006 Ossian Transmission Infrastructure – Natural England’s Advice on EIA Scoping for offshore and terrestrial

1. General Principles

Natural England’s advice on the scope and content of the Environmental Statement is given in accordance with the National Infrastructure Planning Advice Notes:

<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an ES to assess impacts on the natural environment. We would expect the following principles to be applied in this case including:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided⁵.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

2. Cumulative and in-combination effects

The ES should include a thorough assessment of potential cumulative and ‘in combination’ effects of the whole scheme, including all supporting infrastructure, with other proposals. These should include:

- a. existing completed projects
- b. approved but uncompleted projects
- c. ongoing activities

⁵ National Infrastructure Planning [Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements](#) (see Insert 2 – information to be provided with a scoping request)

- 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 proposed development overlaps or is near other plans or projects which should be considered in combination particularly for impacts on designated sites and functionally linked land (FLL), protected landscape and landscape-scale impacts on habitat severance. Results of surveys undertaken for other projects should be considered as far as possible to understand whether there is a cumulative loss of FLL.

Other plans or projects which should be considered but not limited to include:

- Viking Carbon Capture and Storage pipeline
- National Grid Grimsby to Walpole project
- National Grid North Humber to High Marnham project
- Outer Dowsing Offshore Windfarm
- Lincs Node
- Eastern Green Link 3 and Eastern Green Link 4
- Meridian Solar Project

More broadly, Natural England strongly recommends an overall coordinated and holistic approach is adopted for the projects to minimise environmental impacts in this region, and we would welcome strategic discussions with the Applicant on this.

3. Environmental data

National datasets held by Natural England are available at:
<http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles. Further detailed information on Sites of Special Scientific Interest (SSSIs) are publicly available at <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#) and [SSSI Impact Risk Zones \(England\) - data.gov.uk](#).

The [Bird Migration Atlas](#)⁶ may also be a helpful source of records showing presence of ringed Special Protection Area bird species to help inform proposed survey effort.

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, National Trust, Lincolnshire Wildlife Trust for local ecological data, and the Lincolnshire Wolds AONB Partnership in relation to protected landscape.

⁶ [Bird Migration Atlas](#)

4. Biodiversity and Geodiversity

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) and an [EclA checklist](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

The [National Planning Policy Framework \(NPPF\)](#) sets out guidance on how to take account of biodiversity interests in planning decisions and the framework that the responsible authority should provide to assist developers. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

4.1 Use of EIA Matrices

Natural England notes that the approach to the assessment is proposed to align with EIA approaches used on other projects. This matrix approach has been used throughout ESs to date to support the assessment of the magnitude and significance of impacts. Natural England notes numerous instances where significance has been presented as a range (i.e., slight, or moderate, or large) and it is nearly always the lower value that has been taken forward. Indeed, to date no offshore windfarm has identified ecological impacts that are assessed as significant in EIA terms, either cumulatively or in-combination which is surprising. In the absence of evidence to support the use of the lower value in a range, Natural England's view is that the higher value should always be assessed in order to ensure that impacts on features are not incorrectly screened out of further assessment. This is in line with the principles of the Rochdale envelope approach⁷.

4.2 Use of the Rochdale Envelope

Natural England recognises the need to use a Rochdale Envelope approach to allow flexibility in project design to ensure that changes in available technologies and project economics can be considered post consent. However, Natural England has concerns over the extent to which uncertainty in ground conditions is driving the extent of the project envelope, and that the Rochdale Envelope approach is resulting in the provision of insufficient baseline information to inform both project design and assessment of impacts. The lack of understanding of the ground conditions results in the use of Maximum Design Scenarios (MDSs) that are conservative enough to make up for that lack of understanding and allow for all eventualities. This in turn translates into a vast number of variables, causing difficulties in assessment, as it is difficult to identify and assess a realistic worst-case scenario for each of the relevant receptors with any certainty, which in turn necessitates precautionary assessments given this uncertainty. That presents challenges when it comes to identifying appropriate mitigation measures.

⁷ [Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope - GOV.UK](#)

4.3 Outline Plans

Natural England advises that outline documents and/or assessment will need to be included in the Application to ensure that all impacts have been considered and appropriately managed.

4.4 Ecological join up between marine receptor assessments

Natural England advises that changes to marine processes and benthic ecology could cause an indirect impact on mobile interest features from designated sites through changes to supporting habitats and prey availability. Ecosystem impacts should be thoroughly considered within the relevant receptor chapters throughout the ES/Application documents.

4.5 Habitat severance (terrestrial)

Given the nature of the proposals, in particular the linear underground cabling route, the ES should include robust assessment of habitat severance at landscape-scale on biodiversity and the functionality of habitats.

This is particularly with regard to protected species (see section 6), priority and irreplaceable habitats (see sections 7 and 8), and also in relation to the Lincolnshire Wolds National Landscape and its setting (see section 10). This should include robust assessment of alternative route options along with proposed construction methods and their feasibility, such as use of HDD, and their efficacy in terms of mitigation. Cumulative impacts with other projects should also form part of the assessment (see section 2).

5. Designated nature conservation sites

The ES should thoroughly assess the potential for the proposal to directly or indirectly affect nationally and internationally designated sites of nature conservation importance, including marine sites.

This should be in accordance with the 'avoid, mitigate, compensate' hierarchy requirements as set out in the National Planning Policy Framework (NPPF) (paragraph 193) and the Overarching National Policy Statement for Energy (EN-1) (Section 5.4.42). If impacts cannot be avoided, the options with the least impact should be fully explored.

Further information on designated sites within the National Sites Network is provided below.

5.1 International and European sites

International and European sites include Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

The development site is within or may impact on the following **European/ internationally designated nature conservation sites (including marine)**:

- Baston Fen SAC
- Berwickshire and North Northumberland SAC
- Coquet Island SPA
- Farne Islands SPA

- Flamborough and Filey Coast SPA
- Gibraltar Point SPA/ Ramsar site
- Greater Wash SPA
- Humber Estuary SPA/ Ramsar site/ SAC
- Inner Dowsing, race Bank and North Ridge SAC
- Nene Washes SAC
- North Norfolk Coast SAC
- Northumberland Marine SPA
- River Tweed SAC
- Saltfleetby to Theddlethorpe Dunes & Gibraltar Point SAC
- Southern North Sea SAC
- The Wash SPA/ Ramsar site
- The Wash & North Norfolk Coast SAC
- Tweed Estuary SAC

For information, the proposals also fall within the tentative East Coast Flyway World Heritage Site⁸, submitted by the UK in April 2023 for consideration by UNESCO as ‘a *globally important site for migratory waterbirds and for its nearly contiguous complex of ecologically connected and immensely variable coastal wetlands*’.

Further information on the location of designated sites and their special interest features can be found at www.magic.gov.uk. Further information on European site special interest features, their conservation objectives, and any relevant conservation advice packages for designated sites is available at

<http://publications.naturalengland.org.uk/category/6490068894089216>

and <https://designatedsites.naturalengland.org.uk>.

5.2 Habitats Regulations Assessment

Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

European sites fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended 2019) (the ‘Habitats Regulations’). In addition, paragraph 194 of the NPPF requires that proposed SPA, candidate SAC and listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on European sites be treated in the same way as classified sites (ie sites falling within the scope of regulation 8 of the Habitats Regulations).

Under Regulation 63 of the Habitats Regulations, and Regulation 28 of the Conservation of Offshore Habitats and Species Regulations 2017 (as amended), an appropriate assessment must be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

A full assessment should be made of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise, or reduce any adverse significant effects.

⁸ [East Atlantic Flyway: England East Coast Wetlands - UNESCO World Heritage Centre](#)

The consideration of likely significant effects should also include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are qualifying features of the site, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a designated site, for example by being linked hydrologically or geomorphologically. Further guidance is set out in Planning Practice Guidance on appropriate assessment here:

<https://www.gov.uk/guidance/appropriate-assessment>

Should a likely significant effect on a designated site be identified (either alone or in-combination) or be uncertain, the competent authority (in this case the Secretary of State) may need to prepare an appropriate assessment in addition to the consideration of impacts through the EIA process.

This should also take into account any agreed strategic mitigation solution that may be being developed or implemented in the area to address recreational disturbance, nutrients, or other impacts.

Further information on the special interest features, their conservation objectives, and any relevant conservation advice packages for designated sites is available on our website <https://designatedsites.naturalengland.org.uk/> ; and the Joint Nature Conservation Committee (JNCC) website [About Marine Protected Areas | JNCC - Adviser to Government on Nature Conservation](#).

We are pleased to be currently working with the Applicant on preparing the Evidence Plan for the project, and to use this to agree what information should be provided to support the Habitats Regulations Assessment (HRA), early in the process.

At this stage, as the cable corridor is currently an area of search, we are unable to provide a more definitive list of sites relevant to the Transmission infrastructure. However, key potential impact pathways and issues for terrestrial sites are included in the table below (please note this is not exhaustive). Please see Annex C for detailed comments on the offshore project-specific aspects of the scoping report.

<i>Terrestrial European/ international sites – key potential impact pathways including on functionally linked land (not exhaustive)</i>	
Habitat loss/ degradation and Disturbance/ displacement of species	<i>Cabling route and associated infrastructure</i> i) Potential impacts from temporary and permanent habitat loss, noise and visual disturbance, and air and water quality/ hydrological changes (see below) arising from the proposals may affect notified bird species and assemblages particularly associated with the Greater Wash SPA and the nearby The Wash SPA/ Ramsar site, Gibraltar Point SPA/ Ramsar site and Humber Estuary SPA/ Ramsar site. These impact pathways should be fully addressed within the HRA. This should include functionally linked land outside the designated site boundaries which may be used and relied on by SPA/ Ramsar birds for foraging habitat and roosts. ii) We note that Humber Estuary SAC is already scoped in for consideration in the EIA, but wish to point out that this site may be hydrologically linked to the scoping area and consideration of

	impacts to the designated features including Sea/ River Lamprey and Grey Seal should be considered in the HRA. iii) We also advise that Nene Washes SAC and Baston Fen SAC may be hydrologically linked and should be included in the Ecological Impact Assessment and Habitats Regulations Assessment for consideration of impacts to the qualifying species Spined Loach. iv) We also refer you to Natural England's advice regarding onshore and offshore ornithology in our Relevant Representations to the National Planning Inspectorate on the Outer Dowsing proposals, on the 13th June 2024, available here⁹ (Planning Inspectorate Reference EN010130).
Air quality	For sections of the cable route/ landfall site which will involve construction traffic movements within 200m of the designated sites, the potential air quality impacts due to road traffic during the construction phase will need to be considered. Ammonia emissions from road traffic could make a significant difference to nitrogen deposition close to roads and should be included within the assessment. See Section 13 of this letter for further general information.
Water Quality and Hydrology	Any potential for a hydrological connection between the proposed landfall, cable route and the designated sites should be considered, during construction and operation. See Section 14 of this letter for further general information on water quality.

5.4 Highly Protected Marine Areas (HPMAs) and Marine Conservation Zones (MCZs)

Marine Conservation Zones (MCZs)

Marine Conservation Zones are areas that protect a range of nationally important, rare, or threatened habitats and species. You can see where MCZs are located and their special interest features on www.magic.gov.uk. Factsheets that establish the purpose of designation and conservation objectives for each of the MCZ's are available at <https://www.gov.uk/government/collections/marine-conservation-zone-designations-in-england>

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.

⁹ [EN010130-000700-Binder1.pdf \(planninginspectorate.gov.uk\)](#)

The proposal may affect the following **Marine Conservation Zones**:

- Holderness Offshore MCZ
- Holderness Inshore MCZ
- Swallow Sand MCZ
- Northeast of Farnes Deep MCZ

The ES should consider including information on the impacts of this development on MCZ interest features, to inform the assessment of impacts on habitats and species of principle importance for this location. Further information on MCZs is available via the following link: <http://publications.naturalengland.org.uk/category/1723382>

Further information on the special interest features, the conservation objectives, and relevant conservation advice packages for designated sites is available on our website <https://designatedsites.naturalengland.org.uk/>

Please note: As there is only an area of search for the cable corridor at this stage, we are unable to provide a definitive list of sites relevant to the project, but these should be identified and fully considered within the ES/ Application documents.

Highly Protected Marine Areas (HPMAs)

The project may overlap with;

- Northeast of Farnes Deep HPMA.

Further information on the location of potential HPMAs, including Inner Silver Pit South candidate HPMA, can be found at [Consultation on Highly Protected Marine Areas \(HPMAs\) - Defra - Citizen Space](#)

The ES should include a full assessment of the direct and indirect effects of the development on the features of any candidate HPMA and should identify such mitigation measures as may be required to avoid, minimise, or reduce and adverse significant effects.

5.5 Sites of Special Scientific Interest (SSSIs)

Sites of Special Scientific Interest (SSSIs) are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

Please note: As there is only an area of search for the cable corridor at this stage, we are unable to provide an definitive list of sites relevant to the project, but these should be identified and fully considered within an Environmental Statement (ES)/Application documents.

However, the development site is within or may impact on the following **SSSIs**:

- Bratoft Meadows SSSI
- Calceby Marsh SSSI
- Candlesby Hill SSSI
- Claxby Chalk Pit SSSI
- Dalby Hill SSSI
- Gibraltar Point SSSI
- Hoplands Wood SSSI
- Humber Estuary SSSI

- Hundleby Clay Pit SSSI
- Jenkins Carr SSSI
- Keal Carr SSSI
- Mavis Enderby Valley SSSI
- Muckton Wood SSSI
- Saltfleetby - Theddlethorpe Dunes SSSI
- Sea Bank Clay Pits SSSI
- Surfleet Lows SSSI
- Swaby Valley SSSI
- The Wash SSSI
- Willoughby Wood SSSI
- Willoughby Meadow SSSI

The proposed development also lies in proximity to the Lincolnshire Coronation Coast National Nature Reserve (NNR).

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

The ES should include a full assessment of the direct and indirect effects of the development on the notified features of special interest within the SSSIs and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and amphibians. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.

The assessment should include consideration of the key issues/ impact pathways raised in section 5.2 above for European and international designated sites.

5.6 Regionally and Locally Important Sites

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 group. The ES should set out proposals for mitigation of any impacts and if appropriate, remediation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.

6. Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law but advises on the procedures and legislation relevant to such species.

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, to assist in the impact assessment.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

Natural England has had some engagement to date with the Applicant regarding protected species through the onshore ETG, including great crested newt (GCN). GCN District Level Licensing is not currently available in the Lincolnshire area. The NE Wildlife and Licensing Service (NEWLS) is able to engage with the Applicant on GCN and other protected species licensing matters through a Pre-Submission Screening Service, whereby they assess a draft licence application and provide a Letter of No Impediment (LoNI). Further information on this process is set out within [Advice Note 11, Annex C](#).

7. Habitats and Species of Principal Importance

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

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](#). Further information is also available [here](#).

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.

The ES 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
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

8. Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on any ancient woodland and ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

Natural England maintains the [Ancient Woodland Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

9. Biodiversity net gain

The Environment Act 2021 includes NSIPs in the requirement for Biodiversity Net Gain (BNG). The biodiversity net gain objective for NSIPs is defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It's the intention that BNG should apply to all NSIPs accepted for Examination from November 2025.

This includes the intertidal zone but excludes the subtidal zone (an approach to marine net gain is being developed but this will not form part of mandatory BNG). Projects that span both offshore and onshore will be subject to BNG requirements for the onshore components only.

Whilst we are currently in the transition period before the requirements for Biodiversity Net Gain (BNG) delivery are mandatory for Nationally Significant Infrastructure Projects (NSIPs), Natural England strongly advises that the project engages with this at an early stage to maximise positive environmental impact and in order to ensure the project is future proofed. We advise that the sooner net gain is implemented, the sooner habitats can establish.

The biodiversity baseline should include all land contained within the site's red line. We encourage developers to:

- Develop BNG proposals in adherence with well-established BNG principles:
 - BS 8683:2021 Process for designing and implementing Biodiversity Net Gain
 - CIEEM/IEEMA/CIRIA good practice principles (2016) and guidance (2019).
- Use the statutory metric to calculate BNG and adhere to the rules and principles set out within the metric guidance¹⁰.

Biodiversity gains should be secured for a minimum of 30 years and be subject to adaptive management and monitoring. BNG plans should be secured as a requirement in the DCO.

¹⁰ <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

10. Designated Landscapes and Landscape/Seascape Character

10.1 Nationally designated landscapes

The development site is within or may impact on the Lincolnshire Wolds National Landscape and its setting (formally known as the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB)).

The development site is also within the proposed Lincolnshire Heritage Coast Designation (see section 10.2).

Public bodies have a duty to seek to further the statutory purposes of designation in carrying out their functions (under section 245 of the Levelling Up and Regeneration Act 2023). This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The overarching [Energy National Policy Statement EN-1](#)¹¹ (section 5.10) provides significant protection for these nationally designated landscapes including their settings.

Assessment should be made of the direct and indirect effects on this designated landscape and in particular the effect upon its special qualities and purpose for designation – conserving and enhancing natural beauty. The management plan for the designated landscape may also have relevant information that should be considered in the EIA (see section 10.3).

As part of the proposals, the underground cable route corridor crosses part of the Lincolnshire Wolds National Landscape. Even with underground cabling, significant adverse effects on the national landscape could occur as a result of construction works.

There is also the potential for permanent impacts during operation such as the Onshore Converter stations on landscape elements and character and visual amenity. However, we note these are not fully scoped in for assessment (Scoping Report Part 3, Table 7.11.1). The description and proposed assessment relates only to operational activities such as lighting, and not the presence of the converter stations themselves. We note from Table 4.7.1 (Part 1) that the maximum building height for the onshore converter stations is 26m (33m including lightning protection). **We advise that potential impacts of the Onshore Converter stations themselves on the protected landscape and its setting should be scoped in.**

The ES should also provide robust assessment of alternative route options along with proposed construction methods and their feasibility, such as use of HDD, and their efficacy in terms of mitigation. Robust justification will be needed where the proposed cable corridor route cannot avoid the Lincolnshire Wolds National Landscape or its setting.

The ES should also include assessment of impact of severance on biodiversity and the functionality of habitats at a landscape scale in the national landscape setting. This should include how impacts to these features will be avoided.

Natural England would also encourage the Applicant to engage with the Lincolnshire Wolds National Landscape Partnership to discuss potential impacts of the proposals national landscape.

¹¹ <https://assets.publishing.service.gov.uk/media/65bbfbd709fe1000f637052/overarching-nps-for-energy-en1.pdf>

We also recommend the Applicant refers to Natural England and Lincolnshire Wolds Partnership working advice provided to the Outer Dowsing Offshore Windfarm Section 42 draft application consultation (20 July 2023), in relation to Development of Lincs Node. This is provided alongside this letter for ease of reference¹².

10.2 Heritage Coast

The proposals are also located within an area which Natural England has assessed as meeting the criterion for definition as a Heritage Coast. Whilst this assessment process does not confer any additional planning protection, the impact of the proposal on the special character of this area may be a relevant matter in the determination of the proposal. Natural England considers the Lincolnshire Heritage Coast to be a valued landscape in line with paragraph 191 of the NPPF.

An assessment of the landscape and visual impacts of the proposal on this area should be undertaken, with opportunities taken to avoid or minimise impacts on the landscape and secure enhancement opportunities. Any infrastructure development should consider its impact on the area, reflect and enhance its intrinsic character and natural beauty and be in line with relevant National Policy Statements and development plan policies.

A new Heritage Coast is formally defined once a Memorandum of Agreement is signed by Natural England and the local authorities which cover the area. Following signing of the agreement, planning policies and decisions should be consistent with the special character of the area and the importance of its conservation, in line with the NPPF and NPS EN-1 sections 5.6.13, 5.10.10 and 5.10.11.

10.3 Landscape/ Seascape and visual impacts

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. Links for Landscape / Seascape Character Assessment at a local level are also available on the same page:

<https://www.gov.uk/government/publications/seascape-assessments-for-north-east-north-west-south-east-south-west-marine-plan-areas-mmo1134>

<https://data.gov.uk/dataset/3fed3362-2279-4645-8aaf-c6b431c94485/mmo1037-marine-character-areas>

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape/ seascape assessment methodologies](#). We encourage the use of Landscape and Seascape Character Assessment (LCA/SCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA/SCA 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.

A Landscape and Visual Impact Assessment (LVIA) 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 LI and IEMA. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as

¹² Development Impacts of the Lincolnshire Node. A Joint Working Response with Lincs Wolds AONB Partnership (Rev1.0) - Working

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. The Lincolnshire Wolds AONB Management Plan 2018 – 2023 can be found here: [Management Plan - Lincolnshire Wolds Countryside Service \(lincswolds.org.uk\)](https://www.lincswolds.org.uk)¹³.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area (see section 2 above). This should include an assessment of the impacts of other proposals currently at scoping stage.

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](#). 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.

The National Infrastructure Commission has also produced [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

11. Connecting people with nature

The ES should consider the potential impacts on the King Charles III England Coast Path National Trail. The National Trails website www.nationaltrail.co.uk provides further information.

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the King Charles III 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 (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

12. Soils and agricultural land quality

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. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

The following issues should be considered and, where appropriate, included as part of the ES:

- The degree to which soils would be disturbed or damaged as part of the development.

¹³ <https://www.lincswolds.org.uk/our-work/management-plan>

- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- 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).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- 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 off-site impacts.

Temporary displacement of soils because of the underground cable installation and temporary haul roads/ construction compounds can also result in permanent land quality change and soil damage if undertaken inappropriately. Degradation or permanent loss of BMV agricultural land should be considered in the EIA.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and](#) The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

13. Air quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts of air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Natural England has produced guidance for public bodies to help assess the impacts of road traffic emissions to air quality capable of affecting European Sites. [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001](#)

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development
<https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions
<https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

14. Water quality and hydrology

The planning system plays a key role in determining the location of developments which may give rise to water pollution or hydrological changes, and hence planning decisions can have a significant impact on water quantity and quality, and land. The assessment should take account of the risks of water pollution and changes to hydrology, and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

15. Climate change

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES/Application should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 180), which should be demonstrated through the ES/Application.

Further information is available from the [Committee on Climate Change's](#) (CCC) [Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme](#) (NAP), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

16. Landfall

Coastal environments are subject considerable historic and future change. Therefore, should trenchless techniques be considered then a feasibility study informed by geotechnical investigations will be required at the time of consent, particularly within the boundary of a designated site. We would also advise that the Applicant should consider how the coast may alter throughout the lifetime of the project, both in terms of vertical change in beach profile and coastal retreat. Management of cable burial and siting of infrastructure should be considered for the lifespan of the project.

We also advise the landfall assessment needs to consider the effects on the hydrodynamic regime due to the presence of cable protection, equipment such as jack-up rigs, cable-laying vessels, and cofferdams etc, as well as the potential impact of intertidal access and/or vehicle traffic on foreshore profile change or cliff erosion over all phases of the project.

17. Cable protection – including secondary scour

Natural England's position provided for Hornsea Project Three, Norfolk Vanguard and Norfolk Boreas in relation to Adverse Effects on Integrity from the placement of cable protection remains unchanged and therefore cable protection within marine protected areas should be avoided and where that is possible every effort should be made to mitigate the impacts. 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.

Please note that impacts from secondary scouring around cable protection should also be factored into both marine processes and benthic assessment.

18. Marine Mammals impact assessments

We advise Applicants to include reference to the following:

- IAMMWG. 2022. *Updated abundance estimates for cetacean Management Units in UK waters (Revised 2022)* <https://hub.jncc.gov.uk/assets/3a401204-aa46-43c8-85b8-5ae42cdd7ff3>
- *Scientific Advice on Matters Related to the Management of Seal Populations: 2021* <http://www.smru.st-andrews.ac.uk/files/2022/08/SCOS-2021.pdf>
- Carter et al. (2022) <https://www.frontiersin.org/articles/10.3389/fmars.2022.875869/full>

19. Red Throated Divers

Natural England highlights our increasing concerns in relation to disturbance and/or displacement of red-throated divers features from the more persistent presence of offshore wind farm and oil and gas related vessel activity which could make a meaningful contribution to in-combination effects to the Greater Wash SPA and indeed the adjacent Outer Thames Estuary SPA depending on the transit route. As such, we advise appropriate consideration of both seasonal timing of construction and O&M works and vessel transit route is included within the application.

Natural England recommends that where possible, any construction and O&M activities avoid the months of November to March inclusive. Vessel transit routes outside of existing navigation routes through the Greater Wash SPA and Outer Thames Estuary, depending on the port of origin, should also be avoided during these winter months. Natural England advises, as a minimum, the use of best practice measures between 1st November and 31st March to mitigate and therefore minimise disturbance to red-throated diver namely:

- Selecting routes (when transiting to site) that avoid aggregations of red-throated diver and common scoter, where practicable.
- Restricting (to the extent possible) vessel movements when transiting to the site to existing navigation routes (where the densities of divers are typically relatively low).
- Avoidance of over-revving of engines (to minimise noise disturbance); and
- Briefing of vessel crew on the purpose and implications of these vessel management practices (through, for example, tool-box talks).

Depending on the level of proposed activity across the designated site, however, the best practice protocol as set out above may not necessarily minimise the in-combination impacts to an acceptable level.

Annex C – EN0210006 Ossian Transmission Infrastructure – Natural England’s detailed comments (offshore)

This Annex provides Natural England’s detailed comments on the offshore project-specific aspects of the scoping report, in the table below.

Point (n/36)	Section	Paragraph /Table	Topic	Comments	Recommendations
1	Part 1 4.5	Table 4.5.1, Table 4.5.2	Offshore Components	It is noted that site characterisation surveys may involve pre-construction geotechnical surveys. Such surveys have the potential to cause injury and/or disturbance to cetaceans and, therefore, mitigation measures may be necessary. Depending on the duration of the surveys, an assessment of the need for a European Protected Species (EPS) licence may also be required. In addition, if the surveys (or any other activity that could have likely significant effects on the site) are carried out within or around the Southern North Sea SAC designated for harbour porpoise, or any other marine mammal SAC, a Habitats Regulation Assessment should be carried out to assess the impact of those surveys.	It is advised to adhere to the JNCC marine mammal mitigation guidelines for geophysical surveys and submitting relevant data to the JNCC Marine Noise Registry: https://mnr.jncc.gov.uk/ A Habitats Regulation Assessment will be needed for the Southern North Sea SAC and other marine mammal SACs within the zone of influence of the development.
2	Part 2 6.2	6.2.3.12	Physical Processes	There is no mention here of the Swallow Sand MCZ which has the North Sea glacial Tunnel Valleys feature of Swallow Hole. There is also no mention of the Glacial Tunnel Valley which is a designated geodiversity feature. Fig 6.2.2 also doesn’t specifically highlight this despite the Scoping Boundary and the Physical Processes Study Area being inside Swallow Sand MCZ and overlapping with the Tunnel Valley Feature.	Consideration needs to be given to the Glacial Tunnel valley geological features that are present along the Cable Route Scoping boundary. These include Swallow Hole, and Silver Pit.
3	Part 2	Table	Baseline	Swallow Sand MCZ is designated for	We highlight the importance

	6.2.3, 6.3.3	6.2.1, Table 6.3.3	Environment	subtidal coarse sediment, subtidal sand, and North Sea glacial tunnel valleys. All three of these features are in favourable condition. This MPA overlaps with 255.1km ² of the Ossian Offshore Scoping Boundary.	of assessing all potential operational impact-pathways in combination with the Site Information Centre documents on the JNCC website: https://jncc.gov.uk/our-work/swallow-sand-mpa/
4	Part 2 6.2 and 6.3	Table 6.2.1 Table 6.3.1	Protected features of Humber Estuary SAC	'Embryonic shifting dunes' have not been included as a relevant protected habitat of the Humber Estuary SAC in either Table 6.3.1 (physical process study area) or Table 6.3.2 (benthic subtidal and intertidal study area).	For completeness, update Tables 6.2.1 and 6.3.3 to include 'Embryonic shifting dunes' as a protected feature of the Humber Estuary SAC. However, we note that there is unlikely to be an impact pathway
5	Part 2 6.2.3, 6.3.3	Table 6.2.1, Table 6.3.3	Baseline Environment	North East of Farnes Deep MCZ is designated for subtidal coarse sediment, subtidal sand, subtidal mixed sediments, subtidal mud, and ocean quahog. The same area has been designated as a HPMA and provides protection to "the whole ecosystem", meaning all marine flora and fauna, all marine habitats and all geological or geomorphological interests, including all abiotic elements and all supporting ecosystem functions and processes, in the seabed, water column and the surface of the sea. The distance of the proposed operations in relation to the North East of Farnes Deep MCZ/HPMA is inconsistent across the document. The tables state that the MCZ is located 12.87km from the scoping boundary	As North East of Farnes Deep MCZ/HPMA is located approximately 13km away from proposed operations, we do not currently anticipate that any associated activity will have an impact on this MPA. However, we highlight the importance of assessing all potential operational impact-pathways in combination with the Site Information Centre documents on the JNCC website: https://jncc.gov.uk/our-work/north-east-of-farnes-deep-mpa-and-hpma/, which includes high-level

				while the Offshore Scoping Boundary overlaps with 12.9km² of the HPMA.	conservation advice, and additional information regarding the site designation. (see point 36 for additional information) We would like to stress that the above advice assumes that this site does not overlap with the scoping boundary and emphasize that the exact distance of the East of Farnes Deep MCZ/HPMA should be clarified and accurately presented in the EIA Scoping Report. If the scoping boundary is confirmed to overlap with this MPA, our advice with regards to impacts on this site will change.
6	Part 2 6.2.3, 6.3.3	Table 6.2.1, Table 6.3.3, 6.3.3.25	Baseline Environment	Inner Dowsing, Race Bank and North Ridge SAC is designated for Annex I 'reefs' and 'sandbanks which are slightly covered by seawater all the time'. The features of this site are in unfavourable condition. This MPA overlaps with 4.07km² of the Ossian Offshore Scoping Boundary. Table 6.3.3 states that the SAC is 4.07km from the offshore/intertidal scoping boundaries. Conversely, Table 6.2.1 states that the SAC overlaps with the offshore scoping boundary by 4.07km². Equally, Section 6.3.3.25 states that the site overlaps	We seek clarification whether the Inner Dowsing, Race Bank and North Ridge SAC overlaps with the Offshore Scoping Boundary as contrasting statements are made in the EIA Scoping Report. We also highlight that 'sandbanks which are slightly covered by seawater all of the time' have a Conservation Objective to ensure that,

				with the offshore intertidal scoping boundary.	subject to natural change, the integrity of the site is restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features as such compensation may be required if lasting habitat change/loss were to occur as a result of the OT.
7	Part 2 6.2.4, 6.3.4	Table 6.2.2, Table 6.3.4	Proposed Data Sources	We note that the JNCC Site Information Centre was not included in the list of proposed data sources for physical processes and benthic subtidal and intertidal ecology.	Given the overlap of the Ossian offshore scoping boundaries with multiple MPAs, we recommend that the Applicant includes the JNCC Site Information Centre for offshore Marine Protected Areas (MPAs) in the list of proposed data sources.
8	Part 2 6.2.8	6.2.8.5	Proposed Assessment methodology	Eastern Green Link 3 and 4 aren't included here as other projects in the vicinity of the Offshore Export Cable Corridor refined for the ES	Add Eastern Green Link to list of relevant offshore wind farm projects where feasible.
9	Part 2 6.3	Table 6.3.3. Figure 6.3.3	Designated sites with benthic quantifying features within the benthic subtidal and intertidal study area	Holderness Inshore MCZ has not been included in the Table 6.3.3 or Figure 6.3.3, despite falling within the Benthic Subtidal and Intertidal Study Area (15km buffer) and having relevant qualifying benthic features that should be considered.	Applicant to include Holderness Inshore MCZ.

10	Part 2 6.3	Table 6.3.6	Accidental release of Pollutants	At this stage NE are unable to take mitigation measures into account.	Accidental release of Pollutants should be scoped in at this early stage.
11	Part 2 6.3	Table 6.3.3	Baseline Environment	Holderness Offshore MCZ is designated for subtidal coarse sediment, subtidal sand, subtidal mixed sediment, North Sea glacial tunnel valleys, and ocean quahog. All features of this site, except for North Sea glacial tunnel valleys, are in unfavourable condition. The MPA covers an area of 1,176km ² . The Ossian offshore scoping boundary overlaps with 557.8km ² of the site.	The Ossian offshore scoping boundary covers almost 50% of the area of the Holderness Offshore MCZ. JNCC would like to highlight that this site is in unfavourable condition with a conservation objective to recover. We advise that impacts on this site should be avoided to ensure the conservation objectives will not be hindered. Further large-scale developments will place a significant risk on the longer-term achievement to restore the site's conservation objectives. JNCC also previously advised NESO (HND & HNDFUE HRA and MCZ assessment, dated 26 April 2024) in the development of the HND and HNDFUE corridors that the MCZ should be avoided. Our understanding is that changes to the route have been made through the NESO Impact Assessment Process but in most recent design changes seen for Ossian (Design Change, dated June 2024), these changes avoided the

					MCZ. Where the site cannot be <i>entirely</i> avoided the route should avoid the subtidal coarse sediment feature. Considering this, we would also like to stress that cumulative impacts on the Holderness Offshore MCZ should be appropriately considered by the Applicant in light of existing and planned infrastructure in this site. A corridor with a scoping boundary covering almost 50% of the MPA does not consider JNCC's previous advice. Further, failure to avoid the MCZ and its designated features will result in the need to provide Measures of Equivalent Environmental Benefit. We highlight that the Applicant should commence considering how this will be achieved.
12	Part 2 6.3	Table 6.3.3	Operation and Maintenance	Temporary habitat loss and disturbance of habitats during the operation and maintenance phase was scoped out of the assessment for benthic subtidal and intertidal ecology due to the area of disturbance being smaller than during the construction and decommissioning phases.	NE have seen from other projects that Jack up Barge depressions can persist for at least two years. We advise that Temporary Habitat Loss and Disturbance should be fully assessed regarding MPAs regardless of the project phase and regardless

					of their scale in comparison to other phases
13	Part 2 6.3	Table 6.3.3	Operation and Maintenance	Increased SSC's and associated sediment deposition has been scoped out due to the perception of minimal associated impacts.	This should be scoped in due to potential impact on surrounding habitats and features. E.g. RTD and indirect impacts.
14	Part 2 6.3	Table 6.3.5 (rows 1 and 2)	Proposed approach to assessment of benthic impacts	The proposed approaches to assessment of impacts from (1) temporary habitat loss and disturbance, and (2) increased suspended sediment concentrations, have not been completed. The column currently includes duplicated descriptions of these impacts instead.	Applicant to clarify the proposed approach to assessment for temporary habitat loss and disturbance and, increased suspended sediment concentrations.
15	Part 2 6.3.3	6.3.3.3, Table 6.3.4.	Baseline Environment	We note that EUSeaMap (2021) has been used to inform the benthic subtidal and intertidal ecology baseline and is included as a proposed data source in Table 6.3.4.	We advise that the Applicant should use the latest version of the EUSeaMap, currently 2023, to inform their environmental baseline in relation to offshore MPAs. We also emphasize that the Applicant should remain informed about new publications of EUSeaMap and UKSeaMap to ensure that the best available evidence is used.
16	Part 2 6.3.6	Table 6.3.5	Proposed Scope of the Assessment	Not all pressures are adequately considered in relation to Holderness Offshore MCZ. The table does not include cable trenching as a temporary impact during the construction phase, however, we note that the broad-scale habitat and species features of Holderness Offshore MCZ are sensitive to	Natural England advises that cable trenching is included as temporary habitat loss during the construction phase. We emphasise the importance of assessing all potential operational impact-pathways

				the pressures resulting from cable trenching, specifically in terms of ‘ abrasion/disturbance of the substrate on the surface of the seabed’ as well as ‘penetration/disturbance of the substrate below the surface of the seabed.	in combination with the Site Information Centre documents on the JNCC website (https://jncc.gov.uk/our-work/holderness-offshore-mpa/) the Pressures-Activities Database (https://jncc.gov.uk/our-work/marine-activities-and-pressures-evidence/) and Natural England’s Advice on Operations for each of the designated sites (Designated Site Search)
17	Part 2 6.3	6.3.8.3	Relevant Guidance	Reference to the NE Best practice documents should be made here.	NE Best Practice Guidance
18	Part 2 6.4	6.4	Fish and Shellfish Ecology	Natural England defers to the expertise of Cefas on matters of fish and shellfish ecology	Natural England advises Cefas is consulted to review and comment on the Fish and Shellfish ecology section
19	Part 2 6.4.8	6.4.8.3	Relevant Guidance	Reference to the NE Best practice should be made here.	NE Best Practice Guidance
20	Part 2 6.4.3 and 6.5.3		Baseline Environment	Various marine mammals and fish have been scoped out of future assessment within the EIA. The rationale behind scoping out these species is based on their low likelihood of occurrence and/ or rarity in the study area which in Natural England’s view would make these species more sensitive to the project.	Due to an increase in noise in the North Sea, we are becoming more concerned regarding the cumulative impacts of noisy activities. As such we advise that no species present are scoped out of assessment, regardless of abundance, and

					quantitative assessments are carried out where appropriate
21	Part 2 6.5.2.	6.5.2.2.	Proposed Study Area for the Assessment	The marine mammal study area is defined as the area encompassing the Offshore Scoping Boundary plus a buffer of 4km. This was chosen based on evidence of a 4km displacement range from vessel activity during construction. However, it is advised that a minimum buffer of 26km (the largest default disturbance range used in assessments, Effective Deterrence Ranges (EDRs)) when developments may include UXO clearance as this is in line with observed displacement ranges from these activities.	It is advised that a minimum buffer of 26km, given the proposed activities and resulting impact pathways.
22	Part 2 6.5.3	Table 6.5.1	Baseline Environment	Southern Trench MPA is situated 81.3km from the offshore scoping boundary.	As Southern Trench NCMPA is located approximately 81.3km away from proposed operations, we do not currently anticipate that any associated activity will have an impact on this MPA. This advice only relates to potential transboundary impacts resulting from the Ossian Transmission Infrastructure situated in English offshore waters.
23	Part 2 6.5.3	Table 6.5.1	Summary of Designated Sites	We note that Grey Seal as a feature of Berwickshire and Northumberland coast SAC has been scoped in	Natural England recommends the assessment uses the following information when assessing: D2019 00004409 Grey Seals

					condition monitoring 2016 Final Version.PDF
24	Part 2 6.5.5	6.5.5.1	Mitigation Measures	Natural England agrees that the listed embedded mitigation protocols are relevant to the marine mammal assessment, however we advise that more measures may be required to manage disturbance in the SNS SAC in the event that cabling activities take place simultaneously with other OWF construction or noisy activities in the SAC. These plans and contingencies will need to be outlined in detail as part of the ES. Furthermore, a Site Integrity Plan (SIP) will need to be produced which will specify exactly how these plans will be implemented as part of marine licence. We reserve the right to comment on the suitability of these documents in mitigating impacts when they are submitted as part of the consultation process.	The ES will need to demonstrate that the necessary plans and safeguards are built into the programme to account for project alone and multiple in-combination events. Natural England advises the application also includes an outline Site Integrity Plan (SIP) to be submitted with the application.
25	Part 2 6.5.6	6.5.6.2 - 6.5.6.3	Proposed Scope of the Assessment	We note that it is proposed that a Marine Mammal Mitigation Plan (MMMP) will be developed should UXO clearance be required, with the use of low noise methods being used for any UXO clearance by default. Furthermore, any UXO clearance shall be assessed within a separate Marine Licence.	Natural England advises an MMMP would be required for any investigative geophysical/seismic surveys undertaken along the cable route. Such surveys would be required to identify any UXOs requiring clearance, and whether any high-order contingency clearance would be required. Delaying the submission of such required documents risks delaying future pre-application

					discussions, or data collection, and runs counter to the increased emphasis on “front-loading” issues in the NSIP process. It is recommended any pre- or post-clearance data be uploaded to the Marine Noise Registry: https://mnr.jncc.gov.uk/ Defra have recently published their Marine Noise package, which as well as their Marine Noise Policy paper, includes several updated guidance documents in relation to the clearance of UXO, namely; • An updated Unexploded Ordnance (UXO) Joint Position Statement, which can be found here - Marine environment: unexploded ordnance clearance Joint Position Statement - GOV.UK • UXO clearance supporting guidance providing more detail for Supporting minimising environmental

					impacts from unexploded ordnance clearance - GOV.UK JNCC have also published new mitigation guidelines for UXO clearance, which can be found here - JNCC guidelines for minimising the risk of injury to marine mammals from unexploded ordnance (UXO) clearance in the marine environment JNCC Resource Hub
26	Part 2 6.5.8	6.5.8.3	Relevant guidance	Reference to the NE Best practice documents should be made here.	NE Best Practice Guidance
27	Part 2 6.6.3	Table 6.6.1	Summary of Designated Sites with Relevant Qualifying Ornithological Features	The following designated sites have not been included in this Table: • North-East of Farnes Deep HPMA, • Farne Islands SPA, • Coquet Island SPA, • Northumberland Marine SPA.	It is advised the additional sites are considered as the Scoping boundary falls within the foraging range of breeding Ornithological features, such as Atlantic Puffin (<i>Fratercula arctica</i>) at Farne Islands SPA, and Coquet Island SPA where the entire seabird assemblage is designated which includes <i>F. arctica</i> . Those features have a high connectivity with the HPMA and Northumberland Marine SPA and therefore they also need

					to be scoped in.
28	Part 2 6.6.3	6.6.3.6	Baseline Environment	Common scoter and little gull are also non-breeding qualifying features of the Greater Wash SPA, and distributions of both species spatially overlap with the potential transmission route (see Lawson <i>et al.</i>, 2016; Figures 6 to 10). Common scoter is particularly sensitive to visual disturbance (Burt <i>et al.</i>, 2022; Fleissbach <i>et al.</i>, 2019), and little gull is potentially sensitive to activities associated with cable installation (see the Greater Wash SPA Conservation Advice, Advice on Operations on Natural England's website: https://designatedsites.naturalengland.org.uk/MarineAdviceAndEvidence.aspx).	The Applicant should ensure that common scoter and little gull are scoped into the assessment.
29	Part 2 6.6.4	Table 6.6.2	Proposed data Sources	There are some recommended data sources missing from this Table including Lawson <i>et al.</i> , 2016, and Waggitt <i>et al.</i> , 2019	It is advised that (Lawson <i>et al.</i> , 2016) is included for use for the offshore ornithology assessment, together with the Marine Ecosystem research Programme (MERP) maps (Waggitt <i>et al.</i> , 2019). These are available via the Dryad Digital Repository: https://doi.org/10.5061/dryad.mw6m905sz
20	Part 2 6.6.4	Table 6.6.2	Proposed Data Sources	Natural England can provide more recent data on Red Throated Diver Densities and distributions in the Greater Wash SPA.	Natural England advises that the best available evidence/most recent Orni. Data is used in assessments relating to the GW SPA. Natural England will share

					this data as part of the pre-app process.
31	Part 2 6.6.6	Table 6.6.3, row 1	Proposed Scope of the Assessment	We welcome the proposal to carry out a quantified assessment on the impacts of vessels.	Natural England welcomes a vessel disturbance assessment being included with the application. We advise that a 2km buffer around each vessel is used for the assessment of 100% displacement of red-throated diver (Burt <i>et al.</i>, 2022, Burger <i>et al.</i>, 2019). We also advise that a 2.5km buffer around each vessel is used for the assessment of 100% displacement of common scoter (Fliebsbach <i>et al.</i>, 2019). A vessel disturbance assessment should be made using data from the individual species distribution maps and the number of birds potentially displaced presented. If available, the Poseidon data will be a useful resource of recent data, however, we would also recommend consulting Lawson <i>et al.</i> (2016) for higher resolution data of the Greater Wash SPA, as described in the vessel disturbance

					assessment guidance.
32	Part 2 6.6.5	6.6.5.1	Mitigation Measures		The Applicant is advised to use the Best Practice Protocol for vessels in red-throated diver SPAs. RTD SPA best practice protocol
33	Part 2 6.11	All	Water Quality	Natural England defers to the expertise of the Environment Agency for matters of Water Quality	
34	Part 3 7.5.7	Table 7.5.5	Impacts proposed to be Scoped Out	The impact of pollution caused by accidental spills/contaminant release on protected habitats and species during all phases of the Landfall and Onshore Transmission Infrastructure	Currently, there is no evidence to suggest that a Bentonite breakout from drilling operations can be excluded. A Bentonite management plan should be included. Please see main text.
35	Part 5 Appendix 9.1	1.4	Results; Preliminary MCZ Screening	Northeast of Farnes Deep HPMA/MCZ	Also see point 5. We advise that all habitats and species within the HPMA are assessed within an MCZ assessment and where impacts on HPMA's are identified in the screening report, that design routes or installation methodologies are altered to avoid the impact. Appropriate buffer areas would also need to be considered for HPMA's. The assessment needs to consider the advice in the relevant Conservation

					package available from the JNCC. DEFRA, JNCC and NE advised in 2021 that exclusion buffers of 2km for Offshore wind activities are required during all phases. However, actual distances and impacts will depend on the specifics of the ES. Therefore, the assessment must consider the activity-pressure-feature interaction; including the impact, the location and marine processes occurring to ensure that the likelihood of indirect effects is minimised. Fish, birds, and marine mammals have not been scoped into the report as protected features of this HPMA. We advise they will need to be scoped in to ensure that the potential impacts on the HPMA and its conservation objective can be assessed. Additional information about the HPMA can be found on the JNCC website: https://jncc.gov.uk/our-work/north-east-of-farnes-deep-mpa-and-hpma/, which

					includes high-level conservation advice, and additional information regarding the site designation.

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Lincolnshire Wolds Area of Outstanding Natural Beauty (LW AONB) - Natural England and The Lincolnshire Wolds AONB Partnership joint working response highlighting identified concerns for the Development of Lincs Node and associated plans/projects – July 2023

This note sets out the current, shared views of Natural England and the Lincolnshire Wolds AONB partnership to help inform **landscape** impact discussions on future plans or projects proposed along the Lincolnshire coast.

This position pertains to the potential implications on the designated landscape of the Lincolnshire Wolds AONB and Lincolnshire Heritage Coast from the proposed development of the Lincs Node grid connection point and 'Energy Hub' (Natural England terminology) on the Lincolnshire coast to meet national energy security demands and the governments Net Zero targets.

Lincolnshire Wolds Area of Outstanding Natural Beauty (LW AONB)

The Lincolnshire Wolds was statutorily designated an AONB in 1973. This recognised the area as one of England's finest landscapes, unique and with a distinctive 'sense of place'. The Landscape Character Assessment (CCP414, 1993) acknowledged the following outstanding qualities:

- **A unique physiography (geology and topography)** – The physical geography of the Lincolnshire Wolds is unusual and distinctive. The Wolds is the highest upland landscape in eastern England between Yorkshire and Kent and has a complex geology; nowhere else in Britain has a chalk landscape been so extensively modified by glaciations. These have given rise to some of its most striking features including numerous steep-sided and open-ended combes (valley systems). The Lincolnshire Wolds - A Special Landscape Lincolnshire Wolds AONB Management Plan 14 ([Link](#))
- **A scenic, working landscape** – The high scenic quality of the Wolds depends almost entirely upon the area's use for agriculture. Much of its charm is derived from the seasonally changing field and cropping patterns; the rural scenes of farming activity; and the traditional villages and farmsteads in brick and pantile. Overall, approximately 76% of the AONB is in arable cultivation, with 14.5% as pasture or rough grazing and 5.4% woodland cover (Defra Agricultural Census 2013 & Forestry Commission stats, 2015). It is widely recognised that much of the attractiveness of the Wolds today is a result of the activities of generations of landowners and farmers.
- **A major archaeological resource** – The Wolds has a rich legacy of prehistoric sites and a wealth of historic landscape features. Most of Lincolnshire's long barrows are

in the Wolds, with a high concentration of round barrows, together with many important ancient trackways including the ridge-top routes of the Bluestone Heath Road and the Caistor High Street. The Wolds also has one of the largest densities of deserted and shrunken medieval villages (DMVs and SMVs) in the country.

- **A valued cultural landscape** – The Wolds' landscape has been a source of cultural inspiration. The Tennyson family has a strong association with the area. Alfred, Lord Tennyson - the Poet Laureate - spent much of his formative years in the Wolds and it is featured in many of his works including 'The Brook'. The landscape has offered inspiration to many artists and writers over the years including the mid-19th century landscape painter Peter de Wint and more recently the author A. S. Byatt in the Booker Prize-winning novel 'Possession'.

Prospective Lincolnshire Heritage Coast

Natural England and the local planning authority have ambitions for a Lincolnshire Heritage Coast, However, planning for this is still at a very early stage so we cannot provide any certainty about the geographical extent of a finally defined Heritage Coast or about the specific special characteristics that it would seek to protect and how it would be served by local planning policies. Whilst a fully defined Heritage Coast is supported by planning policy in paragraph 178 of the National Planning Policy Framework, a speculative Heritage Coast confers no additional planning protection. Subject to progression we advise appropriate consideration may need to be given to a prospective Heritage Coast in progressing plans and assessing their landscape and seascape effects.

If more definitive information about the Heritage Coast emerges in time to further inform our response, it will be shared.

Lincs Node

As part of the Offshore Transmission Network Review (OTNR) a new national grid substation is proposed to be located on the edge of the LW AONB, known as 'Lincs Node'. In order to transmit electricity across the grid to Lincs Node, a new 400kv power line running the length of Lincolnshire that would connect to the existing grid from Grimsby in the North to Walpole in Norfolk is required. A distance of at least 70 miles which passes either directly through the LW AONB or the settings thereof. and impacts on functionally linked land to designated nature conservation sites.

Outer Dowsing Offshore Windfarm (ODOW) is the first of the marine energy generation projects currently considering a grid connection at Lincs Node. Each individual project will require its own substation before connecting to Lincs Node unless a cross-scheme strategic

approach is possible to enable shared facilities. Due to technical constraints associated with existing infrastructure and designated sites in the vicinity, there are limited viable landfall locations for marine sustainable development projects to connect to. Currently landfall is focused around Anderby Creek, which, in itself, has nature conservation implications.

In addition, because of existing infrastructure and environmental conditions, there are also other marine/coastal industries which currently have an interest in locating in this area of the Lincolnshire coast. These industries include but are not limited to, carbon capture and underground storage, hydrogen and nuclear. It is probable that not only will these industries utilise existing infrastructure, but that new infrastructure will also be required for any plans/projects brought forward for application, which will undoubtedly have an additional cumulative impact on sites designated for nature conservation as well as the settings of the AONB.

Whilst there are currently limited project specific details, based on our experience from other projects and due to the location of the developing Energy Hub (which includes the Lincs Node) on low lying land near to the coast, it is highly likely for there to be a requirement for any infrastructure to be 'housed' within new c.20m high buildings on elevated ground to address coastal conditions and mitigate flood risk. There is also likely to be increased traffic and transport within the more remote areas of Lincolnshire and its coast, which could also impact on the settings and special qualities of the LW AONB and Heritage coast.

Timeframes

The Lincs Node and any associated plans to connect it to the existing grid are at a very early stage in the planning process and the formal consultation process/es with interested parties are yet to commence. However, experience from similar schemes is that the totality of the pre-application, consenting and construction phases is between 6 and 10 years. It should also be noted that these projects were less complex than Lincs Node and proposed extension of the 400kv may be. There were also minimal challenges and/or requirements for mitigation and compensation to overcome for those projects.

We note that for all commercial enterprises a high degree of certainty is required. We assume that there will be a requirement for assurances that the Lincs Node project will not only be consented, but sufficiently constructed prior to the energy projects becoming operational. Whilst we recognise that the Lincs Node is designed to help facilitate meeting the Government's 2030 Green energy and current offshore windfarm delivery targets; we query if this is achievable within the current planning timeframes. The project will also need to allow for due processes to be followed including the necessary stakeholder engagement

on this high risk and complex project. Both Natural England (as the statutory consultee) and the LW AONB partnership (as a non statutory consultee with detailed local knowledge) would seek to be involved in the pre application stage of Lincs Node and the proposed connection between Grimsby and Walpole.

We note that with uncertainty around grid connection at the Lincs Node, ODOW is also exploring within their consultation under Section 42 of the Planning Act 2008 an alternative grid connection with a cable route extending south from Wolla Bank (on the Lincs Coast) to the existing Weston Marsh substation. While avoiding the requirement to connect to Lincs Node, the alternative cable route has similar LW AONB setting implications and environmental implications.

Impacts to the LW AONB

As interested parties, we wish to outline our collective concern in relation to the reliance for energy transmission via a new connection between Grimsby and Walpole and the Lincs Node, and the resulting impact these developments could have on the LW AONB and Heritage coast.

Crossing through the LW AONB and impacting the settings thereof represents a significant challenge in the context of avoiding or reducing significant adverse impacts to the special qualities of the LW AONB: notably to the landscape character (scenic beauty and rural charm, expansive sweeping views, peace and tranquillity), Earth Heritage (chalk upland, geological and glacial) features and archaeology (deserted medieval villages, burial mounds and monuments) special qualities of the Lincolnshire Wolds AONB.

The 2018 to 2023 management plan for Lincolnshire Wolds AONB (The Lincolnshire Wolds Countryside Service, 2018) states specifically within its description of pressures and threats to the special quality of ‘*Expansive Sweeping Views*’ that there is “*particular potential threat from hilltop or skyline developments including overhead powerlines*”.

We note that for other projects impacting on designated landscapes the National Grid have avoided areas of high amenity value, such as AONBs, in their adoption of the ‘Holford Rules’ for undergrounding of new high voltage overhead transmission lines. But this has delivery timeframe implications and still requires considerable stakeholder engagement. And whilst we would expect similar mitigation measures to be implemented for any proposed connections to the existing grid, this doesn’t mitigate for the potential changes to the settings and special qualities of the LW AONB and the defining characteristics of a new Heritage Coast from the construction of Lincs Node, the energy hub and associated infrastructure

within a part of Lincolnshire which primarily consists of rural communities and low-lying arable farming and grazing practices.

Whilst we advise that every effort should be made to minimise designated landscape impacts, there remains a risk this will not be sufficient to avoid adverse impacts on special qualities of the LW AONB.

From: [SM-NE-Consultations \(NE\)](#)
To: [Ossian Transmission Infrastructure](#)
Subject: Natural England Response Email
Date: 27 February 2025 15:58:26
Attachments: [Annex A.pdf](#)

Dear Sir or Madam

We will action your request as follows:

- For consultations on Development Management, we will respond within 21 days from the receipt of your email.
- For consultations on Development Plans, we will respond within 6 weeks from the receipt of your email.
- For consultations from regulators relating to marine fisheries management we will respond within 21 days or within timelines agreed with your Natural England primary contact.
- For marine licence applications (including self-service marine licence applications) we will respond within 28 days.
- If you have specified a different deadline or we agree a revised deadline with you, we will respond within the time specified or agreed.
- If you are applying for the Discretionary Advice Service, we will respond to you within 15 working days.
- If you are a member of the public, we will respond to your query within 10 working days from receipt of your email.
- If your consultation relates to a Tree Preservation Order, Advertisement Consent, Hedgerow Removal Notice or Listed Building Consent, there is no requirement to consult us and you will not receive a further response.
- If your e-mail is regarding Agricultural Land Classification you can view both Post 1988 and Provisional ALC data on the www.magic.gov.uk/ website. Provisional data can also be viewed [here](#).

If this is a Development Management consultation that is not a Nationally Significant Infrastructure Project (NSIP), EIA development, Minerals and Waste development, development affecting over 20ha of Best and Most Versatile agricultural land or does not trigger an Impact Risk Zone (IRZ), there is no requirement to consult us and you will not receive a further response

Please refer to our general advice in the Annex below.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the proposals are not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not the proposals are consistent with national and local policies on the

natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of sites and the impacts of development proposals to assist the decision making process. We advise local planning authorities to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We strongly recommend that local planning authorities (LPAs) use Natural England's Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) (available from the [Natural England Open Data Geoportal \(arcgis.com\)](https://www.naturalengland.org.uk/Data-Geoportal) and to use on [MAGIC \(defra.gov.uk\)](https://magic.defra.gov.uk) along with guidance) to decide when to consult Natural England on development proposals that might affect a SSSI.

The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain locations for some development types. Use of the SSSI IRZs avoids the need for a formal email consultation on some development proposals, saving time during the planning process, and helps to reduce the demand on Natural England, enabling more focus on those development proposals with the highest risk to and opportunity for nature recovery.

[Planning and transport authorities: get environmental advice on planning - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals), [https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals](https://www.gov.uk/guidance/consulting-on-neighbourhood-plans-and-development-orders) <https://www.gov.uk/guidance/consulting-on-neighbourhood-plans-and-development-orders> provides further guidance on when LPAs must consult Natural England on development proposals.

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Annex A – Natural England general advice

Protected Landscapes

Paragraph 189 of the [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the [Levelling-up and Regeneration Act 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2023/1/section/245) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](https://www.landscapelinstitute.org.uk/guidelines-for-landscape-and-visual-impact-assessment-glvia3/) for further guidance.

Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/14/section/40) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/complying-with-the-biodiversity-duty) for further information.

Designated nature conservation sites

Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/habitats-regulations-assessments-protecting-a-european-site) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/appropriate-assessment) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the [SSSI Impact Risk Zones \(England\) \(arcgis.com\)](https://arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified ([Sites of special scientific interest: public body responsibilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/sites-of-special-scientific-interest-public-body-responsibilities)).

Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities \(gov.uk\)](https://www.gov.uk/government/publications/protected-species-and-development-advice-for-local-planning-authorities) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Annex A – Natural England general advice

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply](https://www.gov.uk/wildlife-licences) (www.gov.uk) for more information.

Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK](https://www.gov.uk/local-nature-recovery-strategies) (www.gov.uk) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England](https://www.gov.uk/habitats-and-species-of-principal-importance-in-england) (gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the [Brownfield Hub - Buglife](https://www.brownfieldhub.org.uk/) for more information and Natural England's [Open Mosaic Habitat \(Draft\) - data.gov.uk](https://data.gov.uk/open-mosaic-habitat) (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the [National Planning Policy Framework \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/national-planning-policy-framework) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is also applies extended to small scale development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

[Biodiversity Net Gain](https://www.gov.uk/biodiversity-net-gain) guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the [Biodiversity Net Gain Planning Practice Guidance](https://www.gov.uk/biodiversity-net-gain-planning-practice-guidance) (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric](https://www.gov.uk/calculate-biodiversity-value) for more information. For small development sites, [The Small Sites Metric](https://www.gov.uk/the-small-sites-metric) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](https://www.gov.uk/sites-of-special-scientific-interest)

Annex A – Natural England general advice

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](#) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Ancient woodland, ancient and veteran trees

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The [Natural England Access to Evidence - Ancient woodlands Map](#) can help to identify ancient woodland. Natural England and the Forestry Commission have produced [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](#) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the [Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](#). [Find open data - data.gov.uk](#) on Agricultural Land Classification or use the information available on [MAGIC \(defra.gov.uk\)](#).

The Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites \(publishing.service.gov.uk\)](#) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to [Reclaim minerals extraction and landfill sites to agriculture - GOV.UK \(www.gov.uk\)](#), which provides guidance on soil protection for site restoration and aftercare. The [Soils Guidance \(quarrying.org\)](#) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure

For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to [Green Infrastructure Home \(naturalengland.org.uk\)](#) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 [GI How Principles \(naturalengland.org.uk\)](#). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

Annex A – Natural England general advice

The [Green Infrastructure Map \(naturalengland.org.uk\)](https://naturalengland.org.uk/green-infrastructure-map) and [GI Mapping Analysis \(naturalengland.org.uk\)](https://naturalengland.org.uk/gi-mapping-analysis) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation:

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails:

Paragraphs 105, 185, 187 and 193 of the NPPF highlight the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to [Find your perfect trail, and discover the land of myths and legend - National Trails](#) for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIIIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails.

Further information is set out in the Planning Practice Guidance on the [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/natural-environment).

From: [REDACTED]
To: [Ossian Transmission Infrastructure](#)
Cc: MD.MarineRenewables@gov.scot; [REDACTED]
Subject: RE: EN0210006 - Ossian Transmission Infrastructure project - Notification of Environmental Impact Assessment scoping report consultation - NatureScot advice
Date: 28 February 2025 14:43:32
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

You don't often get email from [REDACTED]@nature.scot. [Learn why this is important](#)

Dear Nadia,

Thank you for requesting advice from NatureScot on the Scoping Report consultation for the Ossian Transmission Infrastructure project.

As you will know this is a cross-border project with the transmission infrastructure spanning Scottish as well as English waters. Our advice will focus on interests in Scottish waters only and in this regard, we have been consulted by the MD LOT for the Scottish portion of this transmission project (SCOP-0068 - Ossian Offshore Wind Farm Limited – Ossian Offshore Transmission Infrastructure, approximately 80 kilometres east of Aberdeenshire). The consultation deadlines are the same – if it is helpful for you to have sight of our advice, we are happy to share this in due course.

Best wishes,

[REDACTED]

[REDACTED] | Marine Sustainability Manager [REDACTED]

NatureScot | The Enterprise Centre | Kilmory Industrial Estate | Lochgilphead | Argyll | PA31 8SH | [REDACTED]

[REDACTED]

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██████████
Marine Licensing & Consenting Casework Officer
Marine Directorate - Licensing Operations Team
Scottish Government – Marine Laboratory
Aberdeen
AB11 9DB

25 March 2025

Our ref: CNS / REN / OSWF / E1
East - Ossian – Pre-application

Sent by email to: ██████████@gov.scot

Dear Iain,

Ossian Offshore Wind Farm Limited – Ossian Offshore Transmission Infrastructure

NatureScot advice on the Environmental Impact Assessment (EIA) Scoping Report

Thank you for consulting us on the EIA Scoping Report submitted by Ossian Offshore Wind Farm Limited for the proposed Ossian Offshore Transmission Infrastructure.

The proposed transmission infrastructure is to be located from within the proposed Ossian Offshore Wind Farm array area, located approximately 80km southeast of Aberdeen to landfall between Sandlands and Anderby Creek on the Lincolnshire coast, England, as per Figure 1.3.1 of the Scoping Report.

We have previously been consulted and provided advice (20 September 2024) on the section 36 consent and marine licences for the associated wind farm array area. Within our response we raised concerns that the application covered the array area only and not the entirety of the proposal. It is understood that this was due to uncertainty around grid connection options however we highlight that potential effects as a result of the proposal as a whole will need to be assessed to ensure full consideration of impacts and mitigation requirements.

Our advice on the natural heritage interests to be addressed within the EIA Report to support the proposed marine licence application for the Offshore Transmission Infrastructure is provided below and relates to the Scottish element of the proposal only, which is located entirely within Offshore waters.

Policy context

We are currently facing two crises, that of climate change and biodiversity loss and as the Scottish Government's adviser on nature, our work seeks to inspire, enthuse and influence others to manage our natural resources sustainably. We recognise that this proposed development is a lease awarded through the ScotWind Leasing Round in an area identified through the Sectoral Marine Plan process for Offshore Wind Energy.

We seek to provide advice that is enabling and secures the right development in the right place with most benefit for climate change reduction and that which avoids damage, and where possible, achieves enhancement and restoration of biodiversity.

Proposal

Our understanding from the Scoping Report (Table 4.5.3) is that the components of the Offshore Transmission Infrastructure proposal will follow a Project Design Envelope (PDE) approach and with respect to the Scottish elements of the proposal include:

- Up to 6 export cables, with a maximum length of up to 270km (this refers to the maximum lengths of all six offshore export cables 'unbundled' and each laid in a single trench as a worst-case scenario);
- Cable burial options include jet trenching, mechanical trenching, ploughing, mass flow excavation and backhoe excavation;
- Maximum cable trench width of up to 3m;
- Maximum width of seabed disturbed up to 20m per cable;
- Target cable burial depth of between 1–3m;
- Cable protection options include burial, concrete mattresses, rock placement, rock bags, cast iron shells and polyurethane / polyethylene sleeving; and
- Pre-construction activities including pre-lay grapnel run, boulder clearance, sandwave clearance, cable crossing preparation, geophysical surveys and out of service cable removal.

The portion of the Offshore Scoping Boundary in Scottish waters encompasses the array site, to allow for inclusion of the offshore export cables stemming from the Offshore Substation Platforms (OSPs), as well as a section to the west of the array site boundary to accommodate the offshore export cable corridor – as per Figure 3.5.1 of the Scoping Report.

The array area application included the OSPs as well as the interconnector cables between the OSPs. Therefore, these elements do not form part of the Offshore Transmission Infrastructure proposal.

Content of the Scoping Report

We are generally content with the format of the EIA Scoping Report, which is well laid out and relatively easy to navigate to find narrative relevant for the Scottish portion of the proposal - the Scoping Report is provided in five parts, with Part 1 and Part 2 being most relevant to our interests.

There is some conflicting information provided in relation to nature conservation Marine Protected Areas (ncMPAs) in Scotland and Marine Conservation Zones (MCZs) in England as well as whether or not a Habitats Regulations Appraisal (HRA) Stage 1 Screening Report has been submitted alongside the EIA Scoping Report – further comments are provided below.

We also wish to highlight that a considerable number of cable installation techniques and cable protection measures have been included within the PDE. However, no details have been provided on predicted amounts or potential locations of cable protection. Therefore, our advice is proportionate to the level of detail provided, and uncertainty, within the Scoping Report. If this lack of detail is continued into the Application, it means that there is a greater risk of a worst-case scenario being assessed and a greater level of precaution in the advice provided.

Just to note that there is no formal requirement for consultation on a Preliminary Environmental Information Report (PEIR) in relation to the Marine Licence application to MD-LOT for the export cable in Scottish waters. However, we encourage the Applicant to consider the need for further engagement with us post Scoping Opinion but pre-application submission.

EIA Report

The EIA Report provides the assessment to support the application and should be suitably structured with appropriate formatting and sufficient information, with limited repetition, to ensure it can be reviewed efficiently and effectively, particularly in relation to the cross-border nature of the proposal. Consideration should therefore be given to the following aspects:

- It should clearly follow the direction provided in the Scoping Opinion, or where specific agreement was later reached during the pre-application process. Any divergence from this needs to be laid out separately and must be fully justified, as well as being raised and agreed during pre-application discussions.
- Consideration should be given to the volume and flow of information within and across each receptor chapter and associated technical appendices. The flow of information relating to impact pathway, assessment and conclusions should be concise, but not omit key information or steps taken. Repeated duplication of text should be avoided through appropriate structuring.
- In electronic versions of the EIA Report, navigational aids including use of hyperlinks etc. are required, particularly where there are supporting technical appendices to any chapters.
- Each stage of the assessment process should be sufficiently transparent to allow the assessments to be repeated. Where specific tools have been used, details of which version and when the assessment was carried out is also required.

We expect to be able to easily navigate the assessment and conclusions for impact pathways relevant to the Scottish portion of the proposal. It may be useful to have further engagement on this prior to submission of the EIA Report.

Assessment approach

The EIA Report should consider the impacts of all phases of the proposed development on the receiving environment, including effects from pre-construction activities that can emit significant underwater noise e.g. unexploded ordinance (UXO) clearance and some geophysical activities. These activities will also require assessment under European Protected Species (EPS) Licensing. Although licensing requirements are usually sought post consent, some consideration of impacts from these activities on EPS will be required within the EIA Report to understand the impact from the proposal in its entirety.

It is noted in Paragraph 4.8.3.3 that the approach for decommissioning the offshore export cables and any cable protection is yet to be determined and that it may be fully removed or left *in-situ*. Please note the policy position in Scotland whereby there is a presumption for full removal.¹

We recommend that the following aspects are considered further and included in the EIA Report.

Assessment of significance

The proposed approach for the identification of impacts and assessment of significance is set out in Section 5.5.2 and it is noted in Paragraph 5.5.2.1 that for each topic chapter, the approach to the evaluation of significance will be clearly defined. Overarching methodology is provided within this section and notes that in all cases the evaluation of significance will be underpinned by a narrative approach and professional judgement.

Although we acknowledge that expert judgement is required when determining sensitivity of receptors and (in some instances) magnitude of impact - in terms of biodiversity, the magnitude of change should generally be expressed in absolute terms and relatively in terms of percentage change to habitat area or species population. This is not reflected in the definitions of magnitude as described in Table 5.5.2.

We also note that the definitions of receptor sensitivity and magnitude provided in Tables 5.5.1 and 5.5.2 respectively, as well as the assessment matrix provided in Table 5.5.3, is based on the Design Manual for Roads and Bridges (DMRB) (Highways England *et al.* 2019). However, the narrative provided in the section on the descriptions of sensitivity and magnitude are taken from CIEEM (2019), which may explain why they differ.

It is also noted that the assessment matrix table often provides more than one option e.g. a High sensitivity combined with Low magnitude could result in a Minor or Moderate level of significance. Paragraph 5.5.2.21 states that where more than one option is available in the significance matrix, the significance of effect will be determined by the author. It goes on to state that in general, a significance of effect of Moderate or greater is considered 'significant'. Therefore, whether the significance of an effect is deemed Minor (not significant) or Moderate (significant) is potentially subjective and open to interpretation by the author. Either way we do not agree with the use of a range.

Ecosystem assessment

Increasingly, there is a need to understand potential impacts holistically at a wider ecosystem scale in addition to the standard set of discrete individual receptor assessments. This assessment should focus on potential impacts across predator prey interactions. This will enable a better understanding of the consequences (positive or negative) of any potential changes in prey distribution and abundance from the proposed cable on bird and mammal (as well as other top predator) interests and what influence this may have on population level impacts.

Climate change and blue carbon

The impact of climate change effects should be considered, both in futureproofing the proposal design as well as how certain climate stressors may work in combination with potential effects

¹ <https://www.gov.scot/publications/offshore-renewable-energy-decommissioning-guidance-scottish-waters/pages/1/>

from the proposed export cable. The EIA Report should also consider the carbon cost of the cable (including supply chain) and to what extent this is offset through the production of green energy.

We note the intention to provide a climate change assessment, including impacts to blue carbon, as part of the EIA Report, with further details provided within Section 8.3 (Part 4), which is welcomed. Noting that we were content with the assessment provided as part of the array application.

Cumulative impact assessment

The proposed approach to the cumulative effects assessment (CEA) is outlined in Section 5.7 (Cumulative Effects with Other Projects) of the Scoping Report. In relation to establishing the long list as set out in Section 5.7.2 – the process follows the Planning Inspectorate’s advice on CEA. As the Planning Inspectorate is relevant for proposals in England and differs from guidance provided by Marine Directorate, we advise that the Applicant consult and seek agreement with MD-LOT on which projects, plans and activities should be included within the initial long list.

It is noted in Paragraph 5.7.2.5 that for the Offshore Transmission Infrastructure, other proposed major developments will be taken into account within the CEA, including but not limited to the Ossian array proposal. However, we advise that for a whole proposal assessment to be undertaken, all elements of the Ossian Offshore Wind Farm (including the Offshore Transmission Infrastructure) should be considered together and then the potential effects of the whole proposal should thereafter be considered cumulatively with other relevant and reasonably foreseeable developments.

It is also advised that the CEA should not be restricted to major developments as cumulative effects can occur on a local, regional or global basis and can be additive, combined or synergistic. Therefore, we reiterate that the Applicant should consult and seek agreement with MD-LOT on which projects, plans and activities should be included within the CEA.

Additional advice in relation to the cumulative impact assessment for each receptor is included in the relevant appendix below.

Mitigation and monitoring

We welcome the identification of mitigation described in Section 5.6 and included in each of the relevant sections of the EIA Scoping Report.

Mitigation measures can often be most successful when they are considered from the outset of the proposal rather than as a late-stage solution. Therefore, in some cases, mitigation can be incorporated as designed in measures that are truly embedded to avoid or reduce impacts.

However, we note that much of the embedded mitigation includes the development and adherence to post-consent plans and programmes. Plans and programmes themselves do not constitute mitigation – it is the measures contained within the plan that will mitigate impacts, for which no detail has yet been provided.

Paragraph 5.6.2.2 notes that embedded mitigation measures will be taken into account within the assessment of effects for each topic. Care needs to be taken to ensure that there is a commitment to specific measures in order for these to be truly embedded mitigation that will reduce impacts and thus could be used in the assessments to reduce the magnitude and significance of effects.

Further advice in relation to mitigation measures are included in each of the relevant appendices of our advice.

It is noted in Section 5.6.5 that monitoring commitments may be put in place, as necessary, to assess the effectiveness of mitigation measures and validate assessment conclusions. No monitoring is currently proposed within the EIA Scoping Report.

We advise that the full range of mitigation and monitoring measures as well as published guidance should be considered and discussed in the EIA Report.

Habitats Regulations Appraisal (HRA) and nature conservation Marine Protected Areas (ncMPA) assessment

It is noted in Section 9.2, and at various points throughout the EIA Scoping Report, that an HRA Stage 1 Likely Significant Effect (LSE) Screening Report has been undertaken and provided separately.

We have not been consulted on the HRA Stage 1 LSE Screening Report for the Offshore Transmission Infrastructure and thus have not been able to provide advice on this. It is generally advised that an HRA Screening Report is submitted alongside the EIA Scoping Report as this enables us to consider and provide comprehensive advice under each assessment process at the same time.

A Marine Conservation Zone (MCZ) screening assessment is provided in Appendix 9.1. MCZ's are relevant to England, Wales and Northern Ireland only, although it is noted within the MCZ screening assessment that impacts on nature conservation Marine Protected Areas (ncMPAs) in Scottish waters have been previously assessed as part of the Ossian array application. It would have been helpful if the ncMPA screening assessment had been signposted within the Scoping Report or included the appropriate extract relevant for the Offshore Transmission Infrastructure.

However, having reviewed the information provided, including the documents submitted as part of the Ossian array application, it is not clear whether an ncMPA screening assessment for impacts from the Offshore Transmission Infrastructure proposal has been undertaken. Therefore, we have reviewed relevant information from the Offshore Transmission Infrastructure Scoping Report and Ossian array EIA Report, including the Underwater Noise Technical Report (Appendix 10.1, 2024) and can advise that we are content that impacts to the Turbot Bank ncMPA and the Southern Trench ncMPA can be screened out from further assessment. However, a screening assessment and justification should be provided within the EIA Report.

Positive effects for biodiversity and nature inclusive design

We recommend early consideration of potential inclusion of positive effects for biodiversity as well as nature inclusive design. Whilst it is not currently a policy requirement in Scotland, as part of the need to address both the climate and biodiversity crises, we encourage the Applicant to consider this as part of their submission.

Natural heritage interests to be considered

We provide advice as detailed below within receptor-specific appendices for key natural heritage interests to be considered in the EIA Report with respect to the Scottish portion of the proposal:

Regarding seascape, landscape and visual impact assessment (SLVIA), there is no mention of impacts to SLVIA with respect to the Offshore Transmission Infrastructure within Scottish waters. However, we advise that we are content for SLVIA to be scoped out of the EIA Report.

- Advice on physical processes is provided in [Appendix A](#).
- Advice on benthic ecology is provided in [Appendix B](#).
- Advice on fish and shellfish ecology is provided in [Appendix C](#).
- Advice on marine mammals is provided in [Appendix D](#).
- Advice on offshore ornithology is provided in [Appendix E](#).

Further information and advice

We hope this advice is of assistance to help inform the Scoping Opinion, noting that there may be aspects where some further engagement is required to assist in preparing the EIA Report.

Please contact me in the first instance for any further advice, using the contact details below, copying to our marine energy mailbox – marineenergy@nature.scot.

Yours sincerely,


Marine Sustainability Adviser - Sustainable Coasts & Seas
 @nature.scot

Cc: Planning Inspectorate - Ossian Transmission Infrastructure:
ossiantransmission@planninginspectorate.gov.uk

Cc: Aberdeenshire Council - ENQ/2025/0254: planning@aberdeenshire.gov.uk

NatureScot advice on the EIA Scoping Report for the Ossian Offshore Transmission Infrastructure

Appendix A – Physical processes

Physical processes is considered within Section 6.2 of the EIA Scoping Report.

Study area

The proposed study area for this receptor has been defined in Section 6.2.2 as the extent of one spring tidal excursion from the scoping boundary using the UK Renewables Atlas (ABPmer, 2024). This equates to 15km in a north-south orientation and 5km in an east-west orientation as per Figure 6.2.1 and is noted to capture the Zone of Influence (Zoi) of all potential impacts to physical processes resulting from the proposal. We are content with the study area proposed.

Baseline characterisation

Data sources

An outline of the baseline environment for physical processes, based on an initial review of key data sources, is provided in Section 6.2.3. Although references are provided within the text, there is no list of key data sources provided and therefore we are not able to comment on whether the list of data sources used to inform the baseline for this receptor is appropriate. It is noted in Paragraph 6.2.4.2 that additional data sources such as emerging research and offshore wind farm EIAs will also be used to inform the assessment.

Paragraphs 6.2.4.3 and 6.2.4.4 state that to support the acquisition of physical processes data, site-specific geophysical, benthic and metocean survey data will also be used to inform the physical processes baseline, which is welcomed.

Designated sites

Table 6.2.1 lists the designated sites and features within the proposed study area relevant to physical processes, all of which are located in English waters. We agree that there are no designated sites in Scottish waters within the proposed study area that are relevant for the assessment of impacts to physical processes.

Receptors

Although designated sites relevant to physical processes are listed in Table 6.2.1, there is no formal identification of receptors for the assessment. As above, we agree that there are no designated sites in Scottish waters within the proposed study area relevant to the physical processes assessment, but we advise consideration should be given to treating areas of undesignated seabed as a receptor. These areas do not appear to be fully characterised yet and might be judged as Low (or even Medium) sensitivity, which could potentially lead to identification of environmental effects that could be mitigated.

Potential impacts

The potential impacts proposed to be scoped in and out of the assessment are detailed in Tables 6.2.3 and 6.2.4. We are generally content with this, subject to our comments below.

There is no mention of seabed scour as a potential impact. We advise that this should be scoped in and assessed, either as a separate impact or consideration should be given to incorporating it into the assessment for 'impacts to seabed morphology'.

The ‘impacts to seabed morphology’ is proposed to be scoped in for all phases but the ‘impacts to sediment transport pathways due to the presence of infrastructure’ is only proposed to be assessed for the operational phase. As infrastructure will be installed during the construction phase, which could have an impact on sediment transport pathways, this impact should also be scoped in for assessment during the construction phase.

Furthermore, as noted in Paragraph 4.8.3.3, it is anticipated that the offshore export cables and cable protection may be left *in-situ*. If it is anticipated that there is the possibility that cable infrastructure will be left *in-situ* post operation phase, then it should be made clear within the assessment that these impacts could be permanent.

Moreover, as highlighted in the cover letter, our understanding is that in Scotland, current policy is that all infrastructure associated with offshore renewable energy should be removed during decommissioning. Thus, we advise further advice should be sought from MD-LOT in relation to decommissioning and assessment requirements for the EIA.

Approach to assessment

Table 6.2.2 presents a summary of data sources proposed to be used for the assessment of impacts to physical processes, which we are content with.

It is stated in Section 6.2.8 that numerical modelling is not proposed to be undertaken for the assessment. Instead, a literature review and existing numerical modelling studies undertaken in relation to relevant offshore wind farm projects will be used to undertake a qualitative assessment. Other projects that will be drawn upon are detailed in Paragraph 6.2.8.5 and only include one project, which is partially located within Scottish waters - the Cambois Connection Marine Scheme.

However, it is noted further on in Paragraph 6.2.8.9 that data analysis and assessment undertaken for the Ossian array EIA Report, will be used to inform the assessment of impacts within the offshore scoping boundary in Scottish waters. Therefore, we are content with the proposed approach to assessment but advise that the qualitative approach taken should be fully justified within the EIA Report.

It is recognised in Table 6.2.3 that the impact ‘increased suspended sediment concentrations (SSCs) and associated deposition’ also has the potential to indirectly impact receptors for other offshore topics, including benthic ecology, fish and shellfish ecology and marine mammals. It is stated that for these receptor groups, significance of effect for direct and indirect impacts will not be assigned within the physical processes assessment but will be set out in the relevant topic chapter. This is welcomed but just to note that other impacts scoped in for the physical processes assessment may also have direct / indirect impacts on other receptor groups.

It is also worth highlighting that as the Ossian array is located approximately 5km from the Morven Offshore Wind Farm Array, potential influences from the Morven Offshore Wind Farm infrastructure will need to be considered within the assessment of impacts to physical processes. It may be appropriate to seek further advice from MD-SEDD.

Cumulative impact assessment

Paragraph 6.2.8.10 notes that the CEA for physical processes will follow the approach set out in Part 1, Section 5 of the Scoping Report. We’ve reviewed Section 5.7 – *Cumulative Effects with Other Projects*, which generally appears appropriate subject to our comments in the cover letter.

We advise that the Applicant seeks agreement with MD-LOT on the list of projects, plans and activities to be included in the CEA.

Mitigation

Mitigation measures are outlined in Section 6.2.5, and we welcome the identification of embedded mitigation at an early stage. However, as noted in the cover letter, some of the mitigation includes adherence to post-consent plans / monitoring. Plans do not strictly constitute mitigation as it is the measures contained within the plans that will mitigate impacts for which little detail has yet been provided.

It is acknowledged in Paragraph 6.2.5.2 that further mitigation measures may be required should significant effects be identified during the EIA, which will be consulted on with statutory consultees during the EIA process.

Transboundary impacts

We agree that transboundary impacts in relation to physical processes can be scoped out from further consideration for the Scottish portion of the proposal.

NatureScot advice on the EIA Scoping Report for the Ossian Offshore Transmission Infrastructure

Appendix B – Benthic subtidal and intertidal ecology

Benthic subtidal and intertidal ecology interests are considered in Section 6.3 of the EIA Scoping Report.

Study area

The proposed study area to inform the baseline characterisation for the benthic subtidal and intertidal ecology receptor is shown in Figure 6.3.1 and encompasses the Offshore Scoping Boundary plus a 15km buffer. This is based upon the extent of one spring tidal excursion (ABPmer, 2024) and matches that proposed for the physical processes, which we are content with.

Baseline characterisation

Data sources

It is noted in Paragraph 6.3.2.3 that site-specific benthic surveys were undertaken over the Ossian array area, which overlaps with the majority of the Offshore Transmission Scoping Boundary in Scottish waters, this data will also be used to inform the baseline characterisation and assessment for the Offshore Transmission Infrastructure EIA. In addition, it goes on to note that additional benthic ecology surveys are planned for this year (2025) and will include the small section of the Offshore Transmission Scoping Boundary to the west of the Ossian array area that was not previously surveyed.

Proposed data sources to be used in the assessment are presented in Table 6.3.4 and it is noted that these were also used to inform the baseline information presented in Section 6.3.3. It is also noted that additional data sources such as emerging research, monitoring results and other offshore development may be used to characterise the baseline environment.

We are content that the site-specific survey data along with the list of data sources will be sufficient to characterise the baseline environment and inform the subsequent assessment. Just to highlight there is a more up to date version of the EMODnet seabed habitat map - EUSeaMap 2023².

Designated sites

Table 6.3.3 lists the designated sites and features within the proposed study area relevant to physical processes, all of which are located in English waters. We agree that there are no designated sites in Scottish waters within the proposed study area that are relevant for the assessment of impacts to benthic ecology.

Habitats and species of conservation importance

Despite there being no sites designated for benthic habitats or species within the proposed study area, there may be a number of habitats and species of conservation importance present within the benthic ecology study area.

² <https://emodnet.ec.europa.eu/en/seabed-habitats>

From the site-specific benthic surveys undertaken within the Ossian array area, the site appears to be relatively homogeneous, with offshore subtidal sands and gravels, a Priority Marine Feature (PMF), recorded across most of the survey area and grab samples (Ossian array EIA Report, 2024).

The PMF ocean quahog *Artica islandica* was recorded across the entire study area and the survey report noted that horse mussel *Modiolus modiolus* is also present, but only as scattered individuals rather than the reef form, which is the PMF.

We note that no Annex 1 habitats were recorded. However, benthic surveys have been undertaken within the Ossian array only, with further surveys planned for the area west of the array this year. Therefore, at this stage, we advise that we expect consideration to be given to Annex 1 habitats if present and PMFs in the EIA Report³.

Potential impacts

We are generally content with the potential impacts that have been scoped in and out of assessment as per Tables 6.3.5 and 6.3.6, subject to the following comments.

Just to highlight that the ‘proposed approach to assessment’ column in Table 6.3.5 contains exactly the same text provided in the impact ‘description’ column for the first two impacts. Therefore, we’re not able to advise on whether or not the proposed approach to assessment is appropriate for these impacts.

The potential impact ‘increased SSCs and associated deposition’ and ‘temporary habitat loss / disturbance’ is scoped out for the operation and maintenance phase as it is noted that this is expected to be minimal and associated with minor repair and reburial only. However, we advise that at this stage and without further justification or evidence provided which justifies that repairs are likely to be minor in nature, these impacts should be scoped into the operation and maintenance phase for further assessment. This is in line with advice provided for transmission cables elsewhere.

For the potential impacts of ‘colonisation of hard structures’ and ‘changes in physical processes’ it is proposed to only assess the impact during the operation and maintenance phase. However, as previously highlighted, it is noted in Paragraph 4.8.3.3 in relation to decommissioning, that it is anticipated that all offshore cables and offshore cable protection may be left *in-situ* to minimise environmental impacts associated with their removal. If it is anticipated that cable infrastructure will be left *in-situ* post operation and maintenance phase, then it should be made clear within the assessment that these impacts could be permanent.

Moreover, as highlighted in the cover letter and in our advice on physical processes (Appendix A), our understanding is that in Scotland, current policy is that all infrastructure associated with offshore renewable energy should be removed during decommissioning. Therefore, we advise further advice should be sought from MD-LOT in relation to decommissioning and assessment requirements for the EIA Report.

It is noted that impacts to benthic invertebrates due to Electromagnetic Field (EMF) effects is proposed to be scoped in during the operation and maintenance phase, which we agree with – advice is provided below in relation to the proposed assessment approach.

³ <https://www.nature.scot/professional-advice/protected-areas-and-species/priority-marine-features-scotlands-seas>

Approach to assessment

The proposed assessment methodology is set out in Table 6.3.5, which we are generally content with subject to the following comments.

As noted above the ‘proposed approach to assessment’ column in Table 6.3.5 contains exactly the same text provided in the impact ‘description’ column for the first two impacts. Therefore, we’re not able to advise on whether or not the proposed approach to assessment is appropriate for these impacts.

For the ‘changes in physical processes’ impact, it is noted that the assessment will be based upon a literature review of relevant offshore wind farms projects. Our advice provided in Appendix A for physical processes is also relevant here – we are content with the proposed approach to assessment but advise that the qualitative approach taken should be fully justified within the EIA Report.

In relation to the ‘removal of colonised hard structures’ it states that during decommissioning, impacts associated with colonisation of hard structures are expected to be less than or equal to effects arising during the construction phase. As noted in Table 6.3.6, there may only be minimal colonisation of hard structures during the construction stage and thus is proposed to be scoped out for assessment for this phase. Therefore, it unclear how the impacts could be less than or equal during decommissioning.

PMFs

We advise that assessments should be undertaken for all benthic PMF habitats and species recorded within the benthic ecology study area. The assessment should quantify, where possible, the likely impacts to PMFs and assess whether this could lead to a significant impact on the national status of each PMF.

EMF

It is noted that the impacts to benthic ecology receptors from EMF effects will be assessed qualitatively for the operation and maintenance phase. We would usually expect modelling to inform the assessment, therefore we advise consulting us in advance of application submission on the proposed assessment methodology to ensure that the potential impacts to benthic species from EMF effects is sufficiently assessed.

We are also aware that the Offshore Wind Energy and Change Programme (OWEC) funded Floating Offshore Wind Environmental Response to Stressors (FLOWERS)⁴ project is due to report in spring this year and this may have pertinent information to consider in respect of EMF effects.

Cumulative impact assessment

Paragraph 6.3.8.7 notes that the CEA for benthic ecology will follow the approach set out in Part 1, Section 5 of the Scoping Report. We’ve reviewed Section 5.7 – *Cumulative Effects with Other Projects*, which generally appears appropriate subject to our comments in the cover letter.

One aspect that we advise should be considered cumulatively is EMF impacts. There has been a tendency for wind farm proposals to dismiss impacts of EMF from a cumulative perspective. We

⁴ <https://www.thecrownestate.co.uk/news/the-crown-estate-and-cefas-advance-understanding-of-interactions-between>

are concerned that the spatial and temporal scale is not being sufficiently considered cumulatively across the network of cables, including those outwith the proposal.

As also previously advised, the Applicant should seek agreement with MD-LOT on the list of projects and / or plans to be included within the CEA.

Mitigation and monitoring

Mitigation measures are outlined in Section 6.3.5, and we welcome the identification of embedded mitigation at an early stage. All the mitigation measures proposed for benthic ecology includes development and adherence to post-consent plans. As noted in the cover letter, plans do not strictly constitute mitigation as it is the measures contained within the plans that will mitigate impacts for which little detail has yet been provided.

It is acknowledged in Paragraph 6.3.5.2 that further mitigation measures may be required should significant effects be identified during the EIA, which will be consulted on with statutory consultees during the EIA process.

No monitoring for benthic ecology is proposed in the Scoping Report and we advise that further consideration is given to this in the EIA Report.

Transboundary impacts

We agree that transboundary impacts in relation to benthic ecology can be scoped out from further consideration from the Scottish portion of the proposal.

NatureScot advice on the EIA Scoping Report for the Ossian Offshore Transmission Infrastructure

Appendix C – Fish and shellfish ecology

Fish and shellfish ecology is considered in Section 6.4 of the EIA Scoping Report.

Our advice focuses on fish and shellfish species, and where appropriate their associated habitats, that are features of protected sites, as well as those that are of conservation importance, including PMFs and key prey species.

We agree that ocean quahog and horse mussel should be considered as benthic ecology receptors.

Study area

A broad fish and shellfish study area is proposed as per Figure 6.4.1 and encompasses the Offshore Scoping Boundary plus a 100km buffer. It is noted in Paragraph 6.4.2.2 that this study area is large enough to consider all direct and indirect impacts relevant to fish and shellfish ecology as well as providing a wider context.

We advise that this is an especially large study area, and the Applicant may wish to consider a smaller study area based on the extent of the underwater noise and / or SSC impact, whichever extends furthest from the proposal.

Baseline characterisation

Data sources

An outline of the baseline environment for fish and shellfish ecology, based on an initial review of key data sources, is provided in Section 6.4.3. Although references are provided within the text, there is no list of key data sources provided *per se* and therefore we are not able to comment on whether the list of data sources used to inform the baseline for this receptor is appropriate.

It is noted that site-specific benthic survey data will also be used to inform the baseline for the fish and shellfish ecology. This will provide information on seabed types and substrate suitability for spawning fish (including sandeel and herring) and habitat for fish and shellfish species, which is welcomed. For the array area, seabed imagery sampling and epibenthic beam trawls have also been undertaken, which will help inform the baseline and assessment for this receptor.

Our understanding from pre-application discussions was that eDNA data collection was going to be used to help inform the baseline characterisation of the Offshore Transmission Infrastructure proposal. As there is no mention of eDNA within the Scoping Report clarification on this would be welcomed.

Receptors

Section 6.4.3 provides a summary of the baseline for the fish and shellfish species typically expected in the proposed study area, which includes marine fish, diadromous fish and shellfish species.

As noted above our interest in fish and shellfish species relates to those species that are PMFs as well as key prey species (such as but not limited to herring, sandeels, sprat and mackerel etc.), noting that many of these are also PMFs.

In relation to diadromous fish (Paragraph's 6.4.3.5-6.4.3.9), it is noted that all named diadromous fish species are considered to have the potential to be present within the vicinity of the proposal,

this includes – Atlantic salmon, sea trout, sea lamprey, river lamprey, allis shad, twaite and European smelt. We are content with these being included in the EIA assessment, noting that some of these species – river lamprey and European smelt are likely to interact with the proposal in coastal areas only. As the proposal is located entirely in offshore waters in Scotland, these could be scoped out of the portion of the proposal in Scottish waters.

We agree that freshwater pearl mussel (FWPM) should be included in the assessment given that Atlantic salmon (and other salmonids) are integral to the lifecycle of this species. Therefore, any impacts to salmonids that prevent them from returning to their natal rivers may have a resulting effect on FWPM.

Basking shark are included within the baseline description for English waters only. As a PMF in Scottish waters, we would have expected some mention of basking shark within the baseline description for Scotland. However, we note in Paragraph 6.4.3.25 and Table 6.4.7 that it is proposed to scope out basking shark from further assessment and we are content with this due to the small numbers likely to be in this area. However, we recommend any mitigation put in place to minimise risks to marine mammals should also be applied to basking shark, should they be present.

Designated sites

European and nationally designated sites with fish and shellfish qualifying features, which overlap with the regional fish and shellfish ecology study area, are listed in Table 6.4.4 and shown in Figure 6.4.8. Although, we note the narrative included within this section focusses on designated sites in England.

The distances presented in Table 6.4.4 to the designated sites in Scotland from the Offshore Scoping Boundary are incorrect. Turbot Bank ncMPA is the closest site in Scottish waters, located 48km (not 63.2km) to the north of the proposal and is designated for sandeel (*Ammodytes marinus* / *A. tobianus*). Although there is no mention in this section of the ncMPA screening assessment, our understanding from Appendix 9.1 – *Marine Conservation Zone screening report* is that impacts on ncMPAs in Scottish waters have been previously assessed as part of the Ossian array EIA. As noted in the cover letter, it would have been helpful if the ncMPA assessment had been signposted within the Scoping Report or included the appropriate extract relevant for the Offshore Transmission Infrastructure.

Having reviewed the information provided, including the documents submitted as part of the Ossian array EIA Report, it is not clear whether an ncMPA screening assessment on impacts from Offshore Transmission Infrastructure has been undertaken. Therefore, we have reviewed the Underwater Noise Technical Report, submitted with the Ossian array EIA Report (Appendix 10.1, 2024) and can advise that we are content that impacts to the Turbot Bank ncMPA can be screened out from further assessment. However, as noted in the cover letter, we recommend that the screening assessment and justification should be provided within the EIA Report.

There are also a number of Special Areas of Conservation (SACs) designated for Atlantic salmon and FWPM identified in Table 6.4.4, which may have connectivity to the proposal but again we note that the distances specified to the proposal is incorrect. Although an HRA Screening Report has not been submitted alongside the EIA Scoping Report we advise that at the present time, diadromous fish should be assessed through the EIA only and not through HRA.

Potential impacts

We are generally content with the list of potential impacts proposed to be scoped in and out of the assessment as per Tables 6.4.6 and 6.4.7, subject to the following comments.

Similarly to our advice on physical process and benthic ecology, the potential impacts ‘temporary habitat loss and disturbance of habitats’ and ‘increased SSCs and associated sediment deposition’ are proposed to be scoped out for the operation and maintenance phase as it is noted that this is expected to be minimal and associated with minor repair and reburial only. However, we advise that at this stage and without further justification or evidence provided that repairs will be minor in nature, these impacts should be scoped into the operation and maintenance phase for further assessment. As noted previously, this is in line with advice provided for transmission cables elsewhere.

It is noted in Table 6.46 that the potential impact ‘colonisation of hard structures’ will only be assessed for the operation and maintenance phase. However, as previously highlighted in relation to decommissioning, it states in Paragraph 4.8.3.3 of the Scoping Report that it is anticipated that all offshore cables and offshore cable protection may be left *in-situ* to minimise environmental impacts associated with their removal. If it is anticipated that cable infrastructure will be left *in-situ* post operation and maintenance phase, then it should be made clear within the assessment that these impacts could be permanent.

Our previous advice in relation to current policy within Scotland around decommissioning offshore renewable infrastructure is also relevant here.

It is noted that impacts to fish and shellfish ecology due to EMF effects is proposed to be scoped in during the operation and maintenance phase, which we agree with – advice is provided below regarding the proposed assessment approach.

We disagree with the proposal in Table 6.4.7 to scope out the assessment of underwater sound from UXO clearance. Although, it is acknowledged that a separate Marine Licence will be required should UXO clearance be undertaken post-consent. This impact should be assessed as part of the EIA – we advise including it within the impact ‘underwater sound from pre-construction site investigation surveys and removal of infrastructure impacting fish and shellfish receptors’.

It is noted that the Applicant intends to use low order deflagration techniques (preferentially, and where possible) and to implement soft start measures for UXO clearance. We wish to take this opportunity to direct the Applicant to the updated policy in relation to UXO clearance⁵. Low noise methods of clearance should be the default method used to clear any type of UXO in the marine environment. If there are extraordinary circumstances which means that low noise clearance cannot be undertaken, Applicants should engage with MD-LOT at the earliest opportunity. For the EIA, we advise that both high order and low order clearance should be modelled to ensure the worst-case scenario is assessed.

Approach to assessment

Table 6.4.5 presents a list of data sources proposed to be used for the assessment of impacts to fish and shellfish ecology. This captures most of the relevant data, but we also recommend

⁵ <https://www.gov.uk/government/publications/marine-environment-unexploded-ordnance-clearance-joint-position-statement/marine-environment-unexploded-ordnance-clearance-joint-position-statement>

inclusion of the Feature Activity Sensitivity Tool (FeAST⁶). If not already reviewed, we would recommend a recent MSc paper by Lucie Hervé ‘An evaluation of current practice and recommendations for environmental impact assessment of electromagnetic fields from offshore renewables on marine invertebrates and fish’. We can supply a copy of this paper on request.

The approach to assessment for fish and shellfish ecology is set out in Table 6.4.6 of the Scoping Report and we are generally content with this, subject to the following comments.

PMFs

We advise that in relation to all fish and shellfish PMF species, the assessment should quantify, where possible, the likely impacts and should assess whether the proposal could lead to a significant impact on the national status of the PMF.

EMF

It is noted that the impacts to fish and shellfish species from EMF effects will be assessed qualitatively for the operation and maintenance phase and that no specific modelling will be undertaken. As noted above in our benthic ecology advice, we would usually expect modelling to inform the assessment, therefore we advise consulting us in advance of application submission on the proposed assessment methodology to ensure that the potential impacts to fish and shellfish species from EMF effects is sufficiently assessed.

Also as noted previously, we are also aware that the OWEC funded FLOWERS⁷ project is due to report in spring this year and this may have pertinent information to consider in respect of EMF effects.

Underwater noise

In relation to the impact ‘underwater sound from pre-construction site investigation surveys and removal of infrastructure impacting fish and shellfish receptors’. It is noted in Table 6.4.6 that a qualitative assessment will be undertaken – we advise that we expect underwater noise modelling to be undertaken to inform the assessment of this impact.

In addition, advice has been provided above in relation to the assessment of UXO clearance – we are happy to provide further guidance to the Applicant, if required.

Changes in prey availability

The inter-related effects assessment for fish and shellfish is discussed within Section 5.8 of the Scoping Report.

We advise that the EIA Report should clearly set out impacts to key prey species (such as but not limited to sandeel, herring, mackerel and sprat) and their habitats arising from the proposal alone and cumulatively. The PrePARED (Predators and Prey Around Renewable Energy Developments) project⁸ may be helpful in the understanding of predator-prey relationships in and around offshore wind farms.

⁶ <https://feature-activity-sensitivity-tool.scot/>

⁷ <https://www.thecrownestate.co.uk/news/the-crown-estate-and-cefas-advance-understanding-of-interactions-between>

⁸ PrePARED Project: <https://owecprepared.org/>

Cumulative impact assessment

Paragraph 6.4.8.7 notes that the CEA for fish and shellfish ecology will follow the approach set out in Part 1, Section 5 of the Scoping Report. We've reviewed Section 5.7 – *Cumulative Effects with Other Projects*, which generally appears appropriate subject to our comments in the cover letter.

One aspect that we advise should be considered cumulatively is EMF impacts. There has been a tendency for wind farm proposals to dismiss impacts of EMF from a cumulative perspective. We are concerned that the spatial and temporal scale is not being sufficiently considered cumulatively across the network of cables, including those outwith the proposal.

As also previously advised, the Applicant should seek agreement with MD-LOT on the list of projects and / or plans to be included within the CEA.

Mitigation and monitoring

Mitigation measures are outlined in Section 6.4.5, and we welcome the identification of embedded mitigation at an early stage. All the mitigation measures proposed for fish and shellfish ecology includes development and adherence to post-consent plans. As noted in the cover letter, plans do not strictly constitute mitigation as it is the measures contained within the plans that will mitigate impacts for which little detail has yet been provided.

It is acknowledged in Paragraph 6.4.5.2 that further mitigation measures may be required should significant effects be identified during the EIA, which will be consulted on with statutory consultees during the EIA process.

No monitoring is proposed for fish and shellfish and we advise that further consideration is given to this in the EIA Report.

Transboundary impacts

The potential for transboundary impacts to fish and shellfish ecology is discussed in Paragraph 6.4.8.8 of the EIA Scoping Report. We agree that transboundary impacts in relation to fish and shellfish ecology can be scoped out from further consideration for the Scottish portion of the proposal.

NatureScot advice on the EIA Scoping Report for the Ossian Offshore Transmission Infrastructure

Appendix D – Marine mammals

Marine mammal interests are considered in Section 6.5 of the EIA Scoping Report.

Study area

Two study areas have been proposed for the marine mammal assessment in Section 6.5.2.

The marine mammal study area, defined as the area encompassing the Offshore Scoping Boundary plus 4km buffer – this was defined for aerial surveys of the array area for ornithology and marine mammal surveys.

The second study area is defined as the regional marine mammal study area, which incorporates the relevant species-specific Management Units (MU) as shown in Figure 6.5.1. We are content with both study areas proposed.

Baseline characterisation

Data sources

Key data sources used to inform the baseline and subsequent assessment are provided in Table 6.5.2 and it is noted in Paragraph 6.5.3.1 that information from site-specific aerial surveys undertaken within the array area as well as those from nearby offshore wind farms are also to be used to inform the baseline.

We are content that the combination of existing data sources and site-specific surveys should provide adequate information to characterise the baseline environment for the marine mammal assessment.

Reference population

In relation to the reference populations, we advise use of the population estimates for the UK portion of the Inter-Agency marine Mammal Working Group (IAMMWG) MUs rather than the full MUs for species with very large MUs. This is to present the most realistic assessment of numbers of animals affected by the proposal in Scottish waters. The MUs for most species are very large and in most cases are too big for a meaningful understanding of impacts to potentially impacted populations. Although we acknowledge this is based on a non-biological delineation, we feel that using the UK portion of the MU better reflects the likely size of populations affected by the potential impact pathways.

The use of population estimates for the full MUs are still useful for context and baseline characterisation. Therefore, we advise stating the total MU population for context and then assessing impacts against the UK portion of the MU.

Receptors

The list of key marine mammal species proposed to be taken forward into the assessment is provided in Paragraph 6.5.3.37 and we are content with those listed.

Designated sites

Paragraphs 6.5.3.40 – 6.5.3.42 discusses protected sites designated for marine mammals that overlaps with the marine mammal study area's and is illustrated in Figure 6.5.5. The protected sites detailed are SACs only and it is noted that a Stage 1 LSE Screening Report has been produced to inform the HRA for the proposal. As noted previously, we have not been consulted on the Stage 1 LSE Screening Report for the Offshore Transmission Infrastructure and thus have not been able to provide advice on this.

A summary of designated sites with marine mammal qualifying species located within the regional study area, which may be scoped in for further assessment, is provided in Table 6.5.1 and includes the Southern Trench ncMPA (although this is noted incorrectly as being located in English waters), Moray Firth SAC, Mousa SAC and Yell Sound Coast SAC. This misses out a number of SACs and Sites of Special Scientific Interest (SSSI) with grey or harbour seal features located much closer to the proposal than the aforementioned Shetland sites. In addition, as noted previously, the distances between the designated sites and the proposal are incorrect. Despite this, based on the information provided to date, we advise that all SACs and SSSIs designated for marine mammals in Scottish waters can be screened out from further assessment due to a lack of connectivity to the proposal. However, we expect some justification around this element to be provided within the EIA Report.

Potential impacts

We are generally content with the potential impacts that have been scoped into the assessment as detailed in Table 6.5.3, subject to our comments below. It is noted in Section 6.5.7 that no impacts are proposed to be scoped out of the assessment for marine mammals.

Injury and disturbance from underwater sound generation in relation to UXO clearance is scoped in for the construction phase, which we agree with. However, we disagree, as highlight above in Appendix C, with the intention to undertake a qualitative assessment – our advice on the proposed approach to assessment is detailed below.

In relation to 'disturbance due to geophysical surveys' we agree that this impact should be scoped in for all phases – advice is also provided below on the proposed assessment approach.

Approach to assessment

The proposed marine mammal assessment methodology is detailed in Table 6.5.3.

In relation to 'disturbance due to geophysical surveys', it is proposed that a qualitative assessment is undertaken to cover all typical geophysical equipment planned for use, which will be based on recent literature. If underwater noise modelling, based on indicative geophysical equipment, is not undertaken to inform the assessment, this should be fully justified in the EIA Report.

For the assessment of UXO clearance on marine mammals it is noted that a detailed qualitative assessment will be undertaken and that detailed underwater noise modelling will be undertaken as part of the relevant Marine Licence application post-consent, if required. We disagree and advise that this impact should be assessed as part of the EIA.

It is noted that the Applicant intends to use low order deflagration techniques (preferentially, and where possible) and to implement soft start measures for UXO clearance. As noted previously, we wish to take this opportunity to direct the Applicant to the updated policy in relation to UXO

clearance⁹. Low noise methods of clearance should be the default method used to clear any type of UXO in the marine environment. If there are extraordinary circumstances which means that low noise clearance cannot be undertaken, Applicants should engage with MD-LOT at the earliest opportunity. For the EIA, we advise that both high order and low order clearance should be modelled to ensure the worst-case scenario is assessed.

Density estimates

We advise that density estimates could be generated from site-specific digital aerial surveys (DAS) (for those species with sufficient data), particularly as this comprises the majority of the proposal scoping boundary within Scottish waters, and then the most precautionary estimate between SCANS IV and DAS is used for the assessment. If there are no density estimates available from DAS or SCANS IV, or the SCANS III modelled density surfaces are significantly higher, then SCANS III should be used instead. If this is not available, we can accept Waggitt et al. (2019). If no density estimates are available, then we would advise assessing the species qualitatively. For seals we would advise a quantitative assessment using Carter *et al.* (2020) density estimates. This should be agreed in advance of application submission.

UXO clearance

In relation to auditory injury impacts from underwater noise (UXO clearance), we expect to see a sensitivity score of High for all cetacean species. This is due to the known importance of hearing function to these species, the uncertainty of this impact in the long term as well as the high vulnerability and low recoverability of individuals from the impact. In relation to disturbance from UXO clearance we would expect a score of Low or Negligible due to the short duration of impact particularly if using low order deflagration techniques.

EPS Licence requirements

For marine mammals, we expect the assessment to focus on impacts to cetaceans under EIA legislation. However, there is also a need to consider impacts to cetaceans within an EPS context, as far as reasonably practicable.

We do not expect a full EPS Risk Assessment at this stage but an understanding of the implications for cetaceans from the proposal under offshore regulations¹⁰, together with committed mitigation options. This will provide confidence, should the proposal be consented, that any impact is able to be addressed through a subsequent derogation under EPS licensing. In our experience, leaving this entirely to the post-consent stage has led to difficulties and delays.

Cumulative impact assessment

Paragraph 6.5.8.10 notes that the CEA for marine mammals will follow the approach set out in Part 1, Section 5 of the Scoping Report. We've reviewed Section 5.7 – *Cumulative Effects with Other Projects*, which generally appears appropriate subject to our comments in the cover letter.

We recommend including all projects up to a year on either side of the proposal, looking at both temporal and spatial overlap. Where underwater noise outputs are not available for other projects, we can accept the use of effective deterrent ranges and this should be clearly indicated.

⁹ <https://www.gov.uk/government/publications/marine-environment-unexploded-ordnance-clearance-joint-position-statement/marine-environment-unexploded-ordnance-clearance-joint-position-statement>

¹⁰ The Conservation of Offshore Marine Habitats and Species Regulations 2017

As also previously advised, the Applicant should seek agreement with MD-LOT on the list of projects and / or plans to be included within the CEA.

Mitigation and monitoring

Mitigation measures are outlined in Section 6.5.5, and we welcome the identification of embedded mitigation at an early stage. All the mitigation measures proposed for marine mammals includes development and adherence to post-consent plans. As noted in the cover letter, plans do not strictly constitute mitigation as it is the measures contained within the plans that will mitigate impacts for which little detail has yet been provided.

Paragraph 6.5.5.2 notes that as cetaceans are EPS, should any disturbances occur to the species, a licence to disturb will be sought following line with the appropriate legal requirements. Just to note that if any potential injury to cetaceans is predicted to occur then mitigation measures and a licence for injury may also be required.

It is acknowledged in Paragraph 6.5.5.3 that further mitigation measures may be required should significant effects be identified during the EIA, this will be consulted on with statutory consultees during the EIA process, which we welcome.

No monitoring is proposed for marine mammals and we advise that further consideration is given to this in the EIA Report.

Transboundary impacts

The potential for transboundary impacts to marine mammals is discussed in Paragraph 6.5.8.11 of the EIA Scoping Report. We advise that there is no potential for transboundary impacts from the proposal description and information provided within the EIA Scoping Report for the Scottish portion of the proposal.

NatureScot advice on the EIA Scoping Report for the Ossian Offshore Transmission Infrastructure

Appendix E – Offshore ornithology

Offshore ornithology interests are considered in Section 6.6 of the EIA Scoping Report.

Study area

The proposed study area for ornithology is detailed in Section 6.6.2 and shown in Figure 6.6.1. It includes the Offshore Scoping Boundary plus a 10km buffer, which we are content with.

Paragraph 6.6.2.4 notes that consideration will be given to Special Protection Areas (SPAs) situated outside the offshore ornithology study area due to the foraging ranges of some seabird species and therefore the potential for impacts from the proposal. As a result, when considering connectivity between the proposal and an SPA, the foraging range of the specific species will be used from Woodward et al. 2019, which we support.

Baseline characterisation

Data sources

An outline of the baseline environment for offshore ornithology, based on an initial review of key data sources, is provided in Section 6.6.3. Although, references are provided within the text, there is no list of key data sources provided *per se* and therefore we are not able to comment on whether the list of data sources used to inform the baseline for this receptor is appropriate.

It is noted in Paragraph 6.6.3 that digital aerial surveys covered the Ossian array area with 4km buffer and therefore the majority of the Offshore Scoping Boundary in Scottish waters. These surveys identified guillemot, kittiwake, gannet, puffin, fulmar and razorbill as key species present in the proposal area during the breeding season. These were also the most abundantly recorded species during the non-breeding season with the inclusion of great black-backed gull.

Although not stated, we assume that the site-specific survey data along with existing data sources will be used to characterise the baseline environment and inform the subsequent assessment of impacts to offshore ornithology.

Designated sites

It is noted in Paragraph 6.6.3.26 that a full screening of European sites with relevant qualifying ornithological features will be undertaken in the LSE Screening Report. As noted in the cover letter we have not yet been consulted on the HRA Stage 1 LSE Screening Report for the Offshore Transmission Infrastructure, but we are happy to review this once available. It is generally advised that an HRA Screening Report is submitted alongside the EIA Scoping Report as this enables us to consider and provide comprehensive advice under each assessment process at the same time.

A summary of designated sites with ornithology qualifying features with connectivity to the proposal is detailed in Table 6.6.1. Only three SPAs have been identified in Scotland – Fowlsheugh SPA, Forth Islands SPA and the Outer Firth of Forth and St Andrews Bay Complex (OFFSAB) SPA. As highlighted for other receptors, the distance from the proposal to the designated sites are incorrect. Furthermore, we would have expected there to be connectivity to more Scottish SPAs based on known foraging distances for the key species identified, including but not limited to St Abb's Head to Fast Castle SPA, Buchan Ness to Collieston Coast SPA and Troup, Pennan and Lion's Heads SPA. Connectivity distances should be based on the closest edge to edge distance – either straight line or at sea is acceptable.

Furthermore, in relation to the OFFSAB marine SPA – just to highlight that a number of the OFFSAB qualifying seabird species are functionally linked to breeding colony SPAs along the east coast of Scotland – further information can be found in the Sites’ Conservation and Management Advice note¹¹ via SiteLink, which may be helpful when undertaking the assessment.

Potential impacts

We are generally content with the potential impacts that have been scoped in and out of the assessment as per Tables 6.6.3 and 6.6.4, subject to the following comments.

In relation to the potential impact ‘disturbance and displacement from airborne noise, underwater noise and the presence of vessels’ we advise that underwater sound from UXO clearance should be included in the assessment of this impact.

Similarly, for the ‘indirect impacts from underwater noise affecting prey species’, underwater sound from UXO clearance should be included within the assessment of this impact.

Approach to assessment

The proposed data sources that will be used to inform the offshore ornithology assessment are detailed in Table 6.6.2. We are content with these but would recommend the following additional data sources are also considered:

- SiteLink – provides access to data and information on key protected areas around Scotland: <https://sitelink.nature.scot/home>
- NatureScot guidance notes to support offshore wind applications - marine ornithology: <https://www.nature.scot/doc/guidance-note-1-guidance-support-offshore-wind-applications-marine-ornithology-overview>
- Ossian Offshore Wind Farm EIA Report: <https://marine.gov.scot/node/25347>

The proposed ornithology assessment methodology is set out in Table 6.6.3 and we are content with the assessment approach proposed. Advice in relation to taking account of Highly Pathogenic Avian Influenza (HPAI) within the assessment is provided below.

HPAI

We advise that there is a need to incorporate HPAI impacts within the assessment. Work is continuing within NatureScot to provide further information and guidance, which will be available in due course. In the meantime, we expect the impact of HPAI on colonies to be considered qualitatively. Surveys have been undertaken at a number of key seabird colonies in 2023, co-ordinated by RSPB, some of which were repeated in 2024. Recent data for key species at some sites can be found on the SMP database. In addition, the RSPB have published a report (Tremlett *et al.* 2024)¹² on HPAI effects, which will provide useful context.

¹¹ <https://www.nature.scot/sites/default/files/special-protection-area/10478/conservation-and-management-advice.pdf>

¹² Tremlett, C.J., Morley, N., and Wilson, L.J. (2024). UK seabird colony counts in 2023 following the 2021- 22 outbreak of Highly Pathogenic Avian Influenza. RSPB Research Report 76. RSPB Centre for Conservation Science, RSPB, The Lodge, Sandy, Bedfordshire, SG19 2DL. <https://www.rspb.org.uk/birds-and-wildlife/seabird-surveys-project-report>

Cumulative impact assessment

Paragraph 6.6.8.5 notes that the CEA for offshore ornithology will follow the approach set out in Part 1, Section 5 of the Scoping Report. We've reviewed Section 5.7 – *Cumulative Effects with Other Projects*, which generally appears appropriate subject to our comments in the cover letter.

As noted throughout our advice, the Applicant should seek agreement with MD-LOT on the list of projects and / or plans to be included within the CEA.

Mitigation and monitoring

Mitigation measures are outlined in Section 6.6.5, and we welcome the identification of embedded mitigation at an early stage. The majority of the mitigation measures proposed for offshore ornithology includes development and adherence to post-consent plans. As noted in the cover letter, plans do not strictly constitute mitigation as it is the measures contained within the plans that will mitigate impacts for which little detail has yet been provided.

It was noted from the DAS results that guillemot make up a large proportion of the overall birds seen, with notable abundance peaks attributed to post breeding movement away from breeding colonies. Consideration of mitigation may be required.

Transboundary impacts

We advise that there is no potential for transboundary impacts from the proposal description and information provided within the EIA Scoping Report for the Scottish portion of the proposal.

From: [REDACTED]
To: [Ossian Transmission Infrastructure](#)
Cc: [REDACTED]
Subject: Ossian Transmission Infrastructure -Scoping Report - Norfolk County Council
Date: 03 March 2025 13:58:38

You don't often get email from [REDACTED]@norfolk.gov.uk. [Learn why this is important](#)

FAO Claire Deery,
Planning Inspectorate,
Claire

Thank you for consulting Norfolk County Council on the above Scoping Report.

As a neighbouring authority there is unlikely to be any immediate cross-boundary issues arising. However, the EIA / ES should address the wider cumulative impacts associated with other major transmission projects in the area including National Grid's:

- a. Grimsby to Walpole Project; and
- b. East Green Links 3 and 4 Projects.

These National Grid transmission Projects will potentially be co-located in Norfolk and Lincolnshire i.e. with substations and converter stations planned in West Norfolk. Both these projects form part of the Great Grid Upgrade - <https://www.nationalgrid.com/the-great-grid-upgrade>

The EIA/ES will need to address the potential cumulative impacts associated with these National Grid Projects; and consider whether the OSSIAN Transmission Infrastructure project will lead to further reinforcement being needed of National Grid's existing or planned transmission infrastructure both within Lincolnshire and in neighbouring Norfolk.

Kind regards

Stephen

[REDACTED]

Principal Planner

Strategy and Transformation

[REDACTED]

[Campaign Logo](#)

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From: [REDACTED]
To: [Ossian Transmission Infrastructure](#)
Subject: EN0210006 - Ossian Transmission Infrastructure project - Notification of Environmental Impact Assessment scoping report consultation
Date: 28 February 2025 08:11:58
Attachments: [image006.png](#)
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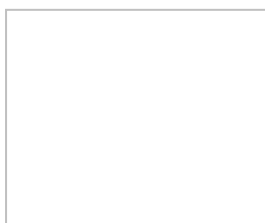
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Dear Sir, Madam

North Kesteven District Council has no comments to make in respect of the Environmental Impact Assessment scoping report noting that the draft Order Limits appear to be outside the District boundary.

Regards

[REDACTED]



Development Manager

[REDACTED]
[REDACTED]@N-KESTEVEN.GOV.UK
www.n-kesteven.gov.uk
Kesteven Street, Sleaford, NG34 7EF

[Find lots more Council services on our website.](#)

Officer: [REDACTED]
Tel: [REDACTED]
Email: [REDACTED] [@northlincs.gov.uk](mailto:[REDACTED]@northlincs.gov.uk)

North Lincolnshire Council

www.northlincs.gov.uk

Church Square House
30-40 High Street
Scunthorpe
North Lincolnshire
DN15 6NL

27/03/2025

Ossian Offshore Wind Farm Limited
10 Bothwell,
Glassgow,
G2 6NT

Planning Inspectorate Reference Number: EN0210006

Planning Application Reference: PA/SCO/2025/5

Application by Ossian Offshore Windfarm Limited (the applicant) for an Order granting Development Consent for the Ossian Transmission Infrastructure (the proposed development)

Scoping Consultation and notification of the applicants contact details and duty to make available information to the applicant if requested – updated correspondence

Location: The project is the transmission infrastructure located at the boundary of the English/Scottish territorial waters, routing south to landfall on the Lincolnshire coast and then over land to two separate grid connection points within Lincolnshire

Officer: Matthew Gillyon

Thank you for your email dated 27th February 2025 giving North Lincolnshire Council (NLC) the opportunity to comment on the Scoping Report submitted by Ossian Offshore Wind Farm Limited (the applicant) in respect of the application by Ossian Offshore Windfarm Limited (the applicant) for an Order granting Development Consent for the Ossian Transmission Infrastructure (the proposed development)

I can confirm that after consultation with our internal technical consultees that North Lincolnshire Council has the following comments to make:

Conservation

Have no comments to make with the application not falling within the North Lincolnshire area.

Archaeology

The proposed development is located outside the North Lincolnshire administrative area. I am satisfied that there would be no direct or indirect affects on any heritage assets with North Lincolnshire. The applicant should follow the advice of the County Archaeologist for Lincolnshire to ensure a robust cultural heritage and archaeological assessment is prepared.

Highways

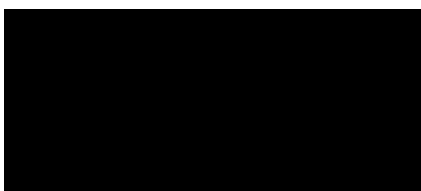
Having reviewed the submitted information the location of the proposal means that it will not have an adverse impact on the highway network within North Lincolnshire. We therefore have no comments to make on this application.

Ecology

The applicant has indicated the preferred route of landfall between Sandilands and Anderby Creek would avoid European designated sites that would require a Habitat Regulation Assessment. Natural England have also indicated the above route is their preferred option.

However, if an alternative route was required, given the location of the offshore and onshore works. I would expect the lead competent authorities to be the Secretary of State, Natural England, the Marine Management Organisation and East Lindsey Council. I would also expect them to lead on protected and priority species

Kind Regards



Senior Planning Officer
North Lincolnshire Council

From: [Before You Dig](#)
To: [Ossian Transmission Infrastructure](#)
Subject: RE: EXT:EN0210006 - Ossian Transmission Infrastructure project - Notification of Environmental Impact Assessment scoping report consultation
Date: 25 February 2025 10:28:09
Attachments: [~WRD1616.jpg](#)
[image002.png](#)
[image004.png](#)
[image005.png](#)

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Northern Gas Networks do not cover this area.

Please use this online tool to find out which gas distribution network you need to contact:

<https://www.energynetworks.org/operating-the-networks/whos-my-network-operator>

Regards,

[Redacted Signature]

Administrative Assistant – Customer Operations Support

Northern Gas Networks

Direct line:

[Redacted Direct Line Number]

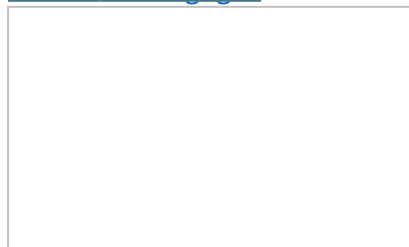
Mobile:

[Redacted Mobile Number]

www.northerngasnetworks.co.uk

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Northern Gas Networks Limited (05167070) | Northern Gas Networks Operations Limited (03528783) | Northern Gas Networks Holdings Limited (05213525) | Northern Gas Networks Pensions Trustee Limited (05424249) | Northern Gas Networks Finance Plc (05575923). Registered address: 1100 Century Way, Thorpe Park Business Park, Colton, Leeds LS15 8TU. Northern Gas Networks Pension Funding Limited Partnership (SL032251). Registered address: 1st Floor Citypoint, 65 Haymarket Terrace, Edinburgh, Scotland, EH12 5HD. For information on how we use your details please read our [Personal Data Privacy Notice](#)

Telephone: 01733 453410 (9am - 1pm Mon, Wed, Fri)
Email: planningcontrol@peterborough.gov.uk
Case Officer: [REDACTED]
Our Ref: 25/01041/CONSUL
Your Ref: EN0210006

PETERBOROUGH



Planning Services

Sand Martin House
Bittern Way
Fletton Quays
Peterborough
PE2 8TY

[REDACTED]
Planning Inspectorate Secretary of State
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Peterborough Direct: 01733 747474

17 March 2025

Dear Sir/Madam

Planning enquiry

Proposal: EIA Scoping Consultation and Notification

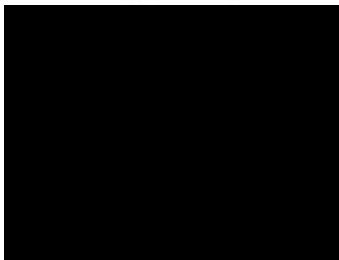
Site address: Ossian Transmission Infrastructure

Further to your enquiry received on 25 February 2025, in respect of the above, the Local Planning Authority makes the following comments:

The proposal site is remote from Peterborough and the Local Authority therefore have no comment to make.

I trust that the above advice is of use however should you have any further queries, please do not hesitate to contact me on the details shown at the top of this letter.

Yours faithfully



Principal Minerals and Waste Officer

From: [REDACTED]@rutland.gov.uk
To: Ossian Transmission Infrastructure
Subject: 2025-0244-MISC _Development Consent for Ossian Transmission
Date: 12 March 2025 10:14:42

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Dear Sirs,

Thank you for your email.

On behalf of Rutland County Council there are no applicable comments to provide for the above development.

Regards

[REDACTED]
Planning Officer
Rutland County Council
Catmose, Oakham, Rutland LE15 6HP
[REDACTED]
e-mail: [REDACTED]@rutland.gov.uk

Please note that the above comments represent my professional opinion as an officer of Rutland County Council, based upon the information available to me at the time of writing, and are not intended to be a formal determination under the Town and Country Planning Act 1990. They are entirely without prejudice to the determination of any planning application that the Council may be considering or which may be considered in the future. Details regarding your data protection rights and how the Council processes your data can be found at:

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Email Enquiries: enquiries@rutland.gov.uk

Council Website: <http://www.rutland.gov.uk>

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From: [REDACTED]
To: [Ossian Transmission Infrastructure](#)
Cc: [REDACTED]
Subject: Ref: EN0210006 - Ossian Transmission Infrastructure
Date: 13 March 2025 13:54:44
Attachments: [image001.jpg](#)
[image002.jpg](#)

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Good Afternoon

Please see the below comment from the Planning Committee held on Wednesday 12th March 2025, this has also been submitted to Planning at East Lindsey District Council.

P60. APPLICATION S/086/00283/25 – Ms. C. Deery, Ossian Offshore Windfarm, (Agenda Item 4.3)

Proposal: Consultation from the Planning Inspectorate on the Scoping Opinion in relation to Ossian Off-shore Wind Farm.

*It was proposed, seconded and
RESOLVED: That Skegness Town Council generally supports the expansion of offshore windfarms but has considerable concerns where the supporting infrastructure results in onshore overhead powerlines resulting in a detrimental impact on the land and residents. Skegness Town Council believe that the infrastructure cabling should be underground.*

Kind Regards

[REDACTED]
**Deputy Town Clerk
Skegness Town Council
Tower Gardens Pavilion
Rutland Road
Skegness
PE25 2AX**



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date: 27 March 2025
your reference: EN0210006
our reference: H22-0192-25
ask for: [REDACTED]
email: [REDACTED]@dpaplanning.co.uk
DDI: 07799 095613



Council Offices
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tel: 01775 761161
fax: 01775 711253
www.sholland.gov.uk

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Sent by email to: ossiantransmission@planninginspectorate.gov.uk

Dear Sir / Madam,

Statutory Scoping Consultation to South Holland District Council under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 prior to the submission of an application by Ossian Offshore Windfarm Limited (the applicant) for an Order granting Development Consent for the Ossian Transmission Infrastructure (the proposed development).

Thank you for your recent consultation in relation to the above. Sam Dewar of Dewar Planning Associates has been instructed to act as Planning Consultant on behalf of the three Local Planning Authorities (LPA's) consulted (Boston Borough Council, South Holland District Council and East Lindsey District Council) under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 to carry out statutory scoping consultation on the proposed application.

An individual response will be provided on behalf of each LPA detailing how the development within their authority boundary impacts them.

Introduction

By way of an introduction, I am a chartered member of the RTPI and act as Director and founder of Dewar Planning. I have previously worked as planning officer through to head of planning at local planning authorities and have since formed my own private planning practice submitting applications to over 100 local planning authorities across the UK. These applications have ranged from large wind farms to residential schemes, and various small to major scale commercial developments. We also continue to provide bespoke consultancy assistance for local planning authorities due to the positive relationships we have developed.

The applicant 'Ossian Offshore Wind Farm Limited (Ossian OWFL)' intends to apply to the Secretary of State for a Development Consent Order (DCO) under Section 37 of the Planning Act 2008 for the construction, operation, maintenance and decommissioning of the offshore and onshore works associated with the Ossian Offshore Wind Farm.

Each Local Planning Authority are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses have been sought internally from department officers, parish councils and Councillors. All consultees have the ability to respond direct to the applicant as part of this process however we have presented any responses received.

List of Consultees

Each LPA are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses were sought internally from department officers and Councillors and externally to Parish Councils and Town Councils. In some cases, consultations were received outside of these bodies and are included for completeness. All consultees have the ability to respond directly to the applicant as part of this process however we have presented any responses received. The list below is the list of consultations sought by the council. Later in this report if any other representations were received, they will also be included however will be shown as being external to demonstrate that these are not necessarily the views of the Council:

1. Cowbit Parish Council
2. Crowland Parish Council
3. Deeping St Nicholas Parish Council
4. Donington Parish Council
5. Fleet Parish Council
6. Gedney Parish Council
7. Gedney Hill Parish Council
8. Gosberton Parish Council
9. Holbeach Parish Council
10. Little Sutton Parish Council
11. Long Sutton Parish Council
12. Lutton Parish Council
13. Moulton Parish Council
14. Pinchbeck Parish Council
15. Quadring Parish Council
16. Surfleet Parish Council
17. Sutton Bridge Parish Council
18. Sutton St Edmund Parish Council
19. Sutton St James Parish Council
20. Tydd St Mary Parish Council
21. Weston Parish Council
22. Whaplode Parish Council
23. Pinchbeck Parish Council
24. Cllr B Alcock
25. Cllr J R Astill
26. Cllr A Harrison
27. Cllr H J W Bingham
28. Cllr M A Geaney
29. Cllr J L King
30. Cllr P S Barnes

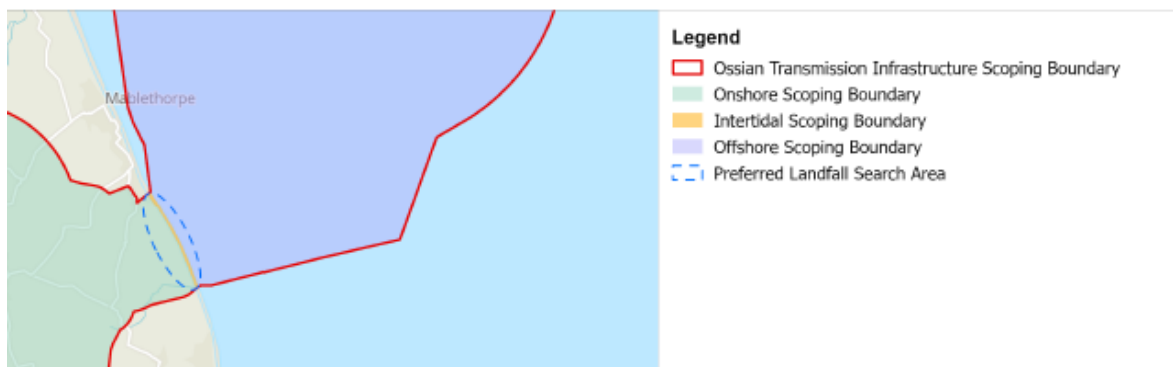
31. Cllr J L Reynolds
32. Cllr C N Worth
33. Cllr C A Beal
34. Cllr P A Redgate
35. Cllr S E Hutchinson
36. Cllr T Carter
37. Cllr N J Chapman
38. Cllr L J Eldridge
39. Cllr T E Sneath
40. Cllr A Casson
41. Cllr A R Woolf
42. Cllr A C Tennant
43. Cllr J Tyrrell
44. Cllr D J Wilkinson
45. Cllr S A Slade
46. Cllr J Avery
47. Cllr E J Sneath
48. Cllr G J Taylor
49. Cllr S Chauhan
50. Cllr I H Sheard
51. Cllr M Hasan
52. Cllr J A LeSage
53. Cllr M E LeSage
54. Cllr D R Ashby
55. Cllr R A Gibson
56. Cllr G P Scalese
57. Cllr J B Whitbourn
58. Cllr A J Spencer
59. Cllr C J T H Brewis
60. Cllr M D Booth
61. Environmental Protection
62. Planning Policy
63. Conservation Assistant (Trees)
64. Conservation Officer (Heritage)
65. Senior Ecologist

The Proposal

Within South Holland District Council an onshore converter station and cable route corridor is expected. For context, our understanding of the proposed development which the LPAs are required to comment on includes the onshore elements only as listed below. It is understood that the array of offshore wind turbines over 80kilometres off the coast of Scotland is being considered for consent by the Scottish Government with an application submitted in 2024 and this application will seek consent for the electrical transmission infrastructure required to bring the power generated to the National Grid for onward supply. The key considerations of the transmission infrastructure are as follows:

Landfall

The Applicant has stated a Landfall in the area between Sandilands and Anderby Creek avoids sensitive designations (including the dunes) at Theddlethorpe. The proposed landscape is consistent with the advice the Applicant has received by provided by Natural England and appears, from initial studies to be technically feasible and would allow opportunities for collaboration with other projects. Work is currently focusing on refining the landfall position within the 'search area' as shown below (blue dotted line in the extract of Figure 3.6.3).



Extract from Figure 3.6.3 showing preferred landfall search area

Onshore Converter Stations

Two Onshore Converter Station Search Areas have been identified, as shown on Figure 3.7.1 (black dotted lines). The locations of these areas have been informed by National Grids preferred siting zones for the new Lincolnshire Connection Substation (LCS) and Weston Marsh Substations that will provide the points of connection for Ossian.

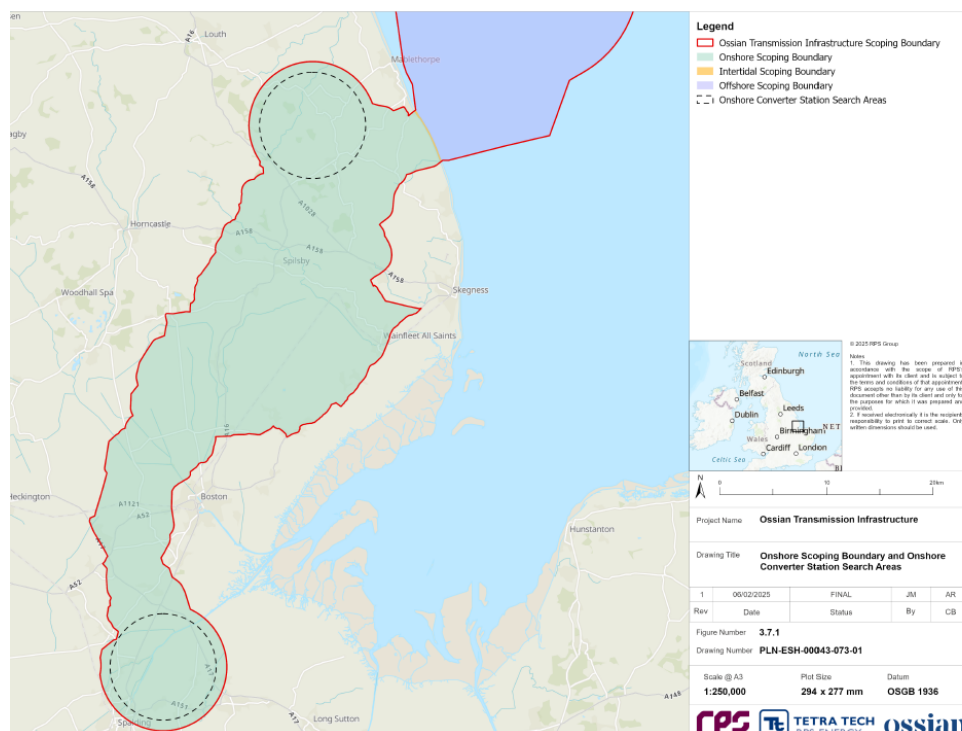


Figure 3.7.1 Extract showing search areas for converter stations

Up to three Onshore Converter Stations will be required as part of the Ossian Transmission Infrastructure (and will be located within the Onshore Converter Station Search Areas). One will be located in proximity to the Lincolnshire Connection Substation (LCS) and up to two will be required in proximity to the Weston Marsh Substation.

In later studies and in defining the Onshore Scoping Boundary, the Applicant has focused on a search area around Lincolnshire Connection Substation A in East Lindsey District as the Applicant expects that to be the LCS location.

Table 4.7.1: Onshore Converter Station Parameters

Parameter	Project Design Envelope
Transmission type	HVDC to HVAC
LCS A Onshore Converter Station	
Number of Onshore Converter Stations	1
Maximum distance from National Grid Lincolnshire Connection Substation (km)	5
Indicative permanent footprint (including landscape planting, drainage) (hectares)	7.5
Maximum building height (m)	26
Maximum height of lightning protection (m)	33
Temporary construction working area (in addition to permanent footprint (hectares)	2.5
Weston Marsh Onshore Converter Stations	
Number of Onshore Converter Stations	2
Maximum distance from National Grid Weston Marsh Substation (km)	5
Indicative permanent footprint (including landscape planting, drainage) (hectares)	15 (2 x 7.5)
Maximum building height (m)	26
Maximum height of lightning protection (m)	33
Temporary construction working area (in addition to permanent footprint (hectares)	5 (2 x 2.5)

Extract from Table 4.7.1 showing sizes of stations

The Onshore Converter Station Search Areas identified on **Figure 3.7.1** comprise a 5 km radius around these two locations (LCS A and Weston Marsh). This radius is primarily driven by the likely feasibility with regard to length of connection between the Onshore Converter Stations proposed as part of the Ossian Transmission Infrastructure and the point of connection (the proposed National Grid substation). There are technical, efficiency and environmental benefits to siting the Onshore Converter Stations in proximity to the proposed NGET substations, such as:

- reduced cable length between the Onshore Converter Station and the point of connection, resulting in reduced disruption to communities and the environment; and
- improved technical efficiency.

Onshore Export Cable Corridor

The starting point for consideration of potential Onshore Export Cable Corridors was identified by the need for a connection between:

- the Landfall and the Onshore Converter Stations; and

- the Onshore Converter Stations and the point of connection at the proposed NGET substations.

The Applicant has stated in the Scoping Report submissions that work has been undertaken to identify environmentally sensitive areas and other projects in the area, including the existing routes of the Viking Link Interconnector and the Triton Knoll Electrical System and the proposed routes for the Grimsby to Walpole, Outer Dowsing and Eastern Green Link 3 and 4 projects.

The established approach to routing linear transmission infrastructure, known as the Horlock Rules, is to choose the most direct route but to avoid, if practicable, areas of high amenity and environmental value. These principles have determined the Onshore Scoping Boundary within which siting work will continue for potential cable routes.

Work is currently being undertaken to identify potential Onshore Export Cable Corridors, which will avoid potential impacts that could lead to significant environmental effects where practicable, together with consideration of local communities and engineering feasibility. This includes taking into account the potential harm to the Lincolnshire Wolds National Landscape

Planning Policy

Whilst the applicant will seek permission for the proposals directly from the SOC for a DCO under section 37 of the Planning Act 2008, there are still a number of local and national planning policies which are considered relevant and should be taken account of as part of the development process. These plans and local knowledge have been formed over several years and have come from a significant evidence base.

The South East Lincolnshire Local Plan 2011-2036 (SELLP) was jointly adopted by Boston Borough and South Holland District Council on the 8 March 2019. The relevant policies within the South East Lincolnshire Local Plan 2011-2036 are:

- Policy 2 'Development Management' – requires proposals to demonstrate sustainable development considerations have been met through a number of criteria.
- Policy 3 'Design of New Development' – requires development to create distinctive places through the use of high quality and inclusive design, demonstrating compliance with a number of considerations.
- Policy 4 'Approach to Flood Risk' – developments must satisfy the sequential test and be supported by a site-specific flood risk assessment covering risk from all sources of flooding including the impacts of climate change. It must be demonstrated that surface water from the development can be managed and will not increase the risk of flooding to third parties.
- Policy 28 'The Natural Environment' – Requires the protection, enhancement and management of natural assets, by ensuring all development proposals provide an overall net gain in biodiversity.
- Policy 29 'The Historic Environment' - Distinctive elements of the South East Lincolnshire historic environment will be conserved and, where appropriate, enhanced.
- Policy 30 'Pollution' Development proposals will not be permitted where, taking account of any proposed mitigation measures they would lead to unacceptable adverse impacts upon:

- health and safety of the public;
 - the amenities of the area; or
 - the natural, historic and built environment;
 - by way of:
 - air quality, including fumes and odour;
 - noise including vibration;
 - light levels;
 - land quality and condition; or
 - surface and groundwater quality.
 - Planning applications, except for development within the curtilage of a dwellinghouse as specified within Schedule 2, Part 1 of The Town and Country Planning (General Permitted Development) (England) Order 2015, or successor statutory instrument, must include an assessment of:
 - impact on the proposed development from poor air quality from identified sources;
 - impact on air quality from the proposed development; and
 - impact on amenity from existing uses.
- Policy 31 'Climate Change and Renewable and Low Carbon Energy' - All development proposals will be required to demonstrate that the consequences of current climate change has been addressed, minimised and mitigated.
 - Policy 32 'Community, Health and Wellbeing' - Development shall contribute to the creation of socially-cohesive and inclusive communities; reducing health inequalities; and improving the community's health and well-being.
 - Policy 33 'Delivering a More Sustainable Transport Network' – reinforces the national approach to promoting sustainable alternatives to the car through new development, making the best use of, and seek improvements to, existing transport infrastructure and services. Solutions that are based on better promotion and management of the existing network and the provision of sustainable forms of travel are supported. To achieve this, a Transport Assessment and associated Travel Plan will be submitted with proposals.

The NPPF was originally implemented in 2012, with the most recent revision being December 2024. The NPPF sets out the UK Government's planning policies for England and how these are expected to be applied.

The NPPF does not contain specific policies for NSIPs (for which particular considerations apply, determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant NPSs) but may be considered as a relevant consideration as below:

- Paragraph 124 - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land (49). Footnote 49 of the NPPF states: Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity.

- Paragraph 125 - Planning policies and decisions should:
 - a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
 - b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
 - c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
 - d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)⁴⁸; and
 - e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.

- Paragraph 161 - The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

- Paragraph 170 - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

- Paragraph 187 - Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Representations Received

Each Local Planning Authority are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses have been sought internally from department officers, parish councils, Town Councils, and Councillors. All consultees have the ability to respond direct to the applicant as part of this process however we have presented any responses received.

South Holland District Council does not have in house specialists or advisers for all topic areas covered by the EIA Scoping Report; therefore, the below list of representations sets out the comments and advice received from internal consultees as well as external consultants employed by the Council. Where no comments have been received and no external consultant employed, this response will seek to comment generally on the topic areas where appropriate, however it is acknowledged that comments may be sent directly by the County Council and these will be endorsed by the Council.

As the Council do not have a Landscape Officer, an external company was sought to respond. Terra Loci are Landscape Architects and specialise in Landscape Planning.

The comments received from consultees are summarised as follows:

Landscape (summarised and expanded upon later in this response)

- Landfall, cable routes and locations of onshore transmission equipment and converter substations are currently not fixed. The LVIA must be undertaken based on final, fixed locations and routes for these elements, defining which sections of the cable route will be laid using open trench methods.
- Paragraph 7.11.2.1 outlines the proposed study area for the Landscape and Visual assessment. A 1km radius study area is proposed around all construction activities, this is likely to be sufficient for low and ground level construction activities requiring small plant. A wider study radius will be required for the assessment of construction activities relating to the three Onshore Converter Stations. The study area for impact arising from construction activities relating to the three Onshore Converter Stations should be 5km from the land to

be occupied by the proposed buildings to match the proposed study area for permanent impacts.

- Supporting Zone of Theoretical Visibility analysis based on the Maximum Design Scenario should also be provided to ensure that the proposed study area is sufficient.
- Broad receptor groups as outlined in paragraph 7.11.3.3 appear to be appropriate.
- No reference to Residential Visual Amenity Assessment (RVAA) is made within the scoping report, where significant effects on residential receptors are likely to arise RVAA should be undertaken.
- Table 7.11.1 outlines the Potential Impacts Proposed to be Scoped in for Landscape and Visual Resources. Rows one and two set out the proposed scope of temporary construction impacts. For the avoidance of any doubt potential impacts arising from the construction of the Onshore Converter Stations should be included within these parts of the assessment.
- Table 7.11.2 outlines Impacts Proposed to be Scoped Out of the Assessment for Landscape and Visual Resources, based on the justification included within this table, the impacts scoped out of the assessment appear appropriate.
- The full LVIA methodology, including factors and / or matrices used for determining sensitivity of landscape and visual receptors and magnitude and significance of effects should be submitted and approved prior to the assessment being undertaken.
- All visual representation with should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019).
- The EIA process should detail the measures to be taken to ensure the building design of the Onshore Converter Stations will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.
- Cumulative impact assessment should include other proposals currently at Scoping stage and onwards. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

Environmental Protection

- No comments received during the consultation period.

Forward Planning Officer

- Part 1 of 5.

I will let others comment on the landfall between Sandilands and Anderby Creek but I agree with the reasoning for not continuing with the other potential landfall locations.

The cable route will cause disturbance during construction but, as we have experienced with other schemes, once completed has little impact. They do need to evidence their choice of route and address the impacts it has.

The lasting impact of the proposal are the Substations (Lincolnshire Connection Node and Western Marsh), but these are NGET projects as part of the Grimsby to Walpole project. So to my mind the bit that Ossian are dealing with is relatively benign. The elements of concern will be considered during the National Grid proposals.

- Part 2 of 5
This focuses on offshore and is outside our jurisdiction. No comments
- Part 3 of 5
This focuses on onshore. The chapter headings cover the usual subjects found in NSIP projects. The technical specialists are more capable of critiquing their subject areas.
- Part 4 of 5
This completes what was considered in part 3 and the technical specialists can critique their subject areas.
- Part 5 of 5
This relates to trans boundary impacts and considers impacts on other countries. The report screens out all impact except for marine mammals, off shore ornithology, commercial fisheries, shipping and navigation. These are matters outside the councils' jurisdiction. The onshore Transboundary Impacts consider the usual subject areas covered by SA for NSIPs and screens out impacts except for Onshore and intertidal ornithology. This seems reasonable and is consistent with the offshore ornithology conclusion. Under the combined impacts it screens in climate change. Owing to national commitments to tackle climate change the impact does need to be quantified. Therefore ruling it in is appropriate.

Conservation Assistant (Trees)

- No comments received during the consultation period.

Heritage Lincolnshire

- As stated within paragraph 7.6.3.7, part 3 of the Scoping report; "There are a considerable number of listed buildings within the Onshore Scoping Boundary and Intertidal Scoping Boundary. Many of these are clustered within historic settlements which are often designated as Conservation Areas: Alford; Raithby; Hundleby; Spilsby; Old Bolingbroke; Wainfleet; Revesby; Kirton Holme; Swineshead; Wigtoft, Pinchbeck and Moulton. Grade I and Grade II* listed buildings within the Onshore Scoping Boundary and Intertidal Scoping Boundary include numerous churches along with external fonts and church crosses, also country houses, chapels, schools and windmills."
- For any above-ground developments proposed within the setting of listed buildings, conservation areas, scheduled monuments, or non-designated heritage assets, a comprehensive and impartial heritage impact assessment must accompany any future application. This assessment should identify built heritage assets, designed landscapes, and/or archaeological features along the proposed development's course. Once identified, the significance of these assets must be described and evaluated, followed by an assessment of the proposal's impact on significance, in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990, the respective Local Plan, and the National Planning Policy Framework.

- The visual impact on the setting of designated heritage assets will be a primary concern. Therefore, a Visual Impact Assessment will likely be required to accompany the Heritage Impact Assessment to provide a clear understanding of the development's impact on the setting of these assets.

Senior Ecologist

- I support the proposed methods and approach used to assess the onshore ecology and nature conservation impacts as described in the scoping report documents available from the Planning Inspectorate's National Infrastructure Project page (<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0210006/documents>), and I believe the research proposals to be suitably rigorous and appropriate.
- I further support the recommendations raised by representatives from Natural England, the Environment Agency, and others during the first ETG meeting (20 March 2025), including the development of specific methods to assess potential impacts to raptor populations (Barn Owl, Marsh Harrier, Redkite, and Hobby), and night-roosting Lapwing and Curlew.
- As mentioned during the ETG, I also believe that it would be useful for the EIA to specifically report on the habitat composition and agricultural land grade of land falling within the potential transmission line boundaries (e.g., reported separately by local district). This baseline information can provide a broader context for interpreting all further species reporting, as well as provide a useful gauge to compare to the specific habitats impacted when the transmission line location is finalized.

Councillor Responses

As part of the consultation process Councillors have the right to respond directly.

At the time of this response no replies from Councillors have been received however they will be sent directly to the Applicant when they come forward.

Parish Council Responses

Gedney Hill Parish Council - have no comments on this application.

As part of the consultation process Parish Councils have the right to respond directly. At the time of this response no other replies from Parishes have been received however they will be sent directly to the Applicant when they come forward.

Review of the EIA Scoping Report

At this stage the following comments are offered in connection with the topic areas as listed. As stated in the aforementioned section, where no opinion has been received from in-house advisors at the Council nor has there been an external consultant employed to provide comment then general observations have been put forward. Some chapters proposed in the scoping report are best covered by the County Council or other statutory stakeholders and so in this case as officers at the LPA we have remained silent.

Geology, Hydrogeology and Ground Conditions

South Holland District Council do not have an in-house geologist and the Coal Authority may have chosen to comment directly on the content of EIA Scoping Report, however having reviewed the information put forward, the approach taken appears reasonable in the methodology and we have the following specific comments to offer:

In relation to this topic the following has been raised:

- Soil management practices may need further evidence and investigation.
- Methodologies to prevent silt slurries should be presented as these pose a dangerous environmental risk.

Hydrology and Flood Risk

Lincolnshire County Council act as Lead Local Flood Authority and may comment directly on the proposed development, as may the Drainage Board and the Environment Agency. Having reviewed the information put forward within the EIA Scoping Report, the approach taken appears reasonable in the methodology however we would want to ensure that in the laying of cables the integrity of the drains is maintained.

Onshore Ecology and Nature Conservation

The Wildlife Trust may have chosen to comment directly on the content of the consultation, however having reviewed the information put forward within the EIA Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer other than the following:

- The Council would like to reiterate the importance of achieving a biodiversity net gain for this proposed nationally significant development, in line with The Environment Act 2021.
- Lastly, temporary construction works can have a significant effect and we would therefore welcome a full scheme of remediation and reinstatement after these works have been undertaken

Onshore and Intertidal Ornithology

This section considers the potential impacts arising from the construction, operation and maintenance and decommissioning of the Landfall and Onshore Transmission Infrastructure and identifies the proposed scope of, and methodology for, the EIA process for onshore and intertidal ornithology.

The Natural England, the Wildlife Trust, Lincolnshire County Council and others may have chosen to comment directly on the content of the consultation, however having reviewed the information put forward within the EIA Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer

To reiterate the comments relevant from the Councils Senior Ecologist are as follows:

- The development of specific methods to assess potential impacts to raptor populations (Barn Owl, Marsh Harrier, Redkite, and Hobby), and night-roosting Lapwing and Curlew.
- It would be useful for the EIA to specifically report on the habitat composition and agricultural land grade of land falling within the potential transmission line boundaries (e.g., reported separately by local district). This baseline information can provide a broader context for interpreting all further species reporting, as well as provide a useful gauge to compare to the specific habitats impacted when the transmission line location is finalized.

Historic Environment

Having reviewed the information put forward within the EIA Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer other than:

- The Council would expect and landscape visual assessment for any above ground features and for each to be looked at separately;
- We would expect a scheme of trail trenching to be included as part of the main planning submission.

Land Use Recreation

Having reviewed the information put forward, the approach taken appears reasonable in the methodology however we have the following comments to make:

- All the relevant issues appear to have been scoped in, albeit some of them at a very strategic level; and
- We are concerned that additional water scarcity for agricultural holdings resulting in loss of productivity could undermine viability of agricultural businesses – particularly considering the effects of climate change.

Traffic and Transport

Lincolnshire County Council act as highways authority and may comment directly on the proposed development. Having reviewed the information put forward, the approach taken appears reasonable in the methodology and we have no specific comments to offer other than the following points:

- The suitability of the rural roads, many of which are in poor condition (e.g. subsidence), to cope with the loading by heavy construction vehicles. What mechanism is in place for any urgent reinstatement. Is a survey of the roads (and any strengthening needed) to be carried out at the commencement of works?
- What restrictions will be placed on working hours/days?

- What is the procedure in place to deal with complaints from residents regarding access, noise, dust etc.?
- Construction compounds and field accesses in the countryside can have a significant effect and we would therefore welcome a full scheme of remediation and reinstatement after the cable/works have been undertaken.

Noise and Vibration

Having reviewed the information put forward within the EIA Scoping Report, the approach taken appears reasonable in the methodology and we have the below comments to offer:

- The Council should be provided with contact details in the event of complaints to assist in the management of complaints and concerns.
- The Council and all relevant noise sensitive receptors in the immediate area to any proposed works are to be informed ahead of these works should they occur outside of normal working hours.
- The Council and all relevant vibration sensitive receptors in the immediate area to any proposed works are to be informed ahead of these works. Additionally appropriate monitoring equipment is to be used in the vicinity of works in order to assess the level of vibration propagating from the works site.

Air Quality

Having reviewed the information put forward, the approach taken appears reasonable in the methodology and we have the below comments to offer.

The Council would expect the following to be complied with during the project installation phase:

- Burning of waste should be avoided. Any burning of waste deemed strictly necessary should be undertaken in accordance with the relevant waste management exemption issued the Environment Agency, and consideration should be given to the timing of such burning, and the prevailing weather conditions to impact emissions to air and nuisance to offsite receptor's; and
- Soil stockpiles should be sealed to reduce fugitive dust emissions.

Landscape and Visual Resources

At this stage we do not have details of the final locations, appearances or extents, of onshore elements however the information as provided for the EIA Scoping Report has been reviewed by external consultants Terra Loci, with the following comments on behalf of the Local Planning Authority which are summarised as follows:

Landfall, cable routes and locations of onshore transmission equipment and converter substations are currently not fixed. The LVIA must be undertaken based on final, fixed locations and routes for these elements, defining which sections of the cable route will be laid using open trench methods. Alternatively, should the final cable route and equipment locations not be available at the time of

assessment, appropriate assessment scenarios should be agreed for assessment to take place on all reasonably foreseeable options.

Paragraph 7.11.2.1 outlines the proposed study area for the Landscape and Visual assessment. A 1km radius study area is proposed around all construction activities, this is likely to be sufficient for low and ground level construction activities requiring small plant. A wider study radius will be required for the assessment of construction activities relating to the three Onshore Converter Stations. The study area for impact arising from construction activities relating to the three Onshore Converter Stations should be 5km from the land to be occupied by the proposed buildings to match the proposed study area for permanent impacts.

Supporting Zone of Theoretical Visibility analysis based on the Maximum Design Scenario should also be provided to ensure that the proposed study area is sufficient.

Broad receptor groups as outlined in paragraph 7.11.3.3 appear to be appropriate. Specific landscape and visual receptors and representative viewpoints must be submitted and approved prior to the assessment being undertaken. Reference is made to “Occupiers of residential properties, where there is the potential for receptors to experience significant adverse effects” However, no approach is proposed to show how residential receptors which may experience significant adverse effects would be selected for inclusion within the assessment. An approach for the scoping in and out potential residential receptors should be proposed.

No reference to Residential Visual Amenity Assessment (RVAA) is made within the scoping report, where significant effects on residential receptors are likely to arise RVAA should be undertaken.

Table 7.11.1 outlines the Potential Impacts Proposed to be Scoped in for Landscape and Visual Resources. Rows one and two set out the proposed scope of temporary construction impacts. For the avoidance of any doubt potential impacts rising from the construction of the Onshore Converter Stations should be included within these parts of the assessment.

Table 7.11.2 outlines Impacts Proposed to be Scoped Out of the Assessment for Landscape and Visual Resources, based on the justification included within this table, the impacts scoped out of the assessment appear appropriate.

The full LVIA methodology, including factors and / or matrices used for determining sensitivity of landscape and visual receptors and magnitude and significance of effects should be submitted and approved prior to the assessment being undertaken.

All visual representation with should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made. Locations for proposed ‘photomontage’ visualisations, including visualisation types, following TGN 06/19 should be submitted and approved prior to being undertaken.

The EIA process should detail the measures to be taken to ensure the building design of the Onshore Converter Stations will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

Cumulative impact assessment should include other proposals currently at Scoping stage and onwards. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

Health and Wellbeing

Section 7.12 of the EIA Scoping Report identifies the proposed scope of the assessment for health and wellbeing relevant to the Ossian Transmission Infrastructure. Health and wellbeing assessment uses the residual effect conclusions of other relevant EIA topic assessments as an input and explains their public health implications. The terms health and wellbeing are used interchangeably, and parity is given to considering both physical and mental health outcomes.

Having reviewed the information put forward, the approach taken appears reasonable in the methodology and we have no comments to offer.

Concluding Remarks

Whilst we appreciate many stakeholders will comment directly to the Applicant on the project, we wanted to provide a response based on the submitted Scoping Report with assessment of the proposed onshore cable route and associated switching and converter stations and substations.

We note your community engagement to date however we would welcome future discussions over any proposed community benefits as well as any proposed employment and skills schemes that could be provided to the local workforce as well as any other potential grid infrastructure improvements that may be facilitated by the development.

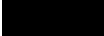
This advice is based upon the information available at this time. Please note that the advice is given without prejudice to any future comments made by the LPA upon the receipt of further information, whether during or before the submission of a full EIA planning application.

We kindly ask that the comments received from stakeholders listed are taken into consideration as you can see there is, in part, strong feelings about the proposal.

If you have any queries, please do not hesitate to contact me on the details provided and I would appreciate it if all future correspondence could be made directly to myself as I have been instructed by the LPA to act on their behalf until the end of the application process. This will avoid any delays in our response as we have struggled to allow internal consultees sufficient time to get back to us.

Yours sincerely


Consultant Planning Officer

@dpaplanning.co.uk


██████████
Planning Inspectorate

ossiantransmission@planninginspectorate.gov.uk

BY EMAIL ONLY

Your ref: EN0210006
Our ref: 25_30943_P

25th March 2025

Dear Ms Deery,

RE: Application by Ossian Offshore Windfarm Limited (the Applicant) for an Order granting Development Consent for the Ossian Transmission Infrastructure – Scoping Consultation

Thank you for consulting Water Management Alliance on the Environmental Impact Assessment (EIA) Scoping consultation for the proposed Ossian Transmission Infrastructure project. This response is provided on behalf of our member, South Holland Internal Drainage Board (SHIDB, or the Board), because parts of this project – including the stretch of electrical cables to the East of the River Welland and the proposed converter station(s) at Weston Marsh – are to be located within the Internal Drainage District (IDD) of this Board. Our comments relate only to potential impacts from the project within the South Holland IDD.

Scope of the Environmental Impact Assessment

There is an extensive network of drainage ditches (including Board-maintained main drains and ordinary (riparian) watercourses) and piped land drainage across the South Holland IDD. It is noted that the project could require crossings of multiple ditches, drains and watercourses for the electrical cables as well as for construction access. The proposed construction of up to two new converter stations at Weston Marsh also has the potential to affect watercourse infrastructure (potentially requiring the diversion of watercourses), land drainage and discharges to the drainage system. The Board therefore strongly agrees that Hydrology and Flood Risk should be scoped into the EIA, because of the relatively high flood risk across the entire area and because of the

Duncan Worth (Chairman)

Simon Bartlett (Vice-Chairman)

Phil Camamile (Chief Executive)

Constituted by The Anglian Water Authority (South Holland Internal Drainage District) Order 1974,
Statutory Instrument 1974 No.1209. Reconstituted in 1993. Statutory Instrument 1993 No.453.

www.wlma.org.uk

potential for the projects to impact on the existing drainage network that is critical to protecting people, property, infrastructure and businesses in the area.

South Holland Internal Drainage Board agrees that the following impacts should be **scoped in** to the Environmental Impact Assessment (EIA) for Hydrology and Flood Risk:

- The impact of increased flood risk arising from surface water runoff during the construction of the Ossian Transmission Infrastructure landward of MHWS
- The impact of increased flood risk arising from watercourse crossings during the construction of the Ossian Transmission Infrastructure landward of MHWS.
- The impact of increased flood risk arising from damage to existing flood defences (where present/relevant) during the construction of the Ossian Transmission Infrastructure landward of MHWS.
- The impact of increased flood risk arising from a watercourse diversion (if such diversions are required) during the construction of the Onshore Converter Stations.
- The impact of increased flood risk arising from surface water runoff during the operation of the Onshore Converter Stations.

The Board welcomes the applicant's commitment to continued engagement with the Board (and other relevant regulators and landowners) with regards to development of the following:

- Watercourse Crossing Methodology
- Outline Drainage Strategy (relating to the operation and maintenance of the onshore converter station(s) at Weston Marsh
- Code of Construction Practice and
- Onshore Decommissioning Plan.

The Board welcomes the development of these documents to mitigate potential impacts on drainage infrastructure and flood risk.

It is noted that the applicant proposes to **scope out** of the EIA the potential impact of damage to existing agricultural field drainage during the construction, operation and maintenance, and decommissioning of the Onshore Transmission Infrastructure landward of MHWS. The Board wishes to highlight the importance of agriculture in the South Holland internal drainage district, and to emphasise the reliance on agricultural land drainage, and therefore the importance of early and frequent engagement between the applicant, landowners and land drainage specialists to avoid impacts as far as possible and to develop robust mitigation as required. This will be particularly important in the South Holland internal drainage district, which, in addition to the

proposed Ossian Transmission Infrastructure project, is to be affected by several major infrastructure projects including:

- Outer Dowsing Offshore Wind Farm (electrical transmission infrastructure),
- Grimsby to Walpole (electrical transmission infrastructure and new substation at Weston Marsh), and
- Eastern Green Link (electricity transmission infrastructure including converter station at Weston Marsh).

It is important that these projects are included in the cumulative impact assessment for hydrology and flood risk within the EIA.

The Board supports the applicant's commitment to undertake a Flood Risk Assessment to support the Environmental Impact Assessment.

Land Drainage Act 1991 and South Holland Internal Drainage Board Byelaws

SHIDB would also highlight that works affecting watercourses, for example the construction of watercourse crossings, drain diversions, any works within 9m of a watercourse and discharges to a watercourse within the Internal Drainage Districts would require consent from the Boards under the Land Drainage Act 1991 including the Boards Byelaws, in a process separate from the Development Consent Order. In addition to an overarching Watercourse Crossing Methodology, before consenting works under its Byelaws the Board will require design details for individual watercourse crossings / diversions etc., with supporting information such as watercourse profiles and water levels to inform our decision-making for such consents.

General comments on the EIA Scoping Report

Scoping Report section	Scoping Report statement	SHIDB comment
7.3.3.4 and Table 7.3.4	South Holland Internal IDB	Should read "South Holland IDB"
7.3.3.5	Within these regions the IDBs are responsible for the maintenance of watercourses...	Within these regions the IDBs can carry out maintenance, improvement or construction work on ordinary watercourses to manage flood risk and protect the environment.
7.3.3.5	... and will be consulted through the relevant ETG regarding works required within close proximity to watercourses and	IDBs must also be consulted with respect to discharge of water into their Internal Drainage Districts – for example, run-off from impermeable

	associated drainage infrastructure, with further information to be provided as the EIA process progresses	surfaces at converter stations and construction compounds, etc.
Table 7.3.4	Information sources	Association of Drainage Authorities interactive map of Internal Drainage Board districts: https://www.ada.org.uk/member_type/idbs/

Yours sincerely,



National Infrastructure Officer
Water Management Alliance

From: [REDACTED]
To: [Ossian Transmission Infrastructure](#)
Subject: Ossian Transmission Infrastructure - scoping consultation
Date: 04 March 2025 16:27:36
Attachments: [image001.png](#)

You don't often get email from [REDACTED]@southkesteven.gov.uk. [Learn why this is important](#)

Dear Claire,

South Kesteven District Council has no comments to make in respect of the above scoping consultation.

Regards,

[REDACTED]
Development Management & Enforcement Manager

South Kesteven District Council
Council Offices
The Picture House,
St Catherine's Road,
Grantham NG31 6TT



[REDACTED]
[@southkesteven.gov.uk](mailto:[REDACTED]@southkesteven.gov.uk)
www.southkesteven.gov.uk

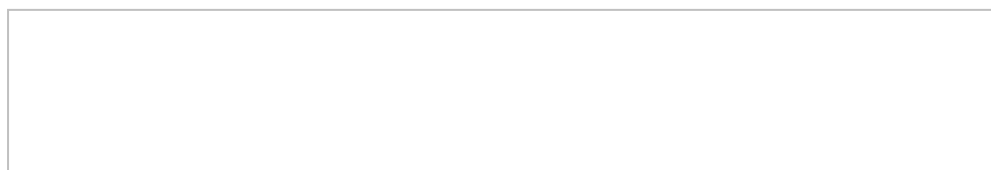
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From: [Swineshead Parish-Council](#)
To: [Ossian Transmission Infrastructure](#)
Subject: Re: EN0210006 - Ossian Transmission Infrastructure project - Notification of Environmental Impact Assessment scoping report consultation
Date: 19 March 2025 11:33:07
Attachments: [image001.png](#)
[image003.png](#)

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Dear Madam,

Thank you for sending details of the Ossian Transmission Infrastructure to Swineshead Parish Council.

At the full council meeting held on 18 March 2025, this planning was discussed by the members of the council and all members had no objections or comments.

Regards





The Coal
Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: The Planning Inspectorate

Nationally Significant Infrastructure Project

[By email: ossiantransmission@planninginspectorate.gov.uk]

3 March 2025

Dear The Planning Inspectorate

Re: EN0210006 Ossian Transmission Infrastructure

Develop transmission infrastructure to connect the Ossian Offshore Wind Farm Array (located in Scottish waters and subject to application for consent under section 36 of the Electricity Act 1989) to National Grid at substations in Lincolnshire.; Located Off The East Coast Of Scotland, To New National Grid Infrastructure, Near Spalding And Near Alford In Lincolnshire

Thank you for your notification of 25 February 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority's defined Development Low Risk Area. On this basis we have no specific comments to make.

However, in the interest of public safety, it is requested that the Coal Authority's Standing Advice note is drawn to the applicant's attention, where relevant.

Yours



From: clerk@theddlethorpeparishcouncil.gov.uk
To: [Ossian Transmission Infrastructure](#)
Subject: RE: EN0210006 - Ossian Transmission Infrastructure project - Notification of Environmental Impact Assessment scoping report consultation
Date: 28 February 2025 08:30:17
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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Dear Ms Luhr,

I am writing to you on behalf of Theddlethorpe Parish Council, a consultee for the captioned proposal. At our meeting of 27 February 2025, the council resolved to ask that the following be included in the EIA:

Survey of expected impact/effect on wildlife (this project will intrude on the dunes and the King's Coronation Coast)

Survey of expected impact/effect on the water table

Survey of expected impact/effect on climate change

Survey of expected impact/effect on flooding risks

Survey of expected health impacts on residents

Expected net carbon footprint of the project

Electromagnetic compatibility, particularly Radiated emissions (with particular emphasis near primary schools)

Archaeological study of the planned route

Economic viability of the project on its own merit; particularly as the proposal assumes the Grimsby to Walpole pylons will be approved, what is the status of the EGL3 and EGL4 if the pylons do not go ahead as proposed?



Kind Regards,



Parish Clerk & RFO

Theddlethorpe (All Saints and St Helen) Parish Council

From: [Sarah Kulwicki](#)
To: [Ossian Transmission Infrastructure](#)
Subject: Thornton Le Fen PC- Comments
Date: 16 March 2025 08:28:16

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The Parish Council of Thornton Le Fen have looked at and discussed your proposals.

We are against any proposal building on and adding to the destructive offer from National Grid. We believe that until NG are forced to be transparent about their costings and change their plan to open the floodgates for the industrialisation of Lincolnshire, no further projects should be encouraged or entertained.

Profit is being put before food security, fragile ecosystems, residents heath, an already crumbling infrastructure, tourism, the migration superhighway....

Your entry - Page 31. Entry 4.7.2.8 supports the fact that the race to net zero is absolutely flawed...

'There's a requirement for a backup diesel generator'.

Surely, this is not in line with the project overall objective of greener energy?

Yours faithfully
Thornton Le Fen Parish Council

From: [REDACTED]
To: [Ossian Transmission Infrastructure](#)
Cc: [REDACTED]
Subject: RE: EN0210006 - Ossian Transmission Infrastructure project - Notification of Environmental Impact Assessment scoping report consultation
Date: 27 March 2025 16:06:01
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.jpg](#)
[EN0210006 - Statutory consultation letter 27 February 2025.pdf](#)

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Good afternoon Nadia,

I can confirm that Trinity House has no comments to make concerning this Scoping Report.

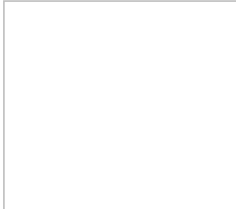
Kind regards,

[REDACTED]

Navigation Services Manager | Navigation Directorate | Trinity House

[REDACTED]@trinityhouse.co.uk | [REDACTED]

www.trinityhouse.co.uk





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DN21 2NA

Telephone 01427 676676
Web www.west-lindsey.gov.uk

Planning.customer.care@west-lindsey.gov.uk

PLANNING INSPECTORATE
TEMPLE QUAY HOUSE
2 THE SQUARE
BRISTOL
BS1 6PN

Sent via email: 11/03/2025

Dear Sir/Madam

Application Number: WL/2025/00205

Proposal: PINS consultation on behalf of the Secretary of State for its opinion (a scoping opinion) as to the information to be provided in an Environmental Statement - EN0210006

Location: Ossian Offshore Wind Farm Limited, 10 Bothwell Street, Glasgow, G2 6NT

Thank you for your consultation regarding the information to be provided in an Environmental Statement for the Ossian Offshore Wind Farm Transmission Infrastructure.

Given the projects distance away from the administrative boundary of West Lindsey (the scoping boundary at its closest being approximately 16km away from the most south-westerly point of the West Lindsey District beyond Southrey), we confirm that we have no comments to make on the information to be provided in the Environmental Statement.

Yours faithfully,

[Redacted signature]

[Redacted name]@west-lindsey.gov.uk
Senior Development Management Officer
On behalf of West Lindsey District Council

If you require this letter in another format e.g. large print, please contact Customer Services on 01427 676676, by email customer.services@west-lindsey.gov.uk or by asking any of the Customer Services staff.

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www.west-lindsey.gov.uk/planning-privacy

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From: [REDACTED] [Parish Clerk](#)
To: [Ossian Transmission Infrastructure](#)
Subject: Re: EN0210006 - Ossian Transmission Infrastructure project - Notification of Environmental Impact Assessment scoping report consultation
Date: 03 March 2025 09:03:05
Attachments: [image001.png](#)
[image003.png](#)
[blocked.gif](#)

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Hello

Wyberton Parish Councillors do not have any objections.

Kind Regards

[REDACTED]

Wyberton Parish Clerk

[REDACTED]

Wyberton Parish Council
295 London Road
Wyberton
Boston
PE21 7DE

Clerk Mobile: [REDACTED]
Office Tele: 01205 351450

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